



Oregon Recycling Modernization Act Producer Responsibility Organization Program Plan Application Form 2025-2027 Program Plan Period

Prospective PRO Contact Information:

Name of organization: Circular Action Alliance Oregon, LLC	
Address: Care of Circular Action Alliance 20 F Street NW, Suite 700 Washington, DC 20001	Phone: 1-833-424-7285
	Website: www.circularaction.org
Authorized representative: Jeff Fielkow	Title: Manager
Address of authorized representative (if different from above): n/a	
Email of authorized representative: info@circularaction.org	

Prospective PRO Qualifications:

Is the organization a 501(c)3 nonprofit legally operating in Oregon? ☒ Yes ☐ No Corroborating documents appended (check all that have been provided): ☒ the organization's articles of incorporation ☒ 501(c)3 letter of determination ☒ proof of registration with the Oregon Department of Justice as a charitable organization ☒ proof of registration with the Oregon Secretary of State as a foreign corporation operating in Oregon (if applicable)
Are the organization's producer members likely to comprise at least 10% of Oregon's market share? ☒ Yes ☐ No Indicate corroborating information provided:
Has the payment of the program plan review fee been remitted to the department? ☒ Yes ☐ No

Program Information:

Submission Type: ☐ Program Plan ☒ Program Plan Amendment

Program name: Oregon Program Plan	Date of submission: August 13, 2025
Executive summary (describing the program plan or program plan amendment in one paragraph): This program plan amendment revamps the “Ensuring Responsible End Markets” subsection of the plan, detailing a comprehensive process for responsible end market verification. This amendment also includes an updated description of Figure 11 in the Financing section of the plan, and it provides the finalized producer fee schedule in Appendix G (a confidential appendix available only to DEQ).	

Certification and Attestation:

I/we hereby declare under penalty of false swearing (Oregon Revised Statute 162.075 and ORS 162.085) that the above information and all the statements, documents and attachments submitted with this plan are true and correct.	
Signed: 	
Printed name: <u>Jeff Fielkow</u>	
Date: <u>August 13, 2025</u>	

Instructions:

A prospective producer responsibility organization seeking to operate a producer responsibility program in Oregon from the Recycling Modernization Act program start date of July 1, 2025, must submit an initial program plan by March 31, 2024, as a searchable electronic file to RethinkRecycling@deq.oregon.gov. Prior to submitting its plan, the prospective PRO should request by email to the same address an invoice for the plan review fee (proposed in draft rule at \$150,000) and then pay the fee. The application will not be considered complete until the fee is paid. Timelines and protocols for department review of program plans are laid out at ORS 459A.878.

If a prospective PRO wishes to apply a claim of proprietary or confidential information to information within a program plan submission, it should not include the confidential information in the body of the submission email. The information should be attached as a separate document labeled as “Confidential.” The inclusion of a confidential file should be noted in the subject line and body of the email. Program plans submitted to the department are public documents per ORS 459A.878(2), and as such will not be reviewed if submitted under a blanket claim of confidentiality.

Per ORS 459A.875(2), the program plan must describe how the PRO will manage and administer a producer responsibility program to meet the organization’s obligations under ORS 459A.860 to 459A.975. The prospective PRO should familiarize itself with all applicable content requirements under statute and rule and ensure that the plan submission includes all the required information. The Recycling Modernization Act can be found in ORS 459A.860 to 459A.975, with related rules to be added to Oregon Administrative Rules, Chapter 340 in 2023-2024. Prior to finalization of program rules, prospective PROs may use proposed rules to guide advance drafting of their program plans.

The Internal Management Directive “Oregon Recycling Modernization Act PRO Program Plans” will provide guidance to department staff when reviewing PRO program plans and periodic reporting. The document is currently in draft format and may serve as a helpful reference for prospective PROs when preparing program plans.

Pages 1-2 of this application document with all fields completed should appear as the first pages of the program plan submission. In addition to providing contact information, an executive summary of the plan, and signed certification of the veracity of the plan’s content, the prospective PRO should indicate in the application its status with respect to three requirements for serving as a PRO in Oregon’s system: nonprofit 501(c)3 status, 10% minimum market share, and payment of the plan review fee at the time of submitting the program plan.

The recommended format for a program plan submission for the subsequent pages of the program plan is as follows:

1. Table of contents
2. Prospective PRO description
3. Goals of the program
4. Operations plan
 - a. Collection and recycling of
 - i. the Uniform Statewide Collection List
 - ii. the PRO Recycling Acceptance List
 - iii. Specifically Identified Materials
 - b. Fulfillment of other PRO obligations
 - i. Ensuring responsible end markets
 - ii. Upholding Oregon’s materials management hierarchy
 - iii. Achievement of statewide plastic recycling goals
 - c. Education and outreach
 - d. Interim coordination/Start-up plans
5. Financing
 - a. Membership fee structure / base fee rates
 - b. Graduated fee algorithm
 - c. Adequacy of financing
 - d. Methods for transportation funding and reimbursements
 - e. Methods for local government funding and reimbursement
 - f. Other funding methods
6. Measuring program performance
7. PRO Management
8. Communications
9. Multi-PRO coordination
10. Dispute resolution mechanism
11. Closure plan
12. Certification and attestation

Appendices:

- A. Definitions
- B. List of member producers
- C. Implementation timelines
- D. Graphic/tabular representation of program performance metrics
- E. Itemized budgets by program year

F. List of existing depots that will be contracted with

Any questions regarding this form and submission of producer responsibility program plans may be addressed to Nicole Portley, PRO Program Plan Lead, at nicole.portley@deq.oregon.gov.

Translation or other formats:

[Español](#) | [한국어](#) | [繁體中文](#) | [Русский](#) | [Tiếng Việt](#) | [العربية](#)

800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

Non-discrimination statement:

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August 13, 2025

Nicole Portley
PRO Program Plan Lead
Department of Environmental Quality Portland Administrative Office
700 NE Multnomah Street, Suite 600,
Portland, Oregon, 97232-4100

Dear Ms. Portley,

Circular Action Alliance Oregon (CAA) is pleased to submit the second plan amendment referenced in the approved program plan. CAA is committed to advancing the Responsible End Market (REM) principles, working with the recycling industry to create meaningful change and aligning industry practices around new regulatory goals.

In the approved program plan, CAA committed to undertaking broad consultation with the industry on the REMs requirements. As stated on page 158 of the current approved program plan:

[I]t is CAA's intention to consult with the industry to validate the applicability and the practicality of the proposed REM Verification Approach. As the REM concept remains new within the recycling end market entities, it is important to consider a phasing approach to drive toward continual improvement.

Therefore, during the first two quarters of 2025, CAA will launch a series of consultations with the industry, with the support of the different trade associations. CAA will also field test the approach with volunteers' end market entities.

Finally, CAA will consult with other PROs and third-party certification schemes to compare verification criteria. Informed by the results of that peer-reviewed process, CAA will update the verification approach, and will also consider how to add or edit criteria, such as energy use and GHG emissions, as proposed by DEQ.

The plan amendment reflects a practical approach to achieving the REM goals while overcoming some of the risks and uncertainties expressed by the industry. Appendix A to the cover letter details how the new approach complies with the REM requirements set out in the rules.



During the development of this amendment, CAA conducted more than 200 hours of consultation with trade associations, recyclers, and brokers, leading five webinars across four trade associations, and translating REMs information into four different languages. As a result of this extensive consultation, CAA is proposing a new Responsible End Markets Section for the plan and has developed the REM background document (Appendix B to the cover letter), which is submitted as a companion document to the plan amendment, further detailing industry support for REM principles and concerns about implementation.

As it is a new concept, it is clear to CAA that the industry is willing to demonstrate alignment with the REM principles, in a manner that avoids duplication of effort and preserves the confidentiality of sensitive information. Appendix C to the cover letter details how CAA intends to disclose information received as part of the process.

This plan amendment also contains two additional plan updates, including:

- A clarifying comment on the Bonus B example presented in Figure 9, which is based on a scenario where the producer will report each component in their packaging separately. There will be alternate scenarios under which producers may not be required to report all components separately.
- Submission of the final 2025 base fee schedule as an amendment to Appendix G, which is a confidential submission to DEQ.

With this submission, the program, with the requested change and granted variances, will operate in compliance with all applicable laws, regulations, and other legal requirements.

CAA looks forward to working with DEQ, the Recycling Council, and the public in reviewing the plan amendment to build effective change management strategies and long-lasting systems to achieve the REM principles as defined in statute.

Sincerely,



Jeffrey Fielkow
CEO, Circular Action Alliance

Cc: Shane Buckingham – CAA Chief of Staff
Kim Holmes – CAA Executive Director – Oregon



info@circularaction.org



www.circularactionalliance.org

Cover Letter Appendix A:

Alignment with Oregon Rules on REMs

The table below has been developed by CAA to clearly outline how each element of Oregon rulemaking pertaining to responsible end markets is addressed in CAA's proposed approach to REM verification.

Regulation	Requirement	CAA Plan Approach
OAR 340-090-0670 (2)(a)(A) to (E)	(2) Standard for responsible end markets (a) For an end market to be a responsible end market, all entities that receive material collected for recycling in Oregon downstream of the commingled recycling processing facility or producer responsibility organization collection point (or post-collection in a supply chain without either facility) must meet the responsible standard, including: (A) The end market(s). (B) All entities in the supply chain leading to the end market, including brokers and shipping companies that take legal or physical possession of materials. (C) Other locations where material disposition occurs (including landfills and incineration facilities). (D) All entities along pathways leading to locations where material disposition occurs (including reload facilities). (E) Entities that produce and use co-products of non-mechanical recycling (including fuels and waxes).	All entities are accounted for in CAA program plan amendment with the exception of: - U.S. and Canada disposal sites, for which a variance has been requested pursuant to OAR 340-090-0670(3)(i). - Non-mechanical recyclers, as CAA doesn't anticipate materials will be sent to non-mechanical recyclers.
OAR 340-090-0670 (2)(b)(A)	(b) The entities named in section (2)(a)(A)-(E) of this rule must meet the following standards:	CAA already requires end market entities to provide their permits and other legal obligations as part of the

	(A) Compliant. Meaning the entity follows its own local, state, and national laws (including relevant environmental, labor, and public health laws) and treaty obligations, and is registered and permitted as required by local, state, and national authorities.	screening assessment (self-attestation) as described in the approved program plan. CAA is not proposing to change that process in the amendment. Further, a verification body engaged by CAA will support end market entities to voluntarily disclose information demonstrating alignment with the REM principles. The amendment provides guidelines that include how to demonstrate legal and environmental compliance. The verification body will verify, among other things, the authenticity of the information provided and the relevant laws and requirements and check compliance. The verification body could recommend an on-site visit, for instance where a current certification with an on-site audit component is not available and information needs to be corroborated in the field. CAA will consider performing an on-site visit in the interim period until the formal standard is developed.
OAR 340-090-0670 (2)(b)(B)	(b) The entities named in section (2)(a)(A)-(E) of this rule must meet the following standards: [...] (B) Transparent. Meaning the entity is willing to be named and audited, provides chain of custody documentation tracking materials (originating in Oregon) to disposition, maintains record keeping relevant to chain of custody and material disposition in accordance with ORS 459A.962(7),	A verification body engaged by CAA will support end market entities to voluntarily disclose information demonstrating alignment with the REM principles. The amendment provides guidelines that include information to track materials and records required information. The verification body will verify, among other things,

	and promptly documents within the chain of custody any penalties, violations or regulatory orders received.	the authenticity of the information provided.
OAR 340-090-0670 (2)(b)(C)	(b) The entities named in section (2)(a)(A)-(E) of this rule must meet the following standards: [...] (C) Environmentally-sound. Meaning the entity is willing to be audited and monitored for outdoor air, water and land emissions and disposal; stores and manages waste and recyclables in a way that avoids release into the environment; and manages inputs sustainably. This includes demonstrating adequate emergency response and environmental health, safety, and management plans.	CAA already requires end market entities to provide their permits and other legal obligations as part of the screening assessment (self-attestation) as described in the approved program plan. CAA is not proposing to change that process in the amendment. This assessment includes environmental permits delivered by local authorities and other environmental obligations. It also requests the end market to provide certifications that could demonstrate compliance to operating in an environmentally-sound manner. CAA has benchmarked certifications that could be used by end markets. Further, a verification body engaged by CAA will support end market entities to voluntarily disclose information demonstrating alignment with the REM principles. The amendment provides guidelines that include how to demonstrate compliance with this requirement. The verification body will verify, among others, the authenticity of the information provided
OAR 340-090-0670 (2)(b)(D) AND OAR 340-090-0670 (2)(c)	b) The entities named in section (2)(a)(A)-(E) of this rule must meet the following standards: [...]	The amendment requests a variance pursuant to OAR 340-090-0670(3)(i) to be applied for this requirement. Consultation with the

	(D) Achieving adequate recycling yields. Meaning the recycling supply chain recycles or causes to be recycled at least 60 percent of each material listed in the recycling acceptance lists if applicable, consisting of the uniform statewide collection list developed pursuant to OAR 340-090-0630(4) and ORS 459A.914(4)(b), the producer responsibility organization recycling acceptance list as described in OAR 340-090-0630(3), and the list of specifically identified materials as promulgated and maintained by DEQ pursuant to ORS 459A.917 even if multiple materials are mixed together, with the remaining material managed in a responsible manner and in alignment with Oregon's hierarchy of materials management pursuant to ORS 459.015. (i) For shredded paper processed into high-grade office paper and cartons processed into tissue, achieving adequate recycling yields means the recycling supply chain recycles or causes to be recycled at least 50 percent of each material. (c) Recycling yield, as stated in Section 2(b)(D) of this rule, will be determined as follows: (A) For all materials except for composite cans made of paper and steel, the recycling yield is the amount of the material that was successfully processed and recycled by the end market divided by the amount of the material that entered the first entity of the recycling supply chain downstream of the commingled recycling processing facility or producer responsibility organization collection point (or	industry has shown that yield information is considered proprietary, and therefore confidential, since it's part of an end market entity's strategic business model to achieve the highest rate of return in a competitive open market. The amendment also presents an alternative approach to ensure minority components of a bale are not voluntarily sent for disposal by end market entities.
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	post-collection in a supply chain without either facility). (B) For composite cans made of paper and steel, the recycling yield is the amount of the metal fraction or paper fraction of the material that was successfully processed by the end market, divided by the amount of that fraction that entered the recycling supply chain initially. If the yield of either the metal fraction or of the paper fraction exceeds 60 percent, the composite material is achieving adequate yields. (C) Calculation of recycling yield shall exclude moisture, if practical to do so, and any contaminants that are included in the bale of received material, as well as incidental materials that are adhered to the received material but are not targeted for recovery, such as tape and staples on corrugated boxes, or inks and labels on most types of packages. In the event that DEQ sets limits for acceptable contamination and moisture in outbound bales through the commingled recycling processing facility permit program per ORS 459A.955(3), reductions to the yield calculation denominator to account for contamination and/or moisture cannot exceed either limit. (D) For the purpose of determining whether at least 60 percent of each material is recycled, yield for individual materials that are recycled separately from other materials must be evaluated on the basis of those individual materials. For materials that are mixed together (such as a bale of mixed paper or mixed plastic) and are being used by the commingled recycling processing facility to achieve capture rates pursuant to	
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	OAR 340-096-0300(3)(a)(B), yield must be evaluated as follows: (i) Yield for items listed in OAR 340-090-0630(2)(d) must be evaluated separately from other materials. (ii) Yield for composite cans made of paper and steel must be evaluated separately from other materials if this material is added to the Uniform Statewide Collection List and recycled at a paper mill. (iii) Yield for items listed in OAR 340-090-0630(2)(j) must be evaluated separately for materials identified in each subparagraph of paragraphs (A) through (D). (iv) Yield for items listed in OAR 340-090-0630(3)(a) through (d), (f), (g) and (j) must be evaluated separately from other materials. (v) Yield must be evaluated separately for any materials proposed by a producer responsibility organization for addition to the uniform statewide collection list pursuant to ORS 459A.914(4)(b) or counted toward the statewide plastic recycling goal in a producer responsibility program plan or plan amendment and approved by DEQ under ORS 459A.878, if required by DEQ. (vi) Yield for other materials that are marketed mixed together may be evaluated in total. (E) Yield, including separate yields for materials mixed together and indicated in subparagraphs (i) through (iv) of paragraph (D) may be estimated and self-attested to by entities in the recycling supply chain, with methodological justification provided.	
OAR 340-090-0670(3)(a)(A)	(3) Implementation of the responsibility standard by a	Screening assessment remains unchanged compared to the approved

	producer responsibility organization. (a) A producer responsibility organization must ensure that materials collected for recycling go to responsible end markets as detailed in ORS 459A.896(2) and this rule by completing the following two steps successively: (A) First, a producer responsibility organization must, using a screening assessment form provided by DEQ, receive and corroborate written verification from each end market and other downstream entity that it meets the standards set forth in Section 2 of this rule.	program plan. CAA already requires documentation to be submitted with the DEQ screening form that demonstrates performance to 340-090-0670(2)(b). If an end market entity is missing documentation, CAA will work with the end market to complete the document submission.
OAR 340-090-0670(3)(a)(B)	(3) Implementation of the responsibility standard by a producer responsibility organization. (a) A producer responsibility organization must ensure that materials collected for recycling go to responsible end markets as detailed in ORS 459A.896(2) and this rule by completing the following two steps successively: (B) Next a producer responsibility organization must conduct a more detailed assessment of whether each end market and other downstream entity meets the responsible standard provided by section 2 of this rule, either through a verification by the producer responsibility organization as provided by subsection (g) of this rule or through third-party certification from an Environmental Quality Commission-approved program.	A verification body engaged by CAA will support end market entities to voluntarily disclose information demonstrating alignment with the REM principles. The amendment provides guidelines that include how to demonstrate compliance to the different requirements. The verification body will verify, among other things, the authenticity of the information provided. The amendment also presents the commitment of CAA to start developing an official REM verification standard with the support of an ANSI-accredited standard development organization.
OAR 340-090-0670(3)(b) to (d)	(b) For materials described under ORS 459A.869(7)(a) and any other materials collected by a producer responsibility organization (including collected through contract with a producer	Screening assessment remains unchanged compared to the program plan. CAA already requires documentation to be submitted with the DEQ

	responsibility organization), a producer responsibility organization must complete the step provided by paragraph (a)(A) by the start date of the program (as defined in OAR 340-090-0720), or prior to sending materials to markets added after the start date of the program. For materials delivered to end markets for recycling on or before June 30, 2026, the step required under paragraph (a)(B) must be completed by July 1, 2027. For materials delivered to end markets for recycling after June 30, 2026, a producer responsibility organization must complete the step provided by paragraph (a)(B) within 12 months of first delivery to the end market. (c) For materials described under ORS 459A.869(7)(b) and any other materials not collected by the producer responsibility organization, a producer responsibility organization must complete the step provided by paragraph (a)(A) within six months of the program start date (as defined in OAR 340-090-0720), or prior to sending materials to markets added after the start date of the program. For materials delivered to end markets for recycling on or before June 30, 2026, the step provided by paragraph (a)(B) must be completed by July 1, 2027. For materials delivered to end markets for recycling after June 30, 2026, a producer responsibility organization must complete the step provided by paragraph (a)(B) within 12 months of first delivery to the end market.	screening form that demonstrates performance to 340-090-0670(2)(b). If an end market entity is missing documentation, CAA will work with the end market to complete the document submission. It is not CAA's intention to perform the detailed assessment before the screening assessment.
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	(d) If a producer responsibility organization completes the step provided by paragraph (a)(B) prior to and within the timeline of the step provided by paragraph (a)(A), the producer responsibility organization is not required to perform the step provided by paragraph (a)(A).	
OAR 340-090-0670(3)(e)	(e) Each end market and other downstream entity that receives material collected for recycling in Oregon requires only one screening assessment and an annually-audited verification by a producer responsibility organization or third-party certification from an Environmental Quality Commission-approved program. Commingled recycling processing facilities and producer responsibility organizations that send materials to the same end markets or other downstream entities may coordinate their market assessment efforts to avoid duplication of effort.	CAA is already leading engagement to obtain the screening assessment information in coordination with CRPFs. CAA is obtaining the self-attestation forms for PRO Recycling Acceptance List materials, and will support CRPFs where this support is requested. If a CRPF requests CAA's support in obtaining disposition data, CAA will attempt to obtain that information but will not assume the reporting responsibility of that information on the CRPFs behalf.
OAR 340-090-0670(3)(f)	(f) DEQ may approve temporary variance to the timelines required by sections (3)(b) and (3)(c) in a producer responsibility program plan.	Not applicable. CAA does not request a variance under this requirement.
OAR 340-090-0670(3)(g)(A)	(g) The producer responsibility verification required by paragraph (a)(B) of this section must contain the following: (A) A description of how a producer responsibility organization determined that the indicated entity or entities (if final disposition occurred at multiple sites) was the end market;	CAA will engage a verification body to verify information provided by end markets during the screening assessment. This will include a verification of the end market entity type as defined in rules.
OAR 340-090-0670(3)(g)(B)	(g) The producer responsibility verification required by paragraph (a)(B) of this section must contain the following: [...]	CAA already requires end market entities to provide their permits and other legal obligations as part of the screening assessment (self-

	(B) A list of local, state and national laws and international treaties applicable to the entity as required by section 2(a)(A) of this rule;	attestation) as described in the approved program plan. CAA is not proposing to change that process in the amendment. Further, a verification body engaged by CAA will support end market entities to voluntarily disclose information demonstrating alignment with the REM principles. The amendment provides guidelines that include how to demonstrate legal and environmental compliance. The verification body will verify, among other things, the authenticity of the information provided.
OAR 340-090-0670(3)(g)(C)	(g) The producer responsibility verification required by paragraph (a)(B) of this section must contain the following: [...] (C) Documentation that the end market and all other downstream entities meet all requirements of section 2 of this rule, with the following exceptions; (i) entities that take only legal and not physical possession of materials do not need to be verified for yield or environmental soundness; (ii) entities that take physical possession of materials but do not cause the materials in a bale to undergo separation or processing do not need to be verified for yield; and (iii) landfills and incinerators do not need to be verified for yield; tonnages received by these entities should rather be treated as yield loss at end markets.	The amendment provides guidelines on how to demonstrate alignment with the requirements of section 2 of the rule. The verification body to be engaged by CAA will review the information and determine if gaps exist.

OAR 340-090-0670(3)(g)(D)	(g) The producer responsibility verification required by paragraph (a)(B) of this section must contain the following: [...] (D) Documentation of any noncompliance with the requirements section 2 of this rule.	The amendment provides guidelines on how to demonstrate alignment with the requirements of section 2 of the rule. The verification body engaged by CAA will review the information and determine if gaps exist. Noncompliance of an end market entity's legal obligation will be documented by the verification body as part of the process: the guidelines for demonstrating alignment in the amendment state that entities should maintain compliance with laws and regulations. As the verification body will conduct a review of the information obtained to indicate which elements of REM requirements have been demonstrated, the verification body could identify if noncompliance exists. The verification body will provide the end market with recommendations on how alignment with REM principles could be further demonstrated.
OAR 340-090-0670(3)(g)(E)	(g) The producer responsibility verification required by paragraph (a)(B) of this section must contain the following: [...] (E) Documentation of the qualification of the auditor required by section 4 of this rule; and	CAA will select the verification body and its auditors based on criteria explained in the amendment.
OAR 340-090-0670(3)(g)(F)	(g) The producer responsibility verification required by paragraph (a)(B) of this section must contain the following: [...]	Not applicable. Certification can't be delivered until a standard is developed.

	(F) Certification and signature from the auditor required by section 4 of this rule that the end market meets the requirements of section 2 of this rule.	
OAR 340-090-0670(3)(h)	(h) The detailed verifications required by paragraph (a)(B) of this rule and certification audits required by section 4 of this rule must occur on an annual basis, with the first renewal verification or certification audits occurring within a year of initial certification.	CAA will engage a verification body that will perform verification annually.
OAR 340-090-0670(3)(i)	(i) DEQ may approve temporary variance to the required components of the detailed verifications required by paragraph (a)(B) of this rule.	Five variances are proposed under this requirement. Those variances remain the same as the one presented in the program plan.
OAR 340-090-0670(4)	(4) Auditing. To demonstrate compliance with the requirement that materials collected for recycling go to responsible end markets as required by ORS 459A.896(2) and this rule, a producer responsibility organization must conduct auditing and provide audit results in annual reporting to DEQ. These audits must include results of random bale tracking to verify chain of custody and must demonstrate and certify that end markets meet the requirements of section 2 and 3 of this rule. For the purposes of enforcement, DEQ may conduct its own random bale tracking. If it is infeasible to conduct random bale tracking safely and without violation of other applicable regulations, a producer responsibility organization may submit a claim in its program plan or a plan amendment that it is infeasible to fulfill the obligation to conduct random bale tracking. The department will review and	Random bale tracking will not be required by DEQ in the first program plan period. CAA will work with a third party verification body to ensure sections 2 and 3 of this rule are demonstrated. However, a certification can't be delivered until a standard is being developed.

	evaluate the producer responsibility organization's claim, and if it accepts the claim, will grant variance to the producer responsibility organization with respect to the random bale tracking requirement.	
OAR 340-090-0670(5)(a) to (e)	(5) Definition of practicable. For purposes of ORS 459A.869(7) and ORS 459A.896(2), practicable actions that may be undertaken by a producer responsibility organization must be determined in accordance with this rule.	CAA will support end markets based on a strategy detailed in the amendment. This strategy remains the same as the one presented in the program plan.
OAR 340-090-0670(6)(a)	(6) Reporting. For all end markets and other downstream entities that receive materials for which it is responsible, per ORS 459A.887(6) producer responsibility organizations must report disposition to DEQ as follows: (a) Disposition reports shall consist of disposition data provided in a manner proscribed by DEQ, as well as all screening assessments, verification reports, and certification reports conducted in a given quarter.	CAA offers to assist with this assessment where there might be overlap with the end markets used for PRO materials to avoid duplication of effort. If a CRPF requests CAA's support in obtaining disposition data, CAA will attempt to obtain that information but will not assume the reporting responsibility of that information on the CRPFs behalf. CAA will provide obtained information for materials on the PRO Recycling Acceptance List.
OAR 340-090-0670(6)(b)	(6) Reporting. For all end markets and other downstream entities that receive materials for which it is responsible, per ORS 459A.887(6) producer responsibility organizations must report disposition to DEQ as follows: [...] (b) Disposition reports must be submitted to DEQ on a quarterly basis, with all reports other than the first report due no later than 45 days after the end of the end of each calendar quarter.	CAA offers to assist with this assessment where there might be overlap with the end markets used for PRO materials to avoid duplication of effort. If a CRPF requests CAA's support in obtaining disposition data, CAA will attempt to obtain that information but will not assume the reporting responsibility of that information on the CRPFs behalf. CAA will provide

	(A) The first disposition report is due December 31, 2025. (B) No disposition reporting is required for materials described in ORS 459A.869(7) that depart from a commingled recycling processing facility, a limited sort facility, or a producer responsibility organization collection point provided under ORS 459A.896(1) prior to July 1, 2025. (C) If a producer responsibility organization wishes to send materials to an entity listed in Paragraph (2)(a)(A) to (E) of this rule and for which no signed screening assessment is on file with DEQ, the signed screening assessment for the entity may be submitted to DEQ outside of the reporting schedule.	obtained information for materials on the PRO Recycling Acceptance List.
OAR 340-090-0670(6)(c)	(6) Reporting. For all end markets and other downstream entities that receive materials for which it is responsible, per ORS 459A.887(6) producer responsibility organizations must report disposition to DEQ as follows: [...] (c) Disposition data must: (A) Indicate entities listed in Subsection (2)(a) of this rule that took possession of material, including the business or person name, city, state, region, and country. The entities must be ordered sequentially along the pathway of disposition, with the end market positioned at the end; and (B) Indicate the amount of material received in tons by each entity during the quarter. (i) Disposition must be reported using the following reporting categories: [...]	CAA offers to assist with this assessment where there might be overlap with the end markets used for PRO materials to avoid duplication of effort. If a CRPF requests CAA's support in obtaining disposition data, CAA will attempt to obtain that information but will not assume the reporting responsibility of that information on the CRPFs behalf. CAA will provide obtained information for materials on the PRO Recycling Acceptance List.

	(ii) When reporting disposition for supply chains in which materials described in ORS 459A.869(7) and for which PROs must ensure flow to responsible end markets mix with non-obligated materials, such as material originating from another state, an accounting method that attributes outputs proportionally with inputs must be applied to attribute output volumes to Oregon. Examples of such methods are the controlled blending methodology and the mass balance rolling average percentage methodology as defined in ISO 22095: 2020, CHAIN OF CUSTODY – GENERAL TERMINOLOGY AND MODELS. (C) Contain comprehensive accounting for all destinations and tonnages described in paragraphs (c)(A) and (c)(B) of this rule. Such accounting may exclude individual destinations as follows:	
OAR 340-090-0670(7)	(7) Application of Oregon's Material Management Hierarchy. In cases of conflict between the elements of Oregon's material management hierarchy under ORS 459.015(2)(c)(C)(i) (preference for recycling pathways that displace more impactful materials) and ORS 459.015(2)(c)(C)(ii) (preference for recycling pathways that best preserve value and molecular structure), DEQ may identify the environmentally preferable option among pathways under consideration.	CAA will follow the Oregon's Material Management Hierarchy as described in the amendment. This remains the same as the approach presented in the program plan.

Cover Letter Appendix B:

REMs Background Document

Circular Action Alliance (CAA) fully supports the principles of Responsible End Markets (REMs) outlined in Oregon's Recycling Modernization Act (RMA). We are committed to seeing these standards successfully implemented across the state. Together with our partners, we are focused on preserving Oregon's strong and diverse recycling markets, helping them stay compliant, transparent, and resilient to ensure the long-term success of the RMA and the communities it serves.

The August 2025 program plan amendment contains numerous updates to the Responsible End Markets section. To provide context for these changes, Circular Action Alliance Oregon LLC (CAA Oregon) in this background document details the organization's market analysis and consultation process that end markets processing recyclables from Oregon will participate in under the RMA.

It's important to note that Oregon will be the first U.S. state to roll out a mandated REMs framework for recovered paper and packaging materials. As part of this process, CAA has strived to develop a REM verification process, in collaboration with DEQ and the participating end markets, that is transparent, trustworthy and aligned with existing recycling and manufacturing processes, meeting the spirit of the RMA statute.

CAA proposes a path forward for developing a REMs verification standard during the first program plan period that will accomplish the goals of both improving transparency and environmental outcomes for recyclables and strengthening reliable end markets for haulers and commingled recycling processing facilities (CRPFs) serving the Oregon market. CAA will strive to complete the independent standard creation process by the end of 2027, resulting in an audit protocol that will be suited for use in Oregon, California, Colorado and other states with REM requirements in their EPR laws. Through the development of an independent, third-party standard, Oregon can help lead other states to implement the principles that DEQ calls foundational to the RMA, and specifically responsible end markets for consumer packaging and paper products.

By thoughtfully and orderly phasing in the REMs framework, Oregon will continue its efforts to lead meaningful reform and change in the recycling industry.

Summary of Industry Consultation

In the approved program plan, CAA Oregon proposed a preliminary REM verification process, noting that more consultation with the recycling industry was needed before a final methodology could be developed. Since the submission of the Oregon program plan in December 2024, CAA has engaged in an extensive formal consultation process with the broader recycling industry, including both domestic and foreign markets and their trade associations. This process has initiated a dialogue of unprecedented scale around how to improve environmental outcomes for recycling and rebuild trust in the recycling system. The goal has been to develop a REM verification process that is efficient and

effective, built on requirements that are reasonable, transparent and harmonized with existing verification frameworks, and will be widely embraced by the industry to advance REM goals.

Over the span of five months, CAA interacted with more than 250 entities from across the recycling end market ecosystem. This engagement included the following activities:

- Five webinars with four trade associations, reaching a total of roughly 200 participants from 88 different entities.
- Translation of REMs materials into four languages to engage a global audience.
- Engagement with five paper trade associations in Southeast Asia.
- Meetings with nine certification/verification schemes (resulting in comparisons of CAA's approach vs. the approaches of other frameworks).
- Field tests of the verification process, conducted at a plastic recycling facility in Oregon, and audit preparation reviews, conducted at two paper mills in the Pacific Northwest (the audits were intended to ensure practicality to measure alignment with the proposed criteria).
- Creation of a REM Working Group, composed of 15 representatives from end markets in various sectors and representative trade associations (see list at the end of this section).
- Three REM Working Group meetings discussing key challenges identified during industry consultation (two more meetings scheduled for the second half of 2025).

These engagements aimed to educate participants of REM requirements, help prepare them for the initial stage of submitting self-attestations, identify practical modifications to the REM verification proposed in the program plan, and identify resourcing needs to better prepare markets for verification.

CAA has continued its work to obtain self-attestation forms from market entities currently receiving Oregon materials. In this self-attestation outreach process, CAA coordinated with nine processing facilities that will potentially be permitted CRPFs under the RMA.

Additionally, CAA has conducted individual meetings with more than 10 material brokers and more than 20 end market entities known to purchase recyclables from CRPFs and commercial entities across Oregon.

CAA also hired Moore & Associates, a consulting firm specializing in paper recycling research, to assess the export market against the REM requirements, and has engaged with organizations, such as the Association of Plastic Recyclers and CAA's founding members, to understand how the industry currently measures and manages the toxicity of covered products.

In aggregate, over 1,000 hours were spent by CAA and its subcontractors to validate the direction of the REMs strategy and gather feedback from the industry. This is on top of the extensive consultation with industry associations and field testing that has taken place.

The REM Working Group includes the following member companies and associations:

American Forest and Paper Association
Alterra 360
Aluminum Association
American Chemistry Council
Association of Plastic Recyclers
Denton Plastics
Georgia Pacific Industries
Glass Packaging Institute
GreenBlue
Knauf Insulation
Merlin Plastics
NORPAC
PNW Metals
Potential Industries
Radius Recycling
Recycled Materials Association
Smurfit Westrock

Consultation Key Findings

Recycling end markets have shared significant hesitation and concern with CAA regarding the current REM requirements.

End market entities contacted during the consultation process expressed specific concerns about the disclosure of details on yields from bales of recyclables they source. Through consultation, CAA uncovered the challenges with the accuracy of yield information, including:

- Entities may be disposing of more material than they are purchasing from Oregon, because Oregon-originating materials represent a small fraction of the overall material they are processing.
- Many processes, like paper and plastics recycling, use water, resulting in high moisture rates of the system out-throws. This is particularly true for paper and plastic recycling operations which often send heavy, wet residuals to landfills.

In addition to the disposal information, required to be disclosed by law and regulation, being an inaccurate reflection of true yield from the recycling process, businesses also expressed reservations about disclosing this information for the following reasons:

- Market representatives have noted that yield information is considered competitively sensitive business information, revealing operational efficiencies relative to all material they are processing, not just materials from Oregon and extending far beyond curbside-recyclable sourcing.

- Representatives stated that their operations largely surpass the 60% yield required under the RMA. The 60% yield threshold is far below industry standards in most cases, and not meaningful in terms of improving environmental outcomes. This point has been corroborated by numerous industry studies.

Other feedback highlighted that due to the very common practice of blending feedstock from a wide variety of sources, it's not possible to report the yield of a specific subset of bales delivered from Oregon to an end market. At the end market level, yield is measured on the overall recycling process, not specific sources. Because Oregon material represents less than 5% of the overall inbound tonnage at most end market entities, a yield calculation representative of Oregon performance is not a reasonable request at this point, nor is it a meaningful data point for improving the environmental outcomes of Oregon-originating materials.

Other concerns raised in the consultation process around the unprecedented level of testing, verification and disclosure required by current rules in Oregon included:

- Industry remains uncertain about DEQ's legal authority to require verification of current REM criteria under the RMA (e.g., reporting on the presence of chemicals that exceed the current regulatory framework and reporting on microplastic discharge in wastewater, which has no current standard of measurement and monitoring).
- Many of the compliance and environmental soundness requirements laid out in the RMA already exist in the regulatory frameworks overseen by local, state or U.S. government entities (e.g., health and safety, environmental impact measurement). The industry believes further validation of current operational compliance in these areas creates an undue and costly administrative burden – and might not be worth undertaking to continue to purchase Oregon materials, which, as stated earlier, are often a minority of the feedstock being secured by end markets.
- While there is broad consensus about the need for transparency in sharing chain of custody information for inbound materials originating from Oregon, reporting outbound data, which means disclosing customer lists and commercial information bound by NDAs and commercial agreements, would involve sensitive and competitive information. This is information that end markets are prepared to share under a formal third-party standards reporting system, but it is not information that end markets are willing to share exclusively for REMs reporting to a regulator. End market entities risk violating commercial agreements and existing customer relationships by offering this competitively sensitive information in the current REMs reporting format required by regulation.
- Verification beyond recyclers and extending to the point at which recyclables become clean feedstock for manufacturing, extending to converters (in the realms of glass and plastic used in food packaging or children's products) is also proving problematic for several reasons explained in the below subsections. The result of these concerns raised during this short consultation period may likely result in an unwillingness by end markets to continue purchasing of materials from Oregon, especially when tonnages sourced from the state represent a small share of a buyer's overall inbound volumes.

Findings from Export Markets

CAA is working with Moore & Associates on assessing how the export market will react and perform against the REM requirements as outlined in rules. The research includes:

- Gathering environmental protection laws and policy for the six primary Asian countries receiving U.S. exports of recovered fiber from the West Coast.
- Identifying REM mill compliance and areas of non-compliance risk for the top 10 individual mills in each country.
- Conducting outreach to the largest U.S. exporting companies and educate them on future REM requirements.

Through its initial research, Moore & Associates has assessed that around 11% of OCC and 36% of mixed paper generated from the state of Oregon is exported, predominantly into six Asian countries: Malaysia, Thailand, Indonesia, Vietnam, Taiwan and South Korea. The following initial findings could be made:

- Environmental laws and regulations in all focus Southeast Asian countries are in place and are comprehensive:
 - Taiwan and South Korea have the most well-established environmental laws and regulations. Each country has their own individual laws, regulations, and permit requirements but basically cover the same environmental subjects:
 - General Environmental Impact
 - Air Pollution
 - Water Pollution
 - GHG Emissions
 - Toxic Substances / Chemical
 - Solid/Hazardous Waste, Soil & Groundwater
- Those laws and regulations are mainly enforced through operating permits or imported volume quota delivery.
- Paper mills built in the past 10 years in Southeast Asia have the best technology, stock preparation, and cleaning systems.
- The volumes of Oregon materials being purchased by mills in Vietnam, Thailand, Malaysia, Indonesia, Taiwan, and South Korea represent an overall low volume of material being processed in total. While there is no reason to believe these end markets are not operationally aligned with REMs principles, Oregon is placing a new verification burden on these facilities, which may cause them to cease buying Oregon materials, which are easily replaceable with volumes from other regions.
- The disposition reporting requirement is a concern that has been raised among the paper trade associations, not because these markets are not compliant, but they are not willing to disclose what is sensitive commercial information, including yield and disposition data.

Based on the learnings from consultation, CAA believes:

- Many of the markets currently receiving materials from Oregon are operating in a sound manner and express willingness to demonstrate that.
- Volumes of recyclable materials generated in Oregon are not sufficient to move the industry to take on a significant level of new verification and regulatory compliance.
- End markets seem willing to disclose operational information in a formal audit undertaken as part of a third-party developed standard, but they are not willing to disclose this information in a direct regulatory oversight reporting situation, which risks disclosure of sensitive commercial information.

These learnings point to the risks and market instability that could be created if current regulation is implemented. But they also underscore the opportunity that could be created for driving meaningful change if the REM requirements could be adapted into a formal standard for broad use and adoption as more states seek to implement EPR for packaging.

Plastics-Specific Issues: Verification Beyond the Recycler

Oregon's EPR program is unique in that it currently requires REM verification beyond the plastic recycler, through to the plastic converter, in the instances of the production of food-contact packaging and children's toys. DEQ indicates that the need for stringent verification beyond the plastics recycler is to control plastic toxicity migration in food or children's products. Specific to this issue in the outreach to end markets, CAA has heard the following feedback:

- Placing the verification at the converter level requires recyclers to provide their list of customers, which would violate existing non-disclosure agreements.
- Converters use a blend of both recycled and virgin materials, meaning testing for certain chemicals cannot be traced to a certain source.
- Recyclers, converters and producers all have processes in place to control any toxics that could migrate to the product.

For both food-contact packaging and children's products, there are regulatory frameworks in place that monitor and prohibit the inclusion of chemicals deemed inappropriate for these applications.

Due to strict regulatory frameworks and the functionality aspect of these applications, a producer cannot choose to use recycled content that would compromise a product's quality or safety. CAA, with the support of the Association of Plastic Recyclers, has documented how the industry ensures this safety across the value chain.

- First, the recyclers control their supply so that only food packaging is used to make new food packaging.
- Then recyclers use a decontamination process and proceed to challenge tests to measure the decontamination efficiency. Reclaimers are required to test for at least one of the chemicals in each of these categories:

Volatile Polar	Volatile Non-Polar	Heavy Metal	Non-Volatile Polar	Non-Volatile Non-Polar
----------------	--------------------	-------------	--------------------	------------------------

Chloroform Chlorobenzene 1,1,1- Trichloroethane Diethyl ketone	Toluene	Copper(II) 2- ethylhexanoate	BenzophenoneMe thyl salicylate	Tetracosane Lindane Methyl stearate Phenylcyclohexan e 1-Phenyldecane 2,4,6- Trichloroanisole
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- The U.S. FDA reviews the methods for source control, decontamination and challenge tests as part of the process of granting a letter of non-objection (LNO). Although not mandatory by law, that letter is always required from food packaging and even children's products converters.
- Finally, producers require their suppliers to undertake testing to validate the quality of material and that it continues to meet the requirements of the LNO.

To sum up this discussion, the toxicity level in recycled plastic material used in the production of food-contact packaging and children's toys is already measured and controlled at various entities along the value chain through longstanding and proven federal regulation.

Summary of Audit Processes Feedback

Field tests

CAA Oregon undertook the ambitious effort to field-test the proposed REM Verification approach presented in the program plan with three recyclers (paper and plastics recyclers) in the short period between the December 2024 program plan submission and the drafting of this plan amendment. Given the steep education required on REMs, and the legal concerns raised in participation in the otherwise untested verification protocol, CAA Oregon was only able to complete one field test (it should be noted that the average time a facility needs to prepare for a formal third-party audit is no less than 6 months).

The preliminary REM Verification approach was field-tested at one plastic recycling facility in Oregon. The verification body, Verico, performed the audit, including on-site validation and review of several documents from the plastic recycler. The audit yielded the following key takeaways from the process itself:

- The approach developed could be streamlined, relying more on current compliance and prior audit results to demonstrate operational alignment with the REM principles.
- In the absence of a formal standard, it will be difficult to scale auditing capacity to achieve the goal of widely auditing current and prospective new end markets.
- The measurement of yield for Oregon materials specifically is impractical. The general yield information is not informative, and calculation details should be provided, especially for specifically identified materials such as nursery pots.

The Recycled Materials Standard (RMS) team, which was hired to oversee the field-testing process also concluded that:

- The biggest hurdle is resistance from industry participants (mostly end markets) regarding the nature of the public disclosure to DEQ and the potential use of commercially sensitive information.
- For many domestic end markets, the current regulatory and environmental permitting process covers many of the compliance and environmentally sound requirements.
 - The opportunity for REM verification lies in pulling necessary information out of existing permit documents to identify specific points defined in the rulemaking.
 - Additionally, end markets with less than 50 employees will find the adaptation and preparation necessary for the audit process burdensome, when they are likely operating responsibly as a nature of the permit requirements. Special consideration or adaptation should be considered for smaller end markets.
- Full REM verification audits will be beneficial where permitting may not be as standardized or up to similar expectations as those seen domestically.
- The lack of direct incentives for REM verification frustrated end markets participating in the trial. They had concerns that being verified as responsible would not necessarily guarantee covered materials, especially those collected outside of CRPFs, would be directed toward them and away from non-verified REMs. They had similar concerns that their products would not be given additional support in the marketplace (in comparison to non-participating end markets).

Comparing with other frameworks

CAA's work on the REMs landscape has shown that current verification frameworks used by two producer responsibility organizations in other jurisdictions – Recycle BC in Canada and Valipac in Belgium – satisfy some of the REM verification needs under the RMA.

Recycle BC's system demonstrates general alignment with the system proposed by CAA Oregon in the approach to verify compliance with laws and regulations. It also covers some (but not all) criteria that have been initially developed for health and safety for environmental soundness.

Valipac's approach, meanwhile, aligns with that of CAA Oregon when it comes to verifying compliance with laws, regulations, health and safety. It covers some (but not all) criteria initially developed for environmental soundness.

While these schemes do not cover all of the criteria DEQ is requesting to see in the REMs verification, these are standards that long-standing EPR programs have come to rely on to increase transparency and confidence in the recycling system.

In addition to existing EPR standards, CAA also reviewed and compared its preliminary REM verification process to frameworks used by the following voluntary certifications: Aluminum Stewardship Initiative (ASI), Association of Plastic Recyclers PCR Certification (APR), Forest Stewardship Council (FSC), International Sustainability & Carbon Certification+ (ISCC+), Recycled

Material Standard (RMS) REM Certification, Recycling Industry Operating Standard (RIOS), and Sedex Members Ethical Trade Audit (SMETA).

In review, most certifications cover some or all of the preliminary REM verification as prescribed by regulation, with the exception of the yield requirement criteria. After consultation with these other certification schemes, many expressed willingness to adapt their certifications to expand and include additional REM criteria to be more inclusive of the principles of transparency, environmental soundness and demonstration of compliance.

As a whole, the market analysis and REM consultation work undertaken by CAA has shown that market entities have a clear intention to demonstrate operational alignment with the REM principles. A phased-in approach is going to be required to develop a standard that can be fully tested and embraced by end markets to drive the change that Oregon intends in increased transparency and better environmental outcomes for recyclables. As has been successfully demonstrated in other sectors, such as electronics recycling, proper standards development and industry education takes time but can ultimately prove to be extremely impactful.

Summary of Risks in REMs Implementation

Without taking a phased-in approach to REMs verification, there is a significant risk of market disruption with the implementation of the REM verification without a proper standard. As noted, Oregon is at risk of losing viable and otherwise responsible end markets as buyers of recyclables. This includes both foreign and domestic markets, potentially creating a market disruption greater than what was experienced in 2018 when Oregon felt the effects of National Sword.

The domestic markets that are currently processing small volumes of recyclables originating from Oregon have expressed they will reconsider the balance of additional administrative costs of the REMs versus the benefits of continuing to source materials from Oregon. For example, non-canned aluminum products represent such limited quantity compared to what the aluminum mills are processing on a daily basis that CAA Oregon may not be able to find a willing recycler for these materials.

Finally, when markets experience macro-economic pressures, or instability, recyclers tend to reduce their capacities, meaning the added quality of Oregon materials (driven by RMA requirements on CRPFs to improve commodity bales) may not actually prove to be a competitive advantage.

Given all of the unknowns of how the market will respond to REMs requirements – and the major potential disruptions for the Oregon recycling system – CAA Oregon's program plan amendment presents a path forward that will both engage and prepare end markets for transition and establish a standard that can be broadly adopted and embraced by industry – achieving the RMA's goals of improving transparency and sound environmental management.

Cover Letter Appendix C:

CAA's Internal Policy on REMs Disclosure

Process

As part of the REM verification process, CAA will collect the following information:

- Name and location of end markets or intermediate supply chain entities that MRFs/CRPFs are doing business with individually.
- Tonnage of commodities sent from each MRF/CRPF to each end market or intermediate supply chain entity.
- Self-attestation forms and related documents (e.g. permits) from end market and intermediate supply chain entities.
- Chain of custody tonnage information (inbound and/or outbound) from end markets and intermediate supply chain entities, including disposition tonnage data.
- Information and documentation related to demonstrating compliance with REM requirements from end market and intermediate supply chain entities.

CAA will share relevant end market information with:

- State authorities, as defined by law/rules:
 - Oregon, based on, but not limited to, OAR 340-090-0710 and OAR 340-096-0310.
 - Other states, as required.
- MRFs/CRPFs.
- End market entities and intermediate supply chain entities.

