



## Vermont Agency of Agriculture, Food and Markets Pesticide Disposal SustainableFunding Study

**BACKGROUND:** An act relating to miscellaneous agricultural subjects—Act 59 of 2025—requires the Secretary of Agency of Agriculture, Food and Markets to submit to the House Committees on Agriculture, Food Resiliency, and Forestry and on Environment and the Senate Committees on Agriculture and on Natural Resources and Energy a study of sustainable funding options to cover all costs associated with the collection and disposal of obsolete and unwanted pesticides. This report is required by December 15, 2025. This report is submitted to meet that requirement.

**Submitted To:** Vermont General Assembly; House Committees on Agriculture, Food Resiliency, and Forestry and on Environment and the Senate Committees on Agriculture and on Natural Resources and Energy

**Published:**

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**From:** Anson Tebbetts, Secretary, Vermont Agency of Agriculture, Food and Markets

A handwritten signature in black ink that reads "Anson Tebbetts". The signature is written in a cursive style with a large, stylized "A" and "T".

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## Executive Summary

The costs borne by solid waste management entities (SWMEs) and taxpayers associated with collection and disposal of obsolete and unwanted pesticides has been increasing over the last several years and is projected to increase in calendar year 2026.

These increases can be attributed to

- Amount of unwanted pesticide products being brought to SWMEs
- Limited number of household hazardous waste disposal vendors serving Vermont- resulting in little competition to contain costs
- Increases in costs for labor, transportation, and hazardous waste management costs

During the 2025 Vermont General Assembly session, VSA Chapter 6, Sections 929 (a) (6) & 1104 (16) were amended to increase the pesticide product registration fee by \$50 per product to provide funds to defray the costs of pesticide collection and disposal incurred by SWMEs and towns. The Agency of Agriculture, Food and Markets (Agency) was also directed to prepare a report on options for sustainable funding for this purpose. The Agency convened a workgroup including representatives of the SWMEs, pesticide registrants, and the Agency of Natural Resources, Department of Environmental Conservation Solid Waste Management Program.

Four options for a sustainable funding mechanism are presented in this report. The Agency's recommendation is to maintain the recently established funding mechanism, which is collecting an additional \$50 with the registration of each pesticide product, and reimbursing SWMEs for allowed expenses incurred with pesticide collection and disposal. This option may remain in place until such time when a pesticide stewardship organization comes into existence. Maintaining a per product fee paid to the Agency at the time of registration and the Agency distributing funds through a reimbursement grant program to participating SWMEs, provides immediate relief to the taxpayers of Vermont for collection and disposal costs. This can serve SWMEs until an alternative system is established. However, for the per product fee to sustainably fund collection and disposal, it should be regularly evaluated to ensure it keeps pace with the costs incurred by SWMEs.

## Background

As authorized by 6 V.S.A. §§929 (a) (6) & 1104 (16) the Agency of Agriculture, Food and Markets (Agency) may use funds from the special pesticide monitoring revolving fund to defray the costs of a collection program for obsolete and unwanted pesticides.

The Agency has provided funds to solid waste management entities (SWMEs) to support the collection and disposal of pesticides by persons that are eligible to use a SWME's disposal services for decades, but the funding has not kept pace with rising costs. Persons eligible to use these disposal services include residents, nonprofits/schools, businesses, and farmers that would qualify as very small quantity generators disposing of pesticides.

The covered products are all pesticides that are or should be registered with the Agency under 6 V.S.A, chapter 81 and includes all products produced, distributed, or used for preventing, destroying, or repelling any insects, rodents, nematodes, fungi, weeds, or other forms of plant or animal life or viruses, except viruses on or in living humans or other animals; or any substance produced, distributed, or used as a plant regulator, defoliant, or desiccant. This includes products covered by Section 25b of the Federal Insecticide, Fungicide, Insecticide, Rodenticide Act administered by the Environmental Protection Agency (EPA) and the State Lead Agency (SLA) under cooperative agreements.

