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February 8, 2022

Representative Amy Sheldon, Chair  
Representative James McCullough, Vice Chair  
House Committee on Natural Resources, Fish, and Wildlife  
State of Vermont House of Representatives  
115 State Street  
Montpelier, VT 05633-5301

**RE: Support for H. 115, An act related to household products containing hazardous substances**

Dear Chair Sheldon, Vice Chair McCullough, and Members of the Committee:

Thank you for the opportunity to submit testimony in support of H. 115, which will create a statewide household hazardous waste (HHW) extended producer responsibility (EPR) program in Vermont, managed and funded by producers.

H.115 is consistent with our organization’s model HHW EPR bill and contains the key elements necessary for successful implementation, including **performance goals** to drive program effectiveness; **annual reporting** to monitor program implementation; and **convenience standards** to ensure that the program is accessible statewide. H. 115 also provides local governments the opportunity to participate in the program and be compensated by producers for their costs of collection.

HHW products that are toxic, corrosive, flammable, and chemically reactive pose human health and environmental risks when stored in the home and improperly disposed. These products, which include cleaning fluids, varnish, paint removers, fuel additives, and propane canisters, are also a significant cost for local governments to manage. Although the U.S. Environmental Protection Agency sets stringent requirements for hazardous waste generated by businesses, it does not regulate similar wastes generated in the home and does not prohibit trash disposal of HHW. Residents, therefore, often put HHW in the trash. In many communities, where there is a lack of collection facilities or events, or inconsistent HHW collection services due to the limited resources of local governments, significant quantities of these materials end up being improperly disposed.

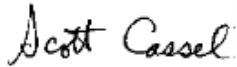
H. 115 will provide consumers with a convenient program that safely manages household products containing hazardous substances, reducing environmental and human health impacts. Similar programs have been operating successfully in Canada since the 1990s.

Vermont already has experience passing and implementing programs required by EPR laws, including for leftover paint, used electronics, pharmaceuticals, mercury lamps, mercury thermostats, and batteries. All these laws are based on the same principle of EPR as H. 115. As a result of the effectiveness of these laws, Vermont has the highest per-capita collection and recycling rates in the nation for many of these products. This bill is expected to produce similar positive results.

The Product Stewardship Institute (PSI) is a national nonprofit that reduces the health and environmental impacts of consumer products across their lifecycle. We work with 47 state agency members, hundreds of local government members, and more than 120 partners from companies, organizations, universities, and international governments. Over the past decade, we have analyzed the operational feasibility of EPR for HHW programs in the U.S. as well best practices and lessons learned from existing EPR programs across Canada.

I encourage you to support H. 115 and reduce the tremendous financial burden placed on local governments for safely managing them. If you have any questions, please feel free to contact me at (617) 236-4822, or [Scott@ProductStewardship.US](mailto:Scott@ProductStewardship.US).

Sincerely,



Scott Cassel  
Chief Executive Officer/Founder