Position

CAA will provide the information that is either required by law/rules or reasonably necessary for interested parties to receive and to successfully implement EPR programs. CAA will not:

- Share information with any party that could be considered trade secret or proprietary/confidential information, unless required by law.
- Determine compliance results of REM verification until a national standard is developed.

CAA believes transparency will lead to better outcomes for EPR implementation. However, CAA is committed to preserve the confidentiality of proprietary information, such as the commercial relationships between service providers and their buyers. Confidentiality of such information was one of the main concerns raised by the industry during the REM verification process consultation.

Reporting

CAA will share the following information:

- To state authorities in quarterly and annual reports and as requested:
 - Name and location of each end market used by a MRF/CRPF, excluding the names of the facility (MRF/CRPF) from which the material originated.

- Aggregated tonnage processed by end markets in each country. Tonnage will be based on MRFs/CRPFs or designated third-party reporting.
- Completed self-attestation forms.
- Other information requested, within boundaries of reasonableness and as required by law.
- To MRFs/CRPFs and intermediate supply chain entities:
 - Names and locations of REMs.
- To end markets:
 - Results of the REM assessment of their facility or facilities.

Oregon Program Plan

(2025 – 2027)



Circular
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Executive Summary

Oregon's Plastic Pollution and Recycling Modernization Act (RMA) creates important changes in how materials management is undertaken and funded within the state. The legislation strives to improve the overall effectiveness of Oregon's recycling collection and processing ecosystem through a shared responsibility model.

A key element of this new framework is the role of a producer responsibility organization (PRO), the entity through which producers of covered materials will fund recycling services, support innovation and manage collection of certain materials through a depot system.

Circular Action Alliance Oregon LLC (CAA) is submitting a detailed approach to managing and administering an extended producer responsibility (EPR) program to fulfill key obligations of the RMA. Our team includes a wide range of recycling industry and policy experts with extensive knowledge in program plan development, implementation, operations, education and outreach, and local government structure. CAA has engaged with the broader interest holder community in Oregon and referenced a wide range of applicable studies to formulate strategies and cost estimates tailored to Oregon's unique and dynamic materials recovery landscape.

CAA has taken the Oregon Department of Environmental Quality (DEQ)'s Internal Management Directive (IMD) on the RMA PRO Program Plans as a basis for the structure of this submission. Some adaptations have been made to the proposed IMD outline to improve narrative flow.

The table of contents, charts, and subheadings in the document will help readers effectively navigate all the plan's content, and brief overviews of core sections are provided below.

Goals of the Program

CAA's overarching objective is to support the successful implementation of the RMA in collaboration with DEQ and all other key interest holders. Through the implementation of this program plan, CAA intends to achieve four overarching goals:

1. Reduce the negative environmental, social, and health impacts from the production and end-of-life management of printed paper, food serviceware and packaging as measured in the Life Cycle Evaluation (LCE) assessment.
2. Increase the diversion of recyclable materials from disposal.
3. Improve public participation, understanding and equity in the state's recycling system.
4. Create a system that fulfills the needs and regulatory requirements of the PRO, its members, and all other relevant interested parties.

These goals are defined in further detail in the Goals of the Program section, along with key objectives, metrics and measures to help chart progress and determine success.

Operations Plan

The operations plan segment delves into the specific steps and strategies that CAA will employ to meet RMA requirements and help catalyze a range of recycling system expansions and improvements that can lead to a stronger, more efficient framework of materials management. This includes detailed plans and recommendations for:

- *Collection and Recycling of USCL Materials* – A plan for the collection, transport, and recycling of all covered materials on the RMA’s Uniform Statewide Collection List (USCL) and a framework for deploying funding to support these activities. Highlights include:
 - The Oregon Recycling System Optimization Project (ORSOP), an important project that offered a more complete picture of system needs, opportunities for efficiency, and more. This initiative has provided, and will continue to provide, additional data and details required to more precisely estimate and schedule the distribution of funding for system improvements and ongoing financial support;
 - Key tasks to support the distribution of funding and reimbursements to eligible parties that must be completed in advance of July 1, 2025 (the RMA implementation date), in addition to the ORSOP;
 - A plan for initiating discussions with local governments for service expansion compensation to be distributed over the course of the program plan period (with a single accounting point-of-contact system) to local governments for service expansion;
 - Setting up a single accounting point-of-contact system (also referred to as an online portal) for:
 - Compensation of local governments for expenses besides service expansion;
 - Payment of contamination management fees and processor commodity risk fees to commingled recycling processing facilities;
 - Payment of transportation reimbursement;
 - Compensating depot operation costs and payment to cover the premium for roll carts that contain 10% post-consumer recycled content, when a premium exists,
- *The PRO Recycling Acceptance List* – This section outlines activities, timelines, and recommendations for increasing diversion of materials named on the PRO Recycling Acceptance List, including proposed approaches to meeting service convenience and performance standards and proposed collection targets for each material category. Highlights include:
 - A list of 118 confirmed sites, many of them permitted, that will serve as the initial PRO Recycling Acceptance List collection sites, with an additional 40 interested locations that CAA will continue to engage with as the network expands into the future. These sites form the

foundation of the network CAA needs to build in Oregon with other interested parties outlined later in this plan;

- Key activities to ensure CAA meets the convenience standard within the first program plan period;
- A description of additional analysis of needs and further design of the PRO depot system to be performed by CAA in consultation with DEQ, potential partner depots, local governments, and service providers;
- The proposed approach for finalizing contracts with local governments, service providers, and end markets and launching reporting and accounting systems while onboarding key interest holders.

→ *Materials Management* – Key materials management considerations including strategies for Specifically Identified Materials (SIMs) and engagement with and verification of responsible end markets (REMs).

Highlights include:

- A proposal to expand the USCL to include transparent blue and green PET bottles, as well as signaling of CAA's intent to submit proposals to expand the USCL to include PET thermoforms, PP and PE caps, lids and carriers, aluminum foil and empty, non-hazardous aerosol containers;
- A proposal to explore commingled, trial collection of polycoated paper packaging and single-use cups with the intent to better understand generator behaviors and other system barriers to the inclusion of these materials on the USCL;
- Insight into the program plan's anticipated impact on plastic recycling and an estimate of Oregon's current plastic recycling rate;
- A strategy to create a materials tracking system that supports REM verification for all system participants and proposed approach to supporting REM development;
- Key activities to support effective materials management and REMs that must be completed in advance of the July 1, 2025, RMA implementation date.

→ *Education and Outreach* – A vision for delivering effective and harmonized education in a manner that incorporates feedback from, and supports, local government outreach and is responsive to diverse audiences across this state. Highlights include:

- Goals to ensure widespread recycling awareness through culturally responsive support and messaging that has been proven to effectively drive increased participation and capture of recyclables, deployed in a manner complementary to programmatic efforts to reduce contamination;
- Recommendation for a Spanish language outreach campaign developed independently of the English language campaign;
- Key activities to support the education and outreach plan that must be completed in advance of the July 1, 2025, RMA implementation date.

Financing Strategy

An essential role of the PRO is to develop a comprehensive methodology to estimate how much funding the system requires, as well as how much each obligated producer of covered materials is required to contribute to the statewide system. When implementing fair and effective producer fees, CAA considers factors such as material type, volume of product sold into state, environmental impact of materials and commodity revenues.

The financing section of the program plan lays out the guiding principles CAA has developed and uses as the basis of the base fee-setting methodology. This section also describes how the fee outcomes from using this fee algorithm satisfy the RMA statutory requirements and fulfill the adequacy of financing requirement.

CAA introduces a graduated fee algorithm to provide producers with practical and measurable criteria upon which to qualify for fee incentives, using LCA rules and parameters.

Revised estimates of the program costs for years 2025, 2026 and 2027 are provided in Appendix E. This sum, to be covered by producer fees, accounts for management costs of materials, service expansion costs, PRO depot system development, as well as costs to develop and sustain viable responsible end markets and other contributions to advance program improvement initiatives.

CAA has updated the program cost estimates for this version of the program plan. The estimate of the program costs was reduced due to the results of ORSOP and the ability to meet convenience standards through the course of the first program plan period.

Equity

There is no one-size-fits-all solution to recycling because motivators and barriers vary. For this reason, CAA has embedded principles of equity into the program plan in a manner that upholds and reinforces the goals set out in the RMA. These principles are integrated into each key component of PRO administration and program implementation.

This proposal describes how CAA has built equity into the proposed approaches for key activities, including:

- The establishment of a PRO depot network
- The development of responsible end markets
- Development and deployment of recycling education and outreach efforts
- PRO administration

CAA consulted with an Oregon community-based organization (CBO) to develop the equity components of this plan and will continue to consult with this and other CBOs. CAA recognizes the importance of fostering relationships with Oregon CBOs to effectively address program equity issues.

In short, the program plan outlines strategies to use this transformational moment in Oregon's materials management as a springboard to greater equity in various areas. CAA views equity work as a journey and will

continue to improve and expand upon engagement with all populations within Oregon through the course of the first program plan and future program plan periods.

Management and Compliance

As an organization helping to introduce a new approach to recycling funding and management in the U.S., CAA recognizes the importance of participant communication as the RMA moves toward implementation.

As such, this program plan offers a detailed explanation on CAA's structure of day-to-day management, as well as a communications strategy for maintaining strong connections with government entities and other interested parties.

Furthermore, CAA has outlined data collection steps and metrics considerations to effectively track program successes and areas in need of improvement. The elements of an optimized annual report are also explained.

Finally, this section of the plan lays out an in-depth process for tracking and maintaining producer compliance, setting clear standards and expectations on rules, audits, and action to take place when companies are found to be in noncompliance. This information is supplemented by important details on contract management, recordkeeping and other best practices around organizational and program governance.

It is through these clear processes that CAA has confidence in its ability to meet the expectations of regulators, drive overall program efficiency, and maintain strong coordination both internally as an organization and externally with partners across the public and private sectors.

At the Center of the Transformation

The ultimate goal of RMA implementation is a transformed system of materials usage and recovery that will be responsive to the needs of all interest holders and that will lead to significant environmental and social benefits for Oregonians.

CAA has invested significant resources in developing this program plan and is committed to working with recycling participants to deliver on the RMA objectives. There is no doubt that effectively and efficiently transitioning to a shared responsibility model of materials management and delivering on other RMA priorities will be a complicated and challenging effort and one in which producers and other interested groups will learn much along the way.

But CAA is confident the transition can and will happen successfully. The Oregon-based CAA team is committed to being innovative, adaptive, collaborative and practical when working with interest holders across the state.

Data-driven decision-making, combined with a spirit of collaboration and communication, will be critical in the quest to see the RMA realize its full potential. CAA has embedded those core principles in all segments of this plan. The group is excited at the prospect of helping Oregon usher in system shifts that help reduce

costs, drive more material into an expanded recycling marketplace, and open the door to a better materials management future.

Goals of the Program

The overarching goal of CAA for this initial program plan period is to support the successful implementation of the RMA in collaboration with the DEQ and all key interested parties, including local governments, commingled recycling processing facilities (CRPFs), haulers, and Oregon waste generators. The goals put forth in this initial program plan are based largely upon the pillars of measuring, reporting and responsive targets, and are supported by clear objectives spelled out in the tables below. CAA developed these high-level goals with continual improvement in mind. We believe it is appropriate to frame the goals for this program plan in terms of processes and decision-making methodologies, to show how CAA will continually evaluate the processes in place and ensure that goals are neither stagnant nor overly prescriptive at such a fluid point in time. We believe it is important to understand the landscape of markets, resident and commercial engagement in the recycling system, and to ensure funding is in place, before then understanding what is achievable and what are the best practices for measuring what success looks like. To that end, success will center on four critical high-level goals:

Goal 1: Reduce the negative environmental, social, and health impacts from the production and end-of-life management of paper, food serviceware and packaging, as measured in the Life Cycle Evaluation (LCE) assessment.

Program Objectives	Outcomes/Indications of Success	Key Metrics
Ensure that materials collected and processed for recycling in Oregon are consistently delivered to responsible and high-benefit end markets.	- System of identifying responsible end markets (REMs) and tracking material flows established with full cooperation from commingled recycling processing facility (CRPFs) and other key interest holders. - CRPF and depot material streams directed to REMs. - System established to continually monitor REM non-conformance and to address and correct issues that arise regarding REMs. - Specifically identified materials (SIMs) directed to REMs, where practicable. - Common performance areas for end markets tracked and analyzed for potential structural issues. - Oregon-origin materials for which differences in environmental impacts between disposition pathways are clearly understood and for which environmental impacts can be maximally reduced through choice of market or market development actions flow to low-impact/high-benefit markets. The prioritized materials for the first program plan period are glass, cartons, and block-white expanded polystyrene.	- Percentage of recycled material going to REMs, including SIMs. - Number, kind, and specific REMs used by CRPFs and CAA for depot material. - Number of REM non-conformance issues identified, corrected and brought into conformance. - Summary of REM verification undertaken. - Percentage of chain of custody anomalies detected during quarterly reporting review process. - Number of challenges identified by end markets and assistance deployed to work through those problems. - Number of materials identified for which impacts of disposition pathways differ meaningfully from one another. - Percent of these materials assessed for compliance against and ultimately complying with the hierarchy disposition requirement, using a methodology developed by DEQ and CAA by the end of the program plan period.

		▪ Percent of materials shifted from lower-benefit to higher-benefit markets, using a methodology developed by DEQ and CAA.
Design and implement producer fee structures that provide adequate financing for RMA obligations and incentivize producers to improve environmental outcomes associated with the production and recycling of printed paper, food serveware and packaging supplied to the Oregon market.	▪ Initial base fee schedule adequately supports RMA verification of REM requirements and other system improvements. ▪ Eco-modulation factors integrated into producer fees following development of datasets and feedback mechanisms required to adjust fees for greater impact reduction. ▪ Environmental and other impacts monitored and reduced through eco-modulated fees. ▪ System in place to evaluate the effectiveness of eco-modulation and to make changes as needed to improve results.	▪ Base fees in the 60 Reporting and Fee Categories for covered materials reflecting their individual features as directed by the RMA. ▪ Data on producer changes to packaging materials and formats that reflect effects of base fees (and at a later date, as applicable, graduated fees). ▪ Quantity and types of specific environmental impacts reduced through eco-modulated fee incentives. ▪ Number and types of adjustments made to eco-modulated fees to produce stronger impacts. ▪ Number of bonuses granted ▪ Number of producers that have qualified for bonuses

Goal 2: Increase the diversion of recyclable materials from disposal.

Program Objective	Outcomes/Indications of Success	Key Metrics
Create new and expanded opportunities for more Oregon waste generators to recycle a wider array of generated materials, including supporting enhancement of local collection services and establishing convenient depots for additional material collection.	▪ PRO-assigned depot system established, meeting convenience standards by 2027 and providing recycling opportunities for materials assigned for depot collection and impact on material recycling rates. ▪ Local government service expansion requests evaluated and funded according to prioritization guidelines resulting in new collection opportunities created for waste generators. ▪ Uniform Statewide Collection List (USCL) applied across the state to expand what is collected in commingled recycling, and steps taken by CAA to successfully add materials to the USCL. ▪ SIMs collection issues successfully addressed. ▪ Progress toward 2028 plastic recycling goals at the end of each program year. ▪ All eligible costs from the 2023 needs assessment are funded through the program. Most eligible costs are funded within 30 months of program implementation, and select costs that do not perform well against funding request review criteria are labeled as pending for the next program plan.	▪ PRO material collection and recycling rates in relation to plan targets. ▪ Number and types of local government service expansions funded, and number and types of new collection opportunities created for waste generators. ▪ Consumer awareness and use of PRO material depots. ▪ Diversion rates associated with USCL materials. ▪ Extent of new SIMs collection efforts established. ▪ Tons of plastic materials sent to responsible end markets divided into tons of covered plastic materials generated. ▪ Extent of covered costs funded within 30 months of program implementation. ▪ At least 10% of the PRO depot sites operational by end of 2025, 65% of sites operational by end of 2026, and fully meeting the convenience standard by end of 2027 through a combination of permanent sites and collection events, where needed.

Facilitate the modernization of Oregon's commingled material processing infrastructure, driving more efficient capture and delivery of high-quality materials to end markets while reducing loss of materials to residue.	▪ Processor commodity risk fee (PCRF) and contamination management fee (CMF) payment system established to provide necessary funding to CRPFs. ▪ CRPFs meeting DEQ's performance standards regarding capture rates and bale quality. ▪ Investments made in new equipment and sorting processes to accommodate the USCL and additions to the USCL.	▪ Funding provided to CRPFs through the PCRF and CMF, with associated tonnage and funding amounts. ▪ Capture rate and bale quality data from DEQ and from CAA. ▪ Individual CRPF capacity to accept and effectively sort USCL materials.
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Goal 3: Improve public participation, understanding and equity in the state's recycling system.

Program Objectives	Outcomes/Indications of Success	Key Metrics
Ensure Oregon waste generators, reflecting the states' many diverse communities, are fully informed about their recycling opportunities and how to use those opportunities optimally, confidently, and correctly.	▪ Increase in the amount of USCL and depot materials collected, indexed against population and generation. ▪ Reduction in the amount of contaminant materials entering the recycling collection stream in commingled recycling and at depots. ▪ Increase in waste generator understanding and confidence in the recycling system across all populations.	▪ Tons of material collected through commingled, depot, and other applicable programs, indexed against population and generation metrics. ▪ Amount and percentage of contaminants in collected streams and in streams entering CRPFs. ▪ Measures of waste generator awareness, knowledge, and confidence in recycling (for example, participation rates) through surveys or other data collection.
Incorporate principles of equity into the deployment of recycling opportunities, education, and other elements of the recycling system.	▪ Equitable recycling opportunities provided for populations that may find it difficult to access service at collection points. ▪ Process established to consult with local governments and community groups to ensure any proposals for the alternate delivery of recycling convenience standards address equitable access for communities and diverse populations. ▪ Educational materials that are clear and demonstrably understandable are universally distributed or made available. ▪ Selected businesses and depot collection partners represent diverse communities, including Certification Office for Business Inclusion and Diversity (COBID) business partnerships. ▪ Groups representing diverse populations within Oregon have consistent opportunities to interact and provide input on equity concerns.	▪ Number and kinds of recycling services provided for populations with access or mobility issues. ▪ Number of local governments and CBOs regularly consulted to provide recycling opportunities to communities which have been historically underserved. ▪ Number of COBID organizations contracted with the PRO to provide services under the RMA. ▪ Number and kinds of recycling opportunities addressing gaps identified by local governments and community groups. ▪ Number and kinds of new educational materials created and distributed, numbers and kinds of communication channels used, and number and kinds of audiences reached. ▪ Number and types of system expansions within the first program plan period.

		▪ Number and types of adjustments made to grow system expansion that address previously underserved or unaddressed engagement.
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Goal 4: Create a system that fulfills the needs and regulatory requirements of the PRO, its members, and all other relevant interested parties.

Program Objectives	Outcomes/Indications of Success	Key Metrics
Manage organizational operations to ensure compliance with all statutory requirements.	▪ Systems and mechanisms in place to fulfill CAA PRO obligations under the RMA regarding day-to-day management, policies and procedures, communication, membership, timelines, and budgets. ▪ Mechanisms in place to address gaps, shortfalls, or other issues regarding CAA's PRO obligations.	▪ Number, kind, and operational status of systems and mechanisms for CAA management obligations. ▪ Number and nature of gaps or issues that needed to be addressed and resolution status of those gaps/issues. ▪ Producer compliance activity reports.
Provide an effective platform of support and interaction with local governments, commingled recycling processing facilities, and haulers that allow them to steadily improve their programs and facilities to meet regulatory targets and the goals of the RMA.	▪ Application, reporting, invoicing, and informational platforms established that are clear, effective, and efficient for interested parties to use. ▪ Mechanisms in place to use interest holder feedback for improving platforms. ▪ Dispute resolution process developed that allows for arbitration	▪ Number and kind of platforms in place for interaction with interested parties. ▪ Extent of platform use (number of users, etc.). ▪ Number and kind of issues with platforms expressed through participant feedback and any related adjustments made to platforms. ▪ Development of dispute resolution process.

The following program plan details the integrated steps CAA will take to produce results that meet the goals and objectives outlined above. In putting this plan into action, CAA will prioritize clear and consistent engagement with all interested groups and will adopt an approach of continual improvement, recognizing the dynamic and complex nature of the Oregon materials management system.

About Circular Action Alliance

This section of the plan provides summary information about Circular Action Alliance LLC Oregon, including details of its structure, governance and members, as well as its qualifications to serve as a PRO in Oregon.

Description of the Organization

Circular Action Alliance is a U.S., nonprofit 501(c)(3) producer responsibility organization (PRO) established to support the implementation of extended producer responsibility (EPR) laws in multiple states for paper, packaging, and foodservice ware. The organization was founded by leading U.S. producers representing retail, food, beverage, and consumer packaged goods manufacturing.

Circular Action Alliance's 20 Founding Members are Amazon; The Clorox Company; The Coca-Cola Company; Colgate-Palmolive; Danone North America; Ferrero US; General Mills; Keurig Dr Pepper; Kraft Heinz; L'Oréal USA; Mars Incorporated; Mondelez International; Nestlé USA; Niagara Bottling, LLC; PepsiCo, Inc.; Procter & Gamble; SC Johnson; Target; Unilever United States; and Walmart.

Together, Circular Action Alliance's membership represents more than 900 brands sold in the U.S., representing a wide variety of covered material types.

Circular Action Alliance was incorporated as a nonprofit corporation on December 21, 2022 and is recognized by the Internal Revenue Services as tax exempt under Internal Revenue Code Section 501(c)(3). Circular Action Alliance has now organized separate wholly owned nonprofit 501(c)(3) subsidiaries to serve as the representative stewardship organization for producers in each state that passes an EPR law. Circular Action Alliance Oregon LLC (CAA) was formed in 2024. Both Circular Action Alliance and CAA are nonprofit organizations exempt from taxation under Section 501(c)(3) of the Internal Revenue Code.

The organization's mission is to provide producers with consistent EPR services across multiple states while developing and implementing EPR programs that:

- Meet state-specific regulatory requirements
- Leverage existing recycling systems and infrastructure
- Advance the circularity of covered materials through collaboration with local governments, service providers, and other relevant recycling system interest holders

Circular Action Alliance's National Board of Directors (the "National Board") is made up of 20 voting representatives of Founding Member companies, which represent a diversity of covered material supplied to the Oregon market. Each Founding Member has the right to appoint one representative to serve as a Director on the National Board.

The National Board has established the following standing committees and has the ability to create additional committees or dissolve committees in the future:

- **Governance Committee** – consisting of at least three members appointed by the National Board who have relevant experience and expertise in governance, membership development, and compliance.
- **Finance, Audit and Investment Committee** – consisting of at least three members appointed by the National Board who have relevant experience, expertise, and knowledge in accounting, auditing, investments, budgeting, cash flow management, reserve management, and financial risk management.
- **Human Resources Committee** – consisting of at least three members, appointed by the National Board, who have relevant experience, expertise, and knowledge in human resources, employment law, organizational development, and/or diversity, equity, and inclusion.

The National Board has established a designated governing body known as the Oregon Board to help oversee the implementation of this producer responsibility plan. Decisions relating to program budgeting and producer fees will continue to reside with the National Board. The Oregon Board includes Founding Member representatives, and may also include other producer representatives and non-voting members consisting of trade associations from industries representing covered materials designated by the Oregon Board and approved by the National Board. The National Board has appointed initial voting members, who will be responsible for selecting a Chair and a Vice Chair. In 2025, the Oregon Board expects to establish a process for recruiting other producer representatives to serve as voting members and trade associations to serve as non-voting members. Individuals appointed to the Oregon Board will serve two-year terms unless they resign or are removed. The Charter of the Oregon Board is available upon request.

CAA's Qualifications to Serve as a PRO in Oregon

Circular Action Alliance was established to support the implementation of EPR laws for paper, packaging, and food serviceware and CAA is fully capable of meeting the PRO statutory requirements under the RMA. The organization has the expertise and vision to collaboratively build a producer responsibility plan that will achieve the objectives of the RMA.

Circular Action Alliance's progress to date includes the following:

- On May 1, 2023, Circular Action Alliance became the first PRO approved to administer an EPR program for paper, packaging and food serviceware in the U.S., being appointed by the Colorado Department of Public Health and Environment as the single PRO responsible for implementing Colorado's Producer Responsibility Program for Statewide Recycling Act.
- On October 18, 2023, Circular Action Alliance was approved as the single PRO to represent the interests of producers in Maryland. As the Maryland PRO, CAA will have a seat on the Producer Responsibility Advisory Council, which will make recommendations to the Maryland governor on how to effectively establish and implement a producer responsibility program for packaging materials.
- On January 5, 2024, Circular Action Alliance was approved as the single PRO to deliver the objectives of the California Plastic Pollution Prevention and Packaging Producer Responsibility Act (California Public Resources Code Sections 42040 to 42084).

As they have in these other EPR states, CAA members have invested time and resources to ensure the organization can fulfill the specific PRO obligations in relation to the RMA in Oregon.

Understanding of Oregon's Recycling Modernization Act

CAA has a strong and detailed understanding of the RMA. Following its incorporation, CAA was engaged in the Phase I and II rulemaking process (and subsequently the Rulemaking Advisory Committee), which included the submission of comments in July 2023 and July 2024.

CAA has also participated in DEQ Technical Working Groups and has pursued independent and extensive engagement with Oregon DEQ and other Oregon groups, including: local governments, Tribes, service providers, the Association of Oregon Recyclers (AOR), and the Oregon Refuse & Recycling Association (ORRA). Full details on CAA's engagement with interest holders during the development of this program plan can be found in Appendix D.

As a result of this engagement, CAA understands not only the requirements of the statute and rules, but also the priorities of key interested groups that are essential to the success of the RMA.

Team Expertise and Capabilities

Circular Action Alliance's mission is to provide producers with consistent compliance services across multiple states while developing and implementing EPR programs that meet state-specific regulatory requirements, leverage existing recycling systems and infrastructure, and advance the circularity of covered material through collaboration with local governments, service providers, and interested parties.

The Founding Members have experience with the implementation of various EPR programs, and they have assembled a team of staff and independent service providers and subject matter experts drawn from across North America with expertise in developing and operating EPR programs to respond to state-specific regulatory requirements and recycling system needs.

CAA team members have participated in EPR implementation and program operation for many years, playing integral roles in the creation, operation, and improvement of PROs. The team has expertise in regulatory compliance, project management, governance, recycling systems and materials management, system improvement, end markets, finance, fee setting, eco-modulation, packaging design, not-for-profit operation, information technology, reporting, consumer education, producer and participant relations, and public affairs.

The Oregon team is led by an Executive Director who is responsible for building the local organization and implementation team. CAA is hiring full-time staff members based in Oregon and will continue to add Oregon-based staff to the team over time. Currently these Oregon team staff members include the following positions:

- Oregon Executive Director
- Oregon Project Manager

- Oregon USCL Recycling Manager
- Oregon Depot Manager
- Oregon Communications Manager
- Oregon Audit Director
- Oregon Reporting Director

CAA's organization charts are included in Appendix C.

Qualifications to Deliver Interim Coordination Tasks

CAA is well-qualified to deliver the start-up tasks (previously referred to as interim coordination tasks) required to launch the program successfully on July 1, 2025, as required by state statute. In particular, the CAA team has launched the following workstreams:

Local Government and Service Provider Engagement (Oregon Recycling System Optimization Project)

This workstream began in May 2024 and concluded in October 2024. The goal was to liaise further with local governments and their service providers on expansion needs, to finalize plans for expansions to be funded in the first program plan, and to conduct consultations on other relevant aspects of the plan. CAA contracted with Resource Recycling Systems (RRS) to undertake this work, building from the initial discussions with a selection of local governments outlined in Appendix D that had taken place since September 2023. The team that led this workstream had experience relevant to Oregon's regulatory requirements, recycling system design, and Oregon's local government ecosystem. More information on this workstream can be found in the Operations Plan section of this plan, under "Collection and Recycling of USCL Materials."

PRO Depot Development (Oregon Recycling System Optimization Project)

This workstream also took place from May 2024 through October 2024. The goal was to identify the baseline of the depot network, which would be composed of the existing drop-off facilities and depot locations, as well as identify new potential partners that will complete a network of PRO depot locations (supplemented by events and other collection services) to meet the necessary collection targets, convenience and performance standards, and Responsible End Market (REM) requirements under the RMA. CAA contracted with RRS, which assembled a team of experts to undertake this work, building from the initial discussions with depot organizations outlined in Appendix D. More information on this workstream can be found in the Operations Plan section of this plan, under "The PRO Recycling Acceptance List."

Education and Outreach

This workstream began in April 2024, with the first set of beta deliverables scheduled for February 2025, and the completion of deliverables later in 2025. The goal is to develop education and outreach collateral and a

statewide promotional campaign to communicate the USCL and PRO Recycling Acceptance List to residents and commercial entities in Oregon. The workstream includes consultations with local interest holders, including but not limited to DEQ, the Oregon Recycling System Advisory Council (ORSAC), Oregon residents (in a range of geographies and housing situations), Oregon businesses, local governments, service providers, and CBOs). CAA has assembled a team of experts to undertake this work. The team has experience in Oregon regulatory requirements, waste generator behavior trends, education materials development and delivery, Oregon-focused media executions, and Oregon local government engagement. More information on plans for this workstream can be found in the Operations Plan section of this plan, under “Education and Outreach.”

CAA’s Producer Membership

CAA membership exceeds the 10% market share threshold for covered materials in Oregon required for approved PROs. Based on available data, CAA estimates that the current updated membership (as of November 2024) accounts for at least 40% of the state’s market share of covered materials. (Details of how the market share estimate was calculated can be found in Appendix B.)

CAA is also conducting information sessions with hundreds of non-member producers regarding EPR obligations in Oregon and other states and will expand membership further through 2024 and into 2025, in advance of the program start date.

CAA is resourced to complete all the tasks necessary to start the program, including all of the interim coordination (start-up) tasks referenced in the RMA rules. CAA Oregon will be a subsidiary of the national organization that is supported by its founding members. These members have made significant funding commitments to support the CAA program plan development in Oregon and other EPR states.

Operations Plan

The operations plan section of this program plan describes activities and recommendations for increasing the diversion of recyclable materials from disposal to support progress toward targets outlined in the Recycling Modernization Act (RMA).

Important areas of Producer Responsibility Organization (PRO) involvement around operations include supporting system expansions and improvements, establishing collection depots, improving materials processing, and carrying out robust and consistent education and outreach.

a. Collection and Recycling of USCL Materials

In this subsection, CAA details how it plans to support the collection and recycling of covered materials that are included on the Uniform Statewide Collection List (USCL).

Under ORS 459A.890, local governments and their service providers are entitled to be reimbursed or be provided advance funding for, as appropriate, eligible expenses in several RMA program areas, including but not limited to: system expansions and improvements (costs associated with the expansion and provision of recycling collection services); the transportation of covered materials over 50 miles; contamination reduction programming and periodic contamination evaluations outside of commingled recycling processing facilities (CRPFs); and ensuring 10% post-consumer content in roll carts.

The collection and recycling section of the program plan addresses each of these areas in turn, and it also discusses CAA's start-up approach to address specific time-sensitive tasks (previously interim coordination tasks).

Since the submission of the initial draft of the program plan in March 2024, CAA has conducted ongoing outreach and consultation with local governments and service providers to:

- Undertake the Oregon Recycling System Optimization Project (more details are provided below)
- Enable the development of more accurate local government funding estimates and prioritization of disbursements
- Develop a schedule for the disbursement of funding for local government service expansion requests, as per RMA requirements
- Finalize the details of how various funding programs related to USCL materials will be administered

Administrative design principles have been developed to inform further consultation as detailed below.

Administrative Design Principles

- **Streamlined and expeditious processes** for the disbursement of eligible expenses
- **Clear and accessible claims submission** instructions and mechanisms (reliance on online submissions where possible)
- **Transparent information requirements** so that all parties are using understandable, similar source data in support of funding requests
- **Standardized review criteria** in support of prioritization and assessment of eligibility of claims (see proposed review criteria below)
- **Coordination of funding program processes** with local government budget cycles wherever possible
- **Streamlined dispute resolution processes**
- **Appropriate accountability mechanisms** to track reimbursements and any advance funding provided

For each compensation program, CAA proposes to post related policy documents, standardized registration forms, claims submissions, and other program documents on its portal for local governments and recycling service providers, for ease of access. These programs would also be supported by CAA program staff dedicated to answering questions and guiding interested parties through program administrative processes.

i. System Expansions and Improvements

Providing financial and other assistance to local governments and service providers that need to expand recycling collection services is a critical step in the implementation of this program plan and the execution of the RMA. The activities outlined below will help meet a range of objectives and goals, including expanding overall opportunities to recycle, and help meet the plastics recycling goal set out in the RMA.

Oregon Recycling System Optimization Project (ORSOP)

Building on Prior Work

Oregon DEQ released its initial RMA Local Government Needs Assessment in May 2023. While completing the needs assessment survey was voluntary for local governments, eligibility for expansion funding from the PRO(s) in the first program plan was contingent on completion of the needs assessment.

Two hundred forty-five local governments responded to the needs assessment survey (200 cities, 36 counties, and nine additional county responses) with 92.2% of respondents indicating an interest in expanding recycling services.

The first needs assessment simply identified areas of potential interest in terms of service expansion. Local governments checked general areas of interest to maintain eligibility for funding under the process, which may in some cases have resulted in an inaccurate picture of needs in relation to existing recycling services. Information provided by local governments was insufficient to prioritize funding requests in relation to RMA rule criteria (which had not been finalized at the time of the needs assessment survey).

As anticipated in DEQ's Internal Management Directive (IMD) related to the program plan submission, CAA conducted a follow up on DEQ's 2023 Needs Assessment by conducting the Oregon Recycling System Optimization Project (ORSOP) between May and October 2024 to gather information necessary to further develop its estimates of required local government funding for recycling system expansions and improvements and refine the schedule for processing funding requests in accordance with RMA rule prioritization criteria.

Project Approach

Given the interrelationship between local government needs assessment requests and other areas of the program plan pursuant to the RMA, CAA developed an integrated approach to carry out ORSOP. CAA coordinated the outreach activities required to develop more accurate estimates of service program expansion requests with continued program development of other local government compensation funding programs.

CAA's main objectives for ORSOP included:

1. Assessing local government and service provider expansion needs

2. Understanding why and how investment is needed so each request can be prioritized against statutory requirements
3. Optimizing investment to eliminate duplicative or unnecessary requests, and maximize use of existing assets
4. Building trust with local governments and service providers
5. Completing an inventory of expected costs and schedule for distribution of funds

CAA's approach for engaging local governments and their service providers in ORSOP included a quantitative survey that was supplemented with qualitative interviews. It was important to collect detailed information on local governments' existing systems and their anticipated needs to meet requirements of the RMA while seeking opportunities to optimize investments and avoid prioritizing investments that do not meet the requirements of the RMA.

CAA distributed the in-depth survey to each jurisdiction that participated in the 2023 needs assessment and/or their designated service provider. The survey was open between May 30 and August 9, 2024. CAA and collaborating organizations provided extensive outreach and technical support to maximize participation.

The outreach around the survey included:

1. A webinar for the survey launch with over 200 attendees
2. An ORSOP Resources website
3. Emails to DEQ contacts for all eligible communities
4. Partnering with trade associations, League of Oregon Cities, and Association of Oregon Counties for targeted follow-up outreach
5. Tracking completion rates using real-time response rates and sending follow-up emails for non-response or low completion rates

The 110-question survey was completed over a 10-week period by 396 interested parties, representing 200 participating jurisdictions. The survey had a response rate of over 85% to yield 29,000 data points from 34 of the 35 wastesheds.

Wasteshed-level interviews were then conducted to confirm requests, understand local coordination and approaches, and identify redundancies. Thirty-four of the 35 wastesheds in the state were interviewed between July 26 and September 18. The only non-participant (Klamath) actively opted out of the process.

CAA created an interview guide and protocol for cross-team consistency. The team training session was conducted for all staff engaged in interviews. Interview teams met every other week to maintain alignment. Scheduling, notes, and documentation were managed in a shared database. Jurisdiction-level responses were reviewed and compiled to develop wasteshed profiles, which contained specific clarifying questions for interviewers. Each interview was recorded, and AI transcriptions were generated. Teams captured highlights from interviews for input into the modeling.

Consultation focused on:

1. Understanding the unique conditions that may exist in each jurisdiction (i.e., local government service provider franchise arrangements, nature of existing recycling services provided, etc.)
2. Consulting with local governments and service providers on the reimbursement process, review criteria, and administrative process that will be established to finalize and roll out service expansion system funding
3. Confirming which permitted facilities and existing local government facilities would like to participate in the PRO depot network
4. Coordinating needs assessment requests in the context of other local government compensation programs such as transportation reimbursement (see relevant section below)
5. Identifying primary contacts for each local government and service provider
6. Reviewing anticipated processes for disbursement of education and outreach materials and the provision of funding for contamination reduction activities

The qualitative data from the survey and interviews related to investment requests were coded. A comparison of questionnaire and interview responses was conducted to review investment requests, remove duplicates, and inform final recommendations for the investment request expected from each jurisdiction.

The investment requests were tabulated in a master inventory of requests. That inventory was further refined through a verification process that considered evaluating the inventory for alignment with other data sources such as:

- Qualitative data from interviews
- Expected volume increases
- Number of new accounts
- New versus replacement costs
- Alignment with CAA program plans

To model the requests for carts, trucks, equipment, and other needs, unit costs were established through consultation with subject matter experts. A model was developed to extrapolate the total cost for each watershed as a function of the base unit cost for each type of investment and the number of investments in the inventory.

Ultimately, ORSOP enabled the development of a schedule, prioritization, and cost estimates of local government service expansion requests, as well as refined estimates of costs associated with reimbursements in other program areas.

General Process & Timelines for Prioritizing & Processing Service Expansion Requests

Proposed Timeline

Under the RMA, producers are not obligated to become paying participants of a PRO until the program starts on July 1, 2025. Given the anticipated cost of local government infrastructure service expansions, CAA will not be in a position to fund service expansion requests until it is receiving revenue from obligated producers.

Actual local government service expansion disbursements, therefore, are anticipated to begin after the July 1, 2025 program start date, with CAA prioritizing funding requests in accordance with RMA rule priorities. However, it is important to note that all eligible costs are expected to be funded by the end of 2027, with the exception of select costs that do not perform well against funding request review criteria, which will be labeled as pending and reconsidered in the next program plan.

The general steps and time frame associated with implementation of this service expansion funding program are below. (This timeline can also be reviewed in Appendix M, Preliminary Program Implementation Timeline.)

- CAA conducts ORSOP (*May – October 2024*)
- CAA program plan is updated based on ORSOP (*December 2024*). Updates include:
 - A more detailed schedule for implementing collection program expansion disbursements
 - Revised estimates of local government expansion disbursements
 - A formalized administrative process for review and approval of expansion disbursements
- Validation of 2025 expansion funding requests begins (*December 2024*)
 - Execution of funding agreements with local governments
 - Identification of individual local government/service provider funding amounts
- CAA program plan approved (*February 2025*)
- Disbursement of 2025 expansion funding requests takes place (*July – December 2025*)
- CAA–local government processing of 2026 expansion funding requests begins (*Fall 2025*)
 - Detailed CAA–local government funding disbursement consultations
 - Identification of individual local government/service provider funding amounts
- Disbursement of 2026 expansion funding requests takes place (*January – December 2026*)
- CAA–Local government processing of 2027 expansion funding requests begins (*Fall 2026*)
 - Detailed CAA–local government consultations
 - Identification of individual local government/service provider funding amounts
- Disbursement of 2027 expansion funding requests takes place (*January – December*)

Funding Request Review Criteria

While RMA rules provide guidance on how to prioritize local government eligible funding requests, there are several references in the RMA related to potential service expansion requests where further clarifications will be required to determine whether or not a particular local government service expansion request is eligible for funding under the statute, and whether or not the need is a high priority to fund during the first program plan instead of a future plan.

For example, service expansion requests related to expanded on-route collection services and the addition of recycling reload facilities indicate that the recycling reload facility is an eligible expense if necessary. RMA rule requirements also indicate that the PRO must provide funding for additional recycling depots “as needed to provide convenient recycling opportunities.” See OAR 340-090-0800(1)(a)(C). In the absence of additional review criteria, to address how RMA terms such as “if necessary” or “as needed” should be interpreted, CAA is proposing program review criteria to clarify how needs assessment funding requests will be assessed. Such criteria will also support other RMA requirements related to the verification of funding amounts anticipated under the statute.

As part of ORSOP, CAA consulted with local governments regarding funding eligibility protocols and the proposed needs assessment review criteria outlined below. These criteria will be applied by CAA to identify local government needs assessment requests that are high-priority eligible costs to be funded within the program plan period. CAA may defer local government needs assessment requests that do not perform well on one or more of these criteria to the next plan period beginning in 2028, but will treat all such requests as “pending” rather than “closed.” If a rulemaking further defining eligible costs is completed in the plan period, the rules will replace these criteria and will be applied by CAA to issue decisions on all pending requests:

1. Support for Existing Services and Infrastructure

Local governments and service providers have invested heavily in recycling infrastructure over decades to deliver recycling services in conjunction with the delivery of other solid waste services that form the greater solid waste management system. Where needed, improvements and additions will be considered, but existing infrastructure should remain the foundation for services. Where consistent with other rules and funding assessment criteria, funding requests should support and utilize existing recycling infrastructure. CAA believes in this concept, and the belief appears to be shared by local governments and service providers, since none of the service expansion requests received conflicted with this concept. The ORSOP survey catalogued the existing recycling infrastructure by jurisdiction. This allowed CAA to identify the gaps that need system expansion funding, building upon the existing system. Using a watershed view of the existing infrastructure, along with watershed consultations, CAA was able to identify investments that would modernize the system on a watershed and regional basis.

2. Consistent with RMA Objectives

Funding requests must be qualified expenses under the statute that are consistent with RMA objectives to minimize the environmental impacts of producer packaging. Regarding local

government infrastructure, requests should efficiently support improved environmental outcomes related to both local government recycling and statewide packaging objectives.

3. Driving Efficiency and Effectiveness

Funding requests should improve current system efficiency and support cost-effective diversion. The funding should be used both to improve the performance of existing recycling programs (e.g., increasing the recovery of materials that are currently recycled) and add new materials in a cost-effective manner. Investments should create new capacity that meets the newly anticipated volumes of recyclables under the RMA. It is recognized that any new tons added into the recycling system will likely increase the total and net system costs. An example of this criteria would include encouraging smaller local governments to work together when expanding services to share equipment, where possible. Instead of buying one truck for each of three local governments with 500 to 1,000 households, governments may coordinate to purchase only one that would be able to serve all three. Another example is a local government operating a depot collecting three materials each in separate bins and wishing to expand to the USCL list by adding an additional bin for each material and buying more land to place them on instead of recognizing that the depot can be more efficient with one bin for all USCL materials collected more frequently.

4. Balancing Local Government and Statewide Needs

Local government funding requests should integrate well with statewide infrastructure. A balance is required between funding to support statewide system benefits and funding for local/regional funding needs and opportunities.

5. No Cross Subsidization or Duplication of Funding

There should be no cross subsidization between local government needs assessment funding and non-RMA solid waste program funding. Funding provided by CAA for recycling programs will be dedicated to eligible recycling programs only. Funding requests should also not duplicate funding provided through other RMA programs.

6. Accuracy and Transparency

Funding requests must be based on accurate and complete information. CAA will work in good faith with local governments and their service providers to document required information associated with various types of system expansion service requests (e.g., required information in relation to a request for expanded on-route collection).

Approach to Funding Disbursement

Actual funding amounts for local government service expansion initiatives will be determined on a case-by-case basis subject to RMA eligibility requirements. A local government or service provider seeking funding identified in the program plan funding schedule (detailed later in this section of the plan) should not

purchase or order equipment without first executing a funding agreement with CAA. Expenditures without a CAA funding agreement will not be eligible for reimbursement.

As depicted in the graphic below, CAA established an administrative approach for disbursement that overlays DEQ prioritization, local government readiness, and operational sequencing. The prioritization process is explained in detail in the next subsection. Readiness can be defined as the local government or service provider's capacity to accept and deploy funding. The sequence, meanwhile, is the operational order of investments for efficient roll-out of system expansion.

The prioritization-readiness-sequencing approach is then applied to the modeled inventory of investments and cost model to generate the schedule of investments.

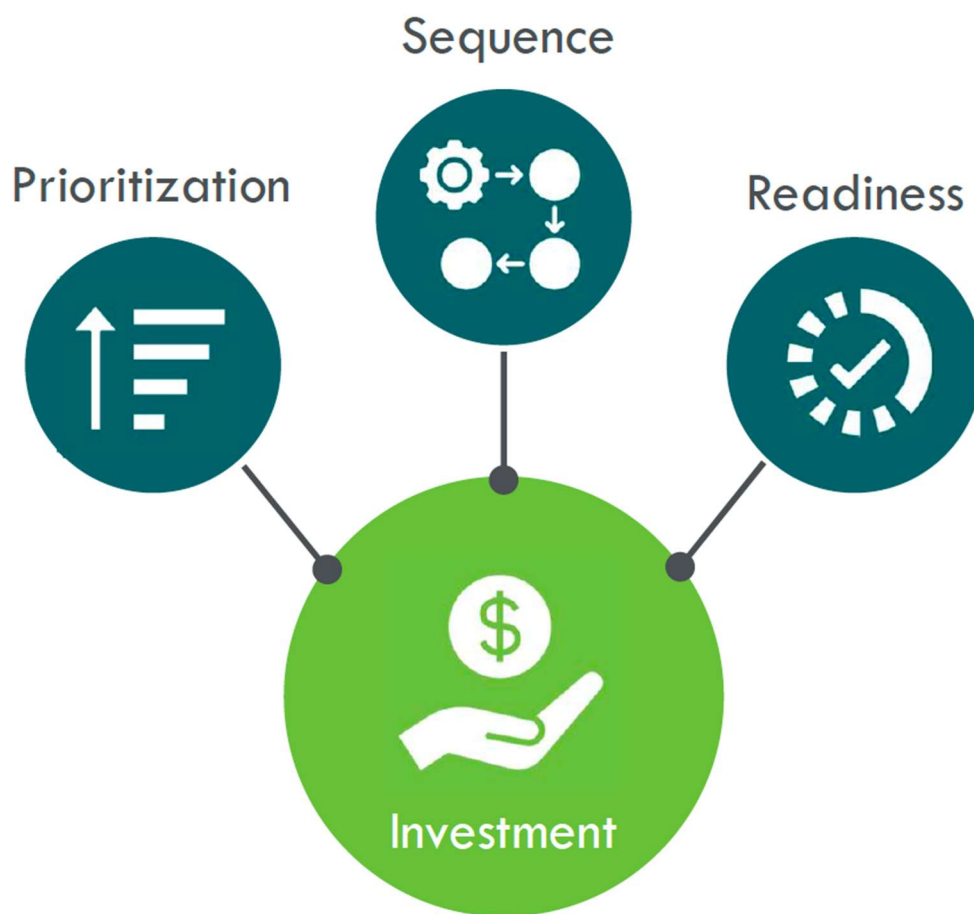


Figure 1
(graphic courtesy of RRS)

Assessing Priority of Funding Requests

All PRO funding for expansions and provision of recycling services from July 2025 through December 2027 have been prioritized following RMA rule guidelines. Requests have been categorized according to six priority groups:

1. **Priority Group A:** Local governments that are not, or will not be, able to provide the opportunity to recycle
2. **Priority Group B:** Existing recycling depots to provide for the collection of any materials that were formerly collected on-route by the local government or a local government's service provider, as needed to ensure continuation of recycling opportunities
3. **Priority Group C:** Existing recycling depots to provide for the collection of any materials that are not currently or were not formerly collected on-route by the local government or local government's service provider
4. **Priority Group D:** Local governments with populations less than 4,000, according to the Portland State University Population Research Center's most recent Population Estimate Report, or such other estimate approved by DEQ
5. **Priority Group E:** Local governments of any size that are looking to add new on-route or recycling depot service
6. **Priority Group F:** All other local governments that are looking to expand existing on-route collection, recycling depots, or both, in ascending order of population

In addition to these statutory funding priority criteria in rule, CAA has applied two additional criteria to developing the schedule of investments. Those are the criteria of readiness and projected volume increases.

Local governments that exhibit a readiness to deploy the requested investments may receive priority over communities that require further planning and program development before the investment can be fully defined.