The producers of pesticides are the registrants of pesticide products. The Agency actively enforces its regulations requiring the registration of products and will prohibit the sales of products not registered in the state as part of its enforcement protocol. Violators may face penalties from the state including but not limited to stop sale notices to retailers, both online and brick and mortar.

The amount the Agency reimbursed to solid waste management entities since fiscal year 2023.

FY 2023		FY 2024		FY 2025
\$39,856.75		\$112,293.93		\$93,091.84

These reimbursements historically did not cover the actual costs of collection and disposal. The costs associated with collection and disposal have increased over time. In the experience of SWMEs this is due to inflation and fewer vendors or contractors providing collection and disposal services to Vermont.

As a result of Act 59 in 2025, collection and disposal will be supported by \$50.00 fee per registered pesticide product. The total number of products registered in 2025 was 12,200. If the same number of products are registered for 2026, this fee would raise \$610,000. Collection of this increased pesticide registration fee began on July 1, 2025. The Agency will collect a fee until a different sustainably funded alternative system for the collection and disposal of obsolete and unwanted pesticides is implemented and 6 V.S.A. Section 981, is amended.

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## Current system of collection and disposal

There are 28 SWMEs in Vermont, but not all SWMEs apply for pesticide collection and disposal grants. Annually, the Agency has historically issued individual grants to between twelve and seventeen SWMEs each fiscal year to reimburse them for their services to the individuals that dropped off obsolete and unwanted pesticides (OUP) at all facilities that collect household hazardous waste across the state.

SWMEs have either

- existing infrastructure and expertise to support the pesticides collection and contract with a hazardous waste hauler for disposal (there are eight fixed facilities), or
- contract with a hazardous waste hauler to support household hazardous waste collection and disposal events (at least two a year).

Act 59 outlines which costs are reimbursable to a SWME, and include facilities, equipment, maintenance, and collection events. Labor and supplies costs are reimbursed as an actual cost. Prorated costs associated with collection events include collection event setup fees, environmental service fees, insurance fees, and shipping containers/drums and materials related to the collection and disposal of OUP.

## Data

Subsequent to the effective date of Act 59, the Agency convened a workgroup consisting of representatives of the Agency, the Solid Waste Program of the Department of Environmental Conservation (DEC), representatives from solid waste management entities, and representatives of Crop Life America/Responsible Industry for a Safe Environment (CLA/RISE), the pesticide registrant trade group. The workgroup was convened to discuss options for

development of a sustainable funding mechanism for disposal of obsolete and unwanted pesticides (OUP).

To prepare for these discussions, the Agency contracted with the Chittenden Solid Waste District (CSWD) to collect data on the costs to SWMEs for the collection and disposal of OUP. Vermont has sixteen SWMEs and twelve municipalities that manage hazardous waste throughout the state. Eight SWMEs have permanent facilities that collect hazardous waste seasonally and year-round. SWMEs without permanent facilities (eight districts and twelve municipalities) conduct collection events for their residents. Thirty-one collection events were held in 2024. CSWD was able to collect data from twenty SWMEs. When data was not available, CSWD estimated costs based on population served by the SWMEs, and other comparable data.

Based on the data, and assumptions made about the amount of pesticide products in waste streams such as oxidizers, flammables, corrosives, and hypochlorites, labor, and actual disposal costs, and other pro-rated costs incurred, the total estimated costs to Vermont SWMEs and municipalities for the collection and management of OUPs is **\$ 402,215 for 2024**. Estimated costs per SWME and municipalities for 2022, 2023, and 2024 are provided in Table 2, below. Attachment 1 provides more data on analysis of pesticide collection and disposal costs. These costs do not include an accurate prorated facility cost, which is anticipated to be greater than the 10% overhead that was used in CSWD's analysis. There is more research and analysis going into developing a more accurate method of calculating.

