

# LPMA

*powered by*

 **Interchange 360**

## Producer Webinar #2

February 25, 2025

# Agenda



1. Overview
2. EPR 101
3. Product Scope
4. State Response Plan Updates
5. Circular Action Alliance
6. Next Steps

# Overview

# Incorporation and Purpose

- Incorporated June 2024
- National non-profit EPR Compliance Agency
- Member-based organization
- Petroleum and petroleum related products and packaging
- Provide state-specific solutions
- Compliance and Circularity

# Founding Members



**ExxonMobil**



# Board of Directors

1. Brian Ahearn (Chair)
2. Jami Rice (Vice Chair) – Shell Lubricants Americas, Business Development Manager
3. Elsie Phillips - BP Castrol, Sr. Manager Global Product Stewardship
4. Dr. Melanie Bower, Exxon Mobil
5. Stephanie Taylor – Valvoline Global Operations, Regulatory Affairs Advisor
6. Steve Curtis – Chevron USA, Category Manager Packaging

# Overview

## Who Should Join LPMA?

Brand-owners, retailers, distributors of petroleum and automotive products and their associated packaging that are captured by the definition of “Producer” in state EPR laws and as such will have a compliance liability.

## How To Join

- Sign Participation Agreements for each state as they become available

The background consists of several overlapping, semi-transparent shapes in various shades of blue, teal, and brown. The shapes are organic and fluid, creating a layered, abstract effect. The colors range from a deep navy blue to a lighter, muted teal and a dark brownish-grey. The text 'EPR 101' is centered in the middle of the composition.

# **EPR 101**



“

**A management system based on industry and consumers taking life-cycle responsibility for the products they produce and use.**

*- Organisation for Economic Co-Operation and Development*

”

# Are you a Producer?

Under EPR regulations, you are considered a producer if you:

- **Brand or Trademark Owners:** Manufacture or control the brand of covered materials.
- **Licensees:** Entities directing the production of packaging under a licensed brand.
- **Manufacturers:** Produce packaging when no identifiable brand exists.
- **Importers:** First entity to import products into the U.S.
- **Retailers:** Selling private label products

As state compliance authorities often focus their compliance on the Brand Owner, it is the Brand Owner that often takes primary responsibility for ensuring that the supply chain sales reporting is complete and accurate.

**We encourage all Producers to consult legal counsel regarding your specific obligations.**

# How Do We Help Producers?

As a National EPR program for the Petroleum and Automotive Industry, LPMA powered by Interchange 360 makes compliance easy and efficient through:

- Cost efficiencies from sector-wide collaboration
- Execution through an experienced team and industry knowledge
- Producer-controlled and industry-specific solutions
- Right-sized design to provide a solution according to the specific state's needs



# Product Scope

# Accepted Products

We manage all petroleum and petroleum related products and packaging up to and including 15 gallons, including oil-based lubricants, grease, antifreeze, engine additives, and other fluids typically used in transportation and mechanical applications and where these containers are often comingled with oil and antifreeze containers at generator sites.

Some common types of petroleum and petroleum related containers and packaging include rigid bottles (e.g., quart, gallon, etc.), pails (e.g., five-gallon buckets), multi-layer tubes and cartridges, and bag-in-box (e.g., 3- or 5-quart fluid-filled bags inside of a cardboard box) and aerosols. Materials used in packaging contain a range of materials including, but not limited to high-density polyethylene (HDPE), polypropylene (PP), polyethylene (PE), metal, cardboard, paper, and other constituents.

# Accepted Products

Product Categories Include (15gal or less):

- Lubricating oil and oil containers
- Antifreeze and Antifreeze Containers
- Diesel Exhaust Fluid (DEF) and DEF containers
- Other Automotive Containers including:
  - Automotive Adhesives
  - Automotive Aerosols
  - Brake fluid
  - Conditioners
  - Degreasers
  - Fuel system cleaners
  - Lubricants
  - Automotive Sealers
  - Solvents
  - Stabilizers
  - Windshield Washer Fluid



# State Response Plans

# Packaging & HHW EPR Landscape

Current as of 01/29/25





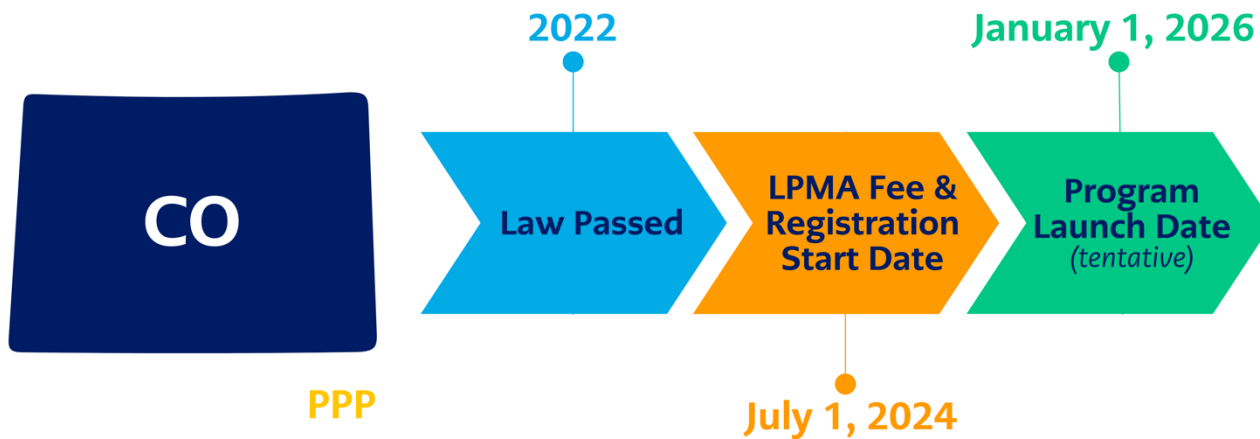


	2022	July 1, 2024	January 1, 2026
	2021	January 1, 2025	July 1, 2025
	2022	January 1, 2025	January 2027
 HHW	2023	January 1, 2025	2026
	2021	July 1, 2025	July 2026
	2024	July 1, 2025	February 2029