To assess potential volume increases, CAA will be using preliminary inbound data from DEQ to estimate tonnage upticks that would come from material additions and other expansion steps in a given community. When a local government or service provider makes a funding request that includes a projected volume increase that varies by 20% or more from CAA's estimated increase, some or all of the requests may be placed in a "parking lot" until CAA and the community can come to a shared understanding of volume projections.

Where local government requests fall into multiple RMA rule prioritization categories, CAA will attempt to identify and sequence in accordance with the most applicable rule criteria. As noted earlier, CAA will also attempt to assess local government requests on a geographic or watershed basis to improve system efficiencies.

If a prioritized local government is not ready to process its funding requests in accordance with the proposed funding schedule, CAA will work with those local governments to process service expansion

requests as soon as that local government is ready to engage in the processing exercise necessary to determine final disbursement amounts.

Local Government Funding Schedule

The funding estimates for local governments and their service providers that are outlined below are model-driven and subject to variability. Some estimates are fixed because they depend on known parameters with known allocations (carts and trucks). In other cases, the calculations are based on assumptions subject to significant variability based on interpretation or unknown parameters (examples include site improvements and equipment purchases).

CAA acknowledges these disbursement estimates represent a significant decrease from the estimates laid out in the first version of the program plan – the total system expansion funding estimate for 2025 through 2027 is now \$81.5 million, whereas in the first program plan it was \$356 million to \$463 million.

Much of this shift can be attributed to the fact that the ORSOP process worked successfully to provide much more specific information from each jurisdiction to verify the need for service expansion, replacing the assumptions based on the 2023 needs assessment that were used to form estimates in the first version of the program plan.

Funding estimate changes can also be attributed to several other factors:

- Requests for new trucks and carts for curbside collection of glass are not being scheduled. CAA is working to preserve the curbside glass currently being collected by offering an incentive equal to the cost of managing glass at depots.
- Some initial estimates overstated the increase in material volumes resulting from the transition to the USCL. The Crowe study¹, in fact, projected no new volumes overall in the system. Also, if successful at reducing contamination, the system will have additional overall capacity. CAA is estimating communities may see a 7% increase if adding more items, such as plastics. Requests that came from communities estimating double-digit increases and requesting investments associated with managing that are in the funding "parking lot."
- Communities were identified that could share a resource between them, such as a truck or reload facility.

The schedule anticipates a 20% "up-front" investment for qualifying communities or investment types. The remaining funding is scheduled at the end of the reimbursement process, or upon final delivery of orders or completion of projects. An additional final reimbursement stage was modeled in anticipation of long lead times for truck purchases.

¹ Crowe. *Study Results: Processor Commodity Risk Fee / Contamination Management Fee*. Retrieved March 8, 2024 from <https://www.oregon.gov/deq/recycling/Documents/TWGTASK4-5Report.pdf>.

The table below shows the estimated system expansion disbursement for each local government and watershed over the course of the program plan period. It should be noted the total annual system expansion investments outlined in Table 1 do not align with the Local Government Collection Services Expansion cost estimates detailed in the program budget in Appendix E for two reasons:

- The cost of goods and services in the table below do not reflect the annual 5% cost of living adjustment (COLA) that has been built into the budget
- CAA built in an additional \$17.3 million for the potential need to fund investments indicated in the 2023 needs assessment but not specifically requested in ORSOP, and to support investment in Tribes as they become ready

The total projected cost for Local Government Collection Services Expansion for the program plan period, as detailed in Appendix E, is \$119.8 million. Table 1, starting on the next page, details the reimbursements that are anticipated for each jurisdiction participating in the ORSOP survey process.

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Baker	Baker City	C				\$0				\$13,393		
Baker	Baker City	C		\$28,571		\$28,571				\$15,179		
Baker	Baker City	A	\$183,620	\$374,400	\$360,080	\$918,100		\$468,000	\$450,100			
Baker	Baker County	E		\$10,000	\$40,000	\$50,000				\$50,000		
Baker	Baker County	A	\$283,620	\$774,400	\$360,080	\$1,418,100		\$468,000	\$450,100		\$500,000	
Baker Total			\$467,240	\$1,187,371	\$760,160	\$2,414,771	\$7,201	\$936,000	\$900,200	\$78,571	\$500,000	
Benton	Benton County	E		\$10,000	\$40,000	\$50,000				\$50,000		
Benton	Benton County	F		\$90,020	\$360,080	\$450,100			\$450,100			
Benton	Corvallis	F		\$8,400	\$33,600	\$42,000		\$42,000				
Benton Total			\$0	\$108,420	\$433,680	\$542,100	\$37,447	\$42,000	\$450,100	\$50,000	\$0	
Clatsop	Astoria	F		\$2,400	\$9,600	\$12,000		\$12,000				
Clatsop	Astoria	C		\$18,750		\$18,750				\$18,750		
Clatsop	Astoria	E		\$10,000	\$40,000	\$50,000				\$50,000		
Clatsop	Cannon Beach*	C		\$4,464		\$4,464				\$4,464		
Clatsop	Cannon Beach*	D		\$50,010	\$200,040	\$250,050		\$25,000	\$225,050			Gearhart Share
Clatsop	Clatsop County	E				\$0				\$50,000		
Clatsop	Clatsop County	E		\$156,020	\$624,080	\$780,100		\$280,000	\$450,100			
Clatsop	Gearhart*	C		\$25,000		\$25,000				\$25,000		
Clatsop	Gearhart*	D		\$50,010	\$200,040	\$250,050		\$25,000	\$225,050			Cannon Beach Share

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Clatsop Total			\$0	\$316,654	\$1,073,760	\$1,390,414	\$73,247	\$342,000	\$900,200	\$148,214	\$0	
Columbia	Clatskanie*	C		\$30,357		\$30,357				\$30,357		
Columbia	Columbia County	C		\$9,821		\$9,821				\$9,821		
Columbia Total			\$0	\$40,179	\$0	\$40,179	\$20,457	\$0	\$0	\$40,179	\$0	
Coos	Bandon*	D		\$12,600	\$50,400	\$63,000		\$63,000				
Coos	Coos Bay	A	\$462,640	\$1,130,400	\$720,160	\$2,313,200		\$913,000	\$900,200		\$500,000	
Coos	Coquille	A	\$15,400	\$61,600	\$0	\$77,000		\$77,000				
Coos	Lakeside*	D		\$5,400	\$21,600	\$27,000		\$27,000				
Coos	Myrtle Point*	D		\$11,200	\$44,800	\$56,000		\$56,000				
Coos	North Bend	A	\$40,600	\$162,400	\$0	\$203,000		\$203,000				
Coos Total			\$518,640	\$1,383,600	\$836,960	\$2,739,200	\$27,662	\$1,339,000	\$900,200	\$0	\$500,000	
Crook	Crook County	C		\$25,000		\$25,000				\$25,000		
Crook	Crook County	F		\$289,040	\$1,156,160	\$1,445,200		\$245,000	\$900,200		\$300,000	
Crook Total			\$0	\$314,040	\$1,156,160	\$1,470,200	\$9,975	\$245,000	\$900,200	\$25,000	\$300,000	
Curry Total			\$0	\$0	\$0	\$0	\$10,953	\$0	\$0	\$0	\$0	
Deschutes	Bend	F		\$528,032	\$2,112,128	\$2,640,160		\$1,289,860	\$1,350,300			
Deschutes	Deschutes County	B				\$0				\$4,464		
Deschutes	Deschutes County	B				\$0				\$6,250		
Deschutes	Deschutes County	B				\$0				\$25,000		
Deschutes	Deschutes County	B				\$0				\$25,000		
Deschutes	Deschutes County	B	\$17,143	\$68,571		\$85,714				\$25,000		

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Deschutes	Deschutes County	E		\$561,692	\$2,246,768	\$2,808,460		\$708,060	\$1,800,400		\$300,000	
Deschutes	La Pine*	D		\$122,270	\$489,080	\$611,350		\$161,250	\$450,100			
Deschutes	Redmond	F		\$458,180	\$1,832,720	\$2,290,900		\$1,390,700	\$900,200			
Deschutes	Sisters*	B	\$1,071	\$4,286		\$5,357				\$5,357		
Deschutes	Sisters*	D		\$137,456	\$549,824	\$687,280		\$237,180	\$450,100			
Deschutes Total			\$18,214	\$1,880,487	\$7,230,520	\$9,129,221	\$80,217	\$3,787,050	\$4,951,100	\$91,071	\$300,000	
Douglas	Douglas County	C				\$0				\$22,321		
Douglas	Douglas County	C				\$0				\$25,000		
Douglas	Douglas County	C				\$0				\$50,000		
Douglas	Douglas County	C				\$0				\$50,000		
Douglas	Douglas County	C				\$0				\$60,000		
Douglas	Douglas County	C				\$0				\$60,000		
Douglas	Douglas County	C				\$0				\$60,000		
Douglas	Douglas County	C				\$0				\$60,000		
Douglas	Douglas County	C		\$507,321		\$507,321				\$60,000		
Douglas	Douglas County	F		\$826,776	\$3,307,104	\$4,133,880		\$783,580	\$1,350,300		\$2,000,000	
Douglas	Oakland*	D		\$52,878	\$211,512	\$264,390		\$39,340	\$225,050			Reedsport Share
Douglas	Reedsport	F		\$88,702	\$354,808	\$443,510		\$218,460	\$225,050			Oakland Share

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Douglas	Roseburg	A	\$277,324	\$389,136	\$720,160	\$1,386,620		\$486,420	\$900,200			
Douglas Total			\$277,324	\$1,864,813	\$4,593,584	\$6,735,721	\$688,853	\$1,527,800	\$2,700,600	\$507,321	\$2,000,000	
Gilliam Total			\$0	\$0	\$0	\$0	\$866	\$0	\$0	\$0	\$0	
Grant Total			\$0	\$0	\$0	\$0	\$3,300	\$0	\$0	\$0	\$0	
Harney	Harney County*	C		\$7,143		\$7,143				\$7,143		
Harney Total			\$0	\$7,143	\$0	\$7,143	\$21,745	\$0	\$0	\$7,143	\$0	
Hood River	Cascade Locks*	D		\$45,010	\$180,040	\$225,050			\$225,050			Hood River Share
Hood River	Hood River	F		\$73,010	\$292,040	\$365,050		\$140,000	\$225,050			Cascade Locks Share
Hood River	Hood River County	E		\$14,000	\$56,000	\$70,000		\$70,000				
Hood River Total			\$0	\$132,020	\$528,080	\$660,100	\$8,965	\$210,000	\$450,100	\$0	\$0	
Jackson	Ashland	C		\$12,857		\$12,857				\$12,857		
Jackson	Ashland	F		\$120,020	\$480,080	\$600,100		\$150,000	\$450,100			Talent Share
Jackson	Butte Falls town*	D		\$444	\$1,776	\$2,220		\$2,220				
Jackson	Central Point	F		\$10,120	\$40,480	\$50,600		\$50,600				
Jackson	Eagle Point	F		\$97,090	\$388,360	\$485,450		\$35,350	\$450,100			
Jackson	Gold Hill*	D		\$4,398	\$17,592	\$21,990		\$21,990				
Jackson	Jackson County	C				\$0				\$17,143		
Jackson	Jackson County	C		\$60,000		\$60,000				\$42,857		
Jackson	Jackson County	E		\$520,276	\$2,081,104	\$2,601,380		\$451,080	\$1,350,300		\$800,000	

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Jackson	Jacksonville*	D		\$25,006	\$100,026	\$125,032		\$12,507	\$112,525			
Jackson	Medford	F		\$180,040	\$720,160	\$900,200			\$900,200			
Jackson	Phoenix	F		\$47,220	\$188,880	\$236,100		\$11,050	\$225,050			
Jackson	Rogue River*	D		\$91,714	\$366,856	\$458,570		\$8,470	\$450,100			
Jackson	Shady Cove*	D		\$116,180	\$464,720	\$580,900		\$130,800	\$450,100			
Jackson	Talent	F		\$8,000	\$32,000	\$40,000		\$40,000	See Ashland			Ashland Share
Jackson Total			\$0	\$1,293,366	\$4,882,034	\$6,175,399	\$90,467	\$914,067	\$4,388,475	\$72,857	\$800,000	
Jefferson	Madras	F		\$21,910	\$87,640	\$109,550		\$109,550				
Jefferson Total			\$0	\$21,910	\$87,640	\$109,550	\$8,680	\$109,550	\$0	\$0	\$0	
Josephine	Grants Pass	F		\$100,072	\$400,288	\$500,360		\$50,260	\$450,100			
Josephine	Josephine County	F		\$120,610	\$482,440	\$603,050		\$152,950	\$450,100			
Josephine Total			\$0	\$220,682	\$882,728	\$1,103,410	\$36,024	\$203,210	\$900,200	\$0	\$0	
Klamath	Klamath Falls	E				\$0				\$50,000		
Klamath	Klamath Falls	E		\$20,000	\$80,000	\$100,000				\$50,000		
Klamath Total			\$0	\$20,000	\$80,000	\$100,000	\$28,634	\$0	\$0	\$100,000	\$0	
Lake	Lakeview town*	C		\$48,214		\$48,214				\$48,214		
Lake Total			\$0	\$48,214	\$0	\$48,214	\$66,066	\$0	\$0	\$48,214	\$0	
Lane	Coburg*	D		\$203,890	\$815,560	\$1,019,450		\$119,250	\$900,200			
Lane	Cottage Grove	A	\$97,220	\$28,800	\$360,080	\$486,100		\$36,000	\$450,100			
Lane	Creswell	F		\$104,662	\$418,648	\$523,310		\$73,210	\$450,100			
Lane	Eugene	F		\$913,600	\$3,654,400	\$4,568,000		\$2,017,500	\$2,250,500		\$300,000	

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Lane	Junction City	F		\$420	\$1,680	\$2,100		\$2,100				
Lane	Lane County	C				\$0				\$2,857		
Lane	Lane County	C				\$0				\$2,857		
Lane	Lane County	C				\$0				\$2,857		
Lane	Lane County	C				\$0				\$7,143		
Lane	Lane County	C				\$0				\$7,143		
Lane	Lane County	C				\$0				\$7,143		
Lane	Lane County	C				\$0				\$8,036		
Lane	Lane County	C				\$0				\$8,036		
Lane	Lane County	C				\$0				\$10,000		
Lane	Lane County	C				\$0				\$10,000		
Lane	Lane County	C				\$0				\$10,000		
Lane	Lane County	C		\$92,143		\$92,143				\$16,071		
Lane	Lane County	E		\$854,816	\$3,419,264	\$4,274,080		\$473,680	\$1,800,400		\$2,000,000	
Lane	Lowell*	D		\$92,158	\$368,632	\$460,790		\$10,690	\$450,100			
Lane	Springfield	C		\$9,821		\$9,821				\$9,821		
Lane	Springfield	F		\$249,104	\$996,416	\$1,245,520		\$795,420	\$450,100			
Lane	Veneta	F		\$102,528	\$410,112	\$512,640		\$62,540	\$450,100			
Lane Total			\$97,220	\$2,651,942	\$10,444,792	\$13,193,954	\$177,487	\$3,590,390	\$7,201,600	\$101,964	\$2,300,000	
Lincoln	Depoe Bay*	D		\$90,020	\$360,080	\$450,100			\$450,100			
Lincoln	Lincoln City	C		\$8,929		\$8,929				\$8,929		
Lincoln	Lincoln City	F		\$180,040	\$720,160	\$900,200			\$900,200			
Lincoln	Lincoln County	E				\$0				\$50,000		
Lincoln	Lincoln County	E				\$0				\$50,000		

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Lincoln	Lincoln County	C		\$61,607		\$61,607				\$61,607		
Lincoln	Lincoln County	E		\$173,176	\$692,704	\$865,880		\$165,880			\$600,000	
Lincoln	Newport	E		\$10,000	\$40,000	\$50,000				\$50,000		
Lincoln	Newport	F		\$154,620	\$618,480	\$773,100		\$123,000	\$450,100		\$200,000	
Lincoln	Siletz*	D		\$6,322	\$25,288	\$31,610		\$31,610				
Lincoln	Toledo*	C		\$25,000		\$25,000				\$25,000		
Lincoln	Toledo*	D		\$203,058	\$812,232	\$1,015,290		\$65,190	\$450,100		\$500,000	
Lincoln	Waldport*	C		\$19,643		\$19,643				\$19,643		
Lincoln	Waldport*	D		\$11,042	\$44,168	\$55,210		\$55,210				
Lincoln	Yachats*	D		\$28,565	\$114,260	\$142,825		\$30,300	\$112,525			
Lincoln Total			\$0	\$972,022	\$3,427,372	\$4,399,394	\$55,207	\$471,190	\$2,363,025	\$265,179	\$1,300,000	
Linn	Albany	C		\$8,036		\$8,036				\$8,036		
Linn	Albany	F		\$40,000	\$160,000	\$200,000					\$200,000	
Linn	Brownsville*	D		\$94,710	\$378,840	\$473,550		\$23,450	\$450,100			
Linn	Halsey*	D		\$1,226	\$4,904	\$6,130		\$6,130	Brownsville			
Linn	Linn County	E		\$9,358	\$37,432	\$46,790		\$46,790				
Linn	Sweet Home	F		\$102,562	\$410,248	\$512,810		\$62,710	\$450,100			
Linn Total			\$0	\$255,892	\$991,424	\$1,247,316	\$49,344	\$139,080	\$900,200	\$8,036	\$200,000	
Malheur	Ontario	F		\$122,220	\$488,880	\$611,100		\$161,000	\$450,100			
Malheur Total			\$0	\$122,220	\$488,880	\$611,100	\$31,398	\$161,000	\$450,100	\$0	\$0	
Marion	Detroit*	D		\$91,364	\$365,456	\$456,820		\$6,720	\$450,100			Turner Share
Marion	Keizer	E		\$10,000	\$40,000	\$50,000				\$50,000		
Marion	Keizer	F		\$20,000	\$80,000	\$100,000		\$100,000				

Wastshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Marion	Marion County	C		\$16,071		\$16,071				\$16,071		
Marion	Marion County	E				\$0				\$50,000		
Marion	Marion County	E		\$20,000	\$80,000	\$100,000				\$50,000		
Marion	Marion County	F		\$278,420	\$1,113,680	\$1,392,100		\$642,000	\$450,100		\$300,000	
Marion	Salem	C				\$0				\$12,500		
Marion	Salem	C				\$0				\$16,250		
Marion	Salem	C				\$0				\$19,643		
Marion	Salem	C		\$71,964		\$71,964				\$23,571		
Marion	Salem	F		\$151,010	\$604,040	\$755,050		\$755,050				
Marion	Silverton	E		\$10,000	\$40,000	\$50,000				\$50,000		
Marion	Turner*	D		\$2,000	\$8,000	\$10,000		\$10,000	See Detroit			Detroit Share
Marion Total			\$0	\$670,830	\$2,331,176	\$3,002,006	\$206,157	\$1,513,770	\$900,200	\$288,036	\$300,000	
Metro	Banks*	D		\$10,000	\$40,000	\$50,000				\$50,000		
Metro	Clackamas County	B	\$1,429	\$5,714		\$7,143				\$7,143		
Metro	Cornelius	E		\$10,000	\$40,000	\$50,000				\$50,000		
Metro	Oregon City	B	\$1,071	\$4,286		\$5,357				\$5,357		
Metro	Oregon City	F		\$342,902	\$1,371,608	\$1,714,510		\$814,310	\$900,200			
Metro	Portland	E		\$10,000	\$40,000	\$50,000				\$50,000		
Metro	Portland	F		\$860,206	\$3,440,824	\$4,301,030		\$4,301,030				
Metro	Sherwood	C		\$9,821		\$9,821				\$9,821		
Metro	Troutdale	E		\$10,000	\$40,000	\$50,000				\$50,000		
Metro	Washington County	F		\$527,080	\$2,108,320	\$2,635,400		\$835,000	\$1,800,400			

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Metro Total			\$2,500	\$1,790,009	\$7,080,752	\$8,873,261	\$793,809	\$5,950,340	\$2,700,600	\$222,321	\$0	
Milton-Freewater	Milton-Freewater	A	\$213,640	\$134,400	\$720,160	\$1,068,200		\$168,000	\$900,200			
Milton-Freewater Total			\$213,640	\$134,400	\$720,160	\$1,068,200	\$2,524	\$168,000	\$900,200	\$0	\$0	
Morrow	Boardman*	A	\$222,040	\$168,000	\$720,160	\$1,110,200		\$210,000	\$900,200			
Morrow	Irrigon*	D		\$9,800	\$39,200	\$49,000		\$49,000				
Morrow	Morrow County	A	\$14,000	\$56,000	\$0	\$70,000		\$70,000				
Morrow Total			\$236,040	\$233,800	\$759,360	\$1,229,200	\$4,214	\$329,000	\$900,200	\$0	\$0	
Polk	Polk County	E		\$114,020	\$456,080	\$570,100		\$120,000	\$450,100			
Polk	Willamina*	D		\$91,020	\$364,080	\$455,100		\$5,000	\$450,100			
Polk Total			\$0	\$205,040	\$820,160	\$1,025,200	\$32,135	\$125,000	\$900,200	\$0	\$0	
Sherman Total			\$0	\$0	\$0	\$0	\$826	\$0	\$0	\$0	\$0	
Tillamook	Bay City*	D		\$100,520	\$402,080	\$502,600		\$52,500	\$450,100			
Tillamook	Manzanita*	D		\$101,862	\$407,448	\$509,310		\$59,210	\$450,100			Nehelam and Wheeler Share
Tillamook	Tillamook	C		\$8,929		\$8,929				\$8,929		
Tillamook	Tillamook	F		\$291,240	\$1,164,960	\$1,456,200		\$556,000	\$900,200			
Tillamook	Tillamook County	C		\$16,071		\$16,071				\$16,071		
Tillamook	Tillamook County	E				\$0				\$50,000		
Tillamook	Tillamook County	E		\$20,000	\$80,000	\$100,000				\$50,000		
Tillamook	Tillamook County	F		\$148,000	\$592,000	\$740,000		\$240,000			\$500,000	

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Tillamook	Wheeler*	D		\$4,080	\$16,320	\$20,400		\$20,400	See Manzanita			Manzanita Share
Tillamook Total			\$0	\$690,702	\$2,662,808	\$3,353,510	\$11,727	\$928,110	\$1,800,400	\$125,000	\$500,000	
Umatilla	Adams*	D		\$10,000	\$40,000	\$50,000				\$50,000		
Umatilla	Athena*	D				\$0				\$50,000		
Umatilla	Athena*	D		\$20,000	\$80,000	\$100,000				\$50,000		
Umatilla	Athena*	C		\$57,857		\$57,857				\$57,857		
Umatilla	Echo*	D		\$3,500	\$14,000	\$17,500		\$17,500	See County			County Share
Umatilla	Echo*	C		\$20,536		\$20,536				\$20,536		
Umatilla	Helix*	D		\$10,000	\$40,000	\$50,000				\$50,000		
Umatilla	Hermiston	A	\$340,060	\$280,000	\$1,080,240	\$1,700,300		\$350,000	\$1,350,300			
Umatilla	Pendleton	C		\$15,179		\$15,179				\$15,179		
Umatilla	Pendleton	C		\$40,179		\$40,179				\$40,179		
Umatilla	Pendleton	A	\$377,440	\$789,600	\$720,160	\$1,887,200		\$487,000	\$900,200		\$500,000	
Umatilla	Umatilla	A	\$25,900	\$103,600	\$0	\$129,500		\$129,500				
Umatilla	Umatilla County	A	\$606,560	\$265,760	\$2,160,480	\$3,032,800		\$332,200	\$2,700,600			
Umatilla	Weston*	D		\$10,000	\$40,000	\$50,000	\$0			\$50,000		
Umatilla Total			\$1,349,960	\$1,626,210	\$4,174,880	\$7,151,050	\$65,312	\$1,316,200	\$4,951,100	\$383,750	\$500,000	
Union	La Grande	F		\$310,440	\$1,241,760	\$1,552,200		\$652,000	\$900,200			
Union Total			\$0	\$310,440	\$1,241,760	\$1,552,200	\$10,779	\$652,000	\$900,200	\$0	\$0	
Wallowa	Wallowa County*	C		\$1,786		\$1,786				\$1,786		
Wallowa Total			\$0	\$1,786	\$0	\$1,786	\$8,019	\$0	\$0	\$1,786	\$0	
Wasco	Dufur*	D		\$90,020	\$360,080	\$450,100			\$450,100			

Wasteshed Name	Name	Priority	2025	2026	2027	Total	Annual Operating and Education	Containers	Trucks	Depot	Reload	Notes
Wasco	The Dalles	A	\$159,698	\$278,712	\$360,080	\$798,490		\$348,390	\$450,100			Maupin and Mosier Share
Wasco	Wasco County	E		\$37,800	\$151,200	\$189,000		\$189,000				
Wasco Total			\$159,698	\$406,532	\$871,360	\$1,437,590	\$10,553	\$537,390	\$900,200	\$0	\$0	
Wheeler Total			\$0	\$0	\$0	\$0	\$686	\$0	\$0	\$0	\$0	
Yamhill	Amity*	C		\$25,000		\$25,000				\$25,000		
Yamhill	Amity*	D		\$5,800	\$23,200	\$29,000		\$29,000				
Yamhill	Lafayette	F		\$14,500	\$58,000	\$72,500		\$72,500				
Yamhill	Newberg	C		\$2,143		\$2,143				\$2,143		
Yamhill	Sheridan	C		\$21,429		\$21,429				\$21,429		
Yamhill	Sheridan	F		\$14,000	\$56,000	\$70,000		\$70,000	See County			County Share
Yamhill	Yamhill*	D		\$6,110	\$24,440	\$30,550		\$30,550	See County			County Share
Yamhill	Yamhill County	C		\$13,393		\$13,393				\$13,393		
Yamhill	Yamhill County	F		\$90,020	\$360,080	\$450,100			\$450,100			Sheridan and Yamhill Share
Yamhill Total			\$0	\$192,394	\$521,720	\$714,114	\$44,975	\$202,050	\$450,100	\$61,964	\$0	
Grand Total			\$3,340,476	\$19,103,118	\$59,081,910	\$81,525,504†	\$2,725,912	\$25,739,197	\$43,659,700	\$2,626,607	\$9,500,000	

†Does not include the 5% cost of living adjustment reflected in the total system costs detailed in the program budget in Appendix E, or the \$17.3 million reserve for communities that responded to the 2023 needs assessment but did not make a request through ORSOP, or investments on Tribal lands as they are ready.

* Indicates communities with a population of less than 4,000 people.

“Notes” column indicates instances where truck requests have been granted but are shared with multiple local governments.

Table 1

The table below shows the schedule of planned system expansion investments by quarter and priority level.

Community Priority	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	2025	2025	2025	2026	2026	2026	2026	2027	2027	2027	2027
Priority A		\$3,319,762			\$4,997,208			\$8,281,840			
Priority B			\$20,714			\$82,857					
Priority C				\$264,607			\$1,058,429				
Priority D					\$2,021,643			\$1,785,174			\$6,301,400
Priority E					\$2,591,158				\$5,683,592		\$4,681,040
Priority F					\$8,087,216					\$16,685,384	\$15,663,480
Capital Sum		\$3,319,762	\$20,714	\$264,607	\$17,697,225	\$82,857	\$1,058,429	\$10,067,014	\$5,683,592	\$16,685,384	\$26,645,920
Operating Sum		\$113,921	\$180,069	\$507,993	\$2,550,245	\$2,550,245	\$2,550,245	\$2,550,245	\$2,550,245	\$2,550,245	\$2,550,245
Total Sum		\$3,433,683	\$200,784	\$772,600	\$20,247,471	\$2,633,103	\$3,608,674	\$12,617,259	\$8,233,837	\$19,235,629	\$29,196,165

Table 2

System Expansion Funding Administrative Process

Disbursements of funding for service expansion require an administrative process that blends DEQ prioritization, local government readiness, and the sequence of operations to optimize investment timing for the state and the watershed. This process must also deliver on the following goals to maintain trust with local partners:

- Transparent
- Accountable
- Accurate
- Timely and predictable

Local governments begin the process according to prioritization in rule. Based on the priority, then each claim will go through a multi-stage process that will begin in advance of their priority funding group's initial disbursement, and continue through the course of the program plan, if not longer, depending on the nature of the investment.

The first stage is initial outreach and technical assistance from the CAA team to local government, or that government's designee, for system expansion funding. Outreach will include providing a packet of information to each jurisdiction, which will include:

- Explanation of how eligible expenses have been derived from the needs assessment and ORSOP responses
- Summary of reimbursement estimates
- An opportunity for the local government or its designee to update or correct any of its ORSOP responses
- Jurisdiction-specific summary of ORSOP results, analysis, and estimated investments, with updated ORSOP responses incorporated

The next stage is confirmation of need and readiness. The CAA team and the funding recipient will work to review the system gap identified in the ORSOP survey and determine if the local government or their service provider is ready to receive the investment. If initial steps must be taken to make the jurisdiction ready to receive the payment, those actions will be mutually identified and outlined in the funding agreement.

The funding agreement stage, involving CAA, the jurisdiction, and/or the hauler representative, will document what investments will be made, when those investments will be made, and how payment/reimbursement will be made. Those details will all be captured in a funding agreement, which will guide the system expansion process for that community over the course of the program plan period.

The funding agreement will outline what information needs to be provided to CAA for reimbursement, and through the estimated lifespan of that equipment purchase to demonstrate the asset is still in use.

Over the course of the plan period, CAA will report quarterly to DEQ on the quantity and type of infrastructure assets that have been confirmed in contracts with local governments and/or their hauler representatives. In this reporting, CAA will notify DEQ if any local government requests are being deferred as

“pending” to a subsequent program plan period. CAA’s first quarterly report will be submitted to DEQ on November 15, 2025.

Ensuring that Eligible Costs are Funded

Communities that filled out the needs assessment but are not in the schedule of investments for system expansion funding (Table 1) will be given another opportunity to fill out the ORSOP (if they did not fill it out in 2024) or an opportunity to update their survey responses (if they did fill it out). This will be done as follows:

- CAA and DEQ will agree upon a list of communities that fall into this category and the priority group that each belongs with.
- Before beginning to disburse funds for each priority group, CAA will reach out to the missing communities assigned to the priority group to offer an opportunity to complete or update an extension of the ORSOP survey. CAA will gather the additional information through an MS forms document that mirrors the initial ORSOP survey. CAA will reach out via email and via phone to contacts on its current list as well as to contacts known to DEQ staff.
- CAA will share with DEQ staff and with the Oregon Refuse and Recycling Association (ORRA) the list of communities that are unresponsive two weeks after completing the outreach step above.
- DEQ and ORRA will have two additional weeks to establish contact with the local governments and/or service providers and confirm interest in completing or updating an ORSOP survey.
- Once interest in completing or updating an ORSOP survey has been confirmed, CAA will work with the local government and/or service provider contacts to gather needed information about the funding requests.
- Eligible funding requests identified during this process will be added to the budget and funded at the end of the appropriate priority group.

Dispute Settlement Process Relating to Service Expansion Funding Requests

CAA will engage with each jurisdiction or service provider that participated in the ORSOP survey and made a request for an eligible expense, review the funding requests with each party, identify the system gap, and determine funding prioritization. The funding commitment from CAA will be captured in a funding agreement with each jurisdiction or funding designee. General payment terms offered by CAA will include direct payment to the vendor of both down payments and final payments, when they come due. Local governments or funding designees that require alternative payment terms must notify CAA of this need during discussions on the funding agreement. In general, local governments or designees requesting funding in total, up front, should offer demonstration of a hardship that requires all investments to be paid in full

when their priority group becomes eligible for funding. All funds received up front and not spent within a designated time frame in the funding agreement will be remitted back to CAA.

CAA will conduct a thorough review of the funding requests received during the ORSOP survey and consultation process. Based on the information provided to demonstrate the need for the investments, CAA will work with communities and service providers to finalize the terms of the needed investments. Any funding commitment from CAA will be captured in a funding agreement with each jurisdiction or funding designee. If a disagreement arises about the funding levels needed to support collection of the USCL, both parties will work through the dispute resolution process.

The dispute resolution process includes five steps, as shown in the table below.

CAA will ensure that DEQ has the right to access information from CAA's dispute resolution process with jurisdictions or service providers if needed for DEQ enforcement actions related to rule or statutory rule interpretation.

Step	Dispute Resolution Approach	Summary	Duration of the Process
1	Working group review (with CAA, Local Governments, Service Providers, and DEQ to address anticipated agreements)	This group will offer review and interpretation on areas of ambiguity where CAA's obligations are not clearly defined in statute or rule. This group could choose to offer an interpretation of the issue for the parties to consider.	90 days
2	DEQ review	For disputes that involve statutory or rule interpretation, DEQ may choose to conduct an independent review and issue an interpretation.	90 days, concurrent with step 1
3	Mandatory Negotiation	When parties do not both agree to the recommendation from the working group, the issue would be elevated to mandatory negotiation. This would require both parties to meet and make a good-faith effort to resolve such dispute themselves through designated representatives.	90 days
4	Mediation	If resolution cannot be reached by the parties themselves within ninety (90) days, the parties shall engage in non-binding mediation with a mediator (who, for the avoidance of doubt, may be selected from a mediation tribunal panel of neutrals) to be mutually agreed on by the parties. The parties shall participate in mediation in good faith, including by cooperating to select a	90 days

		mediator and in scheduling the mediation proceedings. Mediation costs will be shared equally between the parties. Mediation may be conducted in-person or remotely through a videoconference platform approved by the mediator and parties.	
5	Binding Arbitration	If resolution cannot be reached by the parties through non-binding mediation, or the parties fail to complete mediation within ninety (90) days of submission of the dispute to the mediator, any outstanding dispute, controversy, or claim shall be resolved by binding arbitration. The decision of the arbitrator(s) shall be final and binding on the parties, and the parties waive any right to appeal the decision, to the extent that a waiver can be made under applicable law.	

Table 3

Accountability Mechanisms

Funding provided to local governments and their local service providers will need to be accompanied by accountability mechanisms to ensure that PRO funding provided to local governments is allocated to its intended RMA purpose. In many cases, this may include ensuring accountability mechanisms are in place for advance funding for capital items such as trucks. As part of the ORSOP, CAA consulted with local governments and local service providers regarding the accountability reporting and conditions associated with the provision of funding in relation to service expansion requests and different types of eligible funding categories.

CAA will enter into a general funding agreement with all parties eligible for funding under the RMA. For each stream of funding a jurisdiction, service provider, or PRO collection partner is eligible for, an addendum will be made that describes the terms and conditions of each funding stream. The addendum will also include details on what information must be submitted, the time frame within which payment will occur, and any information that needs to be submitted to verify performance is being met according to the addendum. All requests for payment under a funding agreement will be submitted through the CAA portal. Local governments and service providers under the funding agreement will have login credentials for the portal where they can view their account, monitor the status of current requests, and review payment for past requests. Any additional information needed to verify performance according to the terms of the agreements will also be uploaded to their record in the portal.

ii. Transportation Reimbursements

Under the RMA, the PRO is required to fund the local government or their service provider's costs of transporting covered materials from a recycling depot or recycling reload facility to a CRPF, processor, or responsible end market (REM).

DEQ rules establish methods for determining funding and reimbursement amounts, which may include payments based on zones. The rules specify that:

- Costs must be based on the actual costs of managing and transporting covered materials that must be shipped more than 50 miles
- 50-mile distance is the shortest driving distance to:
 - The nearest CRPF with capacity to process the material, if the material is commingled
 - The nearest processing or sorting facility that will prepare it for market or REM, if the material is collected separately (e.g., glass) or is not fully commingled
 - The nearest REM if the material is collected separately and in condition to be sent to an REM
- Costs to receive, consolidate, load, and transport covered materials include but are not limited to purchasing and maintaining equipment, signage (not already covered under RMA provisions), and administrative costs including related staffing costs
- Transportation costs of covered materials directly from a generator to a CRPF or REM are not eligible
- In 2027, the PRO must also conduct a transportation study
- The PRO program plan must include methods for calculating transportation costs
- Payment methods may include rate schedules or zonal maps with periodic adjustments for fuel prices or other variable factors
- Consultation with local governments and service providers on payment methods is required
 - Methods must include a voluntary option where PRO and local government/service provider may agree to transfer some or all transportation responsibilities to PRO

Consultation Process

During the program plan development process, CAA consulted with a select number of local government service providers on the design of the program for administering transportation disbursements under the RMA. These service providers are all likely claimants for transportation reimbursement under the RMA and were selected in consultation with ORRA, which represents haulers and other recycling businesses throughout the state.

CAA received feedback from North Lincoln Sanitary, Thompson Sanitary, and Rogue Disposal. Some of the feedback received was the concern of a mileage or zone reimbursement model not accounting for the more rural locations that are not on the main highway system. With this feedback, CAA has employed a per-hour reimbursement model developed. CAA has shared the details of the time-based reimbursement approach for transportation with ORRA and a number of their members. CAA has also broadly shared information about the time-based reimbursement approach for transportation reimbursement at the Association of

Oregon Recyclers fall forum. There is broad support for this approach and general confidence the model captures all of the cost inputs relating to the transport of USCL materials to market.

The purpose of this pre-program plan consultation was to identify elements that need to be considered in the initial drafting of the funding program for the first plan and inform the structure and approach of the more in-depth consultation through ORSOP. Through the ORSOP process, CAA sought feedback from affected parties throughout the state, including 191 jurisdictions and 34 wastesheds, to develop the proposed RMA compensation program. The list of jurisdictions consulted throughout this process, as well as the list of participants in the ORSOP process, can be found in Appendix D. The proposed transportation reimbursement model, which CAA received additional feedback on during the ORSOP, is described below. Following further consultation and outreach, CAA will finalize transportation reimbursement policies and required forms and documents. These policy documents will be available online, and CAA will conduct webinars and interest-holder outreach prior to program plan implementation to explain the claims submission process before the program start date.

CAA expects to begin processing claims from eligible funding recipients for any qualifying shipments made after the start of the program on July 1, 2025.

Proposed Methods for Calculating Transportation Costs

General Model

CAA will use the following process to determine the accurate transportation reimbursement:

- CAA will calculate disbursements based on a standardized hourly rate from eligible outbound facilities to the nearest CRPF with capacity or end market, with some adjustment for loading and preparation of outbound loads. If the nearest CRPF is at capacity, the CRPF must notify the transporter and CAA by email that they are at capacity and CAA will approve the change in reimbursement ranges to the next nearest CRPF.
- A standardized hourly rate, with different rates for different types of loads, would be utilized to calculate the transportation reimbursement compensation for different facilities. The model also takes into account an average of three different times of day that the loads could be delivered to account for potential rush hour traffic or congestion.
- The standardized hourly rate would be used to calculate a range of transportation reimbursements for each eligible outbound facility based on the application of the standard round trip hourly rate between eligible facilities and the nearest processing facility or end market. The reimbursement will also take into account truck load and unload time, facility staff time loading the trailer, trailer staging, and driver time.
- CAA will work with the transporter to identify backhaul opportunities, if available.

CAA will adjust the fuel rate monthly using prices from the U.S. Energy Information Administration for the “West Coast less California” area. Other costs, such as labor, will be adjusted annually using a standard cost of living adjustment. Local governments can assign transportation eligibility funding rights to service providers, and eligible transporters would register with CAA and enter into a transportation claims

agreement. Functioning through an online portal, eligible applicants would confirm eligibility for reimbursement for individual shipments with CAA prior to the shipment taking place.

CAA would confirm their shipment request and notify the receiving CRPF of the delivery. Once received, the CRPF will confirm the load was accepted and input final weights. Once that is complete, reimbursement would be disbursed to the party initiating the shipment request. The program would include a dispute settlement process with specified timelines for contested claims.

Although funding requests from service providers for facility upgrades and capital costs associated with preparation of materials (excluding costs covered under expansion of services funding to local governments) may coincide with requests for transportation cost reimbursement, CAA recommends managing funding requests for capital items (e.g. depot signage, compaction equipment, etc.) separately from transportation claims.

Registration of Claimants

A process must be established for local governments to identify the recycling depots, recycling facilities, and haulers eligible for transportation reimbursements in their jurisdictions. DEQ is creating a process for local governments to designate others to receive different streams of eligible funding.

Eligible recipients of transportation funding, which could include both local governments and service providers, would enter into a transportation claims agreement with CAA prior to receiving transportation reimbursements:

- This agreement would include terms of payments including indemnification of CAA clauses that clarify each party's liabilities and obligations with respect to transportation of RMA materials, including situations where a funding recipient was utilizing a third party to transport covered materials
- CAA intends to consult with service providers and local governments on the content of a draft transportation claims agreement template

CAA expects to facilitate the registration process and completion of transportation reimbursement claims agreements in time to enable implementation by July 1, 2025.

Establishing Standard Rates

- CAA will develop a draft recycling depot and recycling reload facility list for review by local governments and service providers
- A facility receiving rate of inbound shipments that need to be scaled, received, consolidated, stored, and reloaded and all the associated administration and reporting would be paid a standard fee per ton managed
- A transportation range of reimbursement for outbound shipments from each facility would be calculated based on a standard hourly rate applied to the nearest CRPF with capacity. The process for calculation of transportation rates for each facility would be reviewed including:
 - The categories of shipments that would be subject to different standard transportation rates (i.e., material type, destination)

- Calculation of facility rates reflecting the shipping time from each eligible facility to the nearest processing facility with capacity or nearest end market based on the standard hourly rate
- Proposed rates will be set per ton of eligible covered material

→ Payment process would include determining rates for mixed loads

Based on CAA's research of the existing material processing landscape, most CRPFs in the region do not have capacity issues. The transportation model will use the closest CRPF with reliable capacity. In the instance that a CRPF has a disruption to their available capacity, CAA will make an adjustment to the model once that is made known, and the nearest CRPF with capacity will be adjusted for those affected reload facilities.

Submissions and Reimbursements

CAA will develop an online portal to process submissions of claims. Claims processing will reflect the steps outlined below:

1. Eligible recipients would provide CAA notice of shipment through a standard form via an online process
2. CAA would pre-approve eligible shipments (within specified time frames)
3. A bill of lading would be released to relevant parties, where applicable
4. Final weights of transported materials would be reconciled by CRPFs and other receiving facilities
5. Transporter will submit an invoice for all loads transported each month
6. Payment is released

As per RMA rule requirements, CAA would notify local governments of all payments made to authorized service providers under this program.

Claims Submission Content

Operational information collected via claims submissions may include:

- Confirmation of shipment eligibility (i.e., local government or service provider designation for receipt of transportation funding of covered materials)
- Originating location of recycling depot or recycling reload facility
- Date of load pick up at recycling depot or recycling reload facility
- Destination of delivery: CRPF, processor, or REM
- Date of delivery to CRPF, processor, or REM
- Confirmation of delivery by authorized CRPF, processor, or REM representative
- Identification of covered material load type:
- Commingled material, specific material, if appropriate
 - Baled material vs. compaction vs. uncompacted material
- If applicable, percentage of load associated with eligible covered materials

- Outbound, inbound weights – confirmation of outbound and inbound weights from outbound and inbound facilities

Timing of Payments

CAA proposes that service providers confirm eligibility of shipments and submit claims on a delivery-by-delivery basis. The payment terms and deadlines for claim adjustments will be detailed in the funding agreement and transportation funding addendum, which will need to be signed by all funding recipients.

Dispute Settlement Process

In cases where a submitted transportation claim was not pre-approved or is not considered eligible by CAA, transportation costs may not be reimbursed. If a load is approved for transportation and is rejected upon receipt at the CRPF due to contamination, CAA will work with the transporter and CRPF to determine if the contamination can be easily removed or if the load can be moved to another CRPF for processing, or if the material will need to be sent to disposal. CAA will develop a dispute settlement process for claims where a service provider and CAA disagree on eligibility for a claimed cost or the amount of the transportation cost reimbursement. Details would be included in a funding agreement transportation funding addendum, with the potential for arbitration. Affected local governments will be notified when a dispute settlement process has been initiated.

Percentage of covered material in commingled loads

- Under RMA rules, initially PROs will use data from the 2023 Oregon Solid Waste Characterization and Composition Study to determine the portion of recyclable material that is not covered material in commingled loads
- CAA will propose a standard percentage for use in all rate sheet calculations
- If a local government, service provider, or PRO in a particular county believes that the local commingled stream has a significantly different proportion of covered material (in comparison to the statewide average), it can conduct a study in consultation with the affected parties to determine the proportion of covered material in the local commingled stream
- In 2027, the PRO is obligated to conduct a study to determine the proportion of covered material in commingled loads:
- CAA will consult with interested groups on the appropriate methodology to be used in this study and the revised program plan will include an outline of the proposed approach and timing of initiative

Voluntary Transportation Option

As per RMA rules, CAA would develop an option where CAA would assume responsibility for transporting covered materials from a local government's recycling depot or recycling reload facilities to the nearest facility if the local government and CAA agree to such an approach. This would be implemented through a CAA/local government agreement that would describe service details. CAA will consult with service

providers on the details of the transportation funding program to determine their level of interest in the voluntary interest option.

Opportunities for Efficiency and Effectiveness

Wasteshed-Level Management

The management of materials at the wasteshed level offers several advantages from an administrative, planning, operational, and financial perspective. As such, it is important to manage all the materials at the wasteshed level. The materials can be planned, administered, received, consolidated, prepared for shipment, and loaded in each wasteshed. In some cases, neighboring wastesheds may find it beneficial to work together to benefit from economies of scale and avoid unnecessary duplication of services. CAA will explore options to coordinate transportation of materials on a wasteshed basis during consultation on the details of the transportation funding program. CAA also considered the challenges that many of the rural wastesheds face, being significantly larger in geography. Using the time-based reimbursement transportation model, CAA believes rural communities will be fairly compensated for the time it will take them to prepare and transport a load, as well as make the return trip if no backhaul is being made. CAA believes this creates an effective approach to the transportation funding program for all wastesheds across Oregon.

Material Compaction

The movement of materials must be minimized where possible. One of the most effective ways to minimize the movement of materials is by maximizing load capacities, thus reducing the overall number of loads needed. However, this must not be done at the risk of compromising the recyclability and recovery of the materials by CRPFs.

While baling is an effective way to maximize capacity, it has negative impacts on the recovery yield of the materials. Shipping loose materials is the least effective way of shipping materials, resulting in the most loads to be managed. The most effective way is to compact the material into closed-top walking floor trailers, maximizing the volume capacity without affecting the integrity of the material to be sorted. This will lower freight costs and increase recovery at the CRPF while reducing residue rates.

CAA will allow all options of transportation of material and CAA will work with the local governments and their service providers to eventually have the material compacted rather than loose or baled, if possible.

CAA will consult with local governments and their service providers regarding efficient transportation options. The rate sheet will likely, depending on the results of consultation, distinguish between different types of loads to encourage transportation efficiencies.

iii. Additional Reimbursement and Funding for Local Governments

Contamination Evaluation

Per the recently adopted administrative rules, CAA will operate a centralized material audit program as an effective means of helping local governments meet the requirement in ORS 459A.959(2)(b) to assess and manage contamination. Such a system will be administered, operated, and funded by CAA, with data shared at regular intervals with DEQ, local governments, and service providers.

The contamination audit framework described below is modeled after similar systems that have shown to be successful in other jurisdictions with paper and packaging EPR programs in place. The centralized approach leads to overall cost efficiency, consistency in how contamination is measured, and an ever-growing pool of data that can help highlight important trends (and opportunities for improvement) in material contamination across the state.

Number of Samples Per Community

CAA's proposed audit system will focus primarily on those communities with a population of 4,000 or more, of which there are approximately 115, along with smaller communities that offer curbside recycling collection. It is estimated that over 90% of the population of the state will be included in the audit sampling protocol. The audit center will also process samples from depot locations that collect materials on the PRO RAL, capturing data on the contamination rates of materials managed by CAA.

The focus of the audits will be on sampling from single-family dwellings and multi-family dwelling/commercial loads (generally, self-haul materials are source-separated by individual material, so sampling of USCL material collected at depots will occur but on a more limited scale).

At the outset of the audit initiative, the number of samples to be taken from a given community will depend on the population size of the community, with larger population centers having more samples taken than smaller communities. Later, when sufficient generation data becomes available, the sampling will be based on tonnage generated rather than population.

Following discussions internally and with DEQ, it is proposed that 100 samples of 220 pounds each from around the state be analyzed by CAA monthly. The total number of samples required by each community is weighted proportionally to the population of each.

