

**From:** Suna Bayrakal <suna@productstewardship.us>  
**Sent:** Friday, January 28, 2022 11:12 AM  
**To:** Knaebel, Karen  
**Cc:** Scott Cassel  
**Subject:** Support for Vermont ANR's Draft Determination on 10 VSA §7152(a)(6) Sale of Mercury-Containing Lamps  
**Attachments:** 2022.01.28\_PSI Comment Letter on VT CFL\_FNL.pdf

**EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.**

Dear Ms. Knaebel,

Please accept the attached comment letter from the Product Stewardship Institute in support of Vermont Agency of Natural Resources' draft determination regarding 10 VSA §7152(a)(6) Sale of Mercury-Containing Lamps.

We would also appreciate a confirmation that you have received this email.

Thank you for your assistance.

Suna Bayrakal

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Suna Bayrakal, Ph.D. | *She, Her, Hers*  
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January 28, 2022

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Ms. Karen Knaebel  
Vermont Department of Environmental Conservation  
Waste Management and Prevention Division  
Davis Building – 1<sup>st</sup> Floor  
One National Life Drive  
Montpelier, VT 05620-3704

**RE: Vermont Agency of Natural Resources (ANR) Sale of Mercury Containing Compact Fluorescent Lamp (CFL) Draft Determination**

Dear Ms. Knaebel:

I am writing in **support** of ANR's draft determination that screw-based mercury-containing CFL lamps must not be sold, offered for sale, or delivered to a retailer for subsequent sale in Vermont. We would also **urge that the ANR expand its review** of the applicability of 10 VSA Section 7152(a)(6) from a limited consideration of the *price* of lamps that are of equivalent wattage and type to the *cost* of lamps of equivalent wattage and type over the life cycle of the product, which would allow consideration of a sales ban on other mercury-containing lamps.

Reducing the use of mercury in lighting products through a sales ban that effectively requires substitution with mercury-free lamps that are more energy efficient will avoid the risks of mercury exposure and release to the environment, as well as the need to manage mercury at the product's end-of-life. It will also prevent mercury from being recycled into new products and concurrently reduce greenhouse gas (GHG) emissions.

Vermont is a national leader in environmental protection with the highest per-capita collection and recycling rates for consumer products such as electronics, batteries, and paint in the US. While the state also has an EPR program for mercury-containing lamps that has increased the diversion of these products from the waste stream and reduced the quantity of mercury entering the environment, Vermont has an opportunity to take the next step and prevent these toxic products from being sold.

If you have any questions, please feel free to contact me at (617) 236-4822, or [Scott@ProductStewardship.US](mailto:Scott@ProductStewardship.US).

Sincerely,

A handwritten signature in black ink that reads 'Scott Cassel'.

Scott Cassel  
Chief Executive Officer/Founder