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**Table 1. Reported and Estimated Costs of Collection and Disposal of OUPs.**

SWMES/Towns	2022 Pesticide Cost	2023 Pesticide Costs	2024 Pesticide Costs
Addison County SWMD	\$11,666	\$12,047	\$20,502
Bennington County SWMD	\$14,649	\$1,584	\$28,339
Burke	\$5,179	\$7,872	\$5,911
Canaan	\$1,830	\$1,830	\$1,830

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Coventry	\$11,904	\$13,848	\$12,876
CSWD	\$58,825	\$76,566	\$80,865
CVSWMD	\$37,583	\$31,113	\$31,064
Fairfax	\$8,612	\$9,382	\$8,997
GUVSWMD	\$28,402	\$30,659	\$35,208
Lamoille	\$29,570	\$23,844	\$22,407
Londonderry	\$12,164	\$11,984	\$13,088
Mad River	\$17,134	\$16,387	\$20,541
Mountain	\$20,952	\$20,952	\$20,952
NEKSWMD	\$2,137	\$4,769	\$3,453
NWSWMD	\$13,973	\$16,260	\$18,148
Rutland	\$18,728	\$18,728	\$18,728
Southern W/W	\$11,627	\$11,627	\$11,627
St. Johnsbury	\$8,247	\$8,247	\$8,247
SWAC	\$2,381	\$7,659	\$7,395
White River	\$15,453	\$17,144	\$18,197
Whittingham	\$1,463	\$1,443	\$766
Windham	\$2,220	\$11,146	\$7,247
Winhall	\$5,115	\$4,403	\$5,827
Grand Total	339,814	359,494	402,215

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## Distribution of Waste

The report from CSWD recommends the following distribution of waste categorized as pesticide waste collected at solid waste facilities and events.

- Bulk Flammable Liquid Drums – Contains 10% pesticides based on data provided by the Addison County Solid Waste District.
- Flammable Solid Labpack Drums - 50% pesticides based on data from Addison County Solid Waste District.
- Acid and Bases Labpack Drums - 50% pesticides based on data from Central Vermont
- Hypochlorite - 25% pesticides based on data from the Chittenden Solid Waste District.
- Dioxins - 100% pesticides based on data from the Chittenden Solid Waste District.
- Corrosives - 50% pesticides based on data from the Chittenden Solid Waste District.
- Aerosols mixed – 10% pesticides, based on data from Addison County Solid Waste District.

- Aerosols Pesticides only – 100% pesticides
- Pesticide Labpack – 100% pesticides

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## Fixed Facilities

Method to calculate actual costs and/or to prorate costs associated with pesticide collection and disposal for fixed facilities:

- Labor – Calculated using 1 hour per drum of pesticides disposed using the average employee fully loaded rate at the Chittenden Solid Waste District. Currently, this rate is \$56.25.
- Disposal – Calculated using actual costs for disposal of that material using the conversion when waste is not 100% pesticides.
- Hazardous Waste Vendor Pickup Fees (other than disposal) – Calculated using the percentage of total disposal costs of the pickup attributed to pesticides. Use this percentage for all additional fees applied by vendor.
- Vermiculite (pesticide labpack drums only) – Currently \$40/bag, estimated to use 1/4 or approximately \$10 per pesticide labpack.
- Drums – Specific facility costs/drum multiplied by number of drums used for pesticides and partial drums of pesticides.
- Proration of Equipment costs, Equipment Maintenance Costs and Facility Costs (Building Maintenance, Property Maintenance, Taxes/PILOT, Property/Bld. Lease, Commercial Insurance, Utilities).

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## Events

Method to calculate actual costs and/or to prorate costs associated with pesticide collection and disposal for events as outlined on waste hauler invoice:

Using the total cost of disposal for the collection event and the total disposal cost for pesticides including the portions of the mixed waste drums that contain pesticides, calculate the percentage of disposal costs attributed to pesticides. Use this percentage and apply to fees and costs associated with the event on the invoice including:

- collection event setup fees,
- environmental service fees,
- insurance fees,



- supplies and materials,
- labor

Use the actual cost of shipping containers from waste hauler invoices used to ship pesticides. For mixed waste containers calculate the established proportions for mixed drums, referenced above, and apply proportion to the actual cost of the container.