For example, Salem represents 5.60% of the population of Oregon. Therefore, it will be assigned 5.6% of the 100 samples to be taken each month. This means that over the course of a year, approximately 67 samples will be taken in the City and will include material from both single-family and multi-family/commercial generators.

Sampling Methodology and Data Aggregation

CAA will work directly with CRPFs, reload facilities, and limited sort facilities to identify and separate the appropriate loads from various collectors for material samples. For the sample methodology, CAA will follow the contamination evaluation forms and procedures DEQ has established pursuant to ORS 459A.959, which can be found here: <https://www.oregon.gov/deq/recycling/Pages/gencontamination.aspx>.

After individual 220-pound samples are appropriately gathered at CRPFs and reload facilities, those samples will be shipped to CAA's centralized Audit Center (CAA will pay the cost to transport), where samples will be analyzed and sorted into individual material categories to determine the levels and composition of contamination present.

CAA is working on a reporting protocol, through which the organization will gather inbound tonnage data by facility, tied to individual collectors. The total quantities collected by community would then be multiplied by the final, annualized audit composition data to give CAA the total composition by community.

These data points would then be added together to give CAA the total composition across the state. CAA will also aggregate data by watershed and region to understand broader contamination trends.

Each community will have access to the contamination data specific to their jurisdiction, down to the route information of each sample. CAA will also publish aggregated contamination rates and details in publicly available reports that will be published annually or at more frequent intervals. Jurisdiction-level data will also be shared directly with DEQ, including disaggregated data. DEQ will also have access to sample collection videos upon request.

CAA expects to have the audit center operational in the third quarter of 2025. CAA understands the process outlined above may require slight adjustments from time to time to reflect changes in material flow, variability associated with the results of the audit sampling, and increased knowledge surrounding the program in general. Reviews of the process will include a regular analysis of the sample categories to ensure the list is up to date with the latest materials and any contamination categories necessary to help improve overall performance. CAA will request approval from DEQ for desired changes to DEQ's established contamination evaluation forms and procedures.

Contamination Reduction Programming

The RMA requires DEQ to establish and maintain a list of approved contamination reduction program elements, including:

- Customer-facing materials, methods responsive to diverse populations
- Standards for providing feedback to generators that contribute to contamination
- Standards for service or financial consequences to generators that are repeated sources of contamination

Local governments and service providers must implement programs to reduce contamination that include program elements identified by DEQ, or materials or methods that are as effective, and they must include a process to review and revise these initiatives once every five years. Local governments are only obligated to

participate to the extent program funding is provided by a PRO. PRO contamination reduction funding is capped at \$3 per capita per year.

CAA has conducted some preliminary outreach with local governments related to this program, but as in other program areas, further consultation is required to develop the details of how this program will be administered.

As with other reimbursement programs, local governments may designate service providers as eligible recipients for program funding. Local governments may also assign other local governments as funding recipients (i.e. a city may choose to designate a county as the funding recipient).

Given that PRO program funding is capped at \$3 per capita, the assignment or designation process related to this program requires local governments to assign or designate portions of funding in situations where it may be assigning funding to multiple service providers. The per-capita cap also requires the determination of funding years for which to calculate the cap and the population period on which the per-capita cap was calculated so that in any given funding year, local governments are working from the same population estimates.

To meet the funding obligation outlined in ORS 459A.890.(4), CAA proposes the following general approach to disbursing funding for contamination reduction programming:

- The funding year for disbursements would be based on the municipal fiscal year (e.g., July 1, 2025 to June 30, 2026)
- Prior to the start of each funding year, CAA would calculate the eligible cap for Oregon local governments for the upcoming year based on the most recent estimate of Oregon population available from the Portland State University Population Research Center, as per RMA rules 340-090-0810 (2) (timing to be determined), and provide to local governments and DEQ
- Prior to the start of each funding year, local governments would through the Opportunity to Recycle process assign funding eligibility identifying the portion of funding available to recipients in cases where the local government was assigning eligibility to multiple recipients
- CAA would encourage local governments and eligible service providers to submit contamination reduction funding budgets, identifying what the funding will be utilized for, to CAA for pre-approval prior to the start of each program year; this process would expedite the processing of payments later in the year
- Where recipients want advance funding for contamination reduction programs, they would submit a budget for eligible items to CAA prior to the start of the program year (timing to be determined)
- Recipients that are provided advanced funding in relation to the contamination program would need to monitor spending and provide CAA with updates confirming advance funds were utilized for eligible contamination reduction program elements (timing to be determined)
- In the event that recipients of advance funding related to the contamination reduction program had not spent the advance funding by the end of the funding year, they would be required to return unspent advance funding amounts to CAA (timing to be determined)

- Per the Phase II rules, jurisdictions under 25,000 in population may request two years of funding. Jurisdictions requesting two years of funding will be asked to describe how the contamination reduction programming will be sustained over the two years being funded.

Ensuring 10% Post-Consumer Content in Roll Carts

Roll cart manufacturers now widely offer 10% post-consumer content. Current market research indicates carts containing 10% post-consumer recycled content can be purchased from multiple vendors at no cost differential to those made from virgin materials. Manufacturers require access to residually sourced resin for producing post-consumer content, and there have been supply concerns. To monitor this, CAA will conduct quarterly research of the four major roll cart manufacturers to determine if prices for carts that meet the 10% standard have changed. If two or more companies report a premium for roll carts with 10% post-consumer content, CAA will notify local governments via a maintained email distribution list, outlining their eligibility for partial reimbursement for the price difference when purchasing new or replacement carts containing 10% post-consumer content.

For carts needed as part of the initial system expansion, CAA intends to work closely with local governments and haulers to ensure full reimbursement for the procurement of carts that meet the 10% post-consumer content requirement. When covering the full cost of the cart, CAA may also mandate that the carts have specific features: program branding, RFID tags, serial numbers, hot-stamped labels, and standardized wheels. Due to existing color-coding systems at many of the local jurisdiction levels, local governments and haulers will not be restricted to a predetermined cart color. To procure carts, interested parties must submit manufacturer bids to CAA for approval. Once CAA has reviewed and approved the bids, local governments can proceed with ordering roll carts that meet the specified criteria. After the carts have been delivered, local governments will receive reimbursement for the purchase.

Measures to Protect Ratepayers from Increased Costs

Under the RMA, producers will provide funding for several activities that are currently financed indirectly through ratepayer recycling fees. In addition, producers will fund activities designed to implement recycling system improvements. These significant investments will indirectly protect existing ratepayers from fee increases, as local governments and system participants will no longer be required to recover such costs exclusively through ratepayers.

Producer funding directed toward existing activities that should provide ratepayer protection include:

- Annual compensation to CRPFs to cover current operating and contaminant disposal costs as well as future system improvement costs
- Annual local government contamination reduction program funding
- Funding for local government transportation of covered materials for more than 50 miles

Additionally, recycling system improvements that should provide ratepayer protection include:

- Producer funding for expansion of local government collection services

- Close to 50% of CRPF compensation relates to recycling system improvements associated with RMA obligations
- Producer funding for the collection of PRO acceptance list materials, including potential funding in support of continued curbside collection of select materials
- Producer funding for the provision of local government education and outreach materials
- Producer funding to ensure collected materials are recycled at responsible end markets
- Producer funding for waste prevention and reuse projects designed to lower the environmental impact of covered materials

With respect to the processing costs of collected materials and the requirement under 459A.923 (2) that requires PROs to share in processing costs to allow local governments to reduce the financial impact on ratepayers, CAA supports data reporting processes that would allow it to provide local governments with an annual estimate of PRO funding provided to processing facilities in relation to the volume of commingled materials collected in their jurisdiction. This would allow individual local governments to take PRO funding into account when setting ratepayer fees and processes for their local service providers. CAA can track certain commingled volumes through the provision of transportation subsidies but will likely require additional reporting by CRPFs to ensure that this information is accurate on a local government basis. CAA will work with DEQ to review various data reporting requirements under the RMA with the goal of providing this type of information to local governments.

Because loads of commingled recyclables from different communities can become mixed at the reload facility, it will be challenging for CAA to directly attribute transportation reimbursement back to each community. CAA can offer, upon request, a report of the transportation reimbursement provided to each transporter of commingled recyclables from a reload facility. CAA can also offer an average per ton transportation reimbursement, which will further help communities determine the transportation subsidies their recycling system received based on the volumes generated by the community.

CAA also supports the monitoring of developments at CRPFs over the course of the program plan in relation to the anticipated investments and costs identified through the study by Crowe on the Oregon PCRF and CMF.² This is necessary to review whether anticipated investments were made and to review whether anticipated cost estimates for processing facilities were accurate. Such information will help refine forecasting estimates associated with anticipated future studies related to the calculation of CRPF processing fees. CAA believes that DEQ is best positioned to gather this information as a requirement of CRPF permitting reporting.

Finally, CAA has an obligation under 459A.875 to describe how it will provide funding to allow local governments to protect ratepayers from the increased costs associated with processing and marketing recyclable materials. As noted above, CAA will be making significant investments to support recycling throughout the state. CAA will provide local governments with an annual summary of RMA funding in relation

² Crowe. *Study Results: Processor Commodity Risk Fee / Contamination Management Fee*. Retrieved March 8, 2024 from <https://www.oregon.gov/deq/recycling/Documents/TWGTTask4-5Report.pdf>.

to materials collected in their jurisdiction so that these amounts can be reviewed by local governments when conducting ratepayer reviews in relation to recycling services.

As the program continues to develop, if a local government requests, CAA will aim to offer local governments information about program funding streams that may protect ratepayers from increased costs.

iv. Start-Up Approach for Time-Sensitive Tasks

Given the program start date of July 1, 2025, there are time-sensitive tasks that need to be completed during 2024 and early 2025. Following the conclusion of the ORSOP survey, CAA has established clear direction on the timing and steps for engaging with communities and their service providers who will be receiving funding during the first program plan period.

The expected start-up tasks include:

1. Starting with the communities of highest priority, consulting with and then providing associated compensation (with a single accounting point-of-contact system or online portal) to local governments and service providers for service expansion, beginning December 2024
2. Executing funding agreements with all parties eligible to receive funding from CAA, beginning February 2025
3. Setting up a single accounting point-of-contact system for compensation of local governments and service providers for expenses not related to service expansion (e.g., transportation funding, contamination funding, roll cart funding, etc.)
4. Setting up a single accounting point-of-contact system for payment of contamination management fees and processor commodity risk fees to CRPFs.

In relation to the stated start-up tasks, CAA will begin outreach to and preliminary funding disbursement discussions with communities of the highest priority, and those receiving funding in 2025, to review their identified need and build a strategy with interested parties in those communities for system expansion. Details of this proposed outreach, including ways to gather information that use participant time efficiently (by addressing multiple related topic areas, for example), are included under the "Proposal for an Oregon Recycling System Optimization Project" section above.

By June 30, 2025, the development, buildout, and implementation of a portal for local governments and service providers will be completed. All data within the portal will be encrypted to safeguard against external threats and ensure the confidentiality of data.

For local governments and service providers, the portal will allow access through a secure user ID and password. Once in the portal, service providers will be able to view their claims, account history and balance due, and reports and notices. Additionally, the portal will provide multiple means for service providers to send their claims data to CAA through a structured file upload or direct entry. As described above, details for administering each of the individual reimbursement programs will be discussed with local governments during the next phase of outreach. This process will inform further specific portal requirements.

In parallel with local government and service provider outreach, CAA will continue its discussions and engagement with Oregon's eligible CRPFs to better understand their needs and align on administrative processes for the payment of CMF and PCRF. Payment of these fees will also be facilitated through CAA's secure portal system.

Leveraging functionality that will support the overall achievement of Objective 1, including ensuring that materials are collected and processed for recycling in Oregon and are consistently delivered to responsible end markets, CAA will provide full material flow traceability through a system that manages and reconciles

inventory flow from initial possession, through validation of receipt by responsible end markets. This same functionality will support the material tracking needs under the transportation reimbursement process.

b. The PRO Recycling Acceptance List

This section outlines activities, timelines, and recommendations for increasing diversion of materials named on the PRO Recycling Acceptance List (RAL) from disposal, including steps that have been taken to meet convenience and performance standards and set collection targets.

Through ORSOP and extensive outreach to potential collection sites across the state, CAA has built a strong foundation for a network of collection points. Full details on those sites and the status of the collection system are detailed below.

CAA feels confident that work to date and strategies for ongoing expansion will allow the organization to achieve the convenience requirements in the first program plan period.

As part of that plan to move toward ensuring convenient access to collection points for all Oregonians, CAA is requesting administrative discretion with respect to compliance with the convenience standard to address logistical and geographical complications that come with establishing a new statewide structure while also leveraging existing assets to full effect. CAA is also requesting administrative discretion for meeting the convenience standard for block white EPS collection in the first program plan period, considering the proposed alternative phased-in approach proposed in the program plan. Finally, CAA is also requesting that DEQ consider an alternative distance threshold for the transport of EPS per OAR 340-090-0650(3)(a)(A).

It is also important to note that in its ongoing work to develop this new framework for PRO RAL materials, CAA has been sure to prioritize equitable access. A great number of the confirmed collection points are in areas outside the Portland Metro region, often in areas of the state that have lacked recycling collection access previously. Further, in moving the PRO list network forward, CAA is working with COBID businesses and community-based organizations that have significant experience around equity issues, to help CAA consider how to offer collection opportunities to communities that have previously been underserved.

CAA looks forward to continuing to collaborate with interest holders across the state to develop an innovative and efficient framework for collecting and managing PRO list materials.

i. Proposed Approach to Achieving Convenience Standards

Requirements

Through the rulemaking process, DEQ has defined the convenience standards for depots to ensure Oregonians have reasonable and equal access to recycle materials that the PRO is responsible for collecting and managing. OAR 340-090-0640 outlines minimum sites for counties, cities and the Metro region.

The convenience standard requires at least one collection point for materials on an “enhanced” list in cities with populations of at least 8,000 in Clackamas, Multnomah and Washington Counties and in cities with populations of at least 4,000 in all other counties. It requires additional collection points based on the population and location of the jurisdiction.

Items on the enhanced list have been determined to be generated more frequently and therefore require more collection point options. These materials include HDPE package handles, PE and PP lids, polyethylene film, glass packaging and plastic buckets and other bulky HDPE or PP packaging.

Materials on a separate “base” level collection list are generated less frequently and require fewer options. These materials include aluminum foil and pressed aluminum products, shredded paper and block white EPS.

The PRO will be required to have a minimum of:

- One depot in every county
- For materials subject to the base convenience standard:
 - For Clackamas, Multnomah and Washington counties, one additional collection point for every 60,000 residents of that county
 - For all other counties, one additional collection point for every 40,000 residents of that county
- For materials subject to the enhanced convenience standard:
 - For Clackamas, Multnomah and Washington counties, one additional collection point for every 45,000 residents of each county
 - For all other counties, one additional collection point for every 30,000 residents of that county
- For materials subject to the base convenience standard, at least one collection point is available in each city in Clackamas, Multnomah and Washington Counties with a population of 14,000 or more residents, and at least one collection point available in all other cities with 7,000 or more residents. In addition:
 - For Clackamas, Multnomah and Washington Counties, an additional collection point for every 75,000 residents of the city
 - For cities in all other counties, an additional collection point for every 35,000 residents
- For materials subject to the enhanced convenience standard, at least one collection point available in each city in Clackamas, Multnomah and Washington Counties with a population of 8,000 or more residents, and at least one collection point available in all other cities with 4,000 or more residents. In addition:
 - For Clackamas, Multnomah and Washington Counties, an additional collection point for every 50,000 residents of the city
 - For cities in all other counties, an additional collection point for every 30,000 residents

In addition to minimum regional requirements for depots, there are additional considerations that CAA is factoring in when considering optimal locations for siting depots, including:

- Incorporated versus unincorporated parts of counties
- Proximity to public transit in the multi-depot cities
- A goal that 95% of Oregonians live within 15 miles of a depot

Block white EPS, aluminum foil and shredded paper are not included in the materials that must be collected at locations that meet the enhanced convenience standards. However, CAA plans to collect most, if not all, PRO materials at all points in PRO depot network, meeting the enhanced convenience standards for all

materials while minimizing costs to the system and increasing convenience for the user. Note: an alternative approach for block white EPS is outlined later in this section of the program plan.

CAA will also consider alternative collection locations, where necessary for certain product categories, such as PE films, shredded paper, and block white EPS.

If there are extenuating circumstances beyond the PRO's control, including natural disasters such as wildfires and floods, or other situations that could affect service to a community for a prolonged period, CAA will seek a temporary variance on operations of that depot.

Network Analysis and Mapping

Given all the requirements to meet convenience standards, CAA must establish 144 physical points of collection for materials on the PRO Recycling Acceptance List.

CAA contracted with IncaTech, a consultant group specializing in geospatial analysis, to utilize a GIS mapping tool to predict where coverage might be possible through existing depots and permitted facilities. Lists of prospective depot sites were prioritized and input separately as layers of information to produce different network coverage scenarios.

The RMA requires the PRO to prioritize outreach to permitted DEQ facilities and existing depots, as defined by OAR 340-090-0640(1)(a). As shown in the tables later in this section as well as in Appendix D and Appendix F, CAA has contacted all of the following facility types, inviting them to join the PRO depot network:

- Recycling depots and drop-off centers used by local governments to satisfy the requirement in ORS 459A.(1)(a)(A)
- Recycling depots and drop-off centers used by local governments to satisfy the optional opportunity to recycle program element described in ORS 459A.007(1)(g)
- Recycling depots and drop-off centers operated by or at the direction of Tribal governments
- Recycling depots and drop-off centers located at a site that operates under a valid solid waste permit issued by DEQ
- Recycling depots and drop-off centers operated at the direction of a local government or a local government service provider, as defined by ORS 459A.863(12).

During the outreach to potential depot sites, locations were contacted with direct requests to consider joining the PRO depot network. Those sites listed as "response pending" in Appendix F have or will be contacted a second time.

Through the ORSOP process, the CAA team continued proactive outreach, engaging in conversations with a wide array of geographically dispersed potential PRO depots that will serve as the basis of the depot network. In addition to existing or permitted depot sites, confirmed and potential sites include CBOs, hauler yards, collection points for other EPR programs in the state and any other existing recycling location known to CAA.

At the time of submission of this program plan, 157 locations have indicated they would like to explore participation in the network (see Table 4 below), and 83 of those sites have signed letters of intent (LOIs). Of the identified locations, 118 are included on Table 6 (further down in this section of the plan); these are the sites CAA is moving forward with initially to establish the PRO depot collection network. CAA has identified approximately 40 other interested secondary sites that will be re-engaged once the network is established in each region.

Access to webinars, information offered on the CAA website, and other planned electronic communications will further increase awareness opportunities for these sites as required in ORS 459A.896(1)(a).

Sites that Responded “Yes” to Potentially Hosting a PRO Materials Depot*

County	Site	City	From DEQ List of Sites or Additional
Baker	Baker Sanitary Service	Baker City	Additional
Benton	Corvallis Disposal	Corvallis	DEQ
Benton	First Alternative Coop (3 rd Street)	Corvallis	Additional
Benton	Philomath Public Works	Philomath	Additional
Clackamas	Waste Connections Canby Transfer & Recycling Center	Canby	DEQ
Clackamas	Waste Connections KB Recycling MRF	Clackamas	DEQ
Clackamas	New Seasons Market Happy Valley	Happy Valley	Additional
Clackamas	New Seasons Market Palisades	Lake Oswego	Additional
Clackamas	New Seasons Market Milwaukie	Milwaukie	Additional
Clackamas	Metro South Transfer Station	Oregon City	DEQ
Clackamas	Clackamas County Sandy Transfer Station	Sandy	DEQ
Clatsop	Recology Astoria Transfer Station	Astoria	DEQ
Columbia	Columbia County HHW & Transfer Station	St. Helens	DEQ
Coos	Beaver Hill Solid Waste Facility	Coos Bay	DEQ
Coos	Waste Connections West Coast Recycling and Transfer	Coos Bay	DEQ
Crook	Paulina Transfer Station	Paulina	DEQ
Crook	Republic Services Prineville Disposal Reload Station	Prineville	DEQ
Deschutes	Alfalfa Transfer Station	Bend	DEQ
Deschutes	Deschutes Recycling/Knott Landfill	Bend	DEQ
Deschutes	Republic Services Mid-Oregon Recycling	Bend	Additional
Deschutes	Republic Services La Pine	La Pine	Additional
Deschutes	Southwest Transfer Station	La Pine	DEQ
Deschutes	Negus Transfer Station	Redmond	DEQ

Sites that Responded “Yes” to Potentially Hosting a PRO Materials Depot*			
County	Site	City	From DEQ List of Sites or Additional
Deschutes	Republic Services High Desert Disposal	Redmond	Additional
Deschutes	Northwest Transfer Station	Sisters	DEQ
Douglas	Camas Valley Transfer Station	Camas Valley	DEQ
Douglas	Canyonville Transfer Station	Canyonville	DEQ
Douglas	Elkton Transfer Station	Elkton	DEQ
Douglas	Glide Transfer Station	Glide	DEQ
Douglas	Myrtle Creek Transfer Station	Myrtle Creek	DEQ
Douglas	Oakland Transfer Station	Oakland	DEQ
Douglas	Reedsport Transfer Station	Reedsport	DEQ
Douglas	Roseburg Transfer Station	Roseburg	DEQ
Douglas	Sutherlin Sanitary Service	Sutherlin	Additional
Douglas	Tiller Transfer Station	Tiller	DEQ
Douglas	Yoncalla Transfer Station	Yoncalla	DEQ
Gilliam	Waste Connections Condon Transfer Station	Condon	DEQ
Harney	Rim Rock Recycling	Hines	Additional
Hood River	Waste Connections Cooper Spur	Hood River	Additional
Hood River	Waste Connections Hood River Transfer Station	Hood River	DEQ
Hood River	Waste Connections Mt. Hood Recycling Depot	Mt. Hood	DEQ
Jackson	Waste Connections–Rogue Disposal Glass 4 – Ray’s Market	Central Point	Additional
Jackson	Southern Oregon Sanitation – Eagle Point	Eagle Point	DEQ
Jackson	Waste Connections–Rogue Disposal Glass Depot #6 – Ray’s Market	Jacksonville	Additional
Jackson	Goodwill of Southern Oregon	Medford	Additional
Jackson	Habitat Restore Rogue Valley	Medford	Additional
Jackson	Waste Connections–Rogue Disposal Glass 1 – Sherm’s Thunderbird	Medford	Additional
Jackson	Waste Connections–Rogue Disposal Glass 2 – Food4Less	Medford	Additional

Sites that Responded “Yes” to Potentially Hosting a PRO Materials Depot*			
County	Site	City	From DEQ List of Sites or Additional
Jackson	Waste Connections–Rogue Disposal Glass 3 – Rogue Credit Union	Medford	Additional
Jackson	Waste Connections–Rogue Disposal Glass Depot – Phoenix	Phoenix	Additional
Jackson	Waste Connections–Rogue Disposal Transfer Station and MRF	White City	DEQ
Jackson	Recology Ashland Recycling Depot	Ashland	Additional
Jackson	Recology Valley View Transfer Station	Ashland	DEQ
Jefferson	Madras Sanitary Recycle Depot (a.k.a. Owenjay)	Madras	DEQ
Josephine	Republic Services Josephine Recycling and Transfer Station	Grants Pass	DEQ
Josephine	Southern Oregon Sanitation Redwood Transfer Station	Grants Pass	DEQ
Lane	Cottage Grove Garbage	Cottage Grove	DEQ
Lane	Cottage Grove Transfer Station	Cottage Grove	DEQ
Lane	St. Vincent De Paul	Cottage Grove	Additional
Lane	Bring Recycling	Eugene	Additional
Lane	Glenwood Central Receiving Station	Eugene	DEQ
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	Waste Connections	Eugene	Additional
Lane	Waste Connections Ecosort Material Recovery Facility	Eugene	DEQ
Lane	Florence Transfer Station	Florence	DEQ
Lane	St. Vincent De Paul	Florence	Additional
Douglas	Glendale Transfer Station	Glendale	DEQ
Lane	St. Vincent De Paul	Junction City	Additional
Lane	St. Vincent De Paul	Springfield	Additional
Lane	St. Vincent De Paul	Springfield	Additional

Sites that Responded “Yes” to Potentially Hosting a PRO Materials Depot*			
County	Site	City	From DEQ List of Sites or Additional
Lincoln	North Lincoln Sanitary Service (AKA Next Gen)	Lincoln City	DEQ
Lincoln	Schooner Creek Public Transfer Station	Lincoln City	DEQ
Lincoln	Newport Recycling Center	Newport	DEQ
Lincoln	Thompsons Transfer and Disposal Agate Beach Transfer Station	Newport	DEQ
Lincoln	Toledo Transfer Station	Toledo	DEQ
Lincoln	South Lincoln Recycle & Transfer Station	Waldport	DEQ
Linn	Divert Albany Processing Facility	Albany	DEQ
Linn	Republic Services Albany-Lebanon Recycling Depot	Albany	DEQ
Linn	St. Vincent De Paul	Albany	Additional
Linn	Waste Connections-Sweet Home Sanitation Transfer Station	Sweet Home	DEQ
Malheur	Waste Connections Ontario Sanitary Service Transfer Station	Ontario	DEQ
Marion	Loren's Sanitation Service	Keizer	DEQ
Marion	D&O Garbage	Salem	DEQ
Marion	Gaffin Road Transfer Station	Salem	DEQ
Marion	Garten Recycling Center	Salem	DEQ
Marion	Marion Resource Recovery Facility	Salem	DEQ
Marion	Pacific Sanitation	Salem	DEQ
Marion	St. Vincent de Paul	Salem	Additional
Marion	Suburban Garage	Salem	DEQ
Marion	Republic Services of Marion County – Silverton	Silverton	DEQ
Marion	North Marion County Recycling & Transfer Station	Woodburn	DEQ
Morrow	Boardman Recycling Depot (Front Street NE)	Boardman	DEQ
Morrow	Waste Connections North Morrow County Transfer Station	Boardman	DEQ
Morrow	Waste Connections South Morrow Transfer Station	Lexington	DEQ

Sites that Responded “Yes” to Potentially Hosting a PRO Materials Depot*			
County	Site	City	From DEQ List of Sites or Additional
Multnomah	Habitat for Humanity Portland Metro	Gresham	Additional
Multnomah	New Seasons Market Mountain Park	Lake Oswego	Additional
Multnomah	COR Recycling	Portland	DEQ
Multnomah	Far West Recycling	Portland	DEQ
Multnomah	Ground Score	Portland	Additional
Multnomah	Habitat for Humanity Portland Metro	Portland	Additional
Multnomah	James Recycling	Portland	Additional
Multnomah	Metro Central Transfer Station	Portland	DEQ
Multnomah	Metro RID Deployment Center	Portland	Additional
Multnomah	New Seasons Market Arbor Lodge	Portland	Additional
Multnomah	New Seasons Market Concordia	Portland	Additional
Multnomah	New Seasons Market Grant Park	Portland	Additional
Multnomah	New Seasons Market Hawthorne	Portland	Additional
Multnomah	New Seasons Market Raleigh Hills	Portland	Additional
Multnomah	New Seasons Market Sellwood	Portland	Additional
Multnomah	New Seasons Market Seven Corners	Portland	Additional
Multnomah	New Seasons Market Slabtown	Portland	Additional
Multnomah	New Seasons Market University Park	Portland	Additional
Multnomah	New Seasons Market Williams	Portland	Additional
Multnomah	New Seasons Market Woodstock	Portland	Additional
Multnomah	The Arc of Portland	Portland	Additional
Polk	Republic Services – Dallas	Dallas	DEQ
Polk	Recology Western Oregon Waste	Grand Ronde	Additional
Polk	Brandt’s Sanitary	Monmouth	DEQ

Sites that Responded “Yes” to Potentially Hosting a PRO Materials Depot*			
County	Site	City	From DEQ List of Sites or Additional
Sherman	Sherman County Transfer Station	Biggs	DEQ
Sherman	Waste Connections Grass Valley glass depot	Grass Valley	Additional
Sherman	Waste Connections Rufus glass depot	Rufus	Additional
Tillamook	Manzanita Transfer Station	Manzanita	DEQ
Tillamook	Pacific City Transfer Station	Pacific City	DEQ
Tillamook	Tillamook Transfer Station	Tillamook	DEQ
Umatilla	Humbert Refuse Landfill	Athena	DEQ
Umatilla	Waste Connections City of Echo Recycling Depot	Echo	Additional
Umatilla	Waste Connections Hermiston Recycling Depot	Hermiston	DEQ
Umatilla	Waste Connections–Sanitary Disposal Transfer Station	Hermiston	DEQ
Umatilla	Milton–Freewater Recycling Depot	Milton–Freewater	DEQ
Umatilla	Milton–Freewater Sanitary Landfill	Milton–Freewater	DEQ
Umatilla	Pendleton Recycling Depot (downtown)	Pendleton	DEQ
Umatilla	Pendleton Transfer Station	Pendleton	DEQ
Umatilla	Waste Connections–Sanitary Disposal Stanfield	Stanfield	Additional
Umatilla	Umatilla Recycling Depot	Umatilla	DEQ
Wasco	Waste Connections City of Maupin Recycling Depot	Maupin	Additional
Wasco	St. Vincent de Paul	The Dalles	Additional
Wasco	Waste Connections The Dalles Transfer Station and HHW Facility	The Dalles	DEQ
Washington	Swatco	Banks	Additional
Washington	Habitat for Humanity Portland Metro	Beaverton	Additional
Washington	New Seasons Market Cedar Hills	Beaverton	Additional
Washington	New Seasons Market Progress Ridge	Beaverton	Additional
Washington	Metro Cornelius property	Cornelius	Additional
Washington	Habitat Restore West Tuality	Forest Grove	Additional
Washington	Far West Recycling	Hillsboro	DEQ

Sites that Responded “Yes” to Potentially Hosting a PRO Materials Depot*			
County	Site	City	From DEQ List of Sites or Additional
Washington	New Seasons Market Orenco Station	Hillsboro	Additional
Washington	Pride Recycling Company	Sherwood	DEQ
Washington	New Seasons Market Nyberg Rivers	Tualatin	Additional
Washington	Republic Willamette Resources TS/MRF	Wilsonville	DEQ
Wheeler	Fossil Solid Waste Transfer Station and Recycling Station	Fossil	DEQ
Yamhill	Recology Valley Recovery Zone	McMinnville	DEQ
Yamhill	Waste Management Newberg Transfer and Recycling Center	Newberg	DEQ
* Nearly all sites are existing recycling locations.			

Table 4

A number of permitted and existing depot sites opted to not participate (or their responses are pending), and these are listed in Appendix F.

Closing Gaps to Meet Convenience Standards

Layering the emerging landscape of existing depots and permitted facilities over the county and city convenience standard requirements identified where gaps would exist. Given the location requirements, some gaps emerged in urban areas where alternative methods of collection are needed.

To fill some of the gaps, CAA researched likely participating partner locations. Thrift-based CBOs, Oregon Ecycles sites and hauler yards became an outreach priority and continue to be the most promising additions to the baseline set of locations that CAA has identified.

CAA has consulted with several organizations to explore the feasibility of utilizing their services to fulfill the remainder of the convenience standards requirements. Those organizations include:

- St. Vincent de Paul
- Bring Recycling
- Oregon Beverage Recycling Cooperative
- Habitat ReStores in the Portland Area
- James Recycling in the Metro Area
- Trash for Peace
- The Arc of Portland

- Ground Score
- Gorge Sustainability Project

All of these organizations, which are either non-profit or minority owned/operated, have expressed interest in continuing to explore the opportunity to be part of the PRO depot network.

Once the program is underway, to ensure compliance with convenience standards for transit access, CAA will consult with local governments to continue to better understand geographic details. CAA will also use the GIS mapping tool to overlay public transit routes and help CAA verify how additional depot locations meet the proximity requirements for access to public transit. CAA will continue to communicate with all interested parties as backups and alternative options may become necessary if the landscape changes. CAA also recognizes that some sites that expressed interest in the network might not be able to meet performance standards and will be unable to participate, so having backup sites ready will ensure quicker implementation. CAA also noted and layered many of the existing permitted locations, as well as potential future partner locations that could serve as backup in cities where convenience standards would not be met if some of the central existing permitted locations chose not to participate.

1. As another step to closing gaps in the network, CAA will request alternative compliance per OAR 340-090-0640(6)(a) for use of sites that do not exactly fit the convenience standard requirements as prescribed by regulation. CAA will request alternative compliance for sites that meet the following criteria, which CAA believes still provide for convenient collection for Oregonians. **Address-Based City Inclusion:** CAA will request alternative compliance for sites that have city-based addresses but technically fall just outside city limits. This will enable practical site placements that meet logistical and access needs for residents. Many of the existing permitted facilities fall into this category.
2. **Adjacent Jurisdiction Placement:** CAA will request alternative compliance for collection sites located in a neighboring jurisdiction but directly adjacent to the city or county where the site is needed. In many instances, these are jurisdictions where residents frequently travel for shopping or other errands, so would likely be viewed as convenient.
3. **Mileage-based consideration:** CAA will request alternative compliance for collection points located within a 5-mile radius of urban jurisdictions and a 15-mile radius of rural jurisdictions (as proposed in the first program plan) within which it is not possible to locate a depot.

In the instance a site meeting any of these criteria would need to be used, CAA will consult with the primary jurisdictions to ensure no viable sites are available and the DEQ designated point of contact for the jurisdiction agrees that the alternative location would be considered convenient for the residents of the jurisdiction.

The following table indicates the depot locations that will satisfy convenience standard requirements using one of the components of administrative discretion described above.

Local Government	Satisfies "Base" Convenience Standard	Satisfies "Enhanced" Convenience Standard	Facility Name	Address	City	Zip Code	Alternative Compliance Request
Gladstone	No	Yes	Waste Connections KB Recycling MRF	9602 SE Clackamas Rd	Clackamas	97015	Less than a mile from city limits and 5 miles from city center. Well established drop-off point for surrounding community.
Bend	Yes	Yes	Republic Services Deschutes Recycling	61050 SE 27th St	Bend	97702	Just outside of city limits. Known as the go-to location for disposal and recycling for the city and county. Located 3.8 miles from city center.
Roseburg	Yes	Yes	Roseburg Transfer Station	165 McClain West Ave	Roseburg	97470	~1.5 miles from city limits. Known as the go-to for disposal and recycling for the city and county. Located 4 miles from city center.
Gilliam County	Yes	Yes	Waste Connections Condon Transfer Station	18342 Brown Ln	Condon	97823	~1.5 miles from city center. Known as the go-to for disposal and recycling for the city and county.
Central Point	Yes	Yes	Waste Connections- Rogue Disposal Transfer Station & MRF	8001 Table Rock Rd	White City	97503	~6 miles from city center. Known as the go-to for disposal and recycling for city and county.
Grants Pass	No	Yes	Republic Services Josephine Recycling and Transfer Station	1749 Merlin Rd	Grants Pass	97526	7.5 miles from city center. Known as the go-to for disposal and recycling for city and county.
Eugene	Yes	Yes	Waste Connections	1650 Glenwood Blvd	Eugene	97403	3.5 miles from city center.
Eugene	Yes	Yes	Glenwood Central Receiving Station	3100 E. 17th Ave	Eugene	97403	3.5 miles from city center. Known as the go-to for disposal and recycling for the City.

Eugene	Yes	Yes	Bring Recycling	4446 Franklin Blvd	Eugene	97403	3.6 miles from City center. Known as the go to for alternative recycling opportunities for the City.
Salem	Yes	Yes	Suburban Garage	6075 State St	Salem	97317	6 miles from city center and 1.5 miles from city border.
Woodburn	Yes	Yes	North Marion County Recycling & Transfer Station	17827 Whitney Ln NE	Woodburn	97071	3 miles from city center and 1.5 miles from city border.
Portland	Yes	Yes	New Seasons Mountain Park	3 Monroe Pkwy Suite R	Lake Oswego	97035	Meters from City of Portland border.
Phoenix	No	Yes	Recology TS	3000 N Valley View Rd	Ashland	97520	4 miles from city center.
Talent	No	Yes	Recology TS	3000 N Valley View Rd	Ashland	97520	8 miles from city center.

Table 5

CAA will request alternative compliance on a site-by-site basis for each of the sites in Table 5, and possibly other sites, as part of its quarterly, interim progress reporting to DEQ (see “Interim Reporting” subsection below). For each request, CAA will provide analysis of performance against the four criteria listed in rule at OAR 340-090-0640(6)(c).

When a proposal for alternative compliance is approved by DEQ, CAA will include in its annual report, a review of the impacts the alternative compliance has had on equitable access, and the actions taken to uphold equity using an alternative jurisdiction.

In such cases, CAA will address these gaps by implementing one or more strategies to meet the convenience standard for PRO materials collection.

As described above, CAA has conducted outreach, both through ORSOP and through additional channels, to identify PRO RAL depot locations in every Oregon wasteshed to ensure we are securing a plan for equitable access to collection sites.

The table below details, by county and by the communities within each county and their populations, the distribution of the 118 potential PRO RAL depots that have indicated interest and will form the first group of sites CAA will be working with to establish the network. The table also shows the populations reached by each depot and indicates whether these sites meet the base and/or enhanced standard. Together, the proposed depot sites reach approximately 94.6% of the state’s population, with a few identified locations where a request for administrative discretion would allow a well-suited site to qualify despite being just outside a city limit or 15-mile radius.

Throughout the program plan period, CAA will add more locations to address where gaps exist.

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
State of Oregon	4,237,256	4,009,552	227,704	94.6%	113	140	118	0	Yes	No
Baker County	16,668	13,298	3,370	79.8%	1	1	1	N/A	Yes	Yes
Baker City	10,099	10,099	0	100.0%	1	1	1	0	Yes	Yes
Greenhorn	3	0	3	0.0%	0	0	0	0	Yes	Yes
Haines	373	373	0	100.0%	0	0	0	0	Yes	Yes
Halfway	351	0	351	0.0%	0	0	0	0	Yes	Yes
Huntington	502	0	502	0.0%	0	0	0	0	Yes	Yes
Richland	165	0	165	0.0%	0	0	0	0	Yes	Yes
Sumpter	204	0	204	0.0%	0	0	0	0	Yes	Yes
Unity	40	0	40	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	4,931	2,826	2,105	57.3%	N/A	N/A	N/A	N/A	N/A	N/A
Benton County	95,184	94,490	694	99.3%	3	4	4	N/A	Yes	Yes
Adair Village	994	994	0	100.0%	0	0	0	0	Yes	Yes
Albany	9,117	9,117	0	100.0%	0	0	0	0	Yes	Yes
Corvallis	59,922	59,922	0	100.0%	2	3	2	1	Yes	Yes with Discretion
Monroe	647	647	0	100.0%	0	0	0	0	Yes	Yes
Philomath	5,350	5,350	0	100.0%	0	1	1	0	Yes	Yes
<i>All other areas of county</i>	19,154	18,460	694	96.4%	N/A	N/A	N/A	N/A	N/A	N/A
Clackamas County	421,401	419,968	1,433	99.7%	8	10	7	N/A	No	No
Barlow	133	133	0	100.0%	0	0	0	0	Yes	Yes
Canby	18,171	18,171	0	100.0%	1	1	1	0	Yes	Yes
Estacada	4,356	4,356	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Gladstone	12,017	12,017	0	100.0%	0	1	0	1	Yes	Yes with Discretion
Happy Valley	23,733	23,733	0	100.0%	1	1	1	0	Yes	Yes
Johnson City	539	539	0	100.0%	0	0	0	0	Yes	Yes
Lake Oswego	38,107	38,107	0	100.0%	1	1	1	0	Yes	Yes
Milwaukie	21,119	21,119	0	100.0%	1	1	1	0	Yes	Yes
Molalla	10,228	10,228	0	100.0%	0	1	0	0	Yes	No
Oregon City	37,572	37,572	0	100.0%	1	1	1	0	Yes	Yes
Portland	843	843	0	100.0%	0	0	0	0	Yes	Yes
Rivergrove	495	495	0	100.0%	0	0	0	0	Yes	Yes
Sandy	12,612	12,612	0	100.0%	0	1	0	1	Yes	Yes with Discretion
Tualatin	24,786	24,786	0	100.0%	0	0	0	0	Yes	Yes
West Linn	27,373	27,373	0	100.0%	1	1	0	0	No	No
Wilsonville	24,522	24,522	0	100.0%	1	1	1	0	Yes	Yes
<i>All other areas of county</i>	186,425	184,992	1,433	99.2%	N/A	N/A	N/A	N/A	N/A	N/A
Clatsop County	41,072	40,125	947	97.7%	2	2	2	N/A	Yes	Yes
Astoria	10,181	10,181	0	100.0%	1	1	1	0	Yes	Yes
Cannon Beach	1,489	1,489	0	100.0%	0	0	0	0	Yes	Yes
Gearhart	1,793	1,793	0	100.0%	0	0	0	0	Yes	Yes
Seaside	7,115	7,115	0	100.0%	1	1	1	0	Yes	Yes
Warrenton	6,277	6,277	0	100.0%	0	1	0	0	Yes	No

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
<i>All other areas of county</i>	14,217	13,270	947	93.3%	N/A	N/A	N/A	N/A	N/A	N/A
Columbia County	52,589	49,073	3,516	93.3%	2	2	2	N/A	Yes	Yes
Clatskanie	1,716	1,716	0	100.0%	0	0	1	0	Yes	Yes
Columbia City	1,949	1,949	0	100.0%	0	0	0	0	Yes	Yes
Prescott	82	82	0	100.0%	0	0	0	0	Yes	Yes
Rainier	1,911	1,911	0	100.0%	0	0	0	0	Yes	Yes
Scappoose	8,010	8,010	0	100.0%	1	1	0	0	No	No
St. Helens	13,817	13,817	0	100.0%	1	1	1	0	Yes	Yes
Vernonia	2,374	0	2,374	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	22,730	21,588	1,142	95.0%	N/A	N/A	N/A	N/A	N/A	N/A
Coos County	64,929	63,099	1,830	97.2%	2	3	2	N/A	Yes	No
Bandon	3,321	3,321	0	100.0%	0	0	0	0	Yes	Yes
Coos Bay	15,985	15,985	0	100.0%	1	1	1	0	Yes	Yes
Coquille	4,015	4,015	0	100.0%	0	1	1	0	Yes	Yes
Lakeside	1,904	1,904	0	100.0%	0	0	0	0	Yes	Yes
Myrtle Point	2,475	2,475	0	100.0%	0	0	0	0	Yes	Yes
North Bend	10,317	10,317	0	100.0%	1	1	0	0	No	No
Powers	710	0	710	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	26,202	25,082	1,120	95.7%	N/A	N/A	N/A	N/A	N/A	N/A
Crook County	24,738	24,026	712	97.1%	1	1	1	N/A	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Prineville	10,736	10,736	0	100.0%	1	1	1	0	Yes	Yes
<i>All other areas of county</i>	14,002	13,290	712	94.9%	N/A	N/A	N/A	N/A	N/A	N/A
Curry County	23,446	14,757	8,689	62.9%	1	1	1	N/A	Yes	Yes
Brookings	6,744	6,744	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Gold Beach	2,341	0	2,341	0.0%	0	0	0	0	Yes	Yes
Port Orford	1,146	0	1,146	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	13,215	8,013	5,202	60.6%	N/A	N/A	N/A	N/A	N/A	N/A
Deschutes County	198,253	174,493	23,760	88.0%	6	8	6	N/A	Yes	No
Bend	99,178	99,178	0	100.0%	4	4	3	1	Yes with Discretion	Yes with Discretion
La Pine	2,512	0	2,512	0.0%	0	0	0	0	Yes	Yes
Redmond	33,274	33,274	0	100.0%	2	2	1	1	Yes with Discretion	Yes with Discretion
Sisters	3,064	0	3,064	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	60,225	42,041	18,184	69.8%	N/A	N/A	N/A	N/A	N/A	N/A
Douglas County	111,201	100,001	11,200	89.9%	3	4	4	N/A	Yes	Yes
Canyonville	1,640	815	825	49.7%	0	0	0	0	Yes	Yes
Drain	1,172	0	1,172	0.0%	0	0	0	0	Yes	Yes
Elkton	183	0	183	0.0%	0	0	0	0	Yes	Yes
Glendale	858	0	858	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Myrtle Creek	3,481	3,481	0	100.0%	0	0	0	0	Yes	Yes
Oakland	934	934	0	100.0%	0	0	0	0	Yes	Yes
Reedsport	4,310	4,310	0	100.0%	0	1	0	1	Yes	Yes with Discretion
Riddle	1,214	1,214	0	100.0%	0	0	0	0	Yes	Yes
Roseburg	23,683	23,683	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Sutherlin	8,524	8,524	0	100.0%	1	1	1	0	Yes	Yes
Winston	5,625	5,625	0	100.0%	0	1	1	0	Yes	Yes
Yoncalla	1,021	0	1,021	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	58,556	51,415	7,141	87.8%	N/A	N/A	N/A	N/A	N/A	N/A
Gilliam County	1,995	1,037	958	52.0%	1	1	1	N/A	Yes	Yes
Arlington	628	0	628	0.0%	0	0	0	0	Yes	Yes
Condon	711	711	0	100.0%	0	0	0	0	Yes	Yes
Lonerock	25	0	25	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	631	326	305	51.7%	N/A	N/A	N/A	N/A	N/A	N/A
Grant County	7,233	0	7,233	0.0%	1	1	0	N/A	No	No
Canyon City	660	0	660	0.0%	0	0	0	0	Yes	Yes
Dayville	132	0	132	0.0%	0	0	0	0	Yes	Yes
Granite	32	0	32	0.0%	0	0	0	0	Yes	Yes
John Day	1,664	0	1,664	0.0%	0	0	0	0	Yes	Yes
Long Creek	173	0	173	0.0%	0	0	0	0	Yes	Yes
Monument	115	0	115	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Mount Vernon	548	0	548	0.0%	0	0	0	0	Yes	Yes
Prairie City	841	0	841	0.0%	0	0	0	0	Yes	Yes
Seneca	165	0	165	0.0%	0	0	0	0	Yes	Yes
All other areas of county	2,903	0	2,903	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Harney County	7,495	6,009	1,486	80.2%	1	1	1	N/A	Yes	Yes
Burns	2,730	2,730	0	100.0%	0	0	0	0	Yes	Yes
Hines	1,645	1,645	0	100.0%	0	0	0	0	Yes	Yes
All other areas of county	3,120	1,634	1,486	52.4%	N/A	N/A	N/A	N/A	N/A	N/A
Hood River County	23,977	22,525	1,452	93.9%	1	1	1	N/A	Yes	Yes
Cascade Locks	1,379	0	1,379	0.0%	0	0	0	0	Yes	Yes
Hood River	8,313	8,313	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
All other areas of county	14,285	14,212	73	99.5%	N/A	N/A	N/A	N/A	N/A	N/A
Jackson County	223,259	221,349	1,910	99.1%	6	8	8	N/A	Yes	Yes
Ashland	21,360	21,360	0	100.0%	1	1	1	0	Yes	Yes
Butte Falls	443	443	0	100.0%	0	0	0	0	Yes	Yes
Central Point	18,997	18,997	0	100.0%	1	1	1	0	Yes	Yes
Eagle Point	9,686	9,686	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Gold Hill	1,335	1,335	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Jacksonville	3,020	3,020	0	100.0%	0	0	0	0	Yes	Yes
Medford	85,824	85,824	0	100.0%	3	4	2	2	Yes with Discretion	Yes with Discretion
Phoenix	4,475	4,475	0	100.0%	0	0	0	0	Yes	Yes
Rogue River	2,407	2,407	0	100.0%	0	0	0	0	Yes	Yes
Shady Cove	3,081	3,081	0	100.0%	0	0	0	0	Yes	Yes
Talent	6,282	6,282	0	100.0%	0	1	0	1	Yes	Yes with Discretion
<i>All other areas of county</i>	66,349	64,439	1,910	97.1%	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson County	24,502	23,999	503	97.9%	1	1	1	N/A	Yes	Yes
Culver	1,602	1,602	0	100.0%	0	0	0	0	Yes	Yes
Madras	7,456	7,456	0	100.0%	1	1	1	0	Yes	Yes
Metolius	978	978	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	14,466	13,963	503	96.5%	N/A	N/A	N/A	N/A	N/A	N/A
Josephine County	88,090	77,670	10,420	88.2%	3	3	2	N/A	No	No
Cave Junction	2,071	0	2,071	0.0%	0	0	0	0	Yes	Yes
Grants Pass	39,189	39,189	0	100.0%	2	2	2	0	Yes	Yes
<i>All other areas of county</i>	46,830	38,481	8,349	82.2%	N/A	N/A	N/A	N/A	N/A	N/A
Klamath County	69,413	0	69,413	0.0%	2	3	0	N/A	No	No
Bonanza	404	0	404	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Chiloquin	767	0	767	0.0%	0	0	0	0	Yes	Yes
Klamath Falls	21,813	0	21,813	0.0%	1	1	0	0	No	No
Malin	731	0	731	0.0%	0	0	0	0	Yes	Yes
Merrill	821	0	821	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	44,877	0	44,877	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Lake County	8,160	0	8,160	0.0%	1	1	0	N/A	No	No
Lakeview	2,418	0	2,418	0.0%	0	0	0	0	Yes	Yes
Paisley	250	0	250	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	5,492	0	5,492	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Lane County	382,971	372,986	9,985	97.4%	10	13	12	N/A	Yes	No
Coburg	1,306	1,306	0	100.0%	0	0	0	0	Yes	Yes
Cottage Grove	10,574	10,574	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Creswell	5,641	5,641	0	100.0%	0	1	0	0	Yes	No
Dunes City	1,428	1,428	0	100.0%	0	0	0	0	Yes	Yes
Eugene	176,654	176,654	0	100.0%	6	6	2	4	Yes with Discretion	Yes with Discretion
Florence	9,396	9,396	0	100.0%	1	1	1	0	Yes	Yes
Junction City	6,787	6,787	0	100.0%	1	1	1	0	Yes	Yes
Lowell	1,196	1,196	0	100.0%	0	0	0	0	Yes	Yes
Oakridge	3,206	0	3,206	0.0%	0	0	0	0	Yes	Yes
Springfield	61,851	61,851	0	100.0%	2	3	3	0	Yes	Yes
Veneta	5,214	5,214	0	100.0%	0	1	0	0	Yes	No

