From: Kelly, Josh <Josh.Kelly@vermont.gov>
Sent: Tuesday, September 8, 2026 8:44 AM
To: Eric Nelson <enelson@Interchange360.com>
Cc: Roethlein, Mia <Mia.Roethlein@vermont.gov>; Choquette, Shannon <Shannon.Choquette@vermont.gov>
Subject: Letter from Interchange 360

Hi Eric,

Per your request that we provide information on our conversations, the Vermont Agency of Natural Resources acknowledges receipt of a notice of intent letter from Interchange 360 to develop an independent EPR program for automotive products by July 1, 2027 under Vermont's Household Hazardous Product EPR law.

That law was recently changed to allow for independent stewardship organizations and collection plans for "classes of products" starting July 1, 2027.

In the interim, the Agency expects automotive product manufacturers to register and participate in the State's program, which we understand Interchange 360 has been assisting product manufacturers with.

We expect that these manufacturers will likely be able to transition to being covered under an Interchange "automotive products" Plan after the first Program year (calendar year 2027) dependent upon the Agency's review and approval or denial of Interchange's Plan next summer.

The Agency is actively talking with Interchange about their proposal to make the most of the time we have before July 1, 2027. This will likely improve expectations and outcomes for both the Agency, municipal HHW collection sites, and manufacturers.

Please let us know if you have any questions.
Sincerely,

Josh Kelly | Solid Waste Program Manager (he)
Vermont Agency of Natural Resources | Dept. of Environmental Conservation
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