



VT Household Hazardous Waste (HHW) EPR Preparation for Program Implementation

August 12, 2024

About Reverse Logistics Group (RLG)



- ✓ Operates 40+ EPR Producer Responsibility Organizations (PRO) globally
- ✓ Recognized globally for excellence in PRO/SO operations, fractions include electronics, batteries, packaging & more
- ✓ Proven backend IT capabilities for PRO/SO operations that are in-use worldwide
- ✓ Experienced US-based EPR compliance team with deep knowledge of PRO/SO operational efficiencies & good standing relationships with HCPA, the VT Agency of Natural Resources (ANR), top consultants in sustainability, circularity, and EPR, local governments, and more



Vermont HHW Phased Approach

Phase 1 – 6 months

- Step 1: Stewardship Organization Formation & Pre-Program Implementation
- Step 2: Producer Education & Recruitment
- Step 3: Survey of Local Gov't & Budget Development

Phase 2 – 6 months

- Producer Registration & Put-to-Market Reporting
- Stewardship Organization Plan Development & Submittal

Phase 3 – 12 months

- Stewardship Organization Plan Approval & Implementation



PHASE 1:

***Stewardship Organization
Formation & Pre-Program
Implementation***

July 1, 2024 – December 31, 2024

PHASE 1

Step 1:

Stewardship Organization Formation





Formation of Stewardship Organization (SO)

- ✓ Household Product Stewardship Association formed July 2025
 - ✓ Non-profit formed by HCPA
 - ✓ RLG responsible for:
 - ✓ regulatory program deliverables,
 - ✓ on the ground managerial oversight
 - ✓ ensuring SO delivers regulatory compliance on behalf of members
 - ✓ Producer funded – supported by fees
 - ✓ Est. 1,700+ producers represented
 - ✓ Start up seed funds to come from founding SO members
- ✓ Managed by board of directors reflective of SO membership
- ✓ SO Executive Director to be hired Q1 2025



PHASE 1

Step 2:

Producer Recruitment

Producer & SO Registration



SO Registration Requirements

- ✓ **Registration & annual fee due to ANR July 1, 2025**, requirements include:
 - ✓ List of participating manufacturers, their brands & products obligated under law
 - ✓ Description of how SO meets requirements of subsection 7184 (b). SO commits to:
 - ✓ assume responsibilities, obligations & liabilities of all manufacturers participating in the SO;
 - ✓ not create unreasonable barriers for participation in the SO; &
 - ✓ maintain website listing all manufacturers, their brands & products covered by the SO's approved collection plan
- ✓ Submittal of annual fee to ANR (TBD)



Producer Responsibilities

- ✓ Stewardship Organization (SO) deadlines
 - ✓ Register & be a member of SO by **April 30, 2025**. Portal opens March 1, 2025.
 - ✓ Report relevant covered product brand & product names to SO for registration purposes. Pay one-time registration fee to SO.
 - ✓ Report put-to-market data for 2024 to SO by **April 30, 2025**.
 - ✓ Put-to-market data is covered product sales by product type & volume sold into VT. Reporting will be required annually.
- ✓ **Pay registration & reporting fees to SO based on annual reporting prior to June 30, 2025.**





Plan of Action

- ✓ To collect participating manufacturer name, brand & obligated product information from all obligated parties, RLG will :
 - ✓ Work collaboratively with HCPA, ANR & other trade associations to:
 - ✓ Determine best means to reach affected producers
 - ✓ Develop & rollout a producer engagement plan
 - ✓ pub ed collateral, website, webinars, trade assoc. meetings, email campaigns, et.
- ✓ Build portal to facilitate producer registration, reporting, invoicing & fee payment – go live is March 1, 2025. Portal to be used for local government registration & invoicing in future.



PHASE 1

Step 3:

Survey of Local Gov't & Budget Development



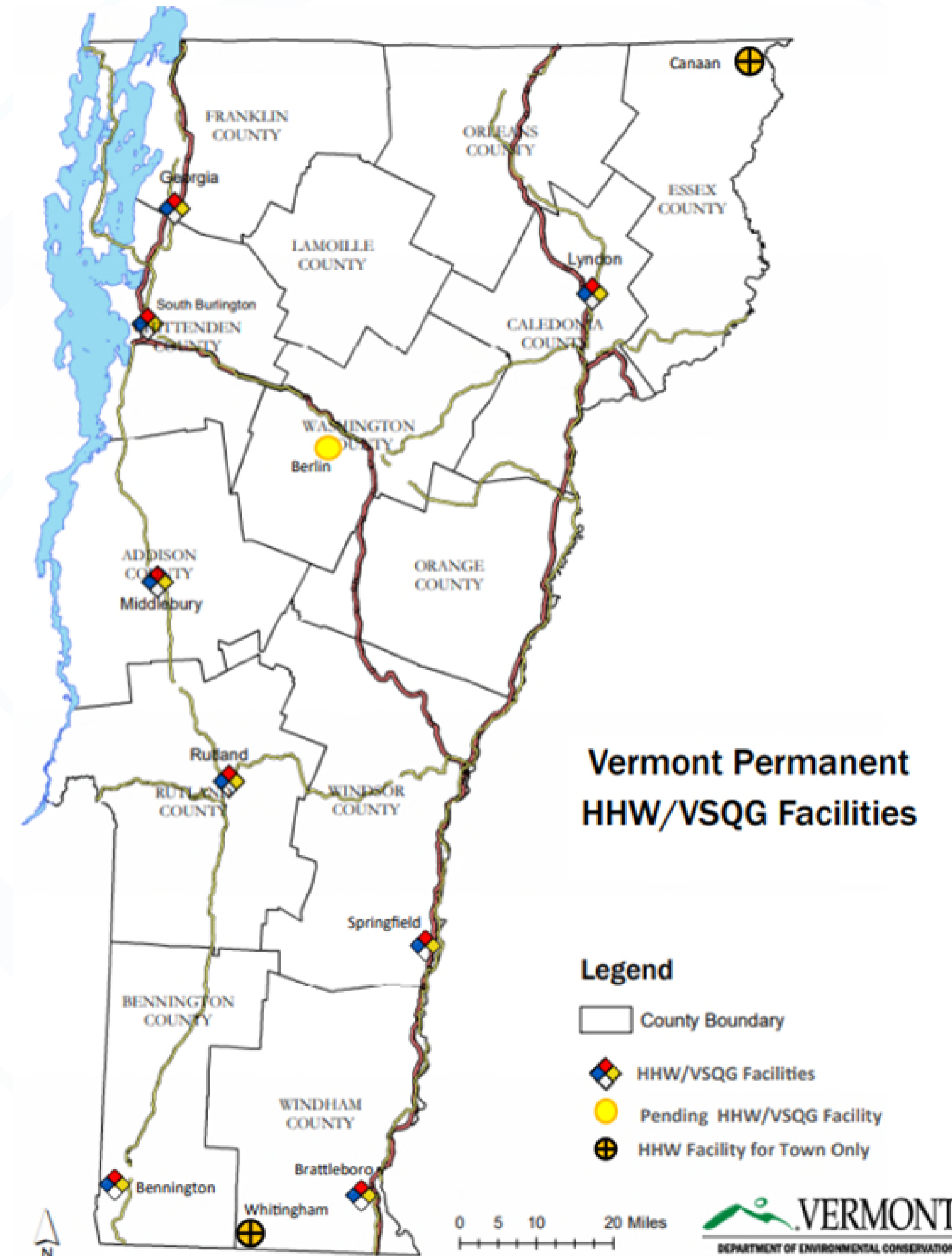
Survey of Current VT HHW Programs

- ✓ RLG conducting surveys of Solid Waste Management Entities (SWMEs) & municipalities currently running HHW programs & their service providers (haulers & processors) to understand:
 - ✓ Current types & volumes of material collected
 - ✓ Associated costs by type of collection, storage, transport & processing
 - ✓ Existing SWME/service provider contract terms & duration
 - ✓ Future maintenance or capital costs for perm facilities
 - ✓ Downstream outlets for collected material
 - ✓ Public education mechanisms & tools SWME's utilize & find effective
 - ✓ Where there may be room for cost efficiencies in Y2 & onward
 - ✓ Any inequities in access to collection in rural or other areas to be addressed in Y2 or later



Vermont HHW EPR

- ✓ Needs Assessments
- ✓ Understand existing infrastructure
 - ✓ 8 perm HHW sites
 - ✓ 31 events held annually
 - ✓ Population is 647,000
 - ✓ 8% participation rate
- ✓ Develop relationships locally with teams working to manage materials at current time ahead of program implementation
- ✓ Assessment reviewed & gaps & possible solutions agreed upon with key stakeholders



The background features a large, abstract graphic on the right side. It consists of several overlapping, rounded rectangular shapes in shades of green and blue. In the center of this graphic is a series of concentric, rounded squares in a dark blue color, creating a focal point. The overall design is modern and clean, with a white background on the left.