In addition to this information, the workgroup discussed the management of pesticide waste in other states, the Extended Producer Responsibility (EPR) for household hazardous waste passed in 2022, other EPR programs currently operated by the Solid Waste Program at the Department of Environmental Conservation, and the existing national pesticide stewardship efforts.

## Options Identified for Sustainable Funding

As a result of these discussions, the following options for sustainable funding for collection and disposal of OUP were identified:

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### Option 1: Maintain system established in Act 59, 2025

The pesticide registration fee of \$250 would remain in effect, with \$50 of the fee being used for reimbursing SWMEs for collection and disposal of OUPs. Additionally, funds would be used to support residential pesticide use education including selecting, applying, storing, and disposing of pesticides with the goal of responsible use and reducing the number of pesticide products that need to be disposed. All SWMEs would be given the opportunity to seek funding from the Agency for reimbursement (fixed facilities and events), along with the Agency requiring reporting on amounts in pounds of disposed pesticides by type (aerosol, flammable, corrosive materials and others) and substantiation of costs specifically related to disposal of pesticides as provided.

To facilitate that process, the Agency along with representatives of SWMEs will develop a standardized system of requesting reimbursement of allowable expenses and reporting, including standardized facility costs formula for fixed facilities, which is under development. The Agency will explore opportunities to audit disposal of pesticides to ensure percent pesticides in mixed waste drums is representative of pesticide waste. The Agency may annually report back to the General Assembly total costs from the previous year to determine if the registration fee should be increased.

The Pesticide Safety Education Program, UVM Extension, would develop materials to educate consumers and attempt to reduce disposal of pesticide products. These materials can be made

available on the Agency's website, DEC's website and SWME's websites or printed and distributed at events and facilities.

Option 1 would not require any immediate changes to current law. Only at such time as the \$50 fee does not cover the cost of collection and disposal and residential pesticide use and disposal educational efforts would an adjustment need to occur by increasing the registration fee.

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## Option 2: The Agency of Agriculture Food and Markets contracts with a single vendor for pesticide waste collection

The pesticide registration fee of \$250 remains in effect, with \$50 of the fee used to pay for a statewide contract for collection and disposal of pesticides. The Agency would contract with a hazardous waste contractor to hold events twice a year in each county to collect and dispose of pesticides. As in Option 1, funds would be used for residential pesticide use education including selecting, applying, storing pesticides and product collection and disposal with the goal of reducing the amount of pesticide provided for collection and disposal.

SWMEs would no longer collect pesticides at their facilities nor at events and could reject those products for which they will not receive funding from the state. The Agency would collaborate with SWMEs to share information with the public about its sponsored events.

The cost of a statewide contract to conduct these services has not been determined and will involve securing locations to hold disposal events, and education to the public about where to dispose of pesticide products, which may be different from current locations.

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## Option 3: Pass and implement an Extended Producer Responsibility law for a stand-alone program administered by the pesticide industry

The \$50 increase in the pesticide product registration fee remains in place until an Extended Producer Responsibility (EPR) law is passed that requires the pesticide industry to establish and pay for a collection and disposal program in Vermont. The law would require the establishment of a Producer Responsibility Organization (PRO) that represents all pesticide producers that sell products into Vermont to submit a plan to the State to fund existing infrastructure or establish new system to provide convenient collection and disposal of OUPs. The law would require the EPR program to provide outreach and education on pesticide product waste reduction and

proper management and disposal of OUP. The EPR program would be paid for by the formed PRO to cover the costs of pesticide product collection and disposal. Pesticide products submitted for registration in Vermont would have to document membership and participation in the pesticide PRO prior to registration. Products would not be accepted for registration and could not be marketed in Vermont without documentation. Based on guidance from DEC we understand these are the necessary elements to institute an EPR program.

