

November 20, 2024

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Dear Mr. Chapman and Mr. Kelly:

RE: Collaborative Approach to Vermont's Extended Producer Responsibility Law for Household Hazardous Products

We are writing to you regarding the implementation of Vermont's extended producer responsibility (EPR) law for household hazardous products. Given that this law impacts a wide range of products and companies with highly complex and divergent supply chains, the following organizations are working toward developing a collaborative approach to support our respective members' obligations under the law.

These organizations include:

- [Household & Commercial Products Association](#) (HCPA)
- [Lubricants Packaging Management Association](#) (LPMA)
- [American Coatings Association](#) (ACA)
- [Pressurized Cylinder Industry Association](#) (PCIA)

We anticipate this coalition of organizations may grow to include industry sectors not currently represented by the above associations.

This collaborative approach allows for better representation of producers directly impacted by the law while leveraging work already undertaken in Vermont and other jurisdictions. Notably, LPMA, ACA, and PCIA have implemented—or are in the process of implementing—EPR programs elsewhere, offering valuable insights and resources to this effort.

We propose a call with the Vermont Agency of Natural Resources (ANR) in December to discuss our future collaborative efforts and next steps to support our respective members' obligations under the law.

We look forward to working with ANR to ensure we are aligned with the intent of the law while facilitating an effective multi-industry response.

Sincerely,

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