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Westfir	259	0	259	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	99,459	92,939	6,520	93.4%	N/A	N/A	N/A	N/A	N/A	N/A
Lincoln County	50,395	41,405	8,990	82.2%	2	2	2	N/A	Yes	Yes
Depoe Bay	1,515	1,515	0	100.0%	0	0	0	0	Yes	Yes
Lincoln City	9,815	9,815	0	100.0%	1	1	1	0	Yes	Yes
Newport	10,256	10,256	0	100.0%	1	1	1	0	Yes	Yes
Siletz	1,230	1,230	0	100.0%	0	0	0	0	Yes	Yes
Toledo	3,546	3,546	0	100.0%	0	0	0	0	Yes	Yes
Waldport	2,249	0	2,249	0.0%	0	0	0	0	Yes	Yes
Yachats	994	0	994	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	20,790	15,043	5,747	72.4%	N/A	N/A	N/A	N/A	N/A	N/A
Linn County	128,610	124,820	3,790	97.1%	4	5	3	N/A	No	No
Albany	47,355	47,355	0	100.0%	2	2	2	0	Yes	Yes
Brownsville	1,694	1,694	0	100.0%	0	0	0	0	Yes	Yes
Gates	46	0	46	0.0%	0	0	0	0	Yes	Yes
Halsey	962	962	0	100.0%	0	0	0	0	Yes	Yes
Harrisburg	3,652	3,652	0	100.0%	0	0	0	0	Yes	Yes
Idanha	71	0	71	0.0%	0	0	0	0	Yes	Yes
Lebanon	18,447	18,447	0	100.0%	1	1	0	0	No	No
Lyons	1,202	1,159	43	96.4%	0	0	0	0	Yes	Yes
Mill City	1,617	0	1,617	0.0%	0	0	0	0	Yes	Yes
Millersburg	2,919	2,919	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Scio	956	956	0	100.0%	0	0	0	0	Yes	Yes
Sodaville	360	360	0	100.0%	0	0	0	0	Yes	Yes
Sweet Home	9,828	9,828	0	100.0%	1	1	1	0	Yes	Yes
Tangent	1,231	1,231	0	100.0%	0	0	0	0	Yes	Yes
Waterloo	222	222	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	38,048	36,035	2,013	94.7%	N/A	N/A	N/A	N/A	N/A	N/A
Malheur County	31,571	26,823	4,748	85.0%	1	2	1	N/A	Yes	No
Adrian	157	0	157	0.0%	0	0	0	0	Yes	Yes
Jordan Valley	130	0	130	0.0%	0	0	0	0	Yes	Yes
Nyssa	3,198	3,198	0	100.0%	0	0	0	0	Yes	Yes
Ontario	11,645	11,645	0	100.0%	1	1	1	0	Yes	Yes
Vale	1,894	1,852	42	97.8%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	14,547	10,128	4,419	69.6%	N/A	N/A	N/A	N/A	N/A	N/A
Marion County	345,920	343,870	2,050	99.4%	9	12	11	N/A	Yes	No
Aumsville	4,234	4,234	0	100.0%	0	1	1	0	Yes	Yes
Aurora	1,133	1,133	0	100.0%	0	0	0	0	Yes	Yes
Detroit	203	0	203	0.0%	0	0	0	0	Yes	Yes
Donald	1,009	1,009	0	100.0%	0	0	0	0	Yes	Yes
Gates	502	0	502	0.0%	0	0	0	0	Yes	Yes
Gervais	2,595	2,595	0	100.0%	0	0	0	0	Yes	Yes
Hubbard	3,426	3,426	0	100.0%	0	0	0	0	Yes	Yes
Idanha	85	0	85	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Jefferson	3,327	3,327	0	100.0%	0	0	0	0	Yes	Yes
Keizer	39,376	39,376	0	100.0%	2	2	1	1	Yes with Discretion	Yes with Discretion
Mill City	354	0	354	0.0%	0	0	0	0	Yes	Yes
Mount Angel	3,392	3,392	0	100.0%	0	0	0	0	Yes	Yes
Salem	146,139	146,139	0	100.0%	6	7	4	2	Yes with Discretion	No
Scotts Mills	419	419	0	100.0%	0	0	0	0	Yes	Yes
Silverton	10,484	10,484	0	100.0%	1	1	1	0	Yes	Yes
St. Paul	434	434	0	100.0%	0	0	0	0	Yes	Yes
Stayton	8,244	8,244	0	100.0%	1	1	0	0	No	No
Sublimity	2,967	2,967	0	100.0%	0	0	0	0	Yes	Yes
Turner	2,454	2,454	0	100.0%	0	0	0	0	Yes	Yes
Woodburn	26,013	26,013	0	100.0%	1	1	1	0	Yes	Yes
<i>All other areas of county</i>	89,130	88,224	906	99.0%	N/A	N/A	N/A	N/A	N/A	N/A
Morrow County	12,186	10,492	1,694	86.1%	1	1	2	N/A	Yes	Yes
Boardman	3,828	3,828	0	100.0%	0	1	0	1	Yes	Yes with Discretion
Heppner	1,187	106	1,081	8.9%	0	0	0	0	Yes	Yes
Ione	337	337	0	100.0%	0	0	0	0	Yes	Yes
Irrigon	2,011	2,011	0	100.0%	0	0	0	0	Yes	Yes
Lexington	238	238	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	4,585	3,972	613	86.6%	N/A	N/A	N/A	N/A	N/A	N/A

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Multnomah County	815,428	815,297	131	100.0%	14	18	14	N/A	Yes	No
Fairview	10,424	10,424	0	100.0%	0	1	0	0	Yes	No
Gresham	114,247	114,247	0	100.0%	2	3	1	0	No	No
Lake Oswego	2,621	2,621	0	100.0%	0	0	0	0	Yes	Yes
Maywood Park	829	829	0	100.0%	0	0	0	0	Yes	Yes
Portland	650,019	650,019	0	100.0%	9	13	13	0	Yes	Yes
Troutdale	16,300	16,300	0	0.0%	1	1	0	0	No	No
Wood Village	4,387	4,387	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	16,601	16,470	131	99.2%	N/A	N/A	N/A	N/A	N/A	N/A
Polk County	87,433	87,407	26	100.0%	3	4	3	N/A	Yes	No
Dallas	16,854	16,854	0	100.0%	1	1	1	0	Yes	Yes
Falls City	1,051	1,051	0	100.0%	0	0	0	0	Yes	Yes
Independence	9,828	9,828	0	100.0%	1	1	0	0	No	No
Monmouth	11,110	11,110	0	100.0%	1	1	1	0	Yes	Yes
Salem	29,396	29,396	0	100.0%	0	0	0	0	Yes	Yes
Willamina	924	924	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	18,270	18,244	26	99.9%	N/A	N/A	N/A	N/A	N/A	N/A
Sherman County	1,870	1,487	383	79.5%	1	1	1	N/A	Yes	Yes
Grass Valley	149	0	149	0.0%	0	0	0	0	Yes	Yes
Moro	367	367	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Rufus	268	268	0	100.0%	0	0	0	0	Yes	Yes
Wasco	417	417	0	100.0%	0	0	1	0	Yes	Yes
<i>All other areas of county</i>	669	435	234	65.0%	N/A	N/A	N/A	N/A	N/A	N/A
Tillamook County	27,390	22,386	5,004	81.7%	1	1	2	N/A	Yes	Yes
Bay City	1,389	1,389	0	100.0%	0	0	0	0	Yes	Yes
Garibaldi	830	830	0	100.0%	0	0	0	0	Yes	Yes
Manzanita	603	0	603	0.0%	0	0	0	0	Yes	Yes
Nehalem	270	0	270	0.0%	0	0	0	0	Yes	Yes
Rockaway Beach	1,441	1,441	0	100.0%	0	0	0	0	Yes	Yes
Tillamook	5,204	5,204	0	100.0%	0	1	1	0	Yes	Yes
Wheeler	422	0	422	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	17,231	13,522	3,709	78.5%	N/A	N/A	N/A	N/A	N/A	N/A
Umatilla County	80,075	78,907	1,168	98.5%	3	3	4	N/A	Yes	Yes
Adams	389	389	0	100.0%	0	0	0	0	Yes	Yes
Athena	1,209	1,209	0	100.0%	0	0	0	0	Yes	Yes
Echo	632	632	0	100.0%	0	0	0	0	Yes	Yes
Helix	194	194	0	100.0%	0	0	0	0	Yes	Yes
Hermiston	19,354	19,354	0	100.0%	1	1	1	0	Yes	Yes
Milton- Freewater	7,151	7,151	0	100.0%	1	1	1	0	Yes	Yes
Pendleton	17,107	17,107	0	100.0%	1	1	1	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Pilot Rock	1,328	1,328	0	100.0%	0	0	0	0	Yes	Yes
Stanfield	2,144	2,144	0	100.0%	0	0	0	0	Yes	Yes
Ukiah	159	0	159	0.0%	0	0	0	0	Yes	Yes
Umatilla	7,363	7,363	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Weston	706	706	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	22,339	21,330	1,009	95.5%	N/A	N/A	N/A	N/A	N/A	N/A
Union County	26,196	0	26,196	0.0%	1	1	0	N/A	No	No
Cove	620	0	620	0.0%	0	0	0	0	Yes	Yes
Elgin	1,717	0	1,717	0.0%	0	0	0	0	Yes	Yes
Imbler	245	0	245	0.0%	0	0	0	0	Yes	Yes
Island City	1,144	0	1,144	0.0%	0	0	0	0	Yes	Yes
La Grande	13,026	0	13,026	0.0%	1	1	0	0	No	No
North Powder	504	0	504	0.0%	0	0	0	0	Yes	Yes
Summerville	119	0	119	0.0%	0	0	0	0	Yes	Yes
Union	2,152	0	2,152	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	6,669	0	6,669	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Wallowa County	7,391	5,844	1,547	79.1%	1	1	1	N/A	Yes	Yes
Enterprise	2,052	2,052	0	100.0%	0	0	1	0	Yes	Yes
Joseph	1,154	1,154	0	100.0%	0	0	0	0	Yes	Yes
Lostine	241	241	0	100.0%	0	0	0	0	Yes	Yes
Wallowa	796	0	796	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
<i>All other areas of county</i>	3,148	2,397	751	76.1%	N/A	N/A	N/A	N/A	N/A	N/A
Wasco County	26,670	23,707	2,963	88.9%	1	1	1	N/A	Yes	Yes
Antelope	37	0	37	0.0%	0	0	0	0	Yes	Yes
Dufur	632	632	0	100.0%	0	0	0	0	Yes	Yes
Maupin	427	0	427	0.0%	0	0	0	0	Yes	Yes
Mosier	468	468	0	100.0%	0	0	0	0	Yes	Yes
Shaniko	30	0	30	0.0%	0	0	0	0	Yes	Yes
The Dalles	16,010	16,010	0	100.0%	1	1	1	0	Yes	Yes
<i>All other areas of county</i>	9,066	6,597	2,469	72.8%	N/A	N/A	N/A	N/A	N/A	N/A
Washington County	600,372	599,839	533	99.9%	11	14	12	N/A	Yes	No
Banks	1,837	1,837	0	100.0%	0	0	0	0	Yes	Yes
Beaverton	97,494	97,494	0	100.0%	2	3	2	1	Yes	Yes with Discretion
Cornelius	12,694	12,694	0	100.0%	1	1	1	0	Yes	Yes
Durham	1,944	1,944	0	100.0%	0	0	0	0	Yes	Yes
Forest Grove	26,225	26,225	0	100.0%	1	1	1	0	Yes	Yes
Gaston	670	670	0	100.0%	0	0	0	0	Yes	Yes
Hillsboro	106,447	106,447	0	100.0%	2	3	3	0	Yes	Yes
King City	5,184	5,184	0	100.0%	0	0	0	0	Yes	Yes
Lake Oswego	3	3	0	100.0%	0	0	0	0	Yes	Yes
North Plains	3,441	3,441	0	100.0%	0	0	0	0	Yes	Yes
Portland	1,641	1,641	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Rivergrove	50	50	0	100.0%	0	0	0	0	Yes	Yes
Sherwood	20,450	20,450	0	100.0%	1	1	1	0	Yes	Yes
Tigard	54,539	54,539	0	100.0%	1	2	1	0	Yes	No
Tualatin	24,786	24,786	0	100.0%	1	1	1	0	Yes	Yes
Wilsonville	2,142	2,142	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	240,825	240,292	533	99.8%	N/A	N/A	N/A	N/A	N/A	N/A
Wheeler County	1,451	641	810	44.2%	1	1	1	N/A	Yes	Yes
Fossil	447	447	0	100.0%	0	0	0	0	Yes	Yes
Mitchell	138	0	138	0.0%	0	0	0	0	Yes	Yes
Spray	139	0	139	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	727	194	533	26.7%	N/A	N/A	N/A	N/A	N/A	N/A
Yamhill County	107,722	107,722	0	100.0%	3	4	4	N/A	Yes	Yes
Amity	1,757	1,757	0	100.0%	0	0	0	0	Yes	Yes
Carlton	2,220	2,220	0	100.0%	0	0	0	0	Yes	Yes
Dayton	2,678	2,678	0	100.0%	0	0	0	0	Yes	Yes
Dundee	3,238	3,238	0	100.0%	0	0	0	0	Yes	Yes
Gaston	6	6	0	100.0%	0	0	0	0	Yes	Yes
Lafayette	4,423	4,423	0	100.0%	0	1	0	0	Yes	No
McMinnville	34,319	34,319	0	100.0%	1	2	1	0	Yes	No
Newberg	25,138	25,138	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Sheridan	4,639	4,639	0	100.0%	0	1	1	0	Yes	Yes

Population Covered by CAA RAL Depots – 15 Mile Buffer Distance + Convenience Analysis										
	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
Willamina	1,315	1,315	0	100.0%	0	0	0	0	Yes	Yes
Yamhill	1,147	1,147	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	26,842	26,842	0	100.0%	N/A	N/A	N/A	N/A	N/A	N/A

Table 6

Running Collection Events

As the depot network is built, there may be instances where barriers exist in establishing depots, such as a lack of available commercially zoned properties, or locations that do not immediately meet performance or geographic convenience standards.

As a method of alternative compliance, following the guidelines of OAR 340-090-0640(6)(b), regular collection events will be an important avenue to provide convenient access to collection points for PRO list materials. In all instances where CAA requests, in its quarterly reporting, alternative compliance to use a collection event to satisfy the convenience standard in lieu of a permanent site, CAA will document in its annual report all attempts to identify a permanent site for that jurisdiction.

In collaboration with community-based organizations (CBOs) and other entities, CAA will ensure that collection events are conducted in areas lacking a permanent depot, prioritizing underserved communities to ensure convenient access to recycling services. Event information will be well promoted in multiple languages and media channels to ensure broad and equitable community awareness.

CAA is committed to working with local governments to identify opportunities for establishing permanent collection sites in each community required to have a collection point under the RMA. If this is not feasible in some locations, CAA may collaborate with local governments to set up mobile collection events at accessible, well-defined locations, with frequencies adjusted to meet community needs. Frequency may be determined based on population, and other community or collection events may be leveraged. These events will be scheduled on a predictable basis and advertised through a range of methods, including partnerships with local organizations and targeted media outreach, to ensure broad awareness and encourage participation.

CAA will also evaluate attendance and feedback from these events to make adjustments that best support community access and convenience. CAA will work with cities and counties to find the most suitable sites for collection events and determine the best time and frequency of hosting events. CAA will work with jurisdictions to develop promotional strategies for the collection events and collect data on utilization. The events will either be staffed by the local municipality and reimbursed by CAA, or by a partner CBO or local COBID certified contractor with experience in waste management. Design for these events will be based on the models of existing Metro area collection events such as Metro Hazardous Waste Rounds Ups, City of Gresham Earth Day Events, Lane County's Plastics Round Ups or James Recycling's recycling collection events and they may be combined to increase participation.

CAA team members and partners have experience conducting similar events in other parts of the U.S. and Canada. The type of event will depend on the community's needs and what other disposal options currently exist. Events will be conducted in accordance with the same performance standards as depot locations (outlined in the Performance Standards section), offering free collection services and collecting covered materials in a way that preserves the quality of the material and prevents risk of litter or loss of materials. CAA will also work with local jurisdictions on strategies that will reduce wait times and vehicle idling to reduce the environmental impact of collection events.

At this juncture, it is difficult to determine what impact the use of collection events would have on material recovery rates and collection targets because it's unclear what percentage of the population will need to be serviced by collection events during the first program plan period. CAA will monitor participation rates for events along with measuring material collected to monitor the impact events might have achieving the collection targets for PRO materials.

Administrative Discretion Relating to Block White EPS Collection

In addition to the alternative compliance requests envisioned and described above for meeting the PRO depot convenience standard requirements over the course of the program plan, Circular Action Alliance is requesting DEQ use administrative discretion to grant a delay in meeting the specific convenience standard requirement for block EPS collection. This action would allow CAA to achieve the convenience standard through a phased approach, with the organization initially building an impactful smaller-scale program and amassing meaningful data while learning how to optimize systems through our experience. The ultimate goal would be the creation of a successful statewide block white EPS collection program by 2032.

CAA proposes a phased approach to EPS collection, initially focusing on the Metro, Eugene, and Tillamook regions, to ensure the development of an effective, data-driven statewide program. By starting with a smaller-scale rollout, CAA can gather critical insights into the types of packaging materials in use, optimize processes for higher efficiency, and avoid costly investments based on incomplete data. This approach enables us to partner with established collection operators to build capacity, refine best practices, and strategically invest in equipment that aligns with actual EPS generation patterns. A phased rollout reduces the risk of stranded assets, such as underutilized densification equipment, and allows for targeted investments that yield long-term, systemic improvements in collection and densification infrastructure. Ultimately, this incremental expansion will allow CAA to build a sustainable, efficient system that better serves the state and its residents, long term. The phased system development approach is described below.

Additionally, CAA is requesting the use of thermal densification, which will allow CAA to achieve better densities, reduce environmental impact in transportation, and potentially be used in the future to process other forms of foamed protective packaging, such as expanded polyethylene (EPE) or expanded polypropylene (EPP).

Finally, CAA is requesting a consideration of an alternate threshold distance to the 75-mile transportation limit in cases where EPS can be used to fill void space in a backhaul with other materials.

CAA is making these requests for administrative discretion and alternative compliance for EPS collection so that core research questions can be answered that allow for development of a more efficient and sustainable collection system for protective packaging. Important system design questions to be answered include:

- What is the capture rate from residents vs. commercial? Can a system built on commercial volumes more successfully sustain collection of residential volumes?
- What are the most efficient reverse logistics and aggregation opportunities?

- How much non-EPS protective packaging will be collected in the system and how can that potentially be managed?
- Will markets prove to be stable for densified EPS?
- What are the best practices for operating EPS collection in urban vs. rural areas, particularly when it comes to using mobile units vs. stationary systems?

CAA proposes to undertake the phased approach below for developing the network, with the goal to meet the convenience standard of serving all required communities by 2032. This will allow time to develop the first-of-its-kind statewide recovery system for EPS, building a sustainable model for recovery and allowing for packaging adaptations to occur that may be happening in response to other EPR laws, such as the California packaging EPR law, which might dramatically change the landscape of protective packaging materials. If EPS recovery targets are not met in California by 2032, a dramatic shift in material choices for protective packaging might be made, and the Oregon system might need to further evolve to respond.

Phase One (First 18 Months): Metro, Lane County and Tillamook

CAA will begin its buildout of a block white EPS network with collection sites in the population-dense Metro Portland area and Lane County. The development of this network will take place from July 1, 2025, through the end of 2026, and will achieve the convenience standard for the metro area, Lane County, and Tillamook County by the end of the program plan period.

CAA is in discussions with community-based organization St. Vincent De Paul (SVDP), which currently operates a successful collection and densification program in Lane County. With 10 collection sites and a facility with a thermal densifier, they are experienced at optimizing a multi-site EPS collection program, one which effectively serves the Lane County community and processed 60 tons of EPS in 2023.

CAA has approached SVDP with a proposal to bring 10 to 15 collection sites to the Portland Metro area, along with a second EPS densification center, also in the Metro region.

Additionally, CAA has identified Green Century, a business that currently accepts and recycles EPS in Portland, as a key potential partner in deepening our collection and densification capacity in the Metro region. Generators currently bring EPS to Green Century's Northwest Portland site for recycling, along with electronics and appliances. CAA is in discussions to upgrade Green Century's existing densification equipment and invest in growing the capacity of the company's Portland operation.

Another component of the first phase of CAA's proposed EPS program is focused on enhancing the current EPS collection system in rural Tillamook County. With a higher capacity densifier, an upgrade from cold press to thermal, and additional program investments from CAA, the initiative can expand while gathering critical operational data. The knowledge and best practices coming out of Tillamook County can then help guide an eventual statewide expansion.

During Phase One, and continuing through Phase Two, CAA will conduct targeted assessments in Central and Eastern Oregon to identify significant sources of EPS generation and evaluate where collection and densification programs would yield the most impact.

Phase Two: EPS Program Expansion 1–5 Corridor and Coastal Communities

During the first 18 months of operating our EPS collection and densification program CAA will generate performance data and answer some of the key research questions outlined above. This information will inform the strategies for growing CAA's collection network to communities along the I-5 corridor and west to the Oregon coast. Our Phase Two, beginning in January 2027, will include investments in expanding EPS collection operations to the wastesheds of Lincoln, Coos and Curry Counties along the coast as well as Douglas, Jackson and Josephine Counties to the California border.

Phase Three: 2029 and Beyond

In the third and final phase, beginning January 2029, CAA will meet the convenience standard through an EPS collection program that includes all of Oregon. CAA is requesting to meet the convenience standard by 2032, which will allow for:

- Optimizing the collection and transportation system design,
- Mapping EPS supplies across commercial and residential generators,
- Identifying the right technologies that enable management of not only EPS, but future forms of protective packaging,
- Allowing the materials changes to occur that might unfold as a result of the California EPR program and other evolutions in policy and markets.

Collaboration with Major Retailers

CAA is also in discussions with major appliance and electronics retailers in Oregon, where large volumes of block white EPS are generated (EPS is often used as a protective material in appliance and electronics packaging). Through partnerships with SVDP and potentially other organizations, CAA will facilitate the placement of large trailers at retailer distribution centers for the collection of EPS from the retailers' back of house operations – the idea is that when new appliances are installed at Oregon homes and businesses, the retailer handling installation will bring EPS used in packaging back to its distribution center alongside the old appliances that have been replaced.

SVDP would then handle collection of both the bulky used appliances and EPS, creating operational efficiencies that align with its charitable mission and revenue model.

As part of this effort, CAA will experiment with filling void space in trailers already hauling used appliances from retailers to drive down the overall impact of transporting EPS from collection sites to densification centers (more information on the void space strategy can be found later in this subsection).

In addition, through these retail partnerships, CAA intends to explore how to use commercial-scale volumes to help build out a system that also captures material from lower-volume generators, such as residents.

Ensuring Safety and Demonstrating Economic Benefits of Thermal Densification

Based on industry experience and market research, CAA believes thermal densification units can be used efficiently and in a way that protects both worker safety and the environment.

St. Vincent De Paul currently operates a block white EPS thermal densification process in Eugene. CAA's review of existing research indicates that emissions during the thermal, or hot melt process are minimal. Further, air monitoring conducted for an Oregon thermal melt operation showed that operator exposure levels for chemicals such as ethyl alcohol, pentane, and styrene were well below OSHA's permissible exposure limits (PEL). Details on the literature reviewed by CAA are available upon request.

CAA will ensure that regular maintenance and operation in accordance to manufacturer guidelines are followed as part of the Depot collector performance standards and audit program.

In addition to its proven safety, thermal densification offers a higher compaction ratio of 90:1, compared to 40:1 for cold-press densification. This nearly doubles the volume of unprocessed material per truckload, significantly improving transportation efficiency. The dense output of thermally densified EPS also has a much higher market value, estimated at \$500 per ton FOB, compared to \$6-25 per ton FOB for cold-pressed EPS.

Finally, if sweeping changes in material selection for protective packaging occur in the next few years, CAA would like to ensure that equipment can be explored that could be used to process a broader range of foamed packaging types. Cold densification systems are not effective in densifying EPE and EPP, meaning if the packaging stream changes over time, there could be a network of ineffective densification equipment deployed across the state. Given the cost of densification units, CAA would like to ensure the units being purchased to serve the system in Oregon have the broadest utility ensuring we are not leaving stranded assets across the state as the packaging stream changes over time.

Transporting Undensified EPS as Void Fill Beyond 75 Miles

A final request for alternative compliance consideration for EPS involves transporting the material beyond the current 75-mile limit if the material is being utilized to fill "void space."

In such a scenario, undensified EPS would occupy unused, "top" areas within a truck that would otherwise remain empty due to load distribution constraints when transporting bulky items like used appliances. The undensified EPS volume shall not exceed 50% of the truck's total cargo space.

To ensure compliance with DEQ's requirements and prevent misuse, the following controls will be implemented:

1. **Volume Threshold:**
 - a. Undensified EPS must constitute no more than 50% of the occupied space within any truck traveling over 75 miles. Loads will be assessed and documented by transport partners, adhering to this standard.

2. Recordkeeping for Periodic DEQ Audits:

- a. We will establish and maintain detailed records for all transports involving undensified EPS beyond 75 miles. Documentation for each such transport will include:
 - i. **Date and route of transport**
 - ii. **Volume estimates** of undensified EPS and other materials
- b. Records will be readily available for DEQ to review at their request for periodic audits, ensuring compliance with the guidelines.

3. Verification Methods:

- a. **Documentation:** Transport partners will complete a form detailing the load composition for trips exceeding the 75-mile threshold, specifically noting undensified EPS used as void fill.
- b. **Photographic Evidence:** A photo of each load will be taken to document undensified EPS placement and confirm it remains within the allowable void fill limit.

Given the increased densities achieved by thermal densification and the use of void space in backhaul situations, CAA anticipates positive environmental outcomes of the alternative compliance proposal.

Underserved Populations

CAA will partner with CBOs and other service providers to provide collection events in areas where populations may find barriers to accessing the depot network. These barriers could include lack of vehicle transportation or, lack of awareness due lack of technology such as a phone or internet. CAA will work with the CBOs and the local governments to identify areas that would benefit from such services.

CAA is exploring a partnership with Metro based Trash for Peace to provide these catered event services that would include informing the public of the coming event, set up, collection and transportation of the materials. The exact frequency of events is still to be determined. As most of the gaps in the current projections of depot locations exist in the Metro area Trash for Peace will be engaging with all three of Metro's counties.

Events will be held in easy to access areas that are within 500 feet of transit services or catered specifically to large, low-income housing developments.

CAA is exploring a number of event partner options outside the Metro region as well.

CAA is also in communication with some of Oregon's Tribal nations about expanding collection services and opportunities to members living outside of jurisdictions receiving system expansion funding for curbside service and depots.

CAA will work with these Tribes to determine service level needs of their members and work with local haulers to coordinate collection opportunities. If areas are far from existing hauling companies, CAA will work with the local Tribe or CBOs to explore creating collection opportunities as requested by Tribes.

PRO Materials Collection Service to Residential Customers with Disabilities

CAA proposes to partner with the franchised residential haulers across the state to provide at-home collection of PRO Materials to residents with disabilities who are unable to take their materials to collection points. This service will be available to residents of single-family, duplex, triplex and four-plex homes. If similar service cannot be arranged for a qualifying resident in a multi-family unit, CAA will work with a local social services agency to identify a collection solution.

In shaping its approach to this service, CAA reviewed local government policies related to solid waste collection services to residents with disabilities and consulted with the Oregon Refuse and Recycling Association. Key components of the planned service are:

- A resident will apply for the service using an online CAA form, uploading a statement of disability from a physician or social worker, and attesting that no one else in the household could bring the materials to a PRO Materials depot. Residents may also request and submit a hard copy form.
- CAA will review the application and inform the resident and hauler whether the service request has been approved.
- A resident with this service will call their hauler to schedule a collection appointment and place their source-separated and bagged recyclables at a location visible to the hauler on the collection day.
- The collection trucks used will vary by hauler, with the only requirement being that they maintain the source-separation of the materials through to delivery to a PRO collection point. Haulers will use the most cost-effective collection point for delivery of collected materials.
- Haulers will utilize an online CAA portal to submit reports and invoices. CAA will reimburse haulers at a per customer rate to be established.
- CAA will provide haulers with instructional materials for distribution to participating customers, a materials checklist for their customer service staff to use when scheduling a pick-up, and instructional materials for staff to use for reporting to CAA.

Interim Reporting

To ensure that CAA remains on track to meet the convenience standard, CAA will report quarterly to DEQ throughout the program plan period on progress toward meeting the convenience standard, in a manner and format agreed upon by DEQ and CAA, and including fully-substantiated, site-by-site requests for alternative compliance for DEQ review and approval, as well as reporting on progress of the phased approach to meeting the convenience standard for expanded polystyrene. The first report will be submitted on November 15, 2025.

ii. Proposed Approach to Addressing Performance Standards

Once the depot network is developed, it will be CAA's responsibility to ensure that each site is operating in conformance with the performance standards defined in the rules. Oversight includes ensuring:

- Sites and services consistently conform to operating standards
- Depots are free to the public
- Sites are well promoted to maximize awareness and participation
- Infrastructure around the site promotes ease of accessibility
- Quality of recyclable materials is maintained
- Depot sites have a positive impact on the communities and environment within which they operate

CAA proposes to build multiple check points into the process of establishing and maintaining the network in a way that meets all these performance standards.

Criteria for Site Selection

CAA is responsible for reaching out to permitted facilities and existing locations to assess their interest in participating as a PRO depot and their suitability as a site. If a permitted facility or existing depot location is found not to conform to the performance standards, CAA will reconsider the eligibility of that depot to serve as a drop off facility within 12 months of that depot correcting any non-conformance to the performance standards.

CAA will also ensure hours of operation conform to the rules. If a depot is located at a "parent facility", such as a permitted facility, access to the PRO recycling area will be open those same hours. For all other collection points, or "stand alone" sites, CAA will ensure they are open for at least 4 days a week, 8 hours a day and that one of those operating hours falls on a Saturday or Sunday. For events, CAA will work with the event partner, such as a CBO or hosting local jurisdiction to determine the appropriate duration.

All sites must meet accessibility standards, having ADA compliant recycling areas in prominent places or marked so residents can easily access recycling opportunities. The sites need to also be accessible from a transportation perspective, ensuring roads and public spaces are suitable for residents to reach and maneuver the site safely and for logistics partners to service. For collection opportunities that may be co-located with retail or other commercial activities, clear signage on how to access the recycling system will be made available at entrance points.

Sites will be fenced or have some other enclosure that acts as a litter mitigation measure. All collection areas shall be covered by a roof or have lidded bins that protect the material's quality and prevent water from accumulating in covered material collection areas.

While drop-off sites are largely designed for residential and small-business generators, medium-, and large-sized commercial generators can contact CAA to arrange for larger volume pick-ups, or to explore the installation of a trailer on site to accumulate large volumes of materials on site.

Establishment of Depot Sites and Contracts

As depot locations are brought on board, CAA will assess sites for additional equipment and infrastructure needed to meet the performance standards. Additional staff time necessary to fulfill the operational obligations of the PRO depot network will also be assessed and worked into the payment schedule. Each site will enter into a services contract with CAA, which will outline performance expectations as terms of the contract.

CAA will also document that all operational expectations are in place before a depot location is added to the network. CAA will create a site audit record for each site, demonstrating that each depot location can meet the performance standards at the outset of operating in the program.

Depot staff will undergo initial onboarding training with their CAA point of contact. Staff will receive training in all operational procedures, become familiarized with the system for pick-up requests, and learn where to find resources to promote their services. CAA will provide a depot management handbook outlining the above information to all depot sites.

It is also important to note that CAA's proposed logistics, transportation and aggregation partner for PRO Acceptance list material will use cameras to capture periodic still images of collected materials, providing photographic documentation to monitor volumes and schedule timely pickups. This documentation strategy will also monitor contamination within and around collection areas. CAA will work with collection sites to determine the best compensation method based off the required FTE to handle the PRO materials brought in by the public as well as the square footage need to place sea containers, bins and storage of materials. The FTE compensation rate will be based on living wages according to the geographic location. Collection volumes may be low for some sites, in which case factoring a per pound reimbursement might not be practical. To adequately accommodate for the fixed space and labor costs, CAA may need to compensate collection sites based on a flat, per month service fee or alternatively, on a per hour basis. Terms of compensation will be part of the depot consultation process.

A provision of the contract will state that any incidents that could substantially impact services offered or require emergency response be reported to the PRO within 24 hours. That will allow the PRO 24 hours from the time of notification by the collection depot to convey incidents to DEQ within the two business days defined by rule.

Operational Support

Once a depot is operating in the program, CAA will provide resources to support their operations. CAA anticipates offering the following resources:

- Newsletter for depots to keep them informed of the progress of the program, feature information on best practices, and remind them how to contact the team for assistance
- Webinars to ensure operators are familiar with operational procedures
- A media kit that will help depot sites promote the PRO collection opportunities alongside their other services

- Building and informational, collection container and wayfinding signage as needed
- Access to digital resources like the PRO depot management handbook and digital files for signage

To ensure residents across Oregon have an equal opportunity to recycle, CAA will make education and promotional materials available in multiple languages. Different language options offered for depot education will mirror the language options used in each jurisdiction for broader program education elements.

Annual Audits

CAA will develop an audit cycle that will include a mix of on-site support and evaluation visits, as well as supplemental desktop audits performed each year for every site. An on-site audit will be conducted within the first three months of bringing a site on board. Each site will also receive an on-site audit during the second calendar year of operation to ensure operations are running smoothly and in accordance with the terms of the contract. In the third year, the site may receive a desktop audit if operations have been running without incident. Desktop audits and on-site audits will assess the same criteria. When a desktop audit is performed rather than an on-site audit, documentation via photos, promotional efforts and compliance documentation will be requested. The same documentation will be gathered by CAA staff when conducting an on-site audit. From there, sites would receive on-site and desktop audits on alternating years.

On-site audits provide an opportunity to build and establish relationships, reengage with site operators and provide additional depot staff training and development. CAA views these visits as opportunities to ensure that depot operators and staff have the information, training, signage and updates they need, in addition to serving as an evaluation of compliance and performance.

Audit Criteria

The audit criteria will include, but is not necessarily limited to:

- Adequate signage
 - Program information
 - Clear messaging that the program is free
 - Hours of operation
 - Contact information for site feedback
- Overall site organization and ease of use for residents
- Record of program promotion throughout the year
- Certificates of insurance
- Demonstration that staff are knowledgeable about the PRO program
- Provision of PRO depot training to all new employees and provision of access to the PRO depot management handbook to all employees
- Documentation of feedback that has been gathered and forwarded to CAA

Contamination Management

For more PRO depot sites, a CAA-funded staff member will be present to assist the public with drop-offs of PRO materials. This staff member will ensure cleaner material streams and will be an educator to the public about the PRO depot system and what it can collect. Where repeated contamination or illegal dumping issues arise at a site, CAA may request the use of monitoring technology to address issues. Signage shall be prominently placed to offer instructions on management of materials that are not accepted in the collection system.

If a load of material is determined to be too contaminated for an end market, the PRO will explore options to remedy the contamination situation through additional sorting at a CRPF. If additional sorting will not result in the material being marketable, or a remedy is not possible, the PRO will choose to landfill the material and notify DEQ within three business days of disposal. The notification will include a description of:

- The nature of contamination
- The cause of contamination
- The remedy explored to improve the quality of the contaminated load
- The remedy that will be put in place to prevent future contamination

If non-PRO program material ends up at the depot that is in the same or similar category to the existing PRO materials, CAA will instruct locations to mix that material with the PRO materials as it will be destined for the same market. For example – a plastic pool ends up at the collection point. This item will be added and picked up with the other bulky rigid plastics at the depot.

Compensation

CAA proposes to contract with each depot location for wages and salaries for additional depot employees needed to monitor and maintain PRO materials collection operations.

Compensation Calculations

The compensation offered to each site will include consideration of:

- Staff time, including training
- Employee safety equipment
- Space dedicated to collections, existing and expanded
- Improvements to an existing site
 - Adding more covered area for keeping materials dry
 - Grading and leveling
- Capital costs borne by CAA for PRO materials depots will include:
 - Sea containers and trailers
 - Totes, cages and drums for materials collection
 - Public-facing depot signage

PRO materials depot sites will require employee oversight to ensure a smoothly operated, effective and user-friendly experience. CAA will evaluate and determine, in partnership with the existing operator where

applicable, during the site contracting phases an agreed upon staffing arrangement. Generally, we anticipate that most depot sites operating at existing recycling facilities will require one quarter of one full time employee (.25 FTE) to ensure that public-facing material locations are checked regularly for incorrectly sorted materials and debris left behind and are accessible for users. Some sites, where the PRO materials depot is operating independently of a preexisting recycling operation, will require additional employee time, potentially two or more full-time dedicated employees. CAA recognizes that these jobs are physically demanding, in an environment that involves exposure to outdoor conditions and handling various recyclable materials, requiring resilience and adaptability. Correspondingly, CAA will provide compensation for the determined staffing level at a living wage, based on geographic location.

Depot sites will also be reimbursed for the portion of their physical plant required to operate PRO depot material collection and storage. For some sites, this will mean a portion of existing buildings, parking lots, outdoor covered spaces or storage facilities. We have established through ORSOP an estimate of monthly site lease fees as compensation for sea container footprint and 53' trailer footprint and additional customer access/operating service space of equal size (container footprint X2) at an average rate of \$2/square foot and onsite material storage facilities.

Site-specific estimates of facility costs and staffing needs will be used in negotiating the terms of compensation among CAA and a prospective collection point service provider, including for the purpose of determining whether or not contracting with an existing depot is possible, pursuant to OAR 340-090-0640(1)(b).

CAA considered instituting a volume-based materials collection incentive program which would reward PRO materials depot collection sites for growing the amount collected. We determined, however, that CAA needs to establish a baseline of volumes collected before creating an incentive. Setting volume-based incentives before the volumes of materials generated at each facility are known, would be premature. CAA recognizes the benefits of incentivizing volumes and will consider how to work that into the depot compensation model in the second program plan period. For this first program plan period, CAA will focus on ensuring that the program is well-operated, accessible and impactful and CAA would like to use the first program plan operating data to inform how we structure incentives across regions, different types of depots and operating environments in order to foster meaningful collection results across material categories.

Events Compensation

Where CAA is finding difficulty siting a collection depot or location, the convenience standard will be met through community collection events. CAA is in discussions with a number of partners with capabilities to operate events statewide as well as experienced community event operators including CBO Trash For Peace and Portland-based recycling business Green Century. Event service provider compensation will be determined using projected event costs developed during the ORSOP process. Several factors are included in determining event rates including event duration, rental equipment needed and staffing requirements. Additional parameters such as event promotion, anticipated event attendance, projected material volumes collected, distance traveled to perform the event, and breadth of services provided may also be considered when negotiating with our event service providers.

Reuse

CAA will explore opportunities for supporting collection of reusable packaging at depot locations and events. As depot locations and events will be staffed, there may be opportunities for collection of reusable packaging.

CAA will consider how PRO collection points could potentially serve as collection points for reusable or refillable packaging that is made to leverage a “return on the go” model. CAA will work with producers to monitor trends in reusable/refillable packaging and anticipate how the depot system can play a role in the return system.

Leveraging the PRO depot system to collect reusable and refillable materials will likely require additional reverse logistics arrangements specific to this packaging. Depending on the status of the material in question, incorporation of reusable packaging into the PRO acceptance collection system may also require material reporting category changes and program plan amendments. CAA will work with producers to assess the full financial and operational implications of managing reusable packaging. Where appropriate trials may be implemented to assess feasibility.

Advanced Notification

Before considering adding any materials for collection at the depot, including a reusable packaging format as described above, CAA would engage with DEQ and local service providers in a process of notification six months before implementation. At that time of notification, CAA will produce data relevant to the proper screening assessment, which relates to sufficient availability of responsible end markets.

Promotion of the PRO Depot Network

The statewide promotional campaign, as part of the broader education and outreach component of this Plan, will focus on three main areas: the USCL, the PRO recycling acceptance list collection materials (including how to take advantage of PRO Recycling material collection opportunities) and reducing contamination (both in terms of proper preparation of materials and avoiding non-accepted materials).

Collection opportunities will be promoted via a CAA-developed website that lists the available depots throughout the state. This will include hours of operation and site accessibility information. Customizable collateral that will be made available to local governments via an online portal and then distributed through their existing channels will also reinforce relevant messaging about depot recycling opportunities.

Educational collateral and campaign material will also highlight the importance of proper preparation of materials for recycling. CAA proposes to use proven motivational messaging to address key issues and inform residents about the new opportunities to recycle materials in their area.

To ensure that materials are accessible and culturally relevant, CAA has built in audience research and consultation processes with local governments, community-based organizations, targeted community focus groups, DEQ and the Oregon Recycling System Advisory Council (ORSAC). This is to ensure that all

educational collateral is informative, well-designed, culturally relevant and actionable. Local governments will also be able to tailor materials to their area via CAA's online portal.

As communities transition materials from the USCL to PRO Depot collection (e.g., shredded paper, aluminum foil, foil-pressed products and aerosol containers in the metro area), CAA will ensure local governments and service providers have the education and outreach tools needed to inform the community about the changes. These tools and resources will be accessible and customizable within the E&O Portal. CAA intends to reach commercial generators with education about the PRO Depot collection opportunities as part of the statewide education campaign, which will target both residential and commercial generators. Large scale commercial generators of PRO acceptance materials will be encouraged to contact the Oregon team directly to arrange for collection of large volumes.

More information about CAA's proposed approach to education and outreach, including education and outreach specific to the PRO depot network, can be found in the "Education and Outreach" section of the Operations plan.

Equity in Performance Standards and Collaboration with the Community

As mentioned in the Convenience Standards section above, CAA has been in talks with several CBOs around the state that have expressed interest in staffing and maintaining depots or events. Several of the CBOs function as workforce development programs, such as Trash for Peace's Environmental Promotor program or The Arc's Job Training programs for individuals with Intellectual and Developmental Disabilities (IDDs). Working with these CBOs to utilize the management of the depots as a training ground for workforce development aligns with the current goals of many of these programs. Saint Vincent de Paul and James Recycling also have similar workforce development programs tailored to individuals with differing physical and mental abilities. CAA aims to make some of the depot contamination management and other processes obtainable for individuals with differing physical and mental abilities.

Other waste-diversion related organizations such as Habitat for Humanity have expressed interest in partaking in the network. CAA believes locations often referred to as the 'stop before the landfill' work well as a location for PRO material collection. Aligning locations where the public might be bringing other items to donate or dispose of may reduce vehicle traffic and dedicated trips to the depots.

CAA has also been working with TSWAN and EPA Region Ten to communicate RMA opportunities to Oregon's Tribes. These opportunities might include staffing opportunities at local depots as well as expanded recycling opportunities for Tribal Members. Several Tribes have been engaging with CAA since July 2024. CAA will prioritize and continue this work throughout Program Plan implementation.

iii. Start-Up Approach for Establishing the Depot Collection System

CAA has recently completed the ORSOP process with the consulting team at RRS. Below we review past phases of PRO depot system development work as well as detail ongoing and future phases required to start up the PRO depot collection system.

CAA is working with the Oregon Beverage Recycling Cooperative to explore the role the cooperative could play in collecting materials from PRO RAL collection points and aggregating PRO materials at OBRC aggregation sites.

CAA is considering taking a regional approach to building out the depot system, which will aid in transportation efficiencies and consumer education. CAA is committed to meeting the convenience standard requirements by December 31, 2027, and meeting the milestones outlined in Goal 2.

Completed: Phase 1: Preparation (April 2024)

CAA's first phase of work to establish a depot collection system focused on preparing for outreach and engagement. During the preparation phase, CAA focused on:

- Working with Oregon DEQ and other interested parties to identify key information gaps to inform outreach and analysis process, for example, the potential role of transfer stations in the depot network
- Refining the target list of existing and potential depot partners, including identifying overlaps with outreach to local governments and service providers
- Drafting consultation materials e.g., background and planning documents that included explorations of the following for existing depot/drop-off sites including those run by Local Governments/service providers, and new sites:
 - Existing collection provision and capacity (if applicable)
 - Appetite and capacity for expansion (existing and new sites)
 - Estimating site expansion needs and answering questions relating to the PRO acceptance list materials
 - Understanding Education and Outreach provisions and needs

Completed: Phase 2: Consultation, Enhanced Analysis and System Design (May–October 2024)

CAA's second phase of work focused on designing and executing the ORSOP survey and associated research, as well as conducting significant outreach to local governments, service providers and CBOs. CAA's work in Phase 2 included but was not limited to:

- Proactive outreach to local government and potential partner depot operators, using the following potential methods:
 - Direct outreach, via the ORSOP survey

- Additional ORSOP follow up outreach conducted by RRS. Follow-up calls and meetings to provide information, answer questions and encourage partnership with potential depot partners
- Securing Letters of Intent (LOIs) for depot sites that have agreed to move forward with partnership
 - Group meetings to facilitate coordination at the watershed level
- In parallel to, and informed by, the outreach and consultation process:
 - Exploring and modeling options for materials management including aggregation, transportation, sorting, and Responsible End Market management, informed by learnings from survey and other outreach
 - Refining the GIS mapping work CAA has commissioned IncaTech for to provide key data and insights relating to depot distribution, accessibility and distances
 - Developing a detailed approach to meeting performance standards, further developing and refining the initial proposals outlined in this submission
 - Refining the plan for achieving collection targets and adjusting corresponding aspects of the program plan
- Liaising cross-functionally on Education and Outreach needs
- Identifying suppliers necessary to provide equipment for Oregon's PRO depots, including sea containers adapted for material collection and sortation tools such as totes and cages
- Conducting foundational conversations and early discussions with logistics, transportation and aggregation partners
- Connecting and identifying partnership opportunities with CBOs, key retailers and private businesses conducting work in materials recycling
- Engaging with community event organizers to develop plans for PRO material collection events
- Working with RRS on cost modeling for PRO depot system build out and ongoing operations
- Conducting responsible end market research

In Progress: Phase 3: Revised Draft Development and Iterations (November – December 2024)

Informed by ORSOP results and cost modeling, additional outreach, and feedback from interested parties CAA is updating its plans for the PRO acceptance list collection system.