PHASE 2:

***SO Plan Development &
Submittal***

Jan 1, 2025 – July 1, 2025



SO Collection Plan Requirements

SO to craft 5-year plan & budget based on operational surveys conducted in Phase 1. Plan to cover:

- ✓ **Participating producers.** List manufacturers, brands, & products participating in the collection plan & methodology for adding & removing manufacturers & notifying the Agency of new participants.
- ✓ **Free statewide collection of covered products.** Free, convenient, & accessible statewide opportunities for collection from covered entities including orphan covered products.
- ✓ **Payment to existing collection infrastructure (SWME) for collection, processing, & end-of-life management of covered products.**
- ✓ **Convenient collection location.** Must allow all municipal HHW collection programs to opt to be part of collection plan. Efforts to site points of collection equitably across all regions of the State required.
- ✓ **Public education & outreach.** Education & outreach program that includes a website plus possibly media advertising, retail displays, articles & publications, etc. Must factor in diverse ethnic populations, translated & culturally appropriate materials & increased meaningful participation by environmental justice focus populations.





SO Collection Plan Requirements Cont'd

- ✓ **Public awareness surveys:** During PY 1 & 2 years after adoption of the collection plan, a survey of public awareness regarding requirements of the program that can identify communities that have disparities in awareness & need more outreach must occur.
- ✓ **Compliance with appropriate environmental standards.** Detail re compliance with all applicable laws related to the collection, transportation, and disposal of hazardous waste.
- ✓ **Method of disposition.** Description of how covered products will be managed in the most environmentally & economically sound manner, including following the waste-management hierarchy. Priority order: source reduction, reuse, recycling, energy recovery, & disposal.
- ✓ **Performance goals.** Performance goals for covered products determined by number of total participants at collection events & facilities listed in the collection plan during a program year divided by total number of households.
- ✓ **Collection plan funding.** Description of how SO will fund implementation of collection plan including costs for education, outreach, collection, processing, & end-of-life management of the covered products. Must detail how municipalities will be compensated for all costs attributed to collection.





Other Required SO Tasks

- ✓ Flesh out requirements for:
 - ✓ Track & Trace system to track movement & final disposition of collected material (go live prior to program implementation – March 2026)
 - ✓ Establishing a portal/invoicing system for SWMEs (go live by Oct 2025)
- ✓ Develop contracts for use with SWMEs
- ✓ Develop audit protocol and best practices for all collectors & service providers from learnings





PHASE 3:

***SO Plan Approval &
Implementation***

Jul 1, 2025 – June 30, 2026



Implementation Tasks Required

- ✓ VT ANR has 3 months to approve SO plan, submitted July 1, 2025
- ✓ Implementation to begin 6 months after approval, est. **March 1, 2026**
- ✓ Assume public education will have to begin at beginning of 2026 & require significant coordination with SWMEs & ANR
- ✓ Contracts w/SWMEs to be set up in Fall 2025
 - ✓ SWMEs need to register on SO portal by Oct 2025
 - ✓ Payment system to be live by program launch. SWME reimbursement cadence is TBD – quarterly or semi-annually? Ops to ask SWMEs in needs assessment.
 - ✓ 2nd round of producer reporting & fee payments to occur in spring 2026





SO Annual Report Requirements

First annual report due 18 months after program implementation or July-Sep 2027. The report shall include:

- ✓ **Description of collection program.**
- ✓ **Quantitative Program Results.** Volume or weight by hazard category, as defined by the Secretary, of covered products collected statewide, & at each collection facility or event, the disposition of collected covered products, & the number of covered entities participating at each collection facility or event.
- ✓ **Name & address of all the recycling and disposal facilities the program utilized**
- ✓ **Manufacturer sales data.** Weight or volume by hazard category of covered products sold in the State in the previous calendar year by a manufacturer participating in a stewardship organization's collection plan.
- ✓ **Performance Goal Analysis.** Comparison of collection plan's performance goals, including participation rate, compared to the actual performance & how the program will be improved if performance goals are not met.
- ✓ **Description of methods used to reduce, reuse, collect, transport, recycle, & process covered products.**
- ✓ **Plan Implementation Cost Details.** Includes the costs of administration, collection, transportation, recycling, disposal, & education & outreach.
- ✓ **Description & evaluation of the success of the education & outreach materials.**





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