1. The Stewardship Plan would be required to have the following components:
  - a. **Collection Standards** – The Plan shall explain that it will offer free collection for covered products from any covered entities at a statewide network of collection sites that must meet some minimum collection convenience standard such as 2 sites per county and 1 site per 10,000 town population.
  - b. **Collectors** – The Plan shall define who can be a collector and who the PRO must let “opt in” to be a collector. Certified solid waste facilities (public or private), municipalities, and retailers that sell the pesticide products are examples of potential collectors to “opt in” under an EPR program.
  - c. **Method of Disposal/Recycling** – The Plan shall explain how it will manage collected covered products. Annually, the PRO submits a report to the State (see “Annual Report” below) on what happened to materials collected.
  - d. **Education and Outreach for Covered Entities** – The Plan shall explain how the PRO will meet the minimum education/outreach requirements of the law to ensure covered entities (generators of these waste products) have awareness of the EPR Program and how to use it.
  - e. **Performance Goals** – The PRO must explain how it will meet the performance goal in the law or propose their own.
  - f. **Funding/Costs/Compensation** – The PRO shall be responsible for funding, which includes all costs currently outlined in Act 59 of the 2025 session, and currently being funded by the Agency of Agriculture, Food and Markets. It shall also establish a fund for the education of households and very small quantity generators on how to purchase and use pesticide products and reduce the need for disposal.
2. **State Administration Fees** – The state will receive full reimbursement for staff time and costs to oversee and administer the program as outlined in Title 10, Chapter 164B.
3. **Annual Report** – The PRO shall submit an annual report to the State with many of the items listed in the Stewardship Plan.

4. **Audit** – A 5-year program and cost effectiveness audit is required as outlined in Title 10, Chapter 164B that the PRO must complete with the prior approval by the State.
5. **State Agency Responsibilities** – Would include a process for Plan review, and approval or denial.

Option 3 would require a legislative change to allow for pesticide disposal to be managed this way when industry forms a PRO. The Agency of Agriculture, Food and Markets will continue to register pesticide products and perform enforcement on unregistered products.

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### Option 4. The Solid Waste Program of the Department of Environmental Conservation implements a state operated pesticide producer responsibility program

The General Assembly updates the definition of “covered household hazardous products” to no longer exempt pesticides registered with VAAFM and requires the industry to form a PRO and the Solid Waste Program of the Department of Environmental Conservation administers that program as it does other EPR programs.

Option 4 would require a legislative change to authorize the Solid Waste Program of the Department of Environmental Conservation to manage and administer a pesticide collection and disposal EPR. The Agency of Agriculture, Food and Markets will continue to register pesticide products and perform enforcement on unregistered products.

### Agency Recommendation:

The Agency recommends Option 1 be used until a producer responsibility organization (PRO) is established under Option 3 or 4, that will meet the requirements for such an organization to address the collection and disposal of pesticide products. EPR programs provide sustainable funding sources to address fluctuations in collection and disposal costs once a PRO is established.

Option 1 provides funding for SWMEs to cover their costs. As noted above, the costs to Vermont municipalities are substantial and may increase. The establishment of the additional registration fee in Act 59, 2025 meets the needs of the Vermont taxpayer now, and no additional action by the Vermont General Assembly is needed to provide this funding, however, an increase in the \$50.00 fee could be required in the future.

## Appendix

### Pesticide Disposal Costs

	Total Annuals	Average SWME Annual Costs and Weights
2022 Total Costs	\$339,813.97	\$14,774.52
2022 Total Weight (in lbs)	104,150.32	4,528.27
2023 Total Costs	\$359,494.45	\$15,630.19
2023 Total Weight ( in lbs)	112,594.39	4,895.41
2024 Total Costs	\$402,215.38	\$17,487.63
2024 Total Weights (in lbs)	113,461.49	4,933.11

