2013 Triennial Mercury-added Product Notifications Overdue

The deadline for companies to file their 2013 Mercury-Added Product Triennial Notifications was April 15, 2014. Most mercury-added product notifiers have submitted their 2013 Triennial forms. However, some have not yet filed and are now considered to be out-of-compliance. During the next few weeks, IMERC staff will be reaching out to these non-compliers in an effort to bring them into compliance. Failure to comply with the requirements may result in non-notifiers being referred for enforcement.

To ensure continued compliance, companies should file their 2013 Triennial notification forms through the IMERC e-filing system as soon as possible.

Notification through the e-filing system enables firms to comply with the Mercury-added Product Notification requirements of Connecticut, Louisiana, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Reporting is required for any company that sold or distributed mercury-added products into the states listed above during calendar year 2013. Helpful documents, including links to a User Guide and an online video demonstration are available at: www.newmoa.org/prevention/mercury/imerc/efiling.cfm.

For additional assistance, contact Guangyu Yang at (617) 367-8558 x307, or gyang@newmoa.org.

Please note: due to the large number of submissions expected for this reporting period, it may take IMERC’s members several months to review and approve your company’s report.

Labeling Requirements for Mercury-Added Products

The states of Connecticut, Louisiana, Maine, Massachusetts, Minnesota, New York, Rhode Island, Vermont, and Washington prohibit the sale of mercury-added products unless they have an approved label. These products and their packaging must have a visible and durable label that indicates that it contains mercury and should be managed or disposed of properly. Guidelines for “Standard Labeling” requirements are available at: www.newmoa.org/prevention/mercury/imerc/labelinginfo.cfm.

Some companies have requested approval for "Alternative Labels" for use on certain products that they feel cannot meet the standard labeling requirements. However, many of these have recently become expired. IMERC staff will be following-up with companies that are using an expired alternative label to request that they submit a renewal application or conform to the standard labeling requirements. IMERC’s members will review these proposals and make a decision on a case-by-case basis.

Mercury-Added Product Phase-Outs & Bans

Since the last triennial reporting cycle in 2010, additional mercury-added product categories have been banned from sale in some or all of the IMERC states. Affected products include: button-cell batteries, sphygmomanometers, thermometers, thermostats, and switches and relays. More information about which products are subject to these bans and in which states is

If your company's product(s) falls within one of the categories covered by the states' sales phase-out requirements and you want to continue to sell it/them in the applicable states, you may apply for an administrative exemption by submitting a Mercury-Added Product Phase-out Exemption Application Form to IMERC.

IMERC staff will be following-up with companies whose exemptions have recently expired or are now subject to additional phase-outs to request that they submit a renewal application.

**Update Company Contact Information**

If you are receiving this *Alert* in error or if you need to update or add additional company contacts, please contact IMERC Staff at imerc@newmoa.org or (617) 367-8558.