

Act 58 – Vermont HHW EPR Law Timeline

Vermont Household Hazardous Waste (HHW) Extended Producer Responsibility (EPR) Law Timeline

January 15, 2024 – ANR Fee Recommendation: ANR shall submit to the Legislature a recommended annual registration fee for its oversight of the household hazardous waste EPR program.

January 1, 2025 – Stewardship Org. Registration: A stewardship organization shall file a registration form with ANR and the Secretary shall only approve one stewardship organization for the first collection plan (up to 5 years).

July 1, 2025 – Collection Plan: For the first Collection Plan one stewardship organization registered with ANR must submit ONE Collection Plan for all manufacturers to ANR. ANR shall approve the Plan for up to 5 years. ANR must hold public comment period during approval process. After the first collection plan (up to 5 years), multiple stewardship organizations may register with ANR and must collaborate to submit ONE Collection Plan for the next plan period.

July 1, 2025 – Covered HHW Disposal Banned: Landfill disposal ban on Covered Household Hazardous Waste goes into effect.

6-months After Plan Approval (DATE TBD):

- **Collection Plan Implementation:** Stewardship organizations must implement the Collection Plan 6 months after ANR approval (potentially March 1, 2026, assuming plan approval is complete by October 1, 2025).
- **Sale Prohibited of Household Hazardous Products that Don't Participate:** Manufacturers cannot sell covered household hazardous products into Vermont unless they are participating in the approved Collection Plan.

18-months After Plan Implemented (DATE TBD) – Annual Reports: Stewardship organization(s) submits the annual report to ANR 18 months after Plan implementation (potentially September 1, 2027) and annually thereafter.

Public Awareness Surveys: During the first year of program implementation (Program Year 1 - 2026), and two years after adoption of the collection plan (DATE TBD), the stewardship organization(s) must complete an annual Public Awareness Survey and report these results to ANR with their annual report.

Annual Performance Goal: During each year of the ANR approved Collection Plan—depending on how long ANR approves the first Plan for—the stewardship organization(s) Plan is required to meet a minimum annual performance goal of a 5% participation rate based on the number of households the collection program serves. Annual Performance Goal data shall be submitted to ANR with the annual report. After the end of the initial approved Collection Plan, the stewardship organization shall propose an annual performance goal for subsequent Collection Plans.

September 1, 2030 – Collection Plan Audit: Stewardship organization(s) is required to submit a Collection Plan Audit to ANR and every 5 years thereafter.