



June 19, 2025

Submitted via email to eprcomments@state.co.us

Colorado Department of Public Health & Environment
4300 Cherry Creek Drive
South Denver, CO 80246

RE: IPP Public Comment – Alliance for Automotive Innovation

To Whom It May Concern:

The Alliance for Automotive Innovation (Auto Innovators)¹ appreciates the opportunity to provide comments on the Lubricants Packaging Management Association (LPMA) Powered by Interchange 360's Individual Program Plan for Producer Responsibility – Colorado, as part of Colorado's Producer Responsibility program.²

Auto Innovators represents the auto manufacturing sector, including automakers that produce and sell more than 90% of the new light-duty vehicles in the United States. Our mission is to work with policymakers to realize a future of cleaner, safer, and smarter personal transportation and to work together on policies that further these goals, increase U.S. competitiveness, and ensure sustainable, well-paying jobs for citizens throughout the country.

We understand that the Colorado Department of Public Health & Environment (CDPHE) is accepting comment on LPMA Powered by Interchange 360's amended Individual Program Plan (IPP). We raise here several concerns about LPMA's plan proposal.

The auto industry does not see a need to have a separate individual program for automotive fluids, and indeed argues that Colorado should not view a separate program as *fait accompli* and rather should truly evaluate the utility of having a separate program. Among other concerns, the auto industry expects that a separate LPMA program will duplicate obligations and costs for the industry, which expects to have obligations related both to the packaging for those fluids and to other packaging, like for stored automotive parts sold online or over the counter.

¹ Auto Innovators represents the full automotive industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive automotive industry that supports U.S. economic and national security. Representing approximately 5 percent of the country's GDP, responsible for supporting nearly 10 million jobs, and driving \$1 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector. www.autosinnovate.org.

² <https://cdphe.colorado.gov/hm/epr-program>.

Auto Innovators is also concerned about a few different elements of participating with LPMA. First, CDPHE’s website states that “[t]o register with LPMA and comply with the law, producers must return a signed copy of the Colorado Participation Agreement to memberservices@interchange360.com by July 1.”³ This seems an incredibly tight timeline considering that these comments are due to CDPHE on June 19. In addition, with respect to participating with LPMA, “[f]ees dating back to the start of the program will be due within 30 days of submission,” even if participants register with the program in 2025 or later.⁴ Auto Innovators does not agree that later-joining participants should be forced to help cover LPMA’s stand-up costs in this manner.

Finally, Auto Innovators raises a few issues with LPMA’s proposed Individual Program Plan. LPMA proposes to set a dues schedule applicable to Colorado Producers based on a metric that is cents per gallon.⁵ Auto Innovators does not agree with this metric system, as it does not truly represent the amount of plastic used to manufacture a container. Therefore, it does not take into account source reduction or other concerns, and does not incentivize the goal of plastics reduction. If Colorado decides to move forward with LPMA’s program, LPMA should reconsider the metric it is using for cost to actually represent the amounts of plastics in any given automotive liquids container. In addition, the Individual Program Plan states that it in future years will be open to expansion to “large commercial generators, industrial, institutional.”⁶ It is Auto Innovators’ understanding that some of those sorts of facilities and entities are beyond the scope of Colorado’s current statute.

Thank you for your consideration of our comments. Please reach out to me if you have any questions.

Sincerely,



Catherine Palin
Alliance for Automotive Innovation

³ <https://cdphe.colorado.gov/hm/epr-program>.

⁴ <https://cdphe.colorado.gov/hm/epr-program>.

⁵ LPMA Powered By Interchange 360, Individual Program Plan for Producer Responsibility at 14 (Amended Submission Apr. 15, 2025), available at <https://oitco.hylandcloud.com/cdphermipop/docpop/docpop.aspx>.

⁶ LPMA Powered By Interchange 360, Individual Program Plan for Producer Responsibility at 10 (Amended Submission Apr. 15, 2025), available at <https://oitco.hylandcloud.com/cdphermipop/docpop/docpop.aspx>.