## 2023 Household Waste Composition Study- Aggregate

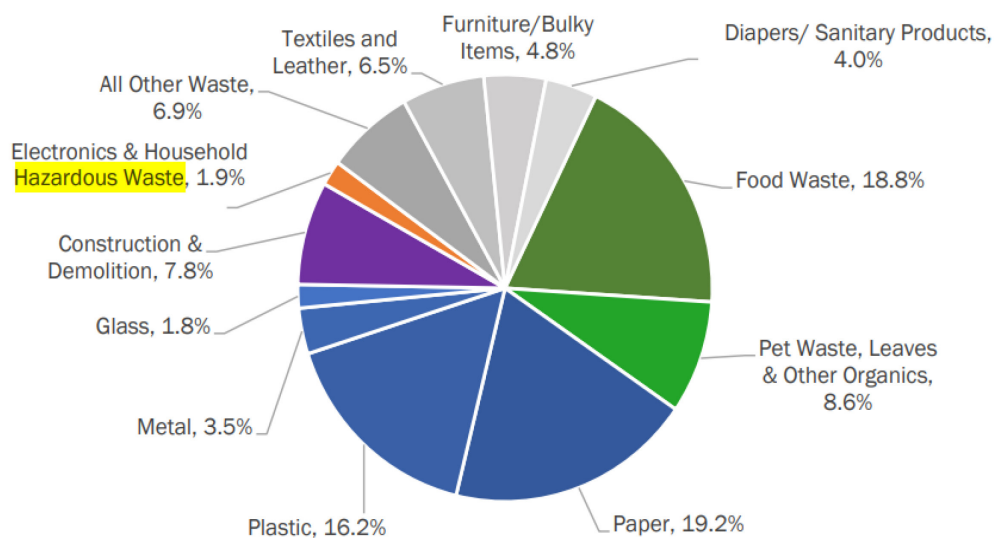
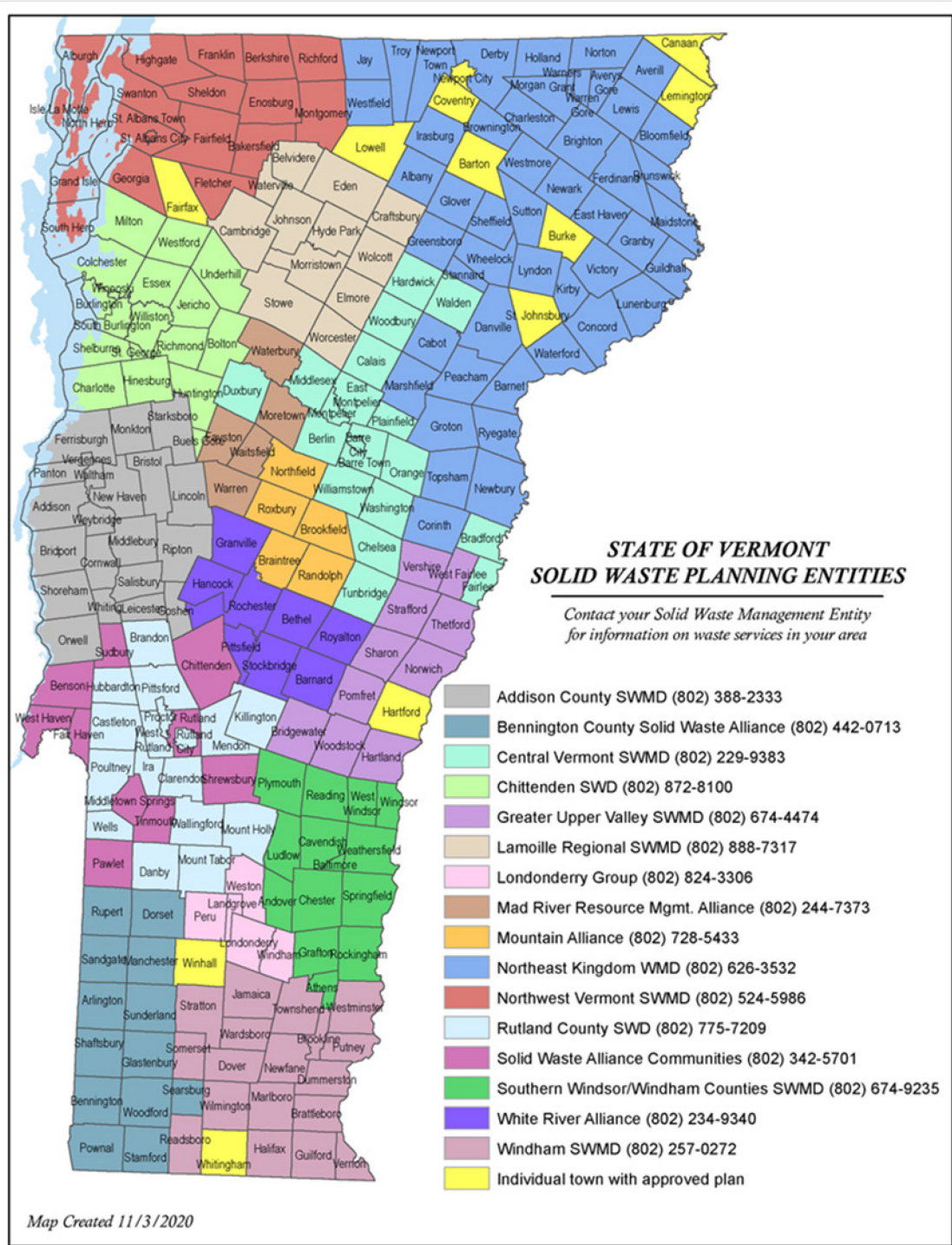