# State Updates

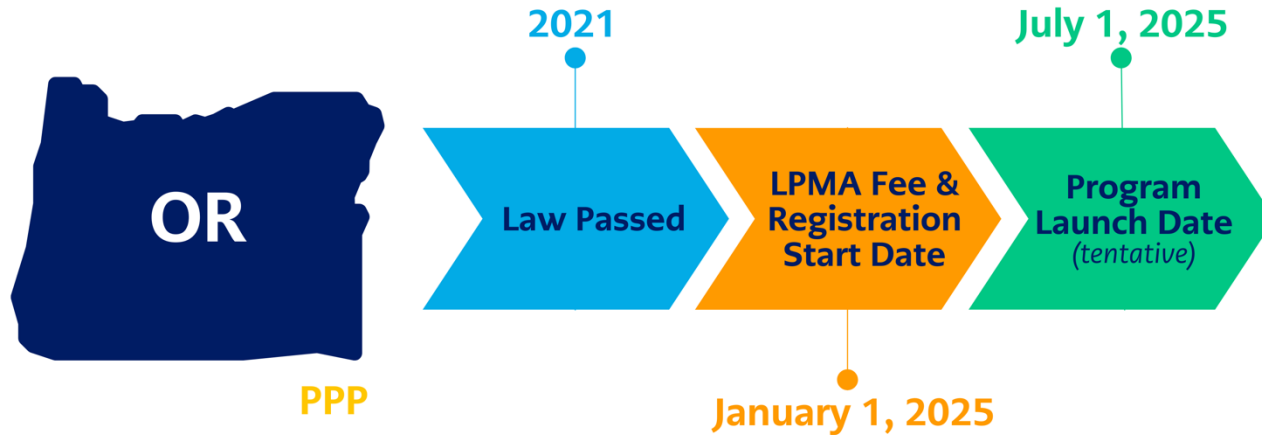
- EPR Regulations have been passed in six states:
  - Colorado
  - Oregon
  - California
  - Vermont
  - Maine
  - Minnesota
- 12 additional states have introduced EPR bills.
- Our mandate is to serve the Automotive and Petroleum sector's EPR needs now and for the future.
- Joining LPMA ensures Producers will stay compliant and on the right side of environmental and social expectations—state to state, across the nation.

# Colorado



- Individual Program Plan (IPP) submitted to CDPHE on December 31, 2024.
- Advisory Board completed review of IPP on Feb 17, 2025.
- LPMA is currently reviewing requested changes and preparing a second draft.

# Oregon



- [Letter regarding Notice of Compliance \(Exemption\) with RMA via Separate Program](#) was sent to the Department of Environmental Quality (DEQ) on December 20, 2024
- LPMA is currently working with DEQ staff on development of exemption plan.

# Fees & Dues

Our fees/dues schedule is intended fund the Extended Producer Responsibility (EPR) program in each state.

**Planning Fees** are intended to fund the activities needed for program start-up, including development of the EPR Plan, engagement with state EPR leads, engagement with stakeholders, preparation of an operational plan, IT, communications, legal and administration. Planning Fees stop when Implementation Fees begin.

**Implementation Fees** are intended to fund the operation of the program including payments to service providers, infrastructure development, public communications, state oversight costs, legal, IT and administration.

# Fees & Dues

- Fees/Dues are expected to change based on the eco-modulation requirements of each state, including requirement for Post Consumer Recycled content and recyclability.
- Fees/Dues are also expected to be regularly assessed and adjusted as program costs become better understood.
- Fees/Dues apply to all petroleum and petroleum related packaging up to 15 gallons.
- The timing of fees/dues varies by state and is impacted by the amount of effort required to meet the different program planning and development processes.

Fees will be listed on the [Producers](#) page of our website.



# **Circular Action Alliance**

# Coordination with Circular Action Alliance

- Circular Action Alliance (CAA) is a national Producer Responsibility Organization (PRO) that has been appointed by several states as the primary PRO.
- The LPMA Plan is designed to be complimentary to the CAA plan.
- The [Coordination Agreement](#) for Colorado is intended to set the standard for our relationship in all states.
- Coordination between CAA and LPMA on key program elements is required for both programs to be successful:
- Keeping LPMA products out of the comingled stream that CAA manages will help improve the recycling rates for all materials.
- Producers that sell products covered by both PROs will have to join both.



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**Join Interchange 360**

# Next Steps

- Review and Complete the current Participation Agreements for each required state.
- Review the Producer Guidance Document.
- Review the Applicable Product List.
- Prepare your data for the first filing.
- Submit Reporting Forms.
- Watch for emails from LPMA regarding ongoing state requirements.

# Questions?

Mark Carpenter

Director of Membership Services

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**Thank You**