Phase 4: Operationalization and Onboarding (January–June 2025)

Subject to DEQ approval of the CAA program plan, CAA will focus on the operationalization of the Oregon PRO depot network. Activities will include, but will not be limited to:

- Finalizing contracts with local governments, service providers and end markets
- Finalizing the launch of reporting and accounting systems while onboarding key partners
- Confirming end markets

Phase 5: Launch

Beginning July 1, 2025, CAA will begin to launch the PRO depot network, including working with sites currently collecting PRO materials. CAA will offer financial support for collection of those materials and work to eventually transition custody of those materials to CAA over time. This transition will be done in a way that avoids disruption to current collection services. Over the course of the program plan CAA will on board additional collection sites to fully achieve convenience standards. Continued education and outreach efforts will ensure accurate information for residents regarding depot location, depot accepted materials, proper preparation of materials for recycling and contaminants to avoid.

iv. Proposed Depot Collection Targets

CAA has developed initial proposed collection targets for the PRO depot network. Information from Cascadia's [Overview of Scenario Modeling: Oregon Plastic Pollution and Recycling Modernization Act](#) (referred to from here on as the "Cascadia report") was used as one key resource to generate the values in the following section. Because the Scenario Modeling did not provide adequate detailed data on a number of material formats, supplementary data from depot programs in Ontario, Canada (the Resource Productivity and Recovery Authority for general blue box materials and the Orange Drop program for hazardous materials) were referenced.³

For the purpose of simplifying equations to demonstrate estimated collection rates per location, the following section will reference a number of depot locations. In this section, the term "depot" is used to represent physical locations, events and curbside services for PRO materials as explained in the *"Proposed approach to meeting convenience standards"* section of the Program Plan. Strictly for purposes of calculations here, but pending a number of considerations going forward, the table and text below use 173 sites against projected collected tons.⁴ The numbers are presented as an average per site per year, while recognizing that, in reality, some sites will collect more material than others.

For purposes of projecting collection targets in this section and subject to additional analysis in future versions of this Plan, CAA also assumes that 15% of the Oregon population will participate in depot and related services. CAA acknowledges concerns about assuming low participation rates. In its implementation of the depot system, CAA will endeavor to optimize participation and to use data from implementation and from its reporting to DEQ to adjust its projections. Curbside audit data will also indicate the disposition of material that might be redirected to depot collection (and overall help understand generally how to increase recycling rate).

While there are data available for a handful of high-performing depots in Oregon and Washington, a solid data set for standard performance is lacking. Without a precedent for this kind of system being implemented at this scale in the U.S., and with depot implementation occurring over the course of the program plan period, CAA is choosing to use a more conservative approach to initial collection targets. CAA has every intent of maximizing volume collection through depots to increase collection rates through convenience and education and improving cost efficiencies for producers.

³ <https://stewardshipontario.ca/wp-content/uploads/2022/06/SO-2020AR-FINAL-002-3.pdf>

⁴ Variables that will affect or determine the final number of collection sites include but are not limited to 1) the percentage of local governments agreeing to host sites, 2) DEQ's flexibility in meeting convenience standards by city, 3) value of curbside collection to displace number of depots, 4) number of sites that can accept all materials versus a more limited range, 5) materials management standards for aerosols and pressurized containers as HHW, 6) the ability to use existing film drop-off points at retailers, and 7) the ability to substitute events for sites.

Proposed Collection Targets and Rates

Material	Proposed Collection Targets and Rates	Average Pounds Per Participant Per Year	Average Tons/Year Per Collection Point
Polyethylene Film Packaging	1,950 tons (5.9% collection rate)	6.16	11.27
Aluminum Foil and Pressed Foil Products	390 tons (6.2% collection rate)	1.23	2.25
Block White Expanded Polystyrene	490 tons (9.2% collection rate)	1.55	2.83
Polyethylene (PE) and Polypropylene (PP) Lids and High-Density Polyethylene (HDPE) Package Handles	290 tons (10% collection rate)	0.92	1.68
Plastics Buckets, Pails, and Storage Containers	975 tons (15% collection rate)	3.08	5.64

Table 7

Material-Specific Discussion

Polyethylene Film Packaging

Data from the Cascadia report suggests approximately 66,000 tons of polyethylene (PE) film were generated in 2023. Assuming 50% falls within the RMA scope⁵, approximately 33,000 tons are generated and available for collection. An estimated 1,950 tons will be collected per year, which is a number consistent with data from available Canadian depot programs. Consumer confusion over flexible films may result in a mix of film resins being captured at the collection points.

⁵ This assumes that 50% of PE film is out of scope because it is generated as wrap by non-RMA retail, distribution center and industry sources. This estimate aligns with other industry sources, for example The Recycling Partnership capture data, accounting for some increases due to commercial volumes but also some decreases due to plastic bag bans in Oregon. Note that this same generation figure is used in the denominator of the plastics recycling rate calculations below.

Overall, the collection rate is estimated to be approximately 5.9%. An average of 11.272 tons are expected to be collected per each of the collection points in the network, at an estimated average of 6.16 pounds collected per participant per year. As part of the depot network for film collection, CAA will continue to reach out to the retailers currently collecting film in the state to see which locations may be voluntarily added to the PRO collection network for film.

DEQ designated PE film as a PRO depot material due to concerns surrounding the material's compatibility with the existing recycling system. While not challenging this decision, CAA believes that this material could eventually be introduced into the USCL list and that improving long-term collection rates will likely be necessary to meet statewide plastic recycling goals.

As such, CAA will work with Oregon processing facilities to review strategies for management of PE film as well as adding non-PE films over time. Assessment may include the implementation of research opportunities once the Program Plan period commences to better understand opportunities. Meanwhile, CAA also plans to further investigate the volume of PE film material flowing through depots, the commingled stream (as contamination) and specialized collection services to inform potential research and trials while meeting its obligation to ensure the disposition of this material to REMs.

Aluminum Foil and Pressed Foil Products

The Cascadia report provided no specific generation estimates for aluminum foil and pressed foil products. Estimates from other sources, including The Recycling Partnership (The Partnership), suggest 6,300 tons of residential material were generated in 2023. Additional tonnage is generated by the non-residential sector but there is no data source available to determine that figure. Based on The Partnership's estimates for collection, corroborated by available information from Canadian depot programs, CAA estimates that approximately 390 tons of aluminum foil and pressed foil products will be collected through PRO depots (Cascadia's report suggested only 50 tons may be collected as it is common for residents to place their aluminum foil products in their curbside container, but this figure seems too low. CAA's projected Depot collected tonnage is almost 8 times the curbside total projected by Cascadia).

A general trend towards grocery products moving away from aluminum foil trays into polycoated boxboard formats may impact the volume of foil products generated over time. Less expensive, freezer-safe and microwave-safe, boxboard trays are increasingly replacing aluminum foil products. Provided that assumed participation rates remain the same, the estimate of collected tonnage may become aggressively high over time.

Overall, the collection rate is estimated to be approximately 6.2%. An average of 2.254 tons are expected to be collected per each of the collection points in the network, at an estimated average of 1.23 pounds collected per participant per year.

Block White Expanded Polystyrene (EPS)

The Cascadia report suggests approximately 5,300 tons of foam polystyrene were generated in 2023. However, the report noted there was some downward pressure on EPS for generation. Using available data,

adjusted for recent reductions in EPS usage suggests approximately 490 tons will be collected. Cascadia's model scenarios had projected a recycled tonnage of 300 tons/year (Scenarios 12 and 13); 490 tons increases that estimate by almost two thirds.

This estimate is consistent with data available from depot programs in Canada. It should be noted that producers utilizing EPS packaging are under pressure to replace it because of the perception of its impact on ocean beaches and marine litter. EPS is being replaced by molded pulp forms, corrugated cardboard forms and expanded PE and PP foams. Therefore, the collection estimate may be on the high side if these other cushion packaging forms continue to make inroads.

Overall, the collection rate is estimated to be approximately 9.2%. An average of 2.83 tons is expected to be collected per each of the collection points in the network, at an average estimated 1.55 pounds collected per participant per year. CAA will also be approaching enhanced recycling service programs, such as Recycle+, to offer management of those collected materials, like EPS, to ensure they are recycled by REMs. These volumes may also be included in the PRO annual recovery calculations.

PE and PP Lids and Caps and HDPE Package Handles

There are little available data on generation of these materials as typically both materials are part of a larger tubs and lids collection program in many jurisdictions. Based on 7.5% of the weight of HDPE and PP bottles, tubs and lids captured in selected Canadian programs, 290 tons are expected to be collected through the collection point network. Overall, the collection rate is estimated to be approximately 10%. An average of 1.676 tons are expected to be collected per each of the collection points in the network at an estimated average of .92 pounds collected per participant per year.

DEQ has included PE and PP lids on the PRO depot collection list due in large part to sortation concerns (they are permitted on the USCL when screwed or snapped onto containers). Realistically, caps and lids will likely have low collection rates, given the time cost associated with households having to collect them and drop them off at designated depot drop-off points. However, CAA will ensure extensive education and promotional materials are distributed to direct people to take their caps and lids to local drop-off depots.

CAA believes this material, inclusive of HDPE package handles, should eventually be introduced into the USCL list, as lids and caps that are screwed or snapped onto containers are already an accepted USCL material. CAA is in contact with an Oregon-based manufacturer of HDPE package handles that has completed further CRPF-focused studies since the rulemaking process. CAA proposes to discuss the findings of this new research with DEQ and Oregon CRPFs, as well as explore other research needs, potential design improvements among producer members and ways of better communicating to residents once the Program commences, with a view to making the case for their inclusion on the USCL.

Plastic Buckets, Pails and Storage Containers

The Cascadia report does not provide categorization or other levels of granularity that produces a generation figure for plastic buckets, pails and storage containers. For purposes of projecting a collection target, it is assumed approximately 6,500 tons of this material are generated per year. Some of this material

is likely currently found in curbside recycling loads in Oregon, but CAA will focus education on driving the right materials to depot locations. At depots, it is estimated that approximately 975 tons will be collected, although this estimate is higher than data available from depot programs in Canada.

Overall, the collection rate is estimated to be approximately 15%. CAA expects 5.636 tons to be collected on average per each of the collection points in the network. An estimated 3.08 pounds per participant per year will be captured.

Glass

Glass currently collected in Oregon via separated curbside streams totals upwards of 38,000 tons annually. CAA is committed to supporting the continuation of curbside glass recycling in communities where these services are already available. CAA has consulted with DEQ and determined that an incentive rate equal to the estimated cost of collecting glass through depots, should be offered to communities that choose to maintain curbside glass collection. Based on the estimated costs to manage glass in the Cascadia report, CAA will initially offer a \$77/ton incentive to local governments, or their designated funding recipient for the incentive. CAA will reevaluate and adjust this rate annually to ensure it remains aligned with current depot collection costs.

Additional glass bottles and jars are expected to be collected through new communities getting access to glass recycling through depots. Many residents in more rural areas, or who self-haul in Oregon, already take glass to their local depots for recycling. Through an enhanced public education and promotion campaign, CAA estimates that an additional 3,100 tons of glass, for a total of approximately 41,100 tons will be collected through the network of collection points, and on-route collection where local governments choose to preserve those services (subject to consultations between CAA and the local governments). This estimate is consistent with the estimates provided by Cascadia. Overall, with an estimate of 77,000 tons of glass available for collection, this translates to an estimated collection rate of 53%; eight percentage points higher than the required rate of 45% under the program.

Challenges associated with glass contaminants in the commingled stream are well understood by CAA and will inform the education and outreach strategy. Given that glass bottles are used in food contact applications, relevant education and outreach will also address appropriate disposal practices in case of high levels of food contamination and will mirror that of delisted materials with similar use cases, such as aluminum foil.

Steel and aluminum aerosols and single-use pressurized cylinders

With recently adopted rules delaying the inclusion of aerosols and pressurized cylinders on the PRO list until 2028, CAA has removed discussion of those materials from this portion of the plan. In the Materials Strategy section below, CAA notes that a program plan amendment will be submitted to propose on-ramping of empty, non-hazardous steel and aluminum aerosol materials onto the USCL. If DEQ's intent is to add pressurized cylinders to the PRO list in 2028, CAA will assess the practicability of managing those materials and will share findings in a later program plan.

Supporting the Oregon statewide plastics recycling rate (ORS 459A.926)

The state of Oregon has established a statewide recycling goal for plastic packaging and plastic food serviceware, with targets of:

- At least 25% by 2028
- At least 50% by 2040 and in each subsequent year, and
- At least 70% by the calendar year 2050 and each subsequent year

The establishment of the statewide PRO depot network along with the USCL will significantly increase access and opportunity uniformly across the state for all Oregonians. The transportation reimbursement to local governments and their service providers will also serve as an economic equalizer across the state, addressing an existing and significant barrier to plastics recycling in more rural parts of Oregon.

CAA expects the increase in access to recycling for a greater range of plastic products, coupled with the continued success of other recycling programs, such as OBRC, to allow the state to reach the first plastics recycling goal of 25% by 2028.

c. Materials Strategy

CAA acknowledges that specific materials need special attention and potential action to help in the achievement of this plan's objectives and goals, as well as the goals of the RMA. These activities connect to the objectives relating to addressing packaging impacts, the expansion of recycling opportunities, the achievement of the plastics recycling goal, and the utilization of responsible end markets.

Many CAA members have made significant investments to support the successful collection and recycling of certain materials nationally and, in many cases, in Oregon specifically. As CAA works to address packaging impacts, the expansion of recycling opportunities, and the achievement of recycling goals and targets, the organization is committed to further leveraging work being done by existing material-focused groups and organizations where applicable. Examples of this type of work include The Recycling Partnership's PET Recycling Coalition and the Poly Coated Paper Alliance. It is a priority of CAA to avoid unnecessary duplication of efforts.

CAA is also committed to exploring opportunities to achieve the broadest possible system benefits from any agreed-upon and funded system interventions. For example, if any investments are made in CRPFs in Oregon, CAA proposes to work with CRPFs to agree upon when and whether or not these may stand to benefit more than one material category and evaluate fee structures to fund investments.

In addition to the specific material actions identified below, CAA will continue to work with decision makers in reviewing other RMA material issues and options. For example, CAA noted support in its Phase I RMA Rules submission for the inclusion on the USCL of PE and PP lids and caps and HDPE package handles CAA will work on a specific action plan in relation to these materials, and the group will continue to assess these materials and potentially other USCL additions with Oregon interest holders in the context of other materials management discussions. All recommendations for the addition of other materials to the USCL or recommendations for trial assessments of other materials will be presented as program plan amendments within 2025, unless otherwise noted. The program plan amendments will showcase the holistic approach taken to ensure materials will be sorted, recovered, and sent to a responsible end market. The amendments will include details on timeline, funding and investments needed, as well as any interim steps necessary.

To effectively improve collection and recycling in Oregon in accordance with the RMA, several material-specific issues must be addressed. In this section, CAA reviews:

1. Proposed additions to the USCL
2. SIMs on the USCL
3. SIMs on the PRO Recycling Acceptance List
4. Proposals to engage on commingled collection of some materials on a trial basis
5. Initial plastic recycling rate projections

i. Proposed Additions to the USCL

Transparent Blue and Green PET Bottles

Material Status

DEQ only included clear PET bottles on the USCL. However, CAA understands from interested party discussions that transparent blue and green PET bottles are widely recycled and CAA recommends that transparent blue and green PET bottles be added to the USCL by July 1, 2025.

There is demand for transparent blue PET bottles, which reclaimers can use to counteract the gray color of rPET derived from clear bottles. CAA understands through discussions with industry participants that transparent blue PET bottles are often combined with transparent green PET bottles with minimal impact on end-market suitability.⁶

CAA presumes that all CRPFs, that have not yet already done so, will invest in optical sorting equipment using the processor commodity risk fee funding, and will manually sort the materials in the meantime. CAA expects CRPFs to make all necessary equipment purchases by the end of 2026. Given that Oregon is a deposit state, with many transparent blue and green bottles collected for recycling via redemption centers, CAA anticipates that adding transparent blue and green PET bottles to the USCL will add a relatively small volume of material to CRPFs.

Performance Against ORS Criteria

Criteria	Performance
The stability, maturity, accessibility and viability of responsible end markets	Consultations with reclaimers clarified that transparent blue and green PET bottles are routinely and successfully routed to established, stable end markets in the Pacific Northwest Region and other parts of the U.S. Also of note, APR and ISRI bale specifications ⁷ are inclusive of transparent blue and green PET bottles with no limitations on either. CAA will monitor and consistently engage with reclaimers to understand and will assess how to address any issues that arise in processing or marketing this material.
Environmental health and safety considerations	Transparent blue and green PET bottles do not present any immediate or substantial health and safety concerns on the health or safety of CRPF operators.

⁶ Interviews with ORPET and email exchange with NAPCOR, APR, and The Recycling Partnership.

⁷ APR's model bale specifications for PET bottle with PET thermoforms and APR and ISRI's model bale specifications for PET bottle bales without PET thermoforms state that transparent green and transparent blue PET are an acceptable part of a model PET bale. See APR's [Model Bale Specification: PET Bottles \(No PET Thermoforms\)](#), APR's [Model Bale Specification: PET Bottles with PET Thermoforms](#), and ISRI's [Bale Specification: PET Bottles \(No PET Thermoforms\)](#). Documents accessed on 02/22/2024.

The anticipated yield loss for the material during the recycling process	Yield loss for transparent blue and green PET bottles is not significantly different than the yield loss during reclamation of clear PET bottles, which can be minimized by optimizing equipment and processes.
The material's compatibility with existing recycling infrastructure	Transparent blue and green PET bottles are already collected and sorted successfully from commingled streams in Oregon and in the state's deposit system.
The amount of the material available	There are little available data on the generation of transparent blue and green PET bottles relative to clear bottles. Industry sources indicate that between 5 and 10% of PET bottle bales are transparent blue and green bottles. Some major beverage industry companies are switching some historically transparent green bottle brands to clear, which may reduce the fraction of transparent green over time.
The practicalities of sorting and storing the material	Optical sorting equipment at CRPFs will effectively sort transparent blue and green bottles with clear bottles, and typically the material is stored and baled together. PET recyclers might then sort PET by colors according to the different end use applications such as bottle (requires clear material) or strapping (using green materials.) CAA presumes that all CRPFs, that have not already done so, will invest in optical sorting equipment using the processor commodity risk fee funding by the end of 2026, and will manually sort the materials in the meantime.
Contamination	There are likely no contamination issues that are specific to the acceptance of transparent blue and green PET bottles. In fact, industry specification standards accept transparent blue and green PET materials. ⁸
The ability for waste generators to easily identify and properly prepare the material	Transparent blue and green PET bottles are easily identifiable by waste generators. Transparent green and blue PET lookalikes made of other resins are also uncommon.
Economic factors	The existing market economics surrounding PET bottle recycling account for the value of transparent blue and green PET bottles and have demonstrated a viable amount of economic productivity.
Environmental factors from a life cycle perspective	It has been demonstrated by the Association of Plastics Recyclers and NAPCOR using LCA analysis that recycling plastic bottles, including transparent blue and green bottles, delivers a substantial net environmental benefit.

Table 8

⁸ <https://plasticsrecycling.org/images/Markets/APR-BaleSpec-PETBottle-WithThermoforms.pdf>

ii. Proposed Future Additions to the USCL through Forthcoming Program Plan Amendments

In addition to taking steps to establish universal adherence to the currently approved USCL, CAA is proposing pathways for some other materials to be added to the USCL. CAA will put forth plan amendments for materials to be added to the USCL. The program plan amendments will showcase the holistic approach taken to ensure materials will be sorted, recovered, and sent to a responsible end market. The amendments will include details on timeline, funding and investments needed, as well as any interim steps necessary. One program plan amendment will be submitted in 2025, which is expected to include the on-ramping proposals and strategies for

- PET thermoforms,
- PP and PE lids
- HDPE package handles
- Aluminum foil and pressed foil products
- Empty, non-hazardous aerosols

In the meantime, CAA is issuing the following sections to signal such future action.

The team has performed qualitative research to inform this section of the program plan, including interviewing CRPFs and reclaimers. This section of the program plan reflects information gathered through that qualitative research.

PET Thermoforms

Material Status

Aside from PET tubs, most PET thermoforms have not been included on the USCL, and DEQ has classified them as a SIM. CAA intends to take steps that will justify the addition of those PET thermoforms to the USCL list, which, in turn, will encompass CAA's obligations to address the concerns raised by Oregon DEQ via the SIMs list. CAA proposes that appropriate actions be taken to include PET thermoforms on the USCL by December 31, 2027. This program plan signals a forthcoming proposal by plan amendment to add PET thermoforms to the USCL.

DEQ's overall material collection determination has kept PET thermoforms (with the exception of PET tubs) off both the USCL and PRO depot lists, meaning these materials will not be collected as a part of curbside commingled streams. However, studies across the country find that even when *not* accepted as a part of curbside commingled collection, thermoforms can make up to 10% of an average PET bale.⁸ Receiving more specific resin or format detail from DEQ's inbound composition data will help CAA understand the current volumes of PET thermoform materials entering CRPFs. To minimize the loss of this thermoform material to CRPF residue or other inappropriate bales, CAA will engage with CRPFs to implement sorting practices that route this material to proper bales and to facilitate solutions to any related market issues.

Under CAA's proposal, PET thermoforms would ultimately be collected statewide as part of commingled curbside streams and would be processed and sent to responsible end markets (REMs) by CRPFs. In the interim, CAA will engage with the specialized subscription-based collectors of PET thermoforms and CRPFs to understand the volumes and processing picture for those materials – and to ensure REMs are being utilized.

Performance Against ORS Criteria

Oregon DEQ excluded PET thermoforms from the USCL based on a set of key criteria in ORS 459A.914(3). Chief among DEQ's concerns is a lack of consistent, responsible end market demand for the material, which in turn has caused limited CRPF acceptance and inclusion in curbside programs. The table below provides information to address the key challenges for PET thermoforms, referencing the specific determination criteria outlined in ORS 459A.914(3). The information has been gathered through ongoing research and engagement with a wide range of interest holders involved with PET thermoform recycling issues (more details can be found in Appendix D).

Criteria	Performance
The stability, maturity, accessibility and viability of responsible end markets	Reclaimer investments and interest in PET thermoform recycling are dynamic and growing, with regional end markets available to Oregon CRPFs and new markets actively developing. CAA will explore the market interventions that may be necessary to facilitate getting PET thermoforms to responsible end markets. CAA also acknowledges the role it may need to play in directing existing PET thermoform collection (e.g., via specialized collection services) to REMs while PET thermoforms remain non-USCL materials. Further, CAA notes there currently is market demand for thermoform-derived rPET (most prominently by berry company Driscoll's) that ostensibly exceeds the current supply of rPET derived from thermoforms. More producers and converters may join this existing end user in demanding thermoform-derived rPET. The details of this demand scenario and its impacts on reclaimer investment and active sourcing of thermoform material from CRPFs is one element of CAA's overall PET thermoform plan, and CAA will continue to explore market realities.
Environmental health and safety considerations	PET thermoforms do not present any immediate or substantial health and safety concerns to the recycling process. Concerns with PET thermoform reclamation include water usage and wastewater management. CAA proposes to examine water consumption in PET thermoform reclamation as part of its REM verification and, as needed, develop interventions to reduce water consumption and improve usage of best practices in wastewater treatment.
The anticipated yield loss for the material during the recycling process	Yield loss during reclamation includes both the intended removal of non-PET materials and the unintended loss of PET. The removal of non-PET items during pre-sorting at the reclaimer causes an unavoidable simultaneous loss of erroneously removed PET. Both forms of yield loss at pre-sorting can be minimized by implementing more effective sorting equipment and procedures at CRPFs. Reclaimers also experience loss of PET due to the generation of fines, which tends to be greater in PET thermoform reclamation than PET bottle reclamation. Reclaimers can minimize yield loss due to fines generation by implementing best practices and optimizing equipment and processes.
The material's compatibility with existing recycling infrastructure	To date, only two Oregon CRPFs are accepting and marketing PET thermoform material gathered through specialized collection programs separate from curbside commingled collection, with one other recycling services company receiving and marketing PET thermoform material collected at retail locations. The current lack of acceptance in

	municipally managed collection programs is a result of a historical lack of scaled end market demand, which has only recently begun to improve. CAA proposes to address the nexus of CRPF acceptance/reclaimer demand with the goal of creating the condition for universal collection.
The amount of the material available	Information submitted by various interested parties in Oregon's rulemaking and material lists technical work group process solidly documents the established, scaled presence of the PET thermoform material in the packaging stream.
The practicalities of sorting and storing the material	PET thermoform sortation and storage at CRPFs is an established practice, most prominently in California. CAA proposes to explore the need for CRPF investment in this equipment and to facilitate this as appropriate.
Contamination	Contamination results from mistaken public recycling of lookalike materials and design issues with PET thermoforms, including the use of recycling-incompatible glues and labels. An additional challenge can arise from residual food waste on PET thermoforms. CAA proposes to develop mechanisms to address and minimize all these challenges through education and outreach efforts.
The ability for waste generators to easily identify and properly prepare the material	CAA proposes to develop mechanisms designed to reduce the presence of lookalikes in the packaging stream (without creating adverse environmental impacts) as well as clear education to help generators correctly identify the materials that should be placed in commingled recycling. This is another area in which detailed DEQ data on resin/format materials inbound to CRPFs will be very helpful in addressing the issue.
Economic factors	While there are no direct measurements of PET thermoform value marketed by CRPFs, PET thermoform bales marketed by California MRFs have consistent positive value, as demonstrated by RecyclingMarkets.net . Similarly, Plastic Recycling Corporation of California (PRCC) 's website indicates thermoform-only bales trade at positive value and that B grade bales with thermoforms trade at a slightly lower rate than B grade bottle bales (3 cents/pound difference in August 2024). ⁹ If this value translates to Oregon when PET thermoforms are collected and processed, it could improve the current "blended value" of all processed materials. CAA proposes to develop market-related mechanisms that will help to guarantee the value of PET thermoform material to CRPFs. Once established in collection, CAA's PCRPF payments will help support PET thermoform sortation and marketing.
Environmental factors from a life cycle perspective	NAPCOR has demonstrated through Life Cycle Analysis that recycled PET resin has substantially better environmental performance over virgin PET, which underscores the importance of collecting and recycling generated PET thermoforms.

Table 9

CAA submits that PET thermoforms have a positive trajectory in relation to the challenges detailed above and that concerted action to be further described in a subsequent plan amendment will encourage that trend, thus facilitating the addition of PET thermoforms to the USCL.

⁹ Based on values indicated on <https://prcc.biz/pricing/> accessed on February 5, 2024.

Interim Preceding Program Plan Amendment Steps and Timeline for PET Thermoform Inclusion on USCL

As part of its pending plan amendment, CAA will continue to take the following steps to facilitate inclusion of PET thermoforms on the USCL:

1. Explore providing technical and financial assistance to CRPFs to receive and sort PET thermoforms for shipment to responsible end markets
2. Explore mechanisms to facilitate end market demand for PET thermoforms to ensure that all CRPFs gain the continuous ability to send PET thermoforms to REMs
3. Research and identify mechanisms to address design issues that hinder PET thermoform recyclability
4. Identify effective means to educate generators on look-alike packaging so that those materials are excluded from collection.
5. Analyze and take steps to address any issues related to material value received by CRPFs once PET thermoforms are added to the USCL

With the implementation of the action steps outlined above during the first Program Plan, supported by the forthcoming plan amendment, CAA proposes that PET thermoforms can be considered for addition into USCL on December 31, 2027. In the interim, CAA will work to ensure that current thermoform collection (e.g., via specialized collection services) are directed to REMs by coordinating with the collectors, their material processors and the markets the processors are using.

CAA financing for activities related to the potential inclusion of PET thermoforms that are currently not accepted for recycling will be managed through the collection of fees applied to these materials. This fee setting principle will be applicable to material management development costs associated with other materials. CAA will allocate specific material development costs to those specific materials through the fee setting process.

Other Materials

Additional Materials Intended for USCL by Plan Amendment During Program Plan Period

- PP and PE lids
- HDPE package handles
- Aluminum foil and pressed foil products
- Empty, non-hazardous aerosols

Additional Materials Intended for USCL in Future Program Plans

Spiral Wound Containers

CAA will continue to research the acceptance of these materials by local end markets and determine if a future program plan amendment to add spiral wound containers to the USCL would be appropriate.

iii. Specifically Identified Materials on the USCL

Some materials that are included on the USCL are also considered SIMs by DEQ. As these materials will require particular attention, CAA proposes implementation of the following strategies outlined in the following subsections by material type to address relevant recyclability challenges.

As part of CAA's overall plan for education and outreach, local governments and their service providers will have the ability to customize education and outreach materials via CAA's education and outreach portal, enabling them to plan, design and deliver phased messaging related to SIMs collection in their communities. As the USCL evolves, CAA will develop and make available specific assets to support the education and outreach for each SIM, which may include, but will not be limited to, sample text and imagery for use in customized collateral, and text and visual messaging for social media, newsletters, and websites.

PET Thermoforms

CAA acknowledges that thermoformed PET tubs are already on the USCL, and as such, CAA will coordinate with CRPFs to understand the quantities they are receiving (unfortunately DEQ inbound data does not provide a breakdown by material and format to provide this information) and to make sure those materials are captured and supplied to REMs. CAA will work to direct current thermoform collection via specialized collection services to REMs through the coordination with the collectors and their material processors. CAA will also explore ways to improve PET thermoform recyclability through packaging design changes.

Polycoated Gable-Top Cartons and Aseptic Cartons

CAA acknowledges that polycoated gable-top and aseptic cartons have been identified as a SIM in addition to being included on the USCL. Currently, it is estimated that about half of Oregon households are served by curbside and drop-off collection programs that include cartons¹⁰ and this will grow to all households with the implementation of the RMA. It is CAA's understanding that Oregon's CRPFs currently include cartons in mixed paper bales and do not sort cartons into a separate PSI 52 grade bale. To date, CRPFs have not seen the value in marketing cartons separately from mixed paper.

Processing and Marketing Challenges

CAA aims to address issues associated with processing and marketing of this material by engaging with key decision makers, as well as identifying logistical issues that CAA can play an active role in resolving.

¹⁰ Carton Council of North America. "Oregon RFI Response," March 20, 2022.

CAA proposes to work with CRPFs to explore the barriers they face in sorting and/or storing cartons and work with interested producers and associations, such as the Carton Council of North America, to review funding options for any necessary incremental infrastructure.

CAA will explore potential market interventions that could be used to improve the marketability of materials like cartons. One example of a market intervention could be offering a marketing service for cartons, which would be voluntary for CRPFs that elect to take advantage of it. For example, CAA could collect carton bales from individual CRPFs on a pre-agreed cadence, consolidate them into truckload quantities, and market them. CAA would then compensate CRPFs for the tons marketed. This could be based on the Pacific Northwest index price for PS54 Mixed Paper as reported on RecyclingMarkets.net's Secondary Materials Pricing (SMP).

In exploring these options, CAA will ensure materials are routed to responsible end markets and will consider adjustments to its producer fees to provide any necessary funding.

Nursery Packaging

CAA acknowledges DEQ's recommendation to place all nursery packaging in the SIM list while designating only HDPE and PP-made nursery packaging as material approved for curbside commingled collection with inclusion on the USCL. CAA has held interest holder consultations with a collection service, CRPFs and reclaimers to understand the contamination risk posed by nursery containers and to outline the role of the PRO in processing and marketing these materials to ultimately reduce contamination.

Education and Outreach

CAA recognizes that the USCL status recommended for HDPE and PP-based nursery packaging will require the program plan to account for communities that may not have collected these pots and trays thus far. Education and outreach will aim to minimize contamination, in particular from problematic PS nursery packaging. To accomplish this, CAA proposes to:

- Explore the need to gather data on which communities in Oregon, prior to July 1, 2025, collect nursery packaging and which ones don't – particularly data that capture the number of communities that collect/do not collect the material, quantities and seasonal trends in the generation of this material as a curbside recyclable, and extent of contamination from PS lookalikes. Similar data collection exercises will be explored for all SIM materials
- Explore opportunities for reuse and recycling of this material at Oregon-based nurseries and explore ways for CAA to leverage this information in its education materials, prioritizing options for reuse wherever possible
- Identify and segment communities in Oregon based on those that are most acutely affected by nursery packaging's inclusion in the USCL. This segmentation could be based on the determination of which communities have accepted nursery packaging prior to July 2025 and which ones have not
- Recommend a phased messaging and timeline to account for the segmentation. For communities where curbside collection of nursery packaging is set to start in 2025, the focus will be on informing

households of the availability of commingled curbside collection of nursery packaging. For households already participating in curbside collection of nursery packaging, the focus will be mitigating contamination

- Determine a suitable strategy to communicate to waste generators how to differentiate recyclable nursery packaging (HDPE and PP-based pots and trays) from contaminants (lookalikes). All information will be provided in language and imagery that is clear and jargon-free.
- As a first step, CAA will continue to investigate the scale of the contamination issue from PS lookalikes in the recycling stream through conversations with CRPFs. Preliminary engagement findings can be found in the “Processing Improvements” section below.

Using The Recycling Partnership’s National Recycling Database, CAA was able to map communities in Oregon that currently list nursery packaging (pots or containers and trays) as an accepted material for recycling. In total, nursery pots are listed as accepted by 36 out of 106 communities in Oregon (see Figure 2(a)). Nursery trays are listed as accepted by two out of 106 communities.

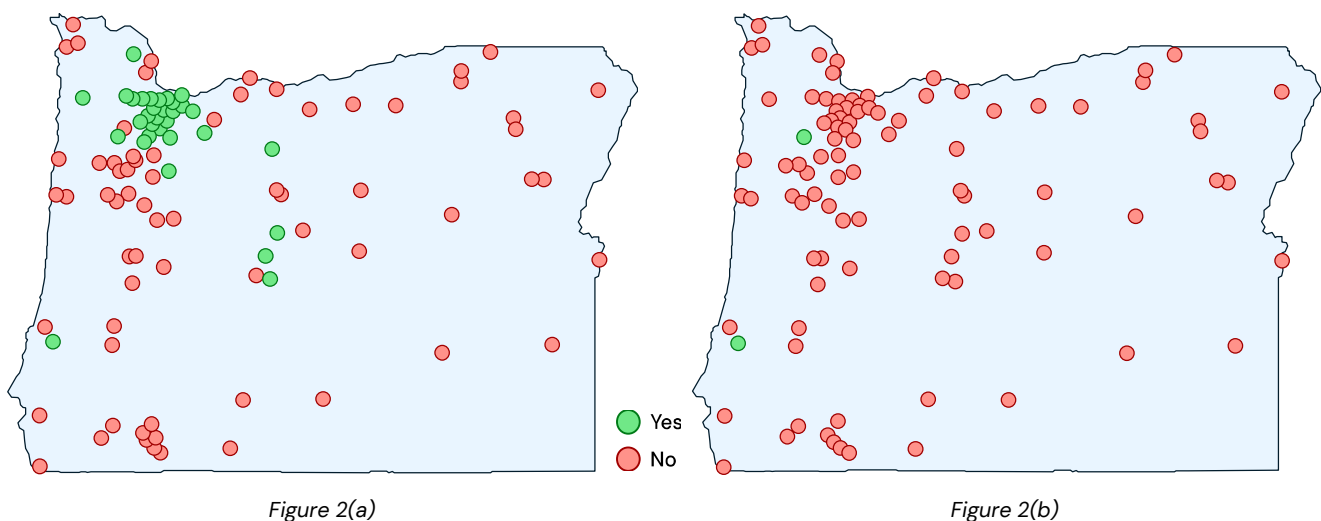


Figure 2: Community acceptance map for (a) nursery pots and (b) nursery trays as accepted materials. Green dots represent communities that have listed these materials as accepted. Red dots indicate communities that do not list these materials as an accepted material on their community websites. Source: The Recycling Partnership’s National Recycling Database (accessed August 5, 2024).

CAA’s plan for education and outreach will offer community managers resources that will help them customize collateral. These resources will allow community managers to build informational flyers on materials that will be accepted for curbside collection. CAA will use information on community acceptance of nursery packaging to determine where to deploy collateral.

Processing Improvements

In order to understand current practices for processing nursery packaging and reducing contamination, CAA engaged with an Oregon-based collection service, James Recycling, as well as a number of Oregon CRPFs and reclaimers. A key finding of this outreach was that CRPFs largely hand sort large nursery containers into bulky mixed rigid bales.

Reclaimers such as EFS that work closely with Oregon CRPFs did not find the presence of PS nursery packaging to be a detriment, as they are successfully able to sort them out and retain the PP nursery packaging. CAA further noted that reclaimers typically receive nursery packaging in bales of #1-7, #3-7 and #5 plastics and have the technical capability to successfully sort out contamination from PS and LDPE nursery containers. Contamination from PS is minimal and in the form of seedling trays, as shared by James Recycling, who noted that they largely receive HDPE and LDPE nursery containers. LDPE containers are further recovered, as noted by EFS, and worked in PE rigid resins. Furthermore, reclaimers did not find that carbon black as a colorant in nursery containers was a deterrent to either sorting or finding end markets.

iv. Specifically Identified Materials on the PRO Recycling Acceptance List

Steel and Aluminum Aerosol Containers

CAA recognizes that steel and aluminum aerosol containers have been designated as a SIM.

Given the outcome of the Phase II rules, which will delay the addition of aerosol containers to the PRO accepted list of materials until 2028, CAA will not pursue collection of aerosols at the PRO material collection points during the course of the first program plan.

In anticipation of aerosols being added to the PRO collection list in 2028, CAA will propose to on-ramp empty, non-hazardous aerosols via a program plan amendment in 2025, with the goal of having those on-ramped within the first program plan period.

CAA will present data to DEQ on the cost to manage aerosols with residual contents that shows management of partially full aerosol containers, through household hazardous waste management would exceed the societal benefit defined in the practicability test.

As part of the SIMs management strategy, residents' education will include awareness about emptying aerosol containers for recycling where currently collected and referring residents to household hazardous waste programs when needed. CAA proposes to:

- Segment Oregon communities based on whether or not they have had curbside commingled collection of aerosol containers or no collection prior to July 2025
- Recommend a phased education and outreach messaging and timeline to account for the segmentation. Provide text and visuals for use in customizable educational collateral via CAA's education and outreach portal for communities to build awareness among residents of how to recycle empty aerosols in communities where they are currently collected and how residents and small-scale generators should manage aerosols with residual contents, taking them either to a household hazardous waste collection program or disposing of them in the garbage.
- Offer, where aerosols are not currently collected in curbside programs, education materials for communities to instruct residents to dispose of empty aerosol containers in the garbage or through hazardous waste management programs.

CAA proposes to continue pursuit of systemic changes to minimize hazard potential and perceptions of aerosol containers and to improve the recyclability status of this material. These may include:

- Work with the U.S. Aerosol Recycling Initiative, led by the Can Manufacturers Institute and Household and Commercial Products Association, along with Portland metro local governments, to learn more about aerosol manufacturing, consumer and end markets, and recycling
- CAA signals its plan to propose on-ramping empty aerosol containers to the USCL in a forthcoming program plan amendment to be submitted in 2025

Aluminum Foil and Pressed Foil Products

CAA acknowledges the addition of aluminum foil and foil products to the list of SIMs. Oregon DEQ cited reasons for this designation that include concerns around food contamination, ability to sort due to the material's flat shape, and realities of smelter yields. CAA's interventions will focus on developing a suitable education and outreach strategy that will encourage residents to recycle these products at appropriate depot drop-off points and reduce the occurrence of these products entering the commingled stream as a contaminant.

A key challenge will be instigating a change to the long-standing practice of collecting this material curbside in parts of the state while simultaneously creating outreach materials that inform residents of appropriate depot locations. CAA's education and outreach plan addresses this via customizable materials for each community. CAA's approach to developing this strategy will include the following steps:

- Segmentation of Oregon communities based on whether they have had curbside commingled collection of aluminum foil and foil products in the past or no collection prior to July 2025. Communities that have historically treated foil as a curbside commingled collection material are likely to be most acutely impacted by this change, requiring the education and outreach strategy to minimize contamination from this group
- Consideration of targeting specific communities across Oregon for outreach on depot collection points for aluminum foil and foil products
- Given that aluminum foil and foil products are often used in food contact applications, provision of clear and jargon-free key messaging that communities and haulers may use in their education materials to help explain how to properly prepare aluminum foil and foil products for recycling to prevent food contamination
- Proposal to on-ramp aluminum foil and pressed foil products to the USCL in a forthcoming program plan amendment to be submitted in 2025

Shredded Paper

Shredded paper is on the PRO Recycling Acceptance list and has been designated a SIM. Much like aluminum foil, shredded paper has been collected by communities in Oregon and the de-listing of this material from collection lists will impact the residents of those communities. Education and outreach will be the primary intervention for shredded paper and will mirror that of other de-listed materials such as aluminum foil.

Using The Recycling Partnership's National Recycling Database, CAA was able to map communities in Oregon that currently list shredded paper as an accepted material (see Figure 3). To this end, eight out of 106 communities currently list shredded paper as an accepted material for recycling. CAA will provide all local governments and their service providers access to customizable collateral that they can use to direct waste generators toward shredded paper drop-off points and to discourage placing shredded paper in the commingled stream. This collateral will not be limited to communities that currently promote its acceptance.

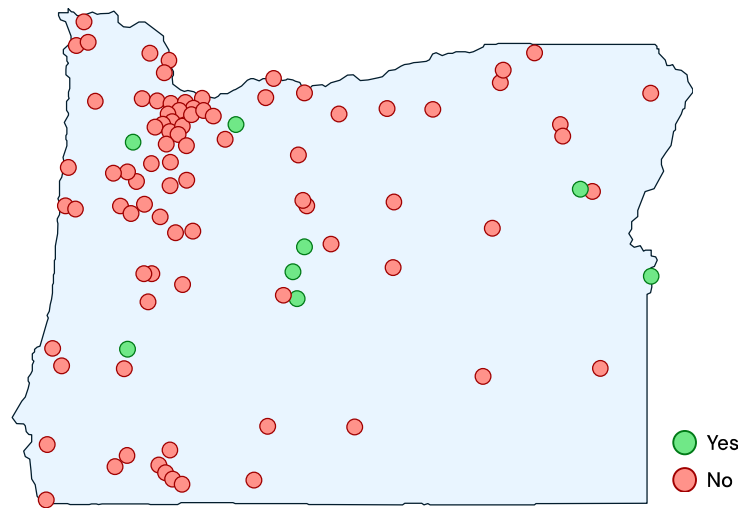


Figure 3: Community acceptance map for shredded paper. Green dots represent communities that have listed this material as accepted. Red dots indicate communities that do not list this material as an accepted material on their community websites.

Source: The Recycling Partnership's National Recycling Database (accessed August 5, 2024).

Glass Bottles and Jars

CAA acknowledges DEQ's decision to include glass bottles and jars on the PRO Recycling Acceptance list and classify them as SIMs.

Glass bottles and jars are currently collected in some areas of Oregon as a separated curbside stream, and the communication necessary with respect to glass containers will be tailored to the outcome of discussions with local governments on the development of the collection system for PRO Recycling Acceptance List materials. Where local governments choose to discontinue existing on-route collection systems for glass, CAA will provide local governments and their service providers access to customizable collateral that they can use to direct residents toward glass drop-off and discourage placing glass in the commingled stream.

As detailed in the PRO Recycling Acceptance list section of this plan, CAA anticipates that a mix of curbside and depot glass collection will support the achievement of the glass collection target.

Using The Recycling Partnership's National Recycling Database, CAA identified and mapped 76 communities that accept glass bottles and jars as per the community acceptance lists published by them. While a majority of these communities fall in the Portland Metro area (which will continue accepting glass bottles and jars curbside), there are communities spread across Oregon that CAA will need to work with to determine if they would like to maintain curbside glass collection or transition their community to depot collection points.

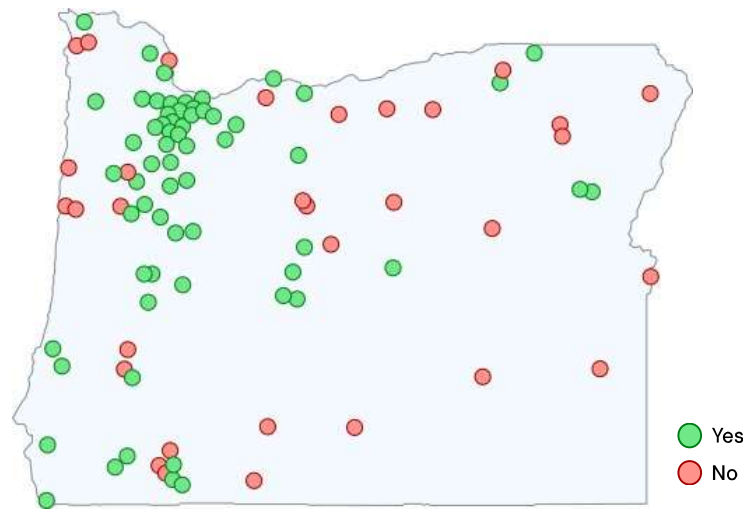


Figure 4: Community acceptance map for glass bottles and jars. Green dots represent communities that have listed this material as accepted. Red dots represent communities that do not list this material as accepted material on their community websites.

Source: The Recycling Partnership's National Recycling Database (accessed August 5, 2024).

v. Proposal to Trial Commingled Collection of Non-USCL Materials

There are two material groupings that DEQ has designated as SIMs that are neither USCL nor PRO Depot materials. These are polycoated paper packaging and single-use cups. While these materials are not currently being recommended for inclusion on the USCL, CAA believes that to adequately address the challenges identified under the SIM designation, it is appropriate to explore commingled collection of these materials on a trial basis after program commencement, with a view to better understanding current generator behavior while at the same time working to understand and address other system barriers to the inclusion of these materials.

Polycoated Paper Packaging

CAA acknowledges that polycoated and similar paperboard packaging have not been included on any collection list due to concerns surrounding their recyclability. DEQ noted challenges in both sortation and yield. On the issue of yield, DEQ has questioned whether these materials are effectively recycled by paper mills, if they are readily recyclable (e.g. polycoated paperboard vs. paperboard with wet strength), and if they showed a high rate of recovery.

CAA also notes that DEQ requests that prospective PROs propose efforts to understand and address the impact of user behavior on CRPFs and end markets if polycoated paperboard packaging is collected as a part of commingled recycling. CAA posits that without collecting this material in a commingled curbside trial

environment, once the USCL formally launches on July 1, 2025, it will be challenging to replicate these behaviors and impacts. Therefore, CAA proposes the use of commingled curbside trials after the commencement of the program period to address this material category's SIM designation, while also exploring future paths to the USCL.

CAA will continue to engage with producers who have expressed interest in public comment and those who have relevant data to further inform the trial plans.

In order to meet DEQ's expectations for this material, CAA proposes conducting time-limited, geographically-bound commingled collection of these materials to derive real-world, actionable insights:

- The trial(s) will primarily aim to understand resident behavior, notably waste generators' ability to differentiate recycling information on polycoated paperboard, polycoated paper cups, and cartons. Currently, these trials are thought to include all food serviceware (e.g. cups, paper plates, to go boxes, etc.). Education and outreach tactics will be deployed to communicate the appropriate actions to both residential and non-residential generators

The trial(s) will aim to understand the nature and quantities of polycoated paper generated, as well as an initial estimate of the quantities of these materials that end up in mixed paper bales. To scope and plan these trials in the right geography, CAA will research regions where variables and metrics that could affect results are strongly controlled. Ideally, CAA would target trial regions where willing local partners have:

- Strong, stable control or influence over accepted materials lists
- Consistent service populations that can be successfully engaged with highly targeted education information
- Consistent flows of collected materials to specific CRPFs
- CRPFs that are willing and able to participate in the trial to track materials to bales
- Responsible end markets willing to participate in the trial to test yield and other factors

CAA proposes to work with relevant interested parties (DEQ, local governments, CRPFs, haulers, and end markets) prior to any trials to develop a detailed project plan for execution factoring in the following considerations:

- Goals and objectives of trials
- Timing and duration
- Interested partners
- Geography (communities potentially impacted)
- Logistics of franchised hauling
- Resident education (what are the related baseline education materials and how will this work within the broader education and outreach plan) – Education efforts will encompass residential and non-residential generators alike
- Costs associated with the proposed trial

The trials would aim to track materials very specifically from route to bale to market and ensure no other material changes to the stream or service changes are happening at the same time.

