



## AGENCY OF NATURAL RESOURCES

### Vermont Department of Environmental Conservation

Waste Management & Prevention Division, Solid Waste Program

One National Life Drive, Davis 1 802-828-1138

Montpelier, VT 05620-3520 [VTrecycles.com](http://VTrecycles.com)

July 3, 2024

Sent via email

### RE: Obligations under the Vermont Household Hazardous Waste Extended Producer Responsibility Law

Dear Manufacturer or trade association representative,

This letter is to inform you about the Vermont Household Hazardous Waste (HHW) Extended Producer Responsibility (EPR) Law ([Act 58 of 2023](#)) and the steps being taken by trade associations, product manufacturers, and brand holders (producers) to establish a Stewardship Organization (SO) that will work to collectively meet the obligations of all companies affected by the law. The Vermont Agency of Natural Resources (“ANR” or “Agency”) has oversight over the implementation of this new law and has established the [Vermont HHW EPR webpage](#) to share information. Important initial steps for your company are to understand:

- What EPR is,
- What your company’s potential individual obligations are,
- How to participate in the development of the SO, and
- How to comply with the law.

The Vermont HHW EPR Law, which was signed by the Governor in June 2023, mandates manufacturers of “covered household hazardous products” sold in Vermont (both online and via brick-and-mortar retail sales) to participate in a SO that offers free statewide collection of such products. These types of product take-back programs are commonly called “extended producer responsibility” or “product stewardship” programs. A “covered household hazardous product” refers to a consumer product sold in Vermont that meets specific characteristics. A summary of the covered HHW products that fall under Act 58 can be found [here](#) and ANR will be working to update this list by **the first Monday of every month**, for approximately the next 6 months. In addition, please see this [timeline](#) of deadlines for requirements of the law.

State law mandates that producers of “covered household hazardous products” form a Stewardship Organization (SO). The Agency is aware of steps being taken by the [Household and Commercial Products Association](#) (HCPA) and [Reverse Logistics Group](#) (RLG) to develop the Household Product Stewardship Alliance (HPSA), which will serve as the SO and work collectively to meet the obligations of all producers affected by the law. HPSA is seeking producers to register with them as soon as possible and can be contacted at [Info@HPSalliance.org](mailto:Info@HPSalliance.org).

The SO will have discretion on how to implement a program that meets the requirements of the law, including structuring the fees producers will need to pay. Producers that join early will be able to provide input into this process.

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The Agency is conducting a virtual meeting on **August 12 from 11:00am – 12:00 pm ET** that will provide producers with information needed to comply with the law and contacts for HPSA, the SO being formed to implement the law's requirements. The meeting will offer an opportunity for producers to ask questions and better prepare in advance of regulatory deadlines.

The SO must submit a five-year collection plan and a list of producer member names, brands, and product information to the Agency of Natural Resources by **July 1, 2025**. Six months after approval of the plan, a [sales ban](#) of covered household hazardous products will go into effect for producers selling into Vermont that do not participate in the SO.

Please contact Mia Roethlein at [mia.roethlein@vermont.gov](mailto:mia.roethlein@vermont.gov) or 802-522-5926 if you have any questions or would like to be included in manufacturer webinars offered by the Agency.

Sincerely,

A handwritten signature in cursive script that reads "Josh Kelly".

Josh Kelly  
Solid Waste Program Manager  
VT Department of Environmental Conservation

cc: Mia Roethlein, Solid Waste Program