



Vermont Department of Environmental Conservation
Waste Management & Prevention Division, Solid Waste Program
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Agency of Natural Resources

November 1, 2021

Mr. Mark Kohorst, Director – Environmental Health & Safety
National Electrical Manufacturers Association
1300 17th Street North, Suite 900
Arlington, VA 22209-3801

Re: 10 V.S.A. §7152(a)(6) Sale of mercury-containing lamps

Dear Mr. Kohorst,

On October 24, 2021, the Vermont Department of Environmental Conservation received a petition request on behalf of Vermont Public Interest Research Group (VPIRG), Clean Lighting Coalition, and Mercury Policy Project for an analysis of data and information provided by lamp manufacturers to demonstrate “that no alternative non-mercury energy efficient lamp is available that provides the same or better overall performance at a cost equal to or better than the classes of lamps that the manufacturer proposes to sell.”

In light of this petition request, and progress in energy efficient non-mercury alternatives, we are contacting you regarding 10 VSA §7152 of the 2012 legislation for the Collection and Disposal of Mercury-containing Lamps. Subsection 7152(a)(6) restricts the sale of a mercury-containing lamp unless “The manufacturer has demonstrated that no alternative non-mercury energy efficient lamp is available that provides the same or better overall performance at a cost equal to or better than the classes of lamps that the manufacturer proposes to sell”.

The Agency of Natural Resources, Department of Environmental Conservation requests that NEMA consult with manufacturers subject to this law and provide information in response to Subsection 7152(a)(6) as stated above together with an analysis of data and information to demonstrate your position. Specifically, provide written details on general purpose, mercury-containing lamps where a non-mercury alternative exists. If a general purpose, mercury-containing lamp does not have a non-mercury alternative, please provide that information as well.

Please submit this information no later than December 1, 2021. Should NEMA and the manufacturers wish to meet with us to discuss, please contact Karen Knaebel at karen.knaebel@vermont.gov to coordinate.

Sincerely,

A handwritten signature in blue ink that reads "Matt Chapman".

Matt Chapman, Director
Waste Management and Prevention Division

cc: **Manufacturers Represented in the NEMA Mercury-Containing Lamp Collection Plan:**

- Ace Hardware Corporation
- CREE Lighting
- Earthtronics
- EIKO Global LLC
- Eye Lighting International of N.A., Inc.

- Fanlight Inc.
- Feit Electric Company, Inc.
- GE Lighting, a Savant Company
- Halco Lighting Technologies
- LEDVANCE LLC
- Maxlite
- Ottilite Technologies, Inc.
- Panasonic Corporation of North America
- Satco Products, Inc.
- Signify North America Corporation
- Southwire/Colman Cable LLC
- Sunshine Lighting
- TCP International Holdings Ltd.
- Ushio America, Inc.
- Westinghouse Lighting