



Date: October 31, 2025

To: Vermont Department of Environmental Conservation – Josh Kelly, Mia Roethlein, and Shannon Choquette

Re: **LPMA Producer Registration for HHW EPR**

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Dear Josh, Mia, and Shannon:

I am writing to advise that all producers participating in the Lubricant Packaging Management Association (LPMA) powered by Interchange 360's Vermont program have authorized LPMA to register them to be in compliance with the Vermont Household Hazardous Waste (HHW) Extended Producer Responsibility (EPR) Law ([Act 58 of 2023](#) and [Act 59 of 2025](#)).

A full [list of participating producers](#) is available on our website and will be continually updated as new Participants join. LPMA will report on all covered products under the law that are included in LPMA's [Applicable Products List](#).

As information from our Participants becomes available, we will update the forms on your website.

LPMA and our Participants are demonstrating leadership and a commitment to responsible product stewardship by working with the state as the new state-run program evolves.

In return, we ask that the Department ensure that the number of program free-riders are limited and that any costs assessed to LPMA participants are applied equitably and transparently.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "DL", is written over a light blue horizontal line.

David Lawes

CEO