In addition, CAA proposes to address concerns surrounding stability, accessibility, and viability of end markets for this material by engaging with CRPFs and end markets to understand an acceptable proportion of this material that will not adversely affect end market applications. Currently, some processors can handle up to 20% of polycoated paperboard (including polycoated cartons and aseptics) in mixed paper bales.¹¹ CAA proposes to explore options to model the proportion of polycoated paperboard currently in mixed paper bales and study the implications of an increase. An in-depth CRPF study could entail examining CRPFs that sort polycoated cups into mixed paper bales separately from those that sort cups into grade 52 carton bales. Such studies could further entail downstream market research for mixed paper bales with polycoated cups. Furthermore, CAA recommends assessing the re-pulpability yield of mixed paper trials. This could potentially include assessing specific packaging structure potential re-pulpability yield to inform education and outreach.

Single-Use Cups

DEQ has excluded single-use PP and PET clear cups from recycling collection lists due to contamination concerns. DEQ stated that the inclusion of single-use cups in acceptance lists may introduce contaminants like trays, clamshells, plates, and food waste, as well as contamination from PVC and PS lookalike packaging. CAA further notes DEQ's request to propose efforts to understand and address the challenges this material poses to the recycling system.

CAA proposes no change to the SIM designation for single-use cups and proposes to conduct a trial study to better understand user behavior and to investigate the challenges single-use cups pose to the recycling system. CAA proposes that the limited time, geographically bound trial(s) be conducted after the program period commences in July 2025.

CAA will continue to engage with producers who have expressed interest in public comment and those who have relevant data to further inform the trial plans.

Prior to the trials, CAA will work with relevant interested partners (DEQ, Communities, CRPFs, haulers, end markets) to develop a detailed project plan for execution factoring in the following considerations:

- Goals and objectives of trials
- Any material overlaps (example, polycoated paper cups that may fall into both categories) and how to deal with these
- Timing and duration
- Interested partners
- Geography (communities)
- Logistics of franchised hauling

¹¹ Based on consultation with a key interested parties processing mixed paper bales.

- Resident education (education efforts will encompass residential and non-residential generators alike)
- Costs associated with trial

The geography of the trials will be determined in a similar manner as for polycoated paperboard packaging as detailed in the above section.

In addition, CAA proposes to address information gaps and concerns surrounding single-use cups. For example, the organization could engage CRPFs and reclaimers receiving single-use cups to understand the extent of yield losses expected with these materials. Additionally, CAA proposes to examine the extent of contamination introduced from lookalikes made of PS and understand challenges this may create during the processing of this material.

vi. Initial Plastic Recycling Rate Projections

This section of the plan provides an estimate of the current plastics generation and recycling rate in Oregon using preliminary data made available to CAA by DEQ. CAA may adjust this plan through plan amendments once DEQ releases final data on waste composition and inbound CRPF tonnages.

CAA uses the current preliminary rate estimate below to project the gap between the current rate and the 2028 recycling target of 25% laid out in the RMA. We outline the elements of this plan that can be expected to contribute to achieving the goal and some preliminary estimates of new recycled tonnage for at least some of the elements. As CAA refines these elements in plan amendments, it will adjust the projected impacts on new plastics tonnage and their contributions toward the plastic recycling goal.

Preliminary Plastic Recycling Rate Estimates

Oregon DEQ has provided CAA with preliminary data estimating the plastics recycling rate. The data combines analysis from the ongoing DEQ waste composition analysis and recycling tonnage data from DEQ's Material Recovery Survey process to produce both a numerator and denominator for the rate calculation. Table 11 below shows this calculation using summary figures. DEQ provided CAA with 2022 Material Recovery Survey data as the numerator in the calculation and provided disposed waste composition estimates for both 2022 and 2023. For purposes of consistency, CAA is using the 2022 disposed waste composition data in this Plan to match the 2022 recycling tonnages provided by DEQ.

CAA will continue to rely on official DEQ data as the source of measuring both the baseline and the ongoing plastics recycling rate, with DEQ specifically identified in the statute as being responsible for the rate calculation. CAA will continue to consult with DEQ on the specific nature of its numerator calculations, which are derived from DEQ's analysis of Material Recovery Survey data. Where possible, CAA will suggest to DEQ possible missing data or improvements to the data to accurately count the amount of plastics tons recycled.

Because CAA is relying on DEQ to make the base calculations, CAA defers to DEQ on the application of "yield rates" in the calculations, but it is assumed that the base data already reflects the current yield rates at CRPFs since it is measuring outbound tonnage. DEQ inbound/outbound data on CRPF performance will allow CAA to target improvements in CRPF plastic yield rates as one key strategy to improve overall plastics recycling tonnage. Requirements in rule on CRPF capture rates and the PCR/CMF payments will help encourage this improvement. CAA understands there may be need to conduct further yield rate adjustments for stages of recycling further down in the commodity chain but since the Material Recovery Survey is the source of the data on the numerator, it will rely on DEQ, who has direct statutory obligations to calculate the recycling rate, to make adjustments to the Survey to accommodate these additional possible yield rate calculations.

Note that in the table below, as per DEQ’s method of making the calculations, that plastics recycled through the deposit system are included in the “recycled tons” number.

	Total Plastics Subject to Plastic Recycling Rate Calculation
Disposed tons	197,242
Recycled tons	40,535
Total Generated Tons	237,777
Current baseline recycling rate	17.05%

Table 10

Using the figures above in Table 10 and assuming there is no substantive change in generation, it is also possible to project the necessary additional annual tonnage that would need to be recycled to meet the 25% goal. Table 11 provides these estimates.

	Plastic Subject to Plastic Recycling Rate Calculation
2028 projected tons generated	237,777
Recycled tons needed to meet 25% target	59,444
Difference between current recycling baseline and target tonnage	18,909

Table 11

Table 11 shows that 18,909 tons of additional tonnage would need to be recycled to meet a 25% recycling goal in 2028. Table 12 below shows some additional detail on DEQ’s recycled data to help guide planning on the kinds of materials that may be currently under-recovered. When the substantial amount of deposit recovered material is figured into this analysis, it shows the amount of rigid plastic containers recycled in Oregon to be a very low tonnage, which indicates improvements in rigid plastic container recycling could be critical to meeting the 2028 goal.

Packaging Material	Recycled Tons
Deposit recovered rigid plastic containers	17,261
Non-deposit recovery portion of RPCs	12,184
Film plastics	6,865
Other plastics	4,225
TOTAL	40,535

Table 12

Table 13 combines the detailed categories of plastics packaging and food serviceware from DEQ’s preliminary waste composition data with DEQ’s preliminary data on tonnages inbound to CRPFs. Combining these two datasets allows CAA to estimate current capture rates for select specific categories of plastics material, which then helps identify the relative opportunities for increased plastics recycling across those categories. The categories are ranked in descending order by their “ostensible capture rate.”

Material	Tons disposed in landfills 2022	Inbound CRPF figure	Ostensible capture rate
No-deposit plastic beverage bottles	4,149	4,917	54%
Very large plastic bev. bottles > 5 gal	30	20	40%
Other plastic bottles 8 oz to 5 gallons	11,462	5,820	34%
Curb-OK plastic tubs, pails 8 oz to 2 gal	2,249	908	29%
Small tubs 6+oz but <8 oz	611	198	24%
Plastic grocery/merchandise bags	2,930	418	12%
Not curb-OK plastic tubs, pails 8 oz to 2 gal	26,176	3,735	12%
Very small plastic bev. bottles 6 oz to < 8 oz	219	26	11%
>2-5 Gal. Buckets/flower pots	8,719	972	10%
Other rigid plastic packaging	16,943	1,079	6%
Block foam packaging	10,496	476	4%
Rigid plastic FSW excl RPC, cups	4,315	155	3%
Plastic other recyc. polyethylene film PKG+FSW	35,003	1,286	4%
Plastic beverage pouches	311	9	3%
Plastic other nonrecyclable film PKG+FSW	43,420	1,213	3%
Bulky rigid plastic packaging	6,229	146	2%

Table 13

Table 13 shows that capture rates for some very important large-volume plastics categories are low and are important targets for increased recycling tonnages. For example, although more than half of “no-deposit beverage bottles” are captured, there is still substantial tonnage available in the disposed stream, as is also true for “other plastic bottles,” which are captured at 34%. Other substantial targets include “non-curb OK

plastic tubs, pails 8 oz – 2 gal” and “other rigid plastics packaging.” Although DEQ’s preliminary data does not break down these categories by resin type, it indicates that plastic recycling could be improved through the inclusion of polypropylene containers to the USCL and by the potential addition of PET thermoforms to the USCL, as proposed in this plan. “Bulky rigid plastic packaging” also appears to demand attention, and successful high rates of collection for two of CAA’s depot materials – block foam packaging and recyclable polyethylene film – could contribute substantially toward a higher overall plastic recycling rate.

This plan includes elements that are expected to result in more recycled plastic, thus allowing Oregon to meet its plastics recycling target. At a very general level, with a great deal of uncertainty as to the true potential of each of these elements to contribute additional tons, Table 14 displays many of the main elements and, where possible, provides preliminary estimates on how much new plastics tonnage would be recycled. CAA will be able to make more solid projections on expected tonnages from each element, as well as the balance of what comes from each element, as the Program Plan is approved and as implementation gets underway. CAA also anticipates that once DEQ delivers its final waste composition and inbound/outbound CRPF data it will be able to refine its projection and be able to more specifically target opportunities for increasing plastics recycling tonnage.

Plan Element	Notes on Potential Impact
Expand curbside, multifamily, and small commercial recycling access through local government needs assessment requests	CAA funding and support of local government requests for new collection infrastructure should result in the collection of additional plastics. Projected tons are difficult to estimate without more data on the number of generators who will receive new service, their generated tonnage, and anticipated participation and participant capture rates. However, CAA estimates a potential additional 1,800 tons of plastics recycling from this element.
Enhance collected material mix in local programs to meet USCL requirements	As collection programs add new plastic materials to meet the USCL requirements, it should result in more plastic tons. For example, new polypropylene container collection from inclusion of the material in all collection programs statewide could amount to about 2,500 tons/year.
Implement PRO depots that collect specific plastics	CAA will collect a range of plastic materials at new and existing depots. A preliminary estimate of new plastics collection is 3,700 tons/year.
Add PET thermoforms to the USCL and local collection	CAA is proposing to add PET thermoform packaging to the USCL by December 31, 2027, at which point thermoform collection could provide as much as 3,500 new plastics tons per year toward the plastic recycling goal.
Enhance plastics capture at Commingled Recycling Processing Facilities	PCRF and CMF payments, along with regulatory mandates to improve capture rates and bale quality, are expected to reduce plastic material disposed at CRPFs and increase tonnage recycled. It is difficult to project the associated tonnages without more direct engagement with individual CRPFs. DEQ's preliminary data on CRPF inbound tonnages and capture rates indicates as much as 4,100 tons of additional plastics could be diverted from CRPF disposal or mis-capture into properly captured materials.
Improve recycling participation and participant capture rates in collection programs	CAA's educational efforts and coordination with local recycling programs and franchised haulers may include specific efforts to raise participation and plastics capture rates. It is difficult to project the amount of new tonnage that could be expected from educational efforts without more specific data from local programs and haulers on current participation and participant capture rates, but new tonnage could be as high as 4,300 tons per year.

Table 14

In summary, using preliminary DEQ data, CAA has provided in this section a preliminary calculation of the baseline generation and recycling tonnage subject to 2028 plastic recycling rate target in Oregon and has identified the plan elements that will help achieve the target. CAA will adjust its plan as DEQ provides final data and as more details on plan elements are determined. Implementation of the plan will also provide new data that will allow CAA to adjust its strategies and to possibly add new strategies to optimize plastics recycling.

On a final note, CAA has concerns about garbage bags being counted as "packaging" in the plastics recycling rate calculations. CAA will continue to engage with DEQ on this issue. If garbage bags are excluded from the denominator, the tonnage gap for the plastic recycling goal is closer to 13,900 tons and the projections on the elements above would then well exceed the achievement of the goal.

vii. Ensuring Responsible End Markets

Responsible End Market (REM) Definition and Requirements

“Responsible end market” (REM) is a concept being introduced for the first time in Extended Producer Responsibility (EPR) legislation in North America in Oregon. ORS 459A.863(29) defines a REM as “[...] a market in which the recycling and recovery of materials or the disposal of contaminants is conducted in a way that benefits the environment and minimizes risks to public health and worker health and safety.” California and Colorado EPR laws have similar definitions in place.

In Oregon, the Producer Responsibility Organization (PRO) is responsible for taking practicable actions to ensure all materials collected for recycling are sent to REMs, even though the PRO only manages materials on the PRO Recycling Acceptance List and not the Uniform Statewide Collection List (USCL). In Oregon, according to ORS 459A.896(2), “A producer responsibility organization shall, to the extent practicable, ensure that covered products collected in this state for the purpose of recovery and described in ORS 459A.869 (Requirements for producers and producer responsibility organizations) (7) will be: (a) Delivered to responsible end markets.”

Although there is a generally harmonized REM definition in states with packaging and paper EPR programs, specific requirements set in rules differ by jurisdiction. In Oregon, requirements are defined in OAR 340-090-0670(2)(b)(A)-(D). These rules consider a REM as:

- Compliant with laws and regulations.
- Transparent on its chain of custody.
- Environmentally-sound in its operation.
- Achieving an adequate recycling yield of 60%.

Circular Action Alliance (CAA) fully supports the REM principles of transparency, compliance, environmental soundness, and adequate yields, and is committed to collaborating on a practical, enforceable REM standard that protects proprietary information and maintains market stability.

CAA Initial Approach for REM Verification

Based on feedback from the Oregon Department of Environmental Quality (DEQ) and the Oregon Recycling System Advisory Council (ORSAC), Circular Action Alliance Oregon LLC (CAA Oregon) submitted a proposed REM verification process for the approved program plan. This process outlined specific criteria, performance indicators and detailed non-compliance procedures.

The process was developed with the vision of supporting and scaling best practices in environmental, health and safety management and was based on a three-step approach:

1. Initial screening (i.e., self-attestation from end markets).

2. Ongoing data review of chain of custody.
3. REM verification through third-party auditing.

While drafting the process in the approved plan, CAA engaged with over 250 industry interest holders representing end market entities and their trade associations to develop effective, harmonized, clear and understandable requirements. CAA's engagement demonstrates the importance of consulting interested parties on the mechanisms by which verification will be undertaken. However, it was identified that those discussions won't suffice to have industry embracing the approach.

"It is important to note that the list below [REM criteria] as well as the compliance approach remain preliminary until CAA has consulted the end market industry on the content and has undertaken field-testing with key end market entities. The final REM Verification methodology, including the final list of criteria, will be provided to DEQ once the consultation and field testing has been completed, via plan amendment if changes have been made." (CAA Approved Program Plan, p. 147)

This consultation approach consisted of measuring REM compliance in five categories against 17 criteria, outlined in the tables below:

REM Compliance Mechanism

Verification against 17 Criteria			5 Potential Compliance Categories	
Disqualifying Non-Compliance 	Major Non-Compliance 	Minor Non-Compliance 	Recommendation 	Compliant 
Significant violations that contradict the principles of the standard	Material issues identified during the audit that must be resolved prior to issuing a positive certification decision.	Technical issues identified during the audit that do not represent material deviations from the standard.	Guidance for future improvement and prevention of non-compliance.	N.A.
Result: Audit immediately suspended. Certificate will not be awarded or will be revoked if granted previously.	Result: Audit continues as planned. Certification will not be awarded or renewed temporarily. Corrective action expected within 30 days	Result: Audit continues as planned. Certification able to be awarded or renewed. Corrective action expected within 1 year	Result: Audit continues as planned Certification able to be awarded or renewed.	Result: Audit continues as planned Certification able to be awarded or renewed.

Table 15

Proposed REM Criteria (for consultation)

Compliance to Laws & Regulations and Labor	• Legal compliance • Awareness of compliance responsibilities • Disclosure of compliance violation • Employment Compliance: ◦ Free & fair labor, Child labor, Discrimination, Harassment & Abuse ◦ Health and Safety responsibilities, procedures, prevention and tracking	
Transparency	• Audits & records • Documentation of covered materials • Quantification of material disposal • Penalties & violation	
Environmentally-Sound	• Environmental compliance • Environmental Management System Components • Environmental Impact Measurement • Chemical Management System Components • Chemical of concern disclosure • Spills, leakages & plastic pollution assessment	
Yield	• Yield documentation • Yield measurement and calculation details	

Table 16

Results from Consultations with the Recycling Industry

Between November 2024 and April 2025, CAA met with more than 250 entities, including end market entities for all materials, brokers, trade associations in the U.S. and Southeast Asia, other PROs undertaking verification of end markets, as well as industry standard owners. The goal of the more than 200 hours of consultation was to provide education on these new REM requirements, gather feedback on the proposed verification approach in the initial program plan and chart a path forward for practical implementation and widespread adoption of a verification approach across the recycling industry, encompassing all materials. The consultation also included a field test of the proposed REM verification process. One full audit was performed at a plastic recycling facility in Oregon, and two audit preparations were initiated at paper mills in the Pacific Northwest.

End Market Feedback

The timeline between program plan approval (February 2025) and implementation (July 2025) was a limitation to the opportunity for field testing. As a consequence, interested parties have communicated to CAA that the current proposed verification system lacks sufficient testing needed to build industry confidence in the validity of the audit criteria. End markets would like to see an independent third-party standard developed, utilizing an ANSI-accredited standard development organization and employing a collaborative standard development process with sufficient public engagement and field testing. Absent the

development of a standard through this independent process, end markets will be less willing to allow on-site audits using untested criteria with great uncertainty around the use of that information.

End markets have raised concerns about the details of how the initially proposed requirements will be verified. These include:

- Concerns about the disclosure of commercially sensitive information outside of a formal audit system, including yield rates at recycling facilities. This information is commonly disclosed during an audit but has no precedent for being disclosed to a regulator.
- There are concerns that disclosing broadly confidential customer information could violate U.S. trade secret protections. This information is usually kept confidential under supply agreements. While this type of customer data is often shared during audits, especially in chain-of-custody processes, there's no established precedent for disclosing publicly as part of a certification or a regulatory reporting obligation.
- Questions about the legal authority to compel reporting by entities outside the state of Oregon.
- Outstanding questions about the legal authority to verify some criteria not explicitly mentioned in the rules (e.g. chemicals of concern disclosure or spill and leakage measurement is not specified in OAR 340-090-0670 but is an expectation from DEQ based on REM definition in ORS 459A.863)
- Increased administrative burden from having to comply with REM requirements when similar measures are already monitored through existing regulations like:
 - Local governments (e.g. discharge permit).
 - State agencies (e.g. Oregon DEQ National Pollutant Discharge Elimination System (NPDES) for wastewater permit).
 - Federal government (e.g. Resource Conservation and Recovery Act (RCRA) related to hazardous waste).

Consultation, including discussions and field-testing preparation, revealed the complexity of measuring and demonstrating some of the criteria proposed in the earlier approved program plan, such as plastic pollution (as no standard exists) and yield (as it is never measured from a specific source but on the overall recycling process, rendering the isolation and meaningful reporting of Oregon materials not possible).

Details of the consultation are provided in the REM background document, submitted as a companion document to this program plan amendment.

Findings from Other Verification Programs

As part of the consultation process, CAA also reviewed and compared the initially proposed REM verification process to the frameworks used by eight voluntary certifications. These eight certifications are shown below:

SMETA	Sustainable Forestry Initiative (SFI).	International Sustainability & Carbon Certification+ (ISCC+)	Recycling Industry Operating Standard (RiOS).
Aluminum Stewardship Initiative (ASI).	Forest Stewardship Council (FSC).	Association of Plastic Recyclers Post-consumer Resin (PCR) Certification (APR).	Recycled Material Standard REM Certification (RMS).

Table 17

These eight certifications cover a combination of the REM requirements. The yield requirement is never considered, as it is entirely novel and relatively untested until this point. Chain of custody tracking is, however, a feature of some of these standards and could be applied in a way that ensures Oregon materials only flow to an entity that has been audited to a REM's standard. Rather than requiring disclosure of each individual market to DEQ, brokers and recyclers could demonstrate that all Oregon material is being directed to a certified responsible end market. An auditor would review the bill of sale for materials to ensure materials purchased from Oregon CRPFs were directed to end markets that have also achieved certification under the REM standard. In addition to chain-of-custody tracking mechanisms, many of these existing standards also cover the principles of the other REM requirements, including demonstrating compliance with all applicable laws and regulations, meeting health and safety requirements, and reducing environmental impacts (Table 18 below). The detailed comparative assessment is provided to DEQ in a separate document to preserve the confidentiality of certification information provided by competing certification systems.

Aspects covered in certification schemes	SMETA	ASI	SFI	FSC	ISCC+	APR	RiOS	RMS REM Module
Laws & regulations	No	Yes	No	No	Yes	Yes	Partial	Yes
Health & safety	Yes	Yes	Yes	Yes	Partial	Partial	Partial	Yes
Environmental impacts	No	Partial	No	No	Yes	Partial	Partial	Yes

Table 18

Conclusions from REM Engagements

CAA has developed five key takeaways from the consultation process:

1. The RMA advanced a meaningful discussion with the global recycling industry about REMs. Progress has been made to ensure recycling supply chain entities understand their obligation to demonstrate that their operations align with the REM principles.
2. Change management takes time. We need to consistently engage with end markets to build trust and acceptance for the new REM requirements. A realistic goal is to have all end markets receiving Oregon material achieve REM verification by 2030. In the meantime, CAA will focus on gathering initial information and offering technical help to prepare them for more thorough auditing under a third-party standard once it is developed.

3. Outstanding uncertainty and concerns remain with the confidential treatment and use of information that will be gathered during the REM process. These concerns extend to how some performance areas, such as yield, can be meaningfully demonstrated.
4. Given the risks associated with the uncertainty of participating in the Oregon market, CAA has heard from several recycling supply chain entities that end markets may opt to purchase materials from jurisdictions with fewer requirements and perceived risk.
5. We need a reformed approach—different from the one in the February program plan—to successfully develop a REM verification system. While this system is achievable over time, CAA is just starting its work. Developing an independent verification standard and scaling the REM verification program will take time.

Proposed REM Amendment

CAA fully supports the REM principles of transparency, compliance, environmental soundness, and adequate yields, and is committed to collaborating on a practical, enforceable REM standard that protects proprietary information and maintains market stability.

Informed by the results of the consultation process, CAA Oregon proposes a phased-in REM process for the first program plan period (2025–2027). This reformed approach provides the flexibility needed to begin drawing end markets into the system *and* charts a course for CAA to support the implementation of REM requirements at scale, to meet the requirements in Oregon and other states where CAA operates as the PRO. The phased approach is a two-step process, which begins with **creating a platform and guidance for voluntary reporting immediately, followed by the development of a formal REM verification standard for broad adoption**. Once a standard is developed, it will be maintained and evolved to create new stretch goals, ensuring a mechanism for continuous improvement in the environmental and social performance of the recycling industry. The result will be a living standard that is meaningful and implementable today and continues to challenge industry growth and evolution into the future. This proposal mirrors the proven trajectory of standard development efforts, which have significantly driven industry improvement in health, safety and environmental outcomes.

Creating a voluntary disclosure starting point, coupled with strong technical assistance from CAA and contracted compliance support professionals, enables a pathway to invite end markets into the system without initial penalty or risk, to demonstrate their operational alignment with the REM principles. Where alignment cannot be demonstrated, CAA and the support team will work with end markets to help them take the necessary steps to fill those performance gaps, in preparation for full auditing under the new REM standard. Using voluntary participation as a starting point is a precedent already established in the eco-modulation portion of the system. Bonus A is the voluntary environmental impact disclosure, which awards producers for taking transparency steps as proven first steps in driving better environmental outcomes. The two-step REM approach is modeled on the same philosophy.

Therefore, the proposed REM amendment outlines a phased-in approach, which includes:

- An initial phase of voluntary information disclosures to demonstrate end market operational alignment with REM principles: For instance, end market entities could cite their compliance with laws, share active certifications that require on-site audits, and provide other operational documentation as evidence. For entities not able to sufficiently demonstrate operational performance that meets REM requirements, CAA will offer technical assistance and conduct an on-site compliance review.
- Five variances to support the phased-in approach (outlined in more detail later in this amendment)
- The creation of an independently developed REM Standard, with an American National Standards Institute (ANSI) accredited development body that can establish a national standard to meet REM requirements for all state programs.

This phased-in approach to REM offers Oregon another chance to lead in advancing meaningful reform and change in the recycling industry. The proposed approach affords the necessary time and strategy to build trust, engagement, and momentum with end markets. The risk of imposing an untested verification program and unprecedented reporting requirements too quickly is that markets will not choose to participate in the purchase of Oregon materials.

Building a Trusted and Effective Standard

Independent standards have been proven to increase transparency and drive environmental improvement across industries. For instance, the Oregon E-Cycles program relies on two industry standards to create confidence that electronics are being managed responsibly at end-of-life. REM verification for packaging and paper products should follow a similar trajectory, relying on the development of a standard by an ANSI-accredited standards development organization, in partnership with recycling industry interest holders and state authorities such as DEQ.

The development of a trusted and effective standard requires:

- Broad engagement and analysis across industries and countries.
- Balanced review and approval with no one party dominating.
- Transparency and opportunity for public comment.
- Measurable progress against objectives.
- Sufficient field testing against real-world scenarios.

A formal standard usually goes through the development of a first draft by a standard-setting committee composed of interested parties made up of a balance of industry, non-governmental organizations (NGOs), and government representatives. These standards also have a consultation process that is long enough to allow for meaningful public comments, sufficient field testing, a revision of the draft by the standard-setting committee, and publication of a final version of the standard.

CAA will support the development of such a standard during the first program plan period, with the goal of having a final version by the end of 2027 to be used in Oregon, California, Colorado and other emerging states with REM requirements as a component of their EPR laws. An official REMs verification standard will serve to demonstrate end market adherence to the principles outlined in the RMA, provide public insight into non-compliance with REM requirements, and serve as an aligned methodology for third-party certification standards to be adopted upon EQC approval and expansion in 2027.

Until a REM verification standard is developed, CAA will strive to enable voluntary disclosure from end markets to self-attest and demonstrate operational alignment with REM principles.

REMs Disclosure Overall Approach

CAA's initial approach will enable end markets to publicly disclose their operational performance qualifications, which uphold the key principles of REMs. Voluntary disclosure to advance improvement is a proven approach used by the Global Reporting Initiative (GRI), which has led to increased transparency in business operations across industry sectors. CAA, in collaboration with GreenBlue's Recycled Material Standard (RMS), has developed a preliminary process for Oregon and other jurisdictions where it has been designated as a PRO (Colorado, California and Minnesota). This process will create guidelines for end market entities to collect and disclose information that demonstrates operational alignment with REM requirements until the REM verification standard is developed.

CAA's voluntary disclosure guidelines adopt a three-step process:

Disclosure Action	When	Who	Purpose
Self-attestation	Immediately for each unassessed end market	CAA for PRO materials and CRPFs for USCL materials	Obtain self-attestation form
Data review	Quarterly	CAA	CAA reporting system available for validating data as desired by the CRPF
REM Disclosure	Annually	Verification body (third-party)	Assess reporting matches self-attestation Support end market entities in acting transparently

Table 19

Initial Screening Steps

CAA will request end market entities to complete self-attestation forms and submit operating permits and, in the case of overseas markets, import permits or authorizations. CAA will also request environmental permits or licenses, if applicable. CAA may request additional information and/or a meeting to clarify certain

elements. Once CRPFs have obtained this information, CAA will work with an external party to further verify the information provided by end markets.

CAA will request that end market entities list active third-party certifications and/or verifications related to recycling processes, facility management systems, or other elements covered by REM requirements. The list of assessed certification programs (as presented in “Other Verification Schemes Feedback” Section) will be provided as part of the outreach to end markets.

While CRPFs are responsible for obtaining self-attestation forms for materials on the Uniform Statewide Collection List (USCL), CAA will offer to assist with this assessment where there might be overlap with the end markets used for PRO materials to avoid duplication of effort (e.g., reaching out to the same end market entities several times). CAA could support CRPF in getting disposition reporting information from end markets, as described in the Data Review Steps section below. While the CRPF may designate other entities for disposition reporting, CAA will decline any such designation as it lacks a direct relationship with end markets.

Data Review Steps

CAA will review the transactional data provided by CRPFs, brokers, and end market entities through the Service Provider Portal. CAA will utilize the same system to track the chain of custody of all PRO materials collected through PRO depots. CAA will employ automated validation of the data to track outbound transactions from CRPFs through brokers to end markets. CAA will make reports available to CRPFs showing the chain of custody and highlight any shipments that lack verification. CRPFs will be able to submit updated data to complete their reports. CAA will make the Service Provider Portal and validation reports available to CRPFs, but each CRPF will be responsible for submitting its individual reports to DEQ.

It should be noted that some required information will be difficult to obtain because of its confidential nature (e.g., disposition data from end markets).

REM Disclosure Steps

To support additional, voluntary REM disclosure, CAA will provide a structured means for end market entities to report on their alignment with REM principles, including compliance with laws and regulations, transparency, environmental soundness, and achieving adequate yield.

CAA will engage verification bodies to offer this support to end market entities, facilitating the confidentiality of the information exchanged by the end market entity during the process. This may include internal management procedures, inbound and outbound data or industrial processes. Verification bodies will be selected based on several criteria, such as:

- ISO 17065 (Conformity Assessment – Requirements for Bodies Certifying Products, Processes and Services) compliant.

- Experience auditing North American and overseas markets (i.e., the verification body has local offices or agents in targeted overseas market).
- Experience auditing related standards to environmental performance, health and safety, traceability or chain of custody, and recycled material processing.
- Existence of a policy for the prevention of conflicts of interest.
- Possesses professional liability insurance.
- Cost of services.
- Employment of native speaking and literate personnel for geographies assigned to each audit.

A verification body will support REM entities in collecting and disclosing information. The criteria initially developed for the program plan to meet DEQ's REM requirements, defined in Rulemaking 1 and based on DEQ feedback, have served as the baseline for building these disclosure guidelines. They will also establish the core of the impact areas to be reported voluntarily by end markets.

The table below provides CAA's list of impact areas that can be used for voluntary reporting. They are developed to help guide end market entities in demonstrating compliance with OAR 340-090-0670(2)(b).

REM Requirements	Impact Areas	Guidelines for reporting
Compliance to law and regulation	Legal and environmental compliance	Entities should maintain compliance with all applicable laws, policies, regulations, and treaties for the jurisdiction(s) in which they operate. This includes but is not limited to requirements related to labor and employees, environmental management, materials management, fair business practices, anti-bribery and corruption, and disclosure and reporting. Any permits or licenses should be up to date. Any contractors providing off-site treatment of waste or wastewater should provide permits and licenses as well. Any instances of noncompliance should be documented and reported, and entities should provide proof of resolution of the noncompliance.
	Disclosure of Compliance Violation	Entities should record and disclose any notices of violation from the relevant rulemaking body and document the resolution of the noncompliance.
	Free labor	All work is voluntary with no compulsory, forced, bonded, or indentured labor in accordance with ILO Convention 29. No labor is conducted under threat of penalty or sanctions.
	Child labor	The entity should not employ workers under the national minimum age for employment, or the age of completion of compulsory education, whichever is higher. In any case, the entity should not employ

		workers under the age of 15 except where permitted by local law and ILO Convention 138. The entity should ensure that workers under the age of 18 do not work at night or in conditions that compromise their health, safety, and emotional or physical development.
Health and Safety	Health and Safety procedures and prevention	The entity should establish and maintain procedures for the promotion of worker health and safety, including procedures for: a) Emergency response, including in the case of injury, illness, evacuation, fire, or other emergency. b) The provision, use, and training for the use of personal protective equipment (PPE) and preventative measures for avoiding illness or injury. c) Worker training on health and safety. The entity should maintain training records for a minimum of five years for relevant licensing or other legal requirements and documentation, such as for qualified machinery operators or chemical use licenses. d) Corrective action and response in the case of noncompliance with health and safety measures or adverse health and safety incidents.
Environmentally-sound	Containment of waste	The entity should demonstrate that there is no activity on-site that causes obvious contamination to the local environment.
	Environmental Management System Components	Entities should have an environmental management system in place to address key environmental impact areas, including the management of chemical inputs to operations. This should include: a) A designated responsible person at the management level; b) A mechanism to remain up to date with applicable local legal requirements; c) Procedures and records for training of relevant staff in environmental impact areas; d) A system to document, measure, and track the relevant indicators for environmental impact areas.
	Environmental Impact Measurement	The entity should work to minimize impacts to air, water, and land from its operations. At a minimum and where applicable to facility processes, it should quantify and disclose relevant indicators related to the below environmental impact areas, as requested by its permit or laws and regulations obligations. a) Emissions to air: Any material emissions to air, including regulated air pollutants or pollutants of concern. b) Discharges to water: Material discharges to water, including direct discharge to water bodies, capture and treatment of runoff, indirect discharge via land application, e.g., private or public treatment systems. c) Water management: water use and related water management indicators.

		d) Waste management: the total amount of hazardous and non-hazardous waste generated from its facilities, and the disposal method used.
Transparency	Audits and records	All Supply Chain Entities – entities transporting, brokering, or transferring or otherwise in control of covered materials from CRPFs to defined end markets – must be willing to be named. Supply Chain Entities should keep Chain of Custody records of transactions of covered materials for not less than five years. All defined end markets should be willing to be named and subject to a desk or on-site audit to support REM disclosure guidelines. End Markets should keep Chain of Custody records of transactions of covered materials for not less than five years.
	Documentation of covered materials	All entities transporting, brokering, or transferring or otherwise in control of covered materials from CRPFs to defined end markets should track materials and provide chain of custody documentation to notify customers. Defined end markets should provide quantification of covered materials received from regulated markets, via quarterly summaries of material volume, by type.
	Penalties and violations	Within 90 days of notification of a regulatory non-compliance event listed above, entities should present a corrective action and non-compliance resolution plan for review and confirmation. Required Participants should provide documentation of penalties and violations occurring in the last calendar year and a signed acknowledgement of completion or acceptable progress by a Regulatory Agency, Producer Responsibility Organization, and/ or Department of Environmental Quality

Table 20

Entities could also report on other related elements according to the nature of their operations. For instance, they could report on:

- Discrimination, harassment and abuse policies.
- Chemical management system components.
- Spills, leakage and plastic pollution.
- Management of resin loss.

Verification bodies shall then conduct a review of the information obtained to indicate:

- Which elements of REM requirements have been demonstrated.
- If information provided by end market entities is useful and authentic.

Once the review is completed, the verification body will provide the end market with recommendations on how alignment with REM principles could be further demonstrated. For clarity, until a REM verification standard is developed by an independent Standards Development Organization, accredited by ANSI, the disclosure process will not be used as a method of determining REM compliance status of any end market.

However, CAA Oregon will forgo the right to randomly audit if an end market entity cannot demonstrate REM alignment (e.g., the entity has no certification or audits by a third-party or governmental agency). Audits will be performed by the verification body, using existing verification and/or certification approaches as guidelines.

End market entities found to be operating in misalignment with REM principles will receive operational and process improvement recommendations from the verification body conducting the assessment. Those recommendations will be contained in the report provided to DEQ upon approval of the end market entity. While CAA Oregon will inform the CRPF(s) using those entities, CAA Oregon doesn't intend to publicly disclose their names. For clarity, CAA Oregon will not publicly disclose the names of end market entities used by CRPFs to protect trade secrets, unless that entity is known to process recovered materials from Oregon. The analysis will be made on a case-by-case basis.

Specific Considerations for Disclosure of Chain of Custody

CAA will offer CRPFs access to a Service Provider Portal that will enable, among other things, the tracking of outbound materials from CRPFs to end markets. Preliminary discussions with CRPFs have been held to define the best approach in terms of data to be shared as well as the methods for sharing data. Data that could be shared includes brokers, end market locations, commodities and tonnage. At a CRPF's request, a verification body will review documentation related to chain of custody (e.g., purchase orders, bills of landing, import/export documentation) to ensure material is tracked in a manner that meets expectations for the transparency REM requirement.

Whistleblower Process

In addition to working with end markets to demonstrate their adherence to REM principles, CAA Oregon will also create the opportunity for communities and other interested parties to report suspected misalignment with the REM principles of certified end markets. This will be made possible once a standard is developed and end markets begin to get certified, as certifications typically publish a list of certified organizations.

The channel will allow for anonymous reporting online and via telephone. Information received through that channel will be reviewed by CAA and transferred to the verification body and its auditor if relevant.

CAA will include a REM reference on its main hotline reporting site (<https://circularactionalliance.org/ethics>), allowing reports of suspected misalignment with REM disclosure guidelines. The reporting page will include access to a copy of the REM impact areas, allowing the public to understand its performance criteria.

Depending on the information presented, CAA may reach out to either the verification body that has reviewed a voluntary disclosure or directly to the facility itself. Upon conclusion of the investigation of the reported REM inconsistency, CAA will inform DEQ of the reported misalignment and outcome within 30 days of the initial reporting.

Requests for Temporary Variance in REM Disclosure

Given that REM requirements are an entirely new approach for evaluating end-markets, CAA Oregon is requesting a number of temporary variances for the duration of the first program plan period, or until the REM verification standard is developed. With these variance requests, CAA Oregon is asking that existing verification efforts used by the industry be recognized as demonstrations of operational alignment with REM principles. These variances will allow time for industry adaptation to demonstrating REM principles, and offers an initial audit mechanism and adjustment period as end markets adapt to the new regulatory requirements. Time is also needed to develop a formal auditing program, build sufficient auditing capacity, and advance meaningful change on a global scale. Furthermore, with additional state EPR programs coming online in 2026 and 2027, the rate of REM verification is anticipated to accelerate over the next five years.

Consistent with the proposed phased-in approach, CAA Oregon requests temporary variances in the instances described below, until Dec. 31, 2027, or until an independently developed standard becomes available.

Variance #1 – List end market aligned with REM requirements when another recognized PRO has already verified and approved the end market

This indicates an end market has been third-party verified for at least a portion of the REM principles, which reduces the risk of misalignment against the REM disclosure guidelines. CAA Oregon requests this variance pursuant to OAR 340-090-0670(3)(i).

CAA has reviewed and compared the preliminary REM principles to the audit programs used by two PROs: Valipac (Belgium) and Recycle BC (Canada). Those PROs periodically verify end markets on environmental performance, health and safety management systems, and compliance with their jurisdiction's requirements or the PRO's policy. The comparative assessment is provided to DEQ in a separate document to preserve the confidentiality of Valipac and Recycle BC verification processes.

CAA Oregon requests a variance in instances where an entity can prove, with evidence, that it has been audited by one of the recognized PROs within the last three years and can provide a self-attestation of its compliance to the other RMA principles.

Valipac and Recycle BC shared similar end markets with Oregon. Both are using Southeast Asian markets, primarily for paper commodities. Recycle BC is also using Pacific Northwest markets for paper, glass and plastic.

Variance #2 – List end market aligned with REM requirements when a recognized certification has already verified and approved the end market

CAA has reviewed and compared the preliminary REM disclosure guidelines to the process used by eight voluntary certifications, as described above. Those certifications cover some or all of the preliminary REM impact areas presented in this document.

An end market entity that is already certified indicates it has been third-party verified for at least a portion of the REM requirements and had an auditor on site, which reduces the risk of misalignment against REM disclosure guidelines. CAA Oregon requests this variance pursuant to OAR 340-090-0670(3)(h).

CAA Oregon requests a variance when an entity can prove, with evidence, that a recognized certification program has audited it within the last three years and can provide a self-attestation of its compliance.

If an entity using a recognized certification can only prove alignment against certain, but not all, REM impact areas, CAA Oregon, through the verification body, will support the disclosure of the missing REM impact areas.

Variance #3 – Exempt all markets for yield disclosure until a REM Verification standard is developed

An end market entity would be required to self-attest that its recycling yield is above the established 60% threshold, excluding moisture and contaminants, and can demonstrate responsible management of minority components of a bale (i.e., material that is not considered a prohibitive contaminant but that could impact yield efficiency if present in high proportion). This includes ensuring “outthrow” materials in paper bales and “Allowable contaminants” in plastic bales are not discarded. CAA Oregon requests this variance pursuant to OAR 340-090-0670(3)(i).

CAA has reached out to several end markets as part of its consultation process. Those entities have expressed strong concerns about sharing yield information, which is commercially sensitive information. All of them have also stated that they already largely surpass the 60% yield, especially if non-covered materials (i.e., contamination) are not part of the denominator. Numerous studies have also proven this:

- Overall yield performance within the paper industry in North America has been confirmed by different entities, including the American Forest & Paper Association (AF&PA), the Technical Association of Pulp and Paper Industry (TAPPI)¹², and Moore & Associates. For example, yields at board mills using OCC and mixed paper are always above 85%. Tissue deinking mills can have yields as low as 70%, but never below 60%. The previous numbers are for 100% recycled fiber mills. “Blended” mills using wood, OCC and mixed paper overall have yields higher than 85%.

¹² Robert de Jong, “Recovered Paper Yield Estimate Using Laboratory and Mill Accounting Data”

- A recent study from the Mechanical Engineering Department of the University of Michigan has mapped the annual flow of steel in the U.S., stating an average yield of 88.9%¹³.
- A recent study from the U.S. Environmental Protection Agency on PET flows and recycling process has shown a yield on PET of 97%¹⁴.

The issue raised by the industry is not about their capacity to meet the threshold, but the sharing of commercially sensitive information. Yield can reveal efficiency and capabilities, leading competitors to adapt their processes accordingly.

The verification body will ask end market entities to estimate and self-attest to achieving a 60% recycling yield, along with providing methodological justifications. The verification body's auditors may ask and review documents such as the facility process diagram, inbound specifications or photos documenting facility operation to determine whether minority components are efficiently processed.

Variance #4 – List plastic and glass converters aligned with REM requirements

Plastics and glass should not be treated differently than other materials, where the end market is defined as the reclaimer and at the point at which the material is a clean commodity ready for remanufacturing. As such, the assessment of end market entities for plastic and glass should be at the reclaimer, not at the converter. CAA Oregon requests this variance pursuant to OAR 340-090-0670(3)(i), including:

- A request for variance to OAR340-090-0670(2)(a) to require verification for all plastics to the reclaimer, as defined in OAR340-090-0670(1)(d). As currently written in rule, verification is required through to the converter for plastics used in food contact and children's toys, which is challenging given material blending in processing and overcoming barriers to commercial information perceived as a trade secret exempt from disclosure.
- A request for variance to OAR340-090-0670(2)(a) as it pertains to the definition of the end market in OAR340-090-0670(1)(a). CAA Oregon is requesting verification only be required to the beneficiation plant. Indeed, markets for glass tend to be regional (i.e. mainly on the West Coast). Those markets are already verified against the components of the REM requirements, like environmental soundness by other state regulations, rendering the REM verification process duplicative.

Current definitions for plastic end market entities state that when the application is food-grade packaging or a children's product, REM verification occurs at the facility that uses flakes or pellets. Based on CAA's REM consultation, reclaimers communicated opposition to this requirement because it would effectively require

¹³ Yongxian Zhu et al., "Mapping the annual flow of steel in the United States"

¹⁴ Raymond L. Smith, "Plastics as Feedstocks for a Circular Economy: PET Flows and Recycling Processes"

the disclosure of the list of converters that purchase plastic flake or pellets. This information is commercially sensitive and, in some cases, cannot be legally shared as maintaining the information as confidential is required by existing commercial and non-disclosure agreements. Furthermore, the mechanisms described below are already in place to ensure the safety of products, mitigating contamination migration risks.

CAA Oregon recognizes that DEQ is expanding its REM verification process to include the converters for plastics used in food-contact packaging and children's products in order to address concerns about certain chemicals. While this is a commendable objective, there are already measures in place within the supply chain to monitor and test for these chemicals. Food packaging using recycled content plastic meets specific specifications for recycled resin, including, but not limited to, an FDA Letter of Non-Objection (LNO), various physical and performance requirements for the PCR (such as color, haze, and IV), and additional testing for chemicals. Recyclers include a Certificate of Analysis (COA) with each truckload of recycled resin to demonstrate compliance with the specifications agreed upon in the brand-supplier contract. The FDA LNO is the industry standard for food-contact recycled plastics used in beverage or food applications. While the LNO is designated as voluntary by the FDA, it is essentially required to sell recycled content into the food-grade market because of contracts between manufacturers and recyclers. To obtain an FDA LNO, recyclers undergo a "challenge test" to prove they have a process to remove any potential inbound contamination of these substances. This "challenge test" deliberately adds specific types of toxic substances to the plastics. Later testing of the processed materials ensures the process safely and effectively removes these contaminants. The recycler must demonstrate that the contaminants are removed to levels below certain thresholds before an LNO is granted for the process. Moreover, several companies test for chemicals at levels beyond the FDA's standards. A standard practice for producers is to require letters of guarantee from their suppliers. They also test the resins against a list of chemicals and non-identified substances. The detection of non-desired chemicals or unidentified substances will immediately halt the purchasing process.

For children's products, according to producers of toys contacted, there are separate product standards based on age range, with more stringent testing required for products designed for young children. Manufacturers source recycled resin with an FDA LNO for products used for children three years and younger. An FDA LNO is preferred, but not always used in products intended for children aged 3 years and older. For all ages, specific toy safety standards and regulations must also be considered, including ASTM F963 in the US and relevant EU regulations (2009/48/EC and Regulation (EU) No 10/2011). It is important to note that recycled resin is subject to the same testing and regulatory requirements as virgin/new plastics. In addition, Oregon's Toxic-Free Kids law requires manufacturers of children's products sold in Oregon to report products containing "High Priority Chemicals of Concern for Children's Health" (HPCCCH) at or above specific levels, and ultimately, to remove or substitute these chemicals. This includes over 80 chemicals.

For glass, the current definition of end market entity implies that REM verification occurs at the converter level. Those facilities tend to be located close to the beneficiation plant due to the cost of transportation. In the case of Oregon, glass cullet is processed mainly at container and fiberglass manufacturing facilities on the West Coast. Those facilities are already verified for environmental, health and safety by state laws and regulations, rendering the REM process duplicative.

CAA Oregon requests that the REM disclosure for all plastic be at plastic reclaimers and glass to be at glass beneficiation plants, not at converters, given existing regulations on chemical migration and toxicity. This includes a variance on disposition reporting obligations for entities downstream from plastics recyclers and glass beneficiation plants.

Variance #5 – List domestic landfills aligned with REM requirements

Unless CAA Oregon receives information on potential misalignment with the REM principles, all domestic landfills will not be subject to REM disclosure. CAA Oregon requests this variance pursuant to OAR 340-090-0670(3)(ii).

Landfills and disposal sites in the U.S. and Canada are already regulated and monitored by local environmental agencies, including Oregon DEQ for sites within Oregon.

CAA Oregon requests a variance for landfill or disposal sites in the U.S. and Canada, as soon as they provide an operating permit delivered by the local authority.

Other Components of REMs

Accounting For Disposition of PRO-Managed Material

REM disclosure guidelines will contain measures to account for end market variance in disposition when covered materials from Oregon mix with non-obligated materials from elsewhere.

The audited entity will be allowed to use one of the following chain of custody models defined by ISO 22095:2020:

- Controlled blending model.
- Mass balance model with rolling average percentage method.

The controlled blending model will be used when an entity uses materials from Oregon mixed with other sources in a batch production. ISO 22095 requires that the ratio between Oregon and non-Oregon materials is known for all outputs, at all times, for a contained volume. This model will be limited in its application as most of the recycling industry does not utilize batch production.

The mass balance model with rolling average percentage method will be used for continuous processes. This is the method most commonly used in the recycling industry, including for mechanical recycling of plastic. The model, as defined by ISO 22095, requires calculating an average percentage of Oregon and non-Oregon materials for each output. It also requires a defined reconciliation period for making a claim. CAA defines those boundaries as follows:

- Single site only (no multiple sites possible).
- Average to be calculated on a quarterly basis.

- Characteristic to be used: Oregon source vs non-Oregon source.

Random Bale Auditing

DEQ has granted CAA Oregon a 30-month delay on the obligation to conduct random bale tracking. DEQ may conduct this tracking itself, as it has the authority to do so under OAR 340-090-0670(4), and will communicate results to CAA Oregon as they become available. CAA Oregon will report its analysis of and action steps pertaining to DEQ's results in its annual reporting.