Figure 1: Municipal solid waste from Department of Environmental Conservation, 2024, [2023-VT-Waste-Composition-Study.pdf](#). Improper disposal includes pouring liquids down a drain and other releases into the environment.



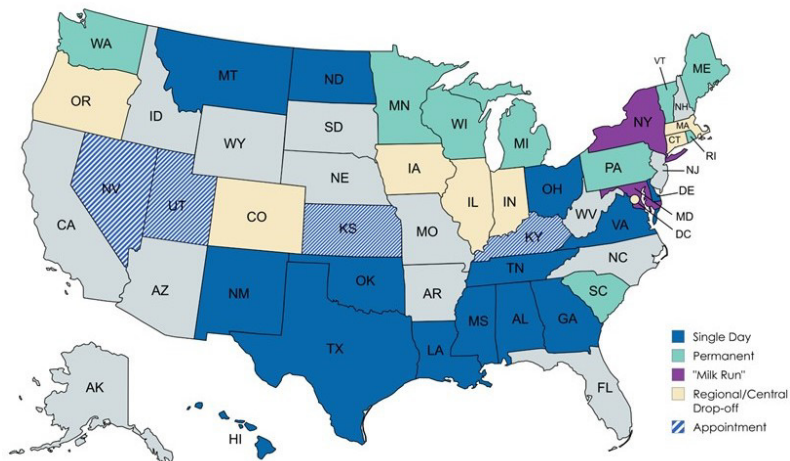
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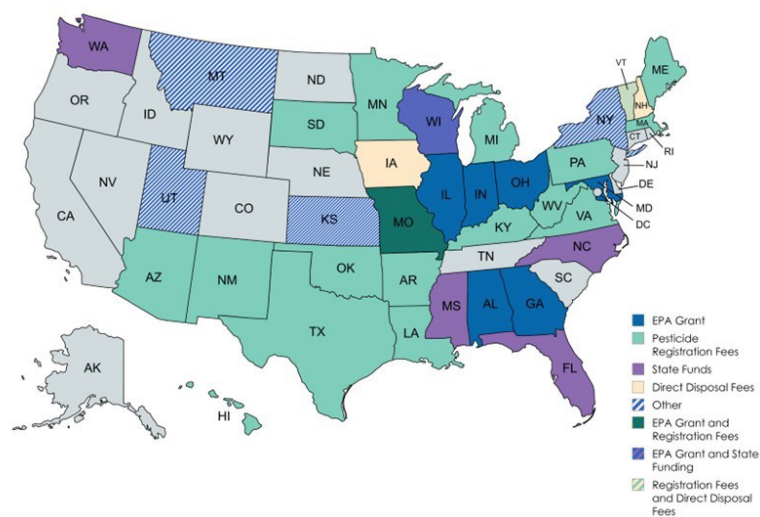
Electronics & Household Hazardous Waste include pesticides

## Collection Types



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## Funding Sources



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Based on data shared from The Pesticide Stewardship Alliance