Supporting Responsible End Markets

On top of the special material investment highlighted in the Materials Strategy section, which already includes end market development components, CAA Oregon's proposed budget includes a dedicated fund for end market development initiatives. The fund will be financed through producer fees and will be approximately 3-5% of expected commodity values.

Every year, the fee schedule will determine the investment level to be incorporated into the Responsible End Market Development Fund. While 3-5% is established based on experience in other jurisdictions that have implemented EPR, the exact amount will be defined annually based on:

- Needs for end market development identified regionally.
- Other partners' involvement.
- Past financial results.

CAA Oregon will use this fund to increase the use of post-consumer recycled materials in product manufacturing. Key targets of CAA's strategy for end market development are to:

- Improve the supply quality of recycled materials (i.e., bale quality).
- Increase market demand as collection volumes increase.
- Enhance market stability.
- Enhance recycled material flows to higher-value end products.

Responsible End Market Development Guiding Principles

The following key principles will guide the planned responsible end market development program:

6. **Collaboration.** CAA will undertake investments in market development activities in cooperation with other parties, where possible (e.g. the private sector, local governments, and state and federal interests).
7. **Link to targets.** CAA's market development investments will be linked to material specific targets.
8. **No cross-subsidization.** CAA, wherever possible, will avoid cross-subsidization of material specific market development. For example, glass producers will be responsible for funding glass market development

activities that the CAA Board approves. Where investments benefit a range of materials, costs will be allocated across all benefiting materials.

9. **Competitive proposals.** Where feasible, CAA will implement a request for proposal/competitive bid process for allocating market development funds. CAA will identify its market development priority areas and will invite interested parties to submit proposals to meet CAA's requirements at the lowest cost. The final decisions regarding market development investments will be made by CAA.

10. **Prioritize regional and domestic markets.** Where feasible, efforts will be made first at the state or regional level, secondly at the U.S. level, and finally at the North American level. CAA will not make overseas investments.

11. **Balance national and state needs.** CAA will aim to improve recycling capacity at a national level, while tailoring actions to meet the specific needs and opportunities of EPR states.

CAA has defined a series of principles under which it will take practicable actions to ensure the integrity of REMs:

- CAA will take practicable actions in priority at North American entities and will limit its actions overseas.
- CAA may consider financial levers under specific considerations, in the form of financial de-risking measures.
- CAA will not take actions if:
 - Other REMs already exist for the relevant material.
 - The entity processes a low volume from Oregon.
 - The entity is not financially stable.

CAA will coordinate with industry interest holders when considering practicable actions for CAA to take.

It is important to highlight that CAA Oregon has no ownership of materials on the USCL; therefore, CAA Oregon does not have the ability to advance system change by directing materials to end markets. The role of CAA Oregon in promoting market development is to identify and address barriers and inefficiencies in the marketplace to make markets work better and encourage recyclable materials suppliers, processors, and end users to be more effective players in the market.

CAA Oregon will utilize the Fund to incentivize best practices at reclaimers, such as implementing measures to mitigate contamination, improve cleaning processes, or produce high-grade end products. CAA Oregon intends to partner with other organizations that may provide grants for direct investments at end market entities. Following internal pre-assessment of existing markets, CAA has identified several commodities expected to require market improvement to satisfy RMA requirements for REMs. While all materials, especially plastics, may benefit from market improvement, some commodities have been identified as priorities for action:

- Mixed paper (grade 54)
- Cartons (grade 52)

- Glass
- Mixed plastics
- Flexible PE plastics
- Polystyrene
- PET thermoforms

CAA will maintain active market development programs for commodities and materials and will take reasonable and practicable steps to facilitate the sale of collected materials to responsible end markets. CAA's ability to facilitate the flow of materials to responsible end markets is predicated upon the voluntary agreement of those entities that manage the flow of those materials.

As OAR 340-090-0670(5) defines the practicable actions a PRO must take in order to move materials to a REM, the regulation appears to be written from the perspective of when end markets may not qualify as a REM. Regulations do not outline the practicable actions that the PRO must take in the event that markets do not want to participate in the buying of commodities from Oregon due to the risk of new reporting and uncertainty around the use of information. In response to the identified barriers, CAA Oregon offers the following practicable actions to increase the availability of REMs to Oregon markets broadly:

- CAA will fund the development of an independent, third-party standard that all interested parties can participate in, creating trust in the verification process for all parties.
- The standard will be developed with the intent to be used across U.S. jurisdictions with packaging and paper EPR programs, creating incentives for end markets to participate in the verification standard to access a broad range of markets and materials. This will make Oregon recyclables competitive, not disadvantaged.
- CAA will continue to offer free-of-charge technical assistance to end markets to help them prepare for demonstrating operational alignment with REM principles.
- If there is clear evidence of non-alignment with the REM principles (e.g. research reveals the end market is non-compliant with its permit), CAA will support CRPF and brokers in finding other end markets

CAA believes these practical steps will help reduce the uncertainty and perceived risks of the new regulatory requirements.

For clarity, CAA will not undertake the following activities, because they are not viewed as practicable in the circumstances when end markets choose not to purchase Oregon materials:

- Assuming a quasi-regulatory role of enforcing operating standards that exceed current state and federal requirements.
- Determining if a facility is "verified" to a set of criteria that has not undergone the proper public input and field-testing process.
- Directly buying or taking ownership of materials until CAA has the ability to conduct on-site audits of end markets, which the PRO has been afforded the course of the program plan to complete.

- Offering financial support to buy specific equipment without any guarantee of processing a significant volume of Oregon materials.

Specific actions/strategies will be developed for each commodity/material during the program plan review period and will be included in the revised program plan submission.

viii. Upholding Oregon's Materials Management Hierarchy

CAA will uphold Oregon's materials management hierarchy, specifically with regard to the third principle: recycle material that cannot be reused, with preference given to recycling pathways, methods and responsible end markets that result in the greatest reduction of net negative impacts on human well-being and environmental health.

CAA has identified these end markets for three priority materials, informed by the outcomes of DEQ's prior LCA work. In this third program plan submission, CAA outlines an initial graduated fee proposal based on current LCA rules and eco-modulation concepts (see Financing section of this plan). For future program plan amendments, CAA intends to extend its eco-modulation program to include additional criteria that will support the policy objectives and environmental outcomes intended to be achieved from the materials management hierarchy.

CAA will capture environmental impacts during the REM verification process. This information will include, wherever applicable, water usage, energy, waste generation, impacts of plastic pollution, etc., and will be gathered during the REMs verification process occurring throughout the course of the first program plan period.

Information gathered during the first program plan period will be used in the plan submissions for subsequent periods. CAA may be able to provide a preferred hierarchy of end markets, for PRO materials, based on that information. For USCL end markets, CAA will indicate which REMs have environmental impact information available, so CRPFs can further explore, and apply a hierarchy for material management with their end markets, if they so choose.

As new end markets are identified, the impact areas of that operation will be compared to information captured for existing REMs for similar materials.

REM auditors will note if the REM can supply information on impact areas.

Material-Specific Strategies

Based on existing information and on DEQ analysis for specific end markets, glass, cartons and polystyrene require unique materials management strategies. CAA will work on selecting specific end markets for each of those materials, and the organization may compare the solutions through an LCA that follows ISO 14040 Standard (LCA principles and framework) to identify those with the better environmental outcomes.

CAA will apply the impact area data capture efforts, described above, to REMs verification for all materials.

Strategy for Glass

Apart from when glass is used in some aggregate applications, which would not be considered in alignment with Oregon's materials management hierarchy unless a LCA can prove otherwise, glass needs to be processed by a glass beneficiation plant before it is sent to final users. Since the first version of the program

plan, CAA has engaged in discussions with representatives of Oregon glass beneficiation plant Glass-To-Glass inc. (G2G). CAA has also assessed different available markets once the material is being processed by G2G. As a result, CAA believes recovered glass could supply different glass container manufacturing and fiberglass manufacturing facilities located in the Pacific Northwest or in California.

It is CAA's belief that sufficient capacity exists for glass today, and so long as the existing capacity is maintained and qualifies as a responsible end market, CAA does not plan to invest in developing alternative markets for glass during the period of the first program plan. In the event that a new and substantially different end market expresses interest in processing Oregon covered glass during the period covered by the first program plan, CAA may conduct an environmental impact evaluation of that new end market relative to existing end markets for the purpose of informing future discussions regarding ORS 459A.896(2)(b).

CAA and G2G are in the process of engaging in a supply agreement for processing glass collected through on-route collection and PRO depots. To ensure the quality of collected glass is maintained, CAA will create targeted education materials to reduce contamination of the most problematic materials, such as ceramic and heatware.

Strategy for Cartons

CAA will work in close collaboration with the Carton Council of North America (CCNA) to partner with specific end market entities that are involved in pulping activities, such as tissue production, notably in North America (e.g. Kimberly-Clark de México, S.A.B. de C.V., Sustana Fibers, and Tissue Depot formerly known as Great Lakes Tissue).

Strategy for Polystyrene

In accordance with DEQ's LCA on polystyrene, CAA will prioritize end markets that utilize mechanical recycling over non-mechanical recycling.

Strategy for All Plastics

While only glass, cartons, and polystyrene are prioritized for selective disposition action during the first program plan period, CAA will explore impacts of markets for other materials through the REM verification process, with the potential to prioritize additional materials in subsequent plan periods. The REM Verification process will pay specific attention to spill and leakage of plastics. A criterion in that regard is to be used during the audit, as described in section "viii. Ensuring Responsible End Markets."

d. Education and Outreach

In this section of the plan, CAA details how it plans to conduct education and outreach activities in support of USCL and PRO Recycling Acceptance list materials, as well as the statewide promotional campaign.

Due to the nature and timing of start-up activities required for education and outreach (previously an interim coordination task), CAA has integrated the requirements for that activity within this section. CAA and its partners plan to consult with local governments and their service providers, ORSAC, DEQ, and community-based organizations to garner feedback throughout the development of educational materials and plan formulation process.

i. Goals for Education and Outreach

1. Effectively build widespread recycling awareness among all Oregonians in the scope of the RMA, including residents living in single-family homes and multifamily communities, as well as commercial businesses, institutions, and non-governmental organizations. Awareness efforts will leave these waste generators with:
 - a. An understanding of the USCL and the PRO Recycling Acceptance List materials, as well as how to prepare those materials for recycling
 - b. Knowledge of which materials will be collected at curbside versus which materials will be handled at depot drop-off points and other drop-off locations (such as collection events)
 - c. Awareness of steps to prepare recyclable materials for collection and to limit contamination
2. Develop educational materials that are culturally responsive to diverse audiences across this state, including people who speak languages other than English and people with disabilities
3. Deliver support and messaging proven to effectively increase participation, boost capture of recyclables and reduce contamination. The education and outreach will contribute substantially to the established goal for increasing the plastics recycling rate (25% by 2028, 50% by 2040, and 70% by 2050), thereby contributing to the RMA's goal of maximizing the use of existing infrastructure
4. Include a systematic focus on and complement programmatic efforts to reduce contamination of recyclable material streams

Accomplishing these education and outreach goals ladders up to the overall program plan goals, in particular Objective 3 (improve public participation, understanding, and equity in the recycling system) and Objective 2 (increase the diversion of recyclable materials from disposal).

CAA proposes to conduct annual assessments of awareness and trust in the recycling system, as well as contamination audits to measure effectiveness of the campaigns and progress toward the goals outlined above.

ii. CAA's Education and Outreach Plan

CAA and partners, in consultation with ORSAC, will develop educational resources and promotional campaigns to promote the USCL, as well as depot recycling programs. CAA will coordinate and fund the distribution of education and outreach materials through statewide promotional campaigns following the first establishment of the USCL and after each revision of the USCL, but not more frequently than once per calendar year.

Supporting Widespread Awareness and Understanding

This section outlines CAA's proposed approach to building widespread consumer awareness and understanding of the USCL, the network for PRO Recycling Acceptance List materials and other recycling services available to them.

Audience Research: Measuring Customer Awareness and Trust

The target audiences for education and outreach efforts under the RMA are described broadly below. Residential audiences can be further segmented by demographic characteristics. A keystone workstream will be to complete in-depth audience research to effectively develop and deploy messaging that resonates with each group.

- Single-family household residents
- Multifamily household residents
 - Multifamily property management
- Residents that will utilize drop-off/depots
- Commercial businesses, institutions, and non-governmental organizations

Audience research will consist of the following activities:

- Statewide Quantitative Survey: Gather attitudes, perceptions and opinions on current recycling practices, and the current system including understanding and satisfaction
 - Explore knowledge and attitudes surrounding the recycling of certain materials
 - Identify gaps in recycling knowledge and points of confusion
 - Gather feedback on concepts/messaging in terms of relevance and motivation
- Qualitative Interviews:
 - To be conducted with customers in the following languages to provide real-world insights to inform the production of non-English material: Spanish, Simplified Chinese, Traditional Chinese, Korean, Arabic, Russian, Vietnamese, Tagalog, Hindi, Somali and Ukrainian

Anticipated audience considerations include:

- 4.2 million residents, living across 1,642,451 households

- 120,704 employer establishments (single physical locations at which business is conducted or where services or industrial operations are performed; companies or enterprises may consist of more than one establishment)
- Translations and transcreations to the following language groups: Simplified Chinese, Traditional Chinese, Korean, Arabic, Russian, Vietnamese, Tagalog, Hindi, Somali and Ukrainian
- Responsive communications strategies to serve an increasingly diverse population
- Accounting for gaps in rural vs. urban use of internet to access government services
- An estimated 35% of Oregon's recycling is generated by the commercial sector, thus substantial investment is needed to effectively capture recyclables from this sector

Developing Messaging

Leveraging key insights from behavioral science research and best practices in motivational messaging for effective outreach, CAA and its partners propose to develop key messages tailored to different audiences in Oregon, which will likely include the Portland Metro Region, communities outside of the Metro region with more than 4,000 residents, and rural communities.

Messaging Best Practices

CAA proposes to leverage proven best practices in motivational messaging to build participant confidence, improve recycling behaviors among participants, and increase capture of recyclable materials. Motivational messages will be paired with instructional messaging, tailored to target audiences. Key messages that will be communicated to the public include but are not limited to:

- An explanation of the USCL
- An explanation of recycling services, including depots and how to sign up for/access services
- Accepted materials vs. not accepted materials
- Instructions for preparing materials for recycling
- Information on the importance of not placing contaminants in curbside recycling bins and carts
- Key messages will be clear and free of jargon

Consultation and Testing

Campaign messaging may incorporate the best practices described above but should be tested and refined to ensure local relevance and cultural sensitivity. CAA proposes to evaluate and adjust its messaging based on a statewide quantitative survey, focus groups, and consultation with Oregon recycling program staff as well as local CBOs.

Change Management

As the RMA is implemented, there will be differing changes to accepted materials lists across the state, and education and outreach will play a critical role in alleviating the burden and confusion of these changes on key audiences. For instance, as infrastructure and responsible end market development goals are met, the USCL and PRO Recycling Acceptance lists may evolve. Additionally, some communities may be exempt from implementing the USCL on the effective date and will come into compliance over time.

Importantly, the effects of these changes may be experienced unevenly across the state. For some communities, updates to the USCL could create feelings that materials are being taken away, and for others, it will be clear that materials are being added. The overall communications strategy must account for the implications of these perceptions and also strive to minimize confusion.

Material-Specific Considerations

Message development will account for the considerations identified in the Materials Strategy section above with regard to SIMs to the fullest extent possible.

For plastics in particular, the expectation is that the majority of resin types, with perhaps the exception of plastic films and expanded polystyrene (not collected curbside), may end up in curbside containers. All efforts will be made through education and outreach to limit contaminants and contamination, and advance collection of all plastics through the depot network where appropriate.

Delivering Messaging

CAA proposes adopting the following best management practices, where appropriate, for delivering communications and messaging to effectively capture attention and motivate appropriate recycling behaviors. Effective strategies will vary depending on the target audience, and are grouped as such:

General Best Practices:

- Behavioral research has not found general “awareness” campaigns to be effective in driving behavior change to increase recycling. Beyond ensuring that residents are aware of recycling in their community, efforts should focus on why and how to recycle
- To capture resident attention and motivate appropriate recycling behaviors, information should be provided to the resident close to where the behavior will occur – most likely, at home. This is what makes direct mailing effective as well as equitable in reaching communities with lower internet accessibility rates
- Recent research suggests that information should only include up to five categories of accepted and unaccepted materials with images and clear language – any more is overwhelming to the resident. CAA will develop a strategy for clearly and succinctly communicating the USCL to customers, while ensuring that they also have access to detail guidance where needed
- Residents need to make the choice to recycle each day, which requires sustained effort. At least one annual mailer is a best practice as a minimum level of recycling education

- A dedicated recycling landing page on local government websites with relevant recycling information for all user groups is a strong step to help funnel searches from residents looking for information online
- All information should be presented using clear language.
- Direct mailings with a top issue (one item that is a top contaminant) are helpful in reducing contamination, especially when paired with cart tags
- Recycling messaging delivered by multiple mailers has been observed to significantly increase recycling participation in one pilot study
- Ongoing research findings imply that multiple interventions (e.g. mailers AND cart tags AND in-person outreach) may be required to meaningfully increase recycling
- Delivering messaging by cart tag is memorable and has proven effective at increasing recycling tons in several pilot studies

Multifamily Recommendations:

- When working with multifamily properties, education and support needs to be provided to residents and property managers. Materials should be written with both audiences in mind, with separate pieces for managers and residents
- Property managers need to be provided with information on regulations, best practices for recycling, how to set up recycling at the property, and resources to educate residents about how to recycle properly
- In-unit recycling bins or totes are a promising strategy for increasing multifamily resident participation, but further research is needed to understand the impact of this tool
- Signs posted near or on recycling containers can help to increase the clarity of what is accepted in the recycling stream. [Portland's free signs](#) are a great example of a helpful tool
- Behavioral scientists recommend introducing new concepts at points of change in people's lives – such as a move. A move-in packet that includes recycling information is a helpful tool for new residents

PRO Depot/Drop-Off Recommendations

CAA will ensure that in conjunction with messaging aimed at building awareness of the USCL, educational collateral and the statewide campaign will promote the depot network, including site locations and instructions for preparing materials. In addition, once customers arrive at the depot, it is important that they are provided with clear guidance and instructions.

- Clear signage with guidance and instructions at the drop-off location (both on containers and at the facility entrance) can help drive correct behavior
- Specific messaging provided around confusing and hard-to-recycle materials, such as film, will help waste generators correctly sort their recyclables
- A single-issue postcard can be used to highlight materials that are common contaminants

Recommendations for Commercial Businesses, Institutions, and Non-Governmental Organizations:

- Conduct outreach to business associations and chambers of commerce to share information about the USCL and the PRO Recycling Acceptance List, and offer technical assistance resources to help businesses throughout the state, especially outside of the Portland Metro area to:
 - Recycle covered materials
 - Recommend the use of internal collection bins and strategies for ensuring recycling is convenient for employees to access. Co-location of recycling and garbage containers is the most convenient setup within a business, both inside the businesses and for external containers
 - Establish guidelines and a minimum recycling service standard for recycling service by business type
- Make recycling signs and instructions available to businesses:
 - Create recycling sign portal with downloadable signs, or available for order and mailed to the business
 - All signs should clearly identify recyclable materials in no more than five categories and include the top five common contaminants in a “no” category
- Tailor messaging and support provided to businesses depending on size and generator type. Each of these generator types face different barriers to recycling, have different recycling systems in place and generate different types of recyclable materials:
 - Institutions: healthcare, university, schools
 - Franchise and chain businesses
 - Independent small businesses
 - Restaurants, retail and manufacturing

Developing Educational Materials

CAA will fund and coordinate the development of the following educational resources, which will be created with local government input and will help enable local governments to meet Opportunity to Recycle Act requirements. CAA will manage and fund the design and printing of education and outreach materials on behalf of local governments and their service providers. Local governments and service providers choosing to design education and outreach materials in-house and seek reimbursement from CAA will be required to meet minimum standards, such as using approved graphics and terms. These standards and other printing guidelines for E&O materials will be available upon request and via the E&O portal. These materials will communicate:

- Materials identified for recycling as described in the USCL
- Requirements to properly prepare materials for recycling
- The importance of not placing contaminants in commingled recycling collection

- Information about collection of materials on the PRO Recycling Acceptance List, including locations and instructions for preparing materials for drop-off

Educational Materials for Local Governments and Service Providers

Educational materials will be made available in digital and print formats for local governments. Materials will be translated and transcreated into Spanish, Simplified Chinese, Traditional Chinese, Korean, Arabic, Russian, Vietnamese, Tagalog, Hindi, Somali and Ukrainian.

Materials will be developed and made available in an electronic format via an online portal to local governments and their authorized service providers for download and customization to local conditions. Customization options will allow local governments to easily adapt the materials below to communicate their individualized phase-in timeline to their local public. Customization is also necessary in allowing for adaptation as accepted materials lists change over time due to end market dynamics and other factors.

Specific collateral will include:

- Photos/illustrations of accepted items and photos/icons of key contaminants
- Sample text for informative, motivational, and instructional messaging via newsletters, websites or social media
- A press release
- Web domain and QR code for public-facing website
- Handouts and/or mailers, including postcards, brochures, full-page flyers, door hangers, and a billing insert
- A social media toolkit
- Signage and stickers for depots, commercial and multifamily recycling enclosures
- Label/in-mold labels for roll carts and other containers used for the setout of recyclables (translated and transcreated into the languages cited above)

To support the use of the above materials, CAA will also produce and make available to local governments and their service providers a recommended messaging timeline, as well as a statewide style guide for consistent visual appearance in education and outreach materials.

Educational materials will be produced and made available to local governments in a series of batches. The batches are described in the following graphic.



Figure 5

Plans for an Online Portal

CAA proposes to provide an online portal for local governments and their designated service providers (and any other entities such as commercial businesses, if planned) to easily access, customize, print and mail educational collateral at no cost.

Users of the portal would be able to:

- Access templates for the various educational materials listed above that have been strategically designed based on best practices to effectively deliver recycling messaging
- Accommodate educational materials for relevance to different types of recycling programs, especially curbside pick-up and drop-off programs
- Produce coordinated educational material that is thematically aligned for cohesive recycling education and outreach across the state
- Customize materials in 10 additional non-English languages spoken in Oregon
- Easily customize materials to reflect their local contact information
- Customize materials to accommodate the different bin colors across programs

CAA has built support for local governments and designated service providers in the utilization of the portal into its staffing plans.

Communicating Directly with the General Public

CAA will maintain a website for Oregon residents to learn about recycling by accessing information on the RMA, the USCL, collection points and depots, and in-home recycling best practices. CAA will also explore opportunities to implement responsive customer service tools via its website.

CAA will include messaging on its public-facing website that is aimed at building public confidence in the recycling system and the RMA. Messaging will include information about the PRO's requirement to ensure

materials are transferred to responsible end markets and its methodology for doing so. Additionally, CAA will make life cycle assessments conducted by producers to meet obligations of the RMA accessible on this website and will accompany these postings with clear and jargon-free explanatory language to ensure this information is accessible to all members of the public.

Additionally, CAA will provide material for local governments to include on their websites, allowing local governments to include more detailed information about accepted and not accepted material. In this way, local governments will continue to serve as a resource for waste generators who want to learn more about recycling in their locality.

iii. A Description of the Statewide Promotional Campaign

CAA proposes to employ a phased approach to the statewide campaign that will focus on (1) communicating statewide changes to the recycling system in 2025 and introducing new resources, and (2) maintaining awareness throughout 2026 and 2027, while driving increased participation and capture to meet goals set by the RMA.

Throughout both phases of the education and outreach plan, CAA and partners will be focused on delivering messaging and collateral that builds awareness among Oregon residents and organizations and effectively introduces the USCL and PRO Recycling Acceptance List. The organization will leverage proven motivational, empathetic messaging in bold, bright colors that will appeal to recyclers who need more encouragement (based on our audience segmentation research), pairing that outreach with detailed instructions for customers to participate successfully in the new system.

The statewide campaign will provide messaging that is instructional and motivational in tone, as described in the graphic below. Instructional-toned collateral will convey basic material instructions including, but not limited to, how to prepare materials for recycling, common contaminants, and Yes/No lists. Motivational-toned collateral will focus on awareness of system change, the benefits of the new system and how to participate.

INSTRUCTIONAL TONE

Basic Materials Instructions
(Prep, Contaminants, Yes/No)

via Digital Portal

- USCL Guide & Visuals
- Style Guide
- Mailer/Poster/Brochure
- Label/In-Mold Graphic for Carts Container Sticker
- Poster (for Depot & Enclosure)
- Postcard
- Billing Insert

MOTIVATIONAL TONE

The System is Changing

via Digital Portal

- Social Toolkit
- Press Release
- Newsletter Article

via Statewide Campaign

- Media Ads
 - Video, Radio, Banner, Social, Native, OOH, Print, Search
- Website
 - The system is changing July 1 & why
 - Benefits of the new system
 - How to participate – action steps

Local Govts. can Adapt & Incorporate into Local Programs

Figure 6

Deployed by CAA at Launch

Phase One/Year 1: Program Launch

Dates: Begins July 1, 2025, extending as recommended throughout the calendar year.

Phase Description: Introduction of the USCL and PRO Recycling Acceptance List. Getting the right information to the right audiences to educate and encourage them to recycle and increase awareness.

Anticipated Channels: Television and cable, digital TV, digital pre-roll (including YouTube), radio, digital audio and podcasts, display on select Oregon news sites and banner ads, billboards and transit ads, search, print newspapers and community media to reach multicultural audiences, and residential mailings.

- Key Insight: Based on 2023 pilots, display ads were a top source of impressions and clicks, driving website traffic at a higher rate than the rest of the tactics and showed the highest click-through rate (CTR) of the channels. Display ad average CTR is 800% higher than the average industry benchmarks, making this a great potential channel for Phase 1

Special Audience Considerations:

CAA proposes to explore the option of creating (not simply translating) an original Spanish language campaign that would parallel the English statewide campaign

Desired Outcomes:

- Drive audiences to key PRO resources (i.e., the PRO's website)
- Increase awareness of new recycling guidelines, including both the USCL and PRO Recycling Acceptance List
- Increase public confidence in Oregon's recycling program
- Begin to drive increased participation

Phase Two/Years 2 and 3: Continued Engagement Phase / Material-Specific Supports

Dates: January 2026 through December 2027

Phase Description: Deliver support to effectively engage frequent, infrequent, and non-participating audiences and achieve increased capture of target materials. It is also possible that during these subsequent years, additional changes will be made to the USCL and PRO Recycling Acceptance List, and therefore elements of this phase will need to be focused on communicating those changes and managing customer expectations.

Anticipated priority channels:

- Leverage moments of change (e.g. recycling welcome kits for residents who fill out change of address forms)
- CBO engagements, especially for equitable outreach

- Ads: television and cable, digital TV, digital pre-roll (including YouTube), radio, digital audio and podcasts, community media, Google search, Meta, native, phone texts, CTV/OTT (streaming TV)

Desired Outcomes:

- Continue to drive audiences to key PRO resources (e.g., the PRO's website)
- Continue to build confidence in Oregon's recycling program
- Achieve increased participation in local recycling programs and PRO depots
- Increase the capture of recyclable materials, with a focus on underperforming target materials

Campaign Applications and Channels

CAA proposes the following campaign, intended to be deployed in the phased approach described above:

- Advertising assets: Video, radio, banner, social, outdoor, print, search and community media ads.
- Recycling signage/decals for depots, enclosures and carts
- Print materials: Up to three brochures or full-page flyers as well as a mailer, cart tag and a door hanger

iv. A Culturally Responsive Approach

CAA will ensure that educational materials and campaigns are culturally responsive to diverse audiences across this state, pursuant to ORS 459A.893(3). This includes, at a minimum:

- Including people who speak languages other than English and people with disabilities
- Ensuring materials, including labels/in-mold graphics for roll carts, are printed or produced in languages other than English and are accessed easily and at no cost to local governments and users of the recycling system

Translation and Transcreation

CAA proposes to translate and transcreate all education and outreach materials into those languages spoken in Oregon by at least 2,000 people over the age of five who spoke English less than very well according to the most recent American Community Survey. These languages are Spanish, Simplified Chinese, Traditional Chinese, Korean, Arabic, Russian Vietnamese, Tagalog, Hindi, Somali and Ukrainian. CAA also plans to create a process through which local governments can request translation or transcreation into additional languages spoken in Oregon by at least 1,000 people over the age of five who spoke English less than very well according to the most recent American Community Survey.

In-language content will be transcreated, not simply translated. CAA and partners will engage linguists and multicultural experts to ensure materials resonate with intended audiences by taking into account language,

but also cultural relevancy. For example, materials for different multicultural communities would be designed with images of recyclable items that are most commonly found in the households of the community that is being targeted. CAA understands that under ORS 251.167, information on the most-commonly spoken languages in the state of Oregon and its counties is updated periodically for the purpose of disseminating accessible information on voting to the public. CAA will use this information in formulating and updating its plan to fulfill these accessibility requirements.

Translations and transcreations include up to 10 digital ads, recycling enclosure signs, three brochures or full-page flyers, and up to three print designs (either for a postcard, mailer, door hanger or similar sized piece).

Co-Creation

Co-creation will be employed for development of campaign materials and multifamily outreach. Co-creation gives community members a chance to participate in campaign design through community-level listening sessions to deepen mutually beneficial relationships. Other connective strategies could be use of an advisory board, active liaisons, or trusted advisors.

Accounting for Future Diversity

The U.S. Census Bureau considers Oregon among the states rapidly becoming more diverse with time. Any outreach plans developed to educate and inform the public about recycling should strive to be responsive to future changes to Oregon resident demographics.

CAA will closely monitor updates in the American Community Survey to ensure transcreation and other elements of the education and outreach strategy remain in line with demographic shifts within the state.

Engagements with Community-Based Organizations

To achieve an inclusive and equitable education and outreach program, CAA plans to engage community-based organizations (CBOs) as advisors to its education and outreach efforts, as well as implementation partners.

Throughout the program plan period, CAA will consult with at least 10 community-based organizations to secure their feedback on USCL and PRO Recycling Acceptance List images, key terms, instructions and communications strategies. CBO participants will be compensated for their participation in consultations.

To ensure that translation and transcreation work is effectively informed by local expertise, CAA also intends to work with CBOs to recruit participants for audience research relating to the creation of materials in Spanish, Simplified Chinese, Traditional Chinese, Korean, Arabic, Russian, Vietnamese, Tagalog, Hindi, Somali and Ukrainian.

Designed for Accessibility

Educational materials created for the campaigns will follow ADA compliance and best practices as well as the principles of universal design, where products, services or environments are designed so that anyone – no matter their age or ability – can use that design with minimal or no accommodations. Examples include:

- Considering color blindness and legibility when selecting color palettes, fonts, text size and imagery. This could include avoiding small print and reverse type and leveraging color blindness testing tools for designers
- Ensuring all elements meet or exceed the Web Content Accessibility Guidelines 2.1 AA (WCAG) requirements
- Building accessible features into electronic versions of collateral that are intended for the general public so they include “alt text” for images and all copy and visuals are “screen reader ready”
- Using plain language and using simple sentences with relevant examples
- Making use of imagery, icons and other visuals rather than large blocks of text to more quickly and easily communicate information and demonstrate processes
- Providing materials in a range of formats to reach across digital access and literacy gaps (e.g. digital ads as well as television, radio, print, and outdoor ads and offering detailed information via websites as well as printed mailers and brochures)

v. Schedule Including Proposed Timings for Start-Up Approach

CAA and its partners propose to develop educational collateral and the subsequent implementation strategy of the statewide promotional campaign in a deliberate and phased approach. Batches of collateral and their expected release dates are summarized in the below graphic.



Figure 7

The visual timeline for this proposed implementation plan can be found in the updated program implementation timeline featured in Appendix M.

Throughout the first program plan, CAA will consult with local governments and communities across Oregon on the development of E&O materials. CAA will summarize, share and incorporate, when possible, community and partner feedback.

CAA will produce a schedule of continued engagement with interested parties covering the term of the first program plan period following the completion of Batch 4 materials, which has an established consultation strategy. The learnings, including contamination reduction and customer understanding, from program plan one will be reviewed with DEQ and the Recycling Council to inform the E&O practices in future program plans.

June – September 2024:

- Quantitative survey of Oregon residents, analysis, and reporting of results and key findings
- Develop campaign strategy based on survey results and existing best practices
- Preliminary conceptualizing for the campaign
- Kick off engagement with CBOs and local governments to consult on strategy
- Work with ORSAC to set a presentation schedule through July 1, 2025

- Confirm the material approval schedule with OR DEQ through July 1, 2025.

Late September 2024:

- Proposed Activity: Consult with ORSAC Education and Outreach Committee to review and provide Quantitative Audience Survey results, campaign name and logomark.

August–October 2024:

- Develop USCL instructions/communications strategy, including key terms
- Local government review of USCL instructions/communications strategy, including key terms

Late October 2024:

- Proposed Activity: Consult with ORSAC Education and Outreach Committee to review and provide feedback on the draft campaign concept prior to testing.
- Conduct qualitative interviews with CBOs and representatives from local governments to test and refine the campaign concepts

Early December 2024:

- Proposed Activity: Detailed report on audience research and campaign concept recommendation presented to ORSAC, with materials to be provided at least two weeks prior

December 2024 – March 2025

- Conduct qualitative audience testing to inform transcreation of outreach materials
- Produce batch 1 materials (those required for April 4, 2025 distribution): USCL guide, label/in-mold graphic for roll carts, style guide, messaging timeline, newsletter article, web domain/QR code
- Local governments to review batch 1 materials over two periods
- Initial drafting of batch 2 materials (those required for May 16, 2025 distribution): Social toolkit, press release, newsletter article, website, print materials – USCL mailer/poster, postcard, bill insert, depot/enclosure signage, available in agreed-upon languages
- Local governments to review the relevant parts of batch 2 materials over two periods
- Develop media planning strategy and establish hotsheet of advertising specifications

By February 1, 2025

The following beta materials will be available to local governments and service providers for download by February 1, 2025:

- Graphics showing materials on the USCL as well as key contaminants and materials that may be removed from some local collection programs
- USCL Guide in English and Spanish
- Newsletter article in English and Spanish
- Cart label in English and Spanish

Note: beta materials are expected to be very similar to final materials. They are being made available to local governments and service providers early to ensure materials meet pre-established non-RMA deadlines.

March 2025:

- Proposed Activity: Present batch 1 materials to ORSAC
- Submit batch 1 materials to DEQ for approval

Key Deliverables by April 4, 2025

The following **guidance documents and editable design files** will be available to local governments and service providers for download:

1. Images of all materials on the USCL, materials being removed from lists around the state, and contaminants of concern, in both low and high resolution
 - a. A label/in-mold label graphic for roll carts
 - b. A style guide to help ensure waste generators experience a unified aesthetic and feel whenever and wherever they receive recycling information in the state (see attached example of Metro Multifamily Decals and Signage Playbook) that includes fonts, colors, as well as a vetted list of terms (e.g., when to use “bins” versus “carts,” “recycling” versus “recyclable materials,” etc.) in agreed-upon languages
 - c. A recommended phased messaging timeline for local governments and service providers to adhere to
2. A customizable newsletter-style article outlining relevant details related to the RMA
 - d. A QR code to public-facing website with an identifiable and memorable domain name that local governments and service providers can use to direct their residents/customers to more information

March – June 2025

- Complete production of batch 2 materials for May 16 distribution.
- Initial drafting of batch 3 materials (those required by July 4) – Website strategy, design, development and QC to have live, updated with downloadable materials.
- Initial production of batch 4 materials (those required by August 1) in English – ad materials – video, radio, banner, social, native, OOH, print, search.

- Local governments to review batch 4 English materials over two 2-week periods
- Upon approval of English materials, transcreated materials will be developed
- PR planning, messaging and materials development (early milestone is 'change is coming' release)
- Initiate business association outreach
- Initiate mail house coordination
- Design, build and test education and outreach electronic portal

Key Deliverables by May 16, 2025

Electronic Portal launches by May 16 to support outreach efforts conducted by local government and service providers. The following materials will be available for download via electronic portal:

1. Social media toolkit with messaging in agreed-upon languages
2. Example and customizable brochure in agreed-upon languages that is simple, clear, and free of jargon that also serves as mailer/poster and includes:
 - a. Basic preparation information (“empty and dry”)
 - b. Top 3–5 contaminants to keep out
 - c. Limited Yes/No poster that can be posted near receptacles and includes a QR code to the public-facing website with comprehensive list of accepted items and contaminants
3. Additional example and customizable resources, including social media toolkit, newsletter, postcard, billing insert, press release, available in agreed-upon languages, that deliver the following messages:
 - a. The system is changing July 1 and why
 - b. Benefits of the new system
 - c. How to participate—action steps
4. Example and customizable container stickers and depot/enclosure posters and signage in agreed-upon languages, available in different sizes developed through consultation with local government

May – June:

- Complete production of batch 3 materials for July 4 release.
- Ongoing business association outreach
- Ongoing mail house coordination
- PR planning, messaging and materials development
- PR materials development
- Initiate media negotiation and coordination

Key Deliverables by July 4, 2025

The following **print materials** will be available for local governments and service providers to order for delivery by July 4, available in different sizes developed through consultation with local governments in agreed-upon languages, made of waterproof materials that are appropriate for indoor and outdoor use:

1. Signage for depots and commercial and multifamily recycling enclosures
2. Stickers for roll carts/containers

A live **public-facing website** with memorable domain name, populated with change-is-coming messaging will also be available by June 1. Information posted to the site will explain/include the items below.

Information will be available/accessible in all agreed-upon languages:

- The Oregon recycling system is changing July 1, and why
 - The benefits of the new system
 - How to participate—action steps
- A downloadable poster to hang near receptacles that includes:
 - Basic preparation information (“empty and dry”)
 - Limited Yes/No list
 - QR code to the website itself with comprehensive list of accepted items and contaminants
- A complete Yes/No list for materials, closer to <https://www.oregon.gov/deq/recycling/Documents/rmaMatAccept.pdf>, but using customer-friendly terminology
- Detailed preparation information and list of common contaminants

Key Deliverables by August 1, 2025

- Formal campaign launch
- All other USCL educational resources made available

2026–2027

- Campaign continues as described in the campaign section of the education and outreach plan

vi. Relevant experience

Given its widespread reputation as a leader in recycling education, The Recycling Partnership has worked with CAA to develop plans for the education and outreach aspects of the program plan. CAA will also consult with The Recycling Partnership to execute the education and outreach plan. CAA believes the team tasked with delivering this work needs to have:

- **Industry Knowledge** – A deep understanding of the recycling and waste management sector, including knowledge of current trends, challenges, and opportunities specific to Oregon. The qualified firm will have considerable experience with deploying recycling education and outreach campaigns that measurably improve the performance of recycling programs
- **Communication Expertise** – Proven experience in developing comprehensive communication strategies that resonate with diverse audiences. The firm will show demonstrated proficiency in utilizing various communication channels, including traditional media, social media, and digital platforms
- **Interest Holder Engagement** – Experience identifying and engaging with key interest holders, including local governments and recycling service providers. This experience should extend to building collaborations to enhance the reach and impact of campaigns
- **Campaign Development** – Previous success in developing and implementing large-scale, statewide campaigns. The goal is outreach that leverages creativity and innovation to craft compelling messages and materials that effectively convey the campaign's goals
- **A Data-driven Approach** – Utilization of data and analytics to inform the development of materials and to measure the success of outreach interventions
- **Cultural Sensitivity** – Understanding of the cultural diversity within the state, ensuring that the campaign is inclusive and resonates with various demographic groups
- **Adaptability** – Flexibility to adapt strategies based on feedback, changing circumstances, and emerging trends

Financing

a. Membership Fee Structure and Base Fee Rates

i. Reporting Categories (Product Speciation for the Fee Structure)

CAA proposed a product speciation list of 60 material categories in the previous draft of the program plan and carries that proposal to this program plan amendment, grouped by eight material classes as described below. This list was developed based on our understanding of the RMA requirements, our experience with EPR programs in other jurisdictions, and the USCL and PRO accepted material lists developed by DEQ as a part of rulemaking. We also considered its potential for “nestability” with other EPR programs, such as California, to enable producer reporting synergies between Oregon and other state programs. The final 2025 Oregon base fee schedule will be published outside of this program plan amendment. The table below shows the list of USCL and PRO Recycling Acceptance List (RAL) materials, along with the acceptance of each of those materials.

Material Class	Reporting Category – Revised	Accepted: USCL or LG Depot	Accepted: PRO RAL
Printing and Writing Paper	Newspapers	Y	N
	Newsprint (inserts and circulars)	Y	N
	Magazines, Catalogs and Directories	Y	N
	Paper for General Use	Y	N
	Other Printed Materials	Y	N
Glass and Ceramics	Glass Bottles and Jars & Other Containers	N	Y
	Ceramic – All Forms	N	N
Metal	Aluminum Containers	Y	N
	Aluminum Foil and Molded Containers	N	Y
	Aluminum Aerosol Containers	N	Y
	Aluminum Other Forms	N	N
	Steel Containers	Y	N
	Steel Aerosol Containers	N	Y
	Steel – Other Forms	N	N
	Metal – Small Format	Y	Y
	Pressurized cylinders	N	Y
Paper/Fiber	Aseptic and Gable-top Cartons	Y	N
	Kraft Paper	Y	N
	Corrugated Cardboard	Y	N
	Corrugated Cardboard (Tertiary/transport) non-consumer	Y	N
	Paperboard	Y	N
	Polycoated Paperboard	N	N
	Other Paper Laminates	N	N
	Other Paper Packaging	Y	N
	Paper – Small Format	Y	N
Plastic – Rigid	PET (#1) – Bottles, Jugs, and Jars (Clear/Natural)	Y	N
	PET (#1) – Bottles, Jugs, and Jars (Pigmented/Color)	N	N
	PET (#1) – Tubs	Y	N
	PET (#1) – Thermoformed Containers, Cups, Plates, Trays	N	N
	PET (#1) – Lids	N	N
	PET (#1) – Other Rigid Items	N	N
	HDPE (#2) – Bottles, Jugs and Jars (Clear/Natural)	Y	N
	HDPE (#2) – Bottles, Jugs and Jars (Pigmented/Color)	Y	N
	HDPE (#2) – Pails & Buckets	Y	Y
	HDPE (#2) – Tubs, Nursery (plant) pots & trays	Y	N
	HDPE (#2) – Package Handles, Lids	N	Y
	HDPE (#2) – Other Rigid Items	N	N
	PVC (#3) – Rigid Items	N	N

	LDPE (#4) – Bottles, Jugs and Jars	N	N
	LDPE (#4) – Lids	N	Y
	LDPE (#4) – Other Rigid Items	N	N
	PP (#5) – Bottles, Jugs and Jars	Y	N
	PP (#5) – Tubs, Pails and Buckets, Nursery (plant) pots & trays	Y	Y
	PP (#5) – Lids	N	Y
	PP (#5) – Other Rigid Containers, Cups, Plates, Trays (non-nursery (plant))	N	N
	PP (#5) – Other Rigid Items	N	N
	PS (#6) Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers	N	N
	PS (#6) White Expanded/Foamed Cushioning	N	Y
	PS (#6) Colored Expanded/Foamed Cushioning	N	N
	PS (#6) Rigid Non-Expanded	N	N
	PLA, PHA, PHB – Rigid Items	N	N
	Other/Mixed Rigid Plastic	N	N
Plastic – Flexible	HDPE (#2)/LDPE (#4) Flexible and Film Items	N	Y
	HDPE (#2)/LDPE (#4) (Pallet Wrap) non-consumer	N	Y
	PP (#5) Flexible and Film Items	N	N
	PLA, PHA, PHB – Flexible and Film Items	N	N
	Plastic Laminates and Other Flexible Plastic Packaging	N	N
Plastic – Other	Plastic – Small Format	N	Y
	Plastic containers for motor oil, antifreeze, or other automotive fluids, pesticides or herbicides, or other hazardous materials (flammable, corrosive, reactive, toxic)	N	N
Wood and Other Organic Materials	Wood and Other Organic Materials	N	N

Table 21

Table 19 indicates the material categories used for producer reporting and for setting the 2025 and 2026 fee schedules. For the 2027 fees, to better differentiate recyclables and non-recyclables, CAA will:

- Break the category “Plastic – Small Format” into two categories:
 - “Plastic – Small Format – PE and PP caps and lids, HDPE package handles” accepted on the PRO RAL
 - “Plastic Small Format” not accepted on either USCL or PRO RAL
- Break the category “Other Paper Packaging” into two categories:

- "Other Paper Packaging" accepted on the USCL
- "Other Paper Packaging – Molded Pulp Food Serviceware" not accepted on either USCL or PRO RAL

ii. Development of the Base Fee Algorithm

In the fall of 2023, CAA began developing a national fee-setting methodology to be deployed to all EPR enacted states where CAA is a PRO and has the authority to set producer fees. As the methodology development continued through 2024, CAA also established a set of guiding principles to inform the development of fair and equitable fees payable by producers. The guiding principles underpinning the fee-setting methodology are:

CAA Fee-Setting Guiding Principles

1. **Harmonization:** The national fee-setting methodology will be used consistently across states, but the fee rates will vary by state due to differing state requirements and program costs.
2. **Fairness:** Producers supplying covered materials to consumers must contribute to the costs of the recycling system, including producers that use materials that are not recycled.
3. **Material-Specific Costs:** Fee rates will reflect **material-specific management costs in each state** using the best available data.
4. **Commodity Revenue:** Fee rates will **reflect state-specific commodity revenues**, and these revenues will be attributed to the corresponding material categories that earned them.
5. **Eco-modulation:** Fee-setting will account for measurable environmental objectives and **state-mandated eco-modulation** policies.
6. **Responsible End Markets:** Fee-setting will **factor in the development and maintenance of viable responsible markets** with any associated costs attributed to the material category that requires end market development.
7. **Clarity:** Fee-setting materials and consultations will be prepared and conducted in a manner that **clearly communicates** to producers the principles, methodologies and approach that CAA is using to determine fee rates.

These principles provide guidance for the development of a fair, transparent and effective fee-setting methodology for producers. For covered materials that are neither collected nor recycled, producers of those materials will still incur fees to cover the cost of the recycling system in accordance with the Fairness principle.

CAA Fee-Setting Methodology (Base Fees)

As part of the fee-setting development process, CAA evaluated past and present frameworks used in other jurisdictions that have implemented EPR for paper, food service ware and packaging. CAA continued development of its draft methodology after the submission of the first program plan. CAA will adopt the current methodology, used to set the fees in this program plan, in all other EPR state programs where CAA has the authority to determine the methodology. Given the complexity of preparing producers to report

data for eco-modulation, CAA completed further consultations with its members and other parties to address DEQ's proposed lifecycle assessment (LCA) impact rule concepts.

To determine the base fees, the fee-setting methodology allocates the estimated material management costs to covered materials based on their share of supply tons. Material cost variations exist in part because CAA incorporated material-specific cost indices generated by an Oregon-based Activity-Based Costing (ABC) model into the fee allocations process. Other factors, such as commodity revenues and share of supply tons also play a role. The indices represent the varying costs that each material incurs in the recycling system as it is being managed from collection to transfer and consolidation, and then transportation to processing facilities. These indices are used to approximate the relative cost proportionality of covered materials managed in the program to avoid arbitrary cross-subsidization outcomes and to ensure that the requirement under ORS 459A.884(3)(b) is satisfied.

The base fees reflect CAA's material-specific funding obligations in Oregon. For example:

- The Processor Commodity Risk Fee (PCRF) is apportioned to the material categories on the USCL that flow through a Commingled Recycling Processing Facility (CRPF);
- The Contamination Management Fee (CMF) is apportioned to a portion of the material categories that fall on the PRO RAL and covered products that are not currently collected and would be considered contaminants;
- PRO depot costs are apportioned to the material categories that are included on the PRO RAL;
- Transportation reimbursement costs are borne by USCL materials;
- Collection operating costs are not reflected in the fees because this is covered by ratepayers

Similarly, the system expansion costs and operating costs identified through the ORSOP process have been assigned to material categories that receive direct PRO funding under the construct of the RMA.

The base fee schedule will be updated annually at a minimum, to reflect changes to producer supply tons, system operations and costs. The base fee schedule meets the state-mandated requirement under ORS 459A.884(3)(a) that the average base fee rates for covered materials that are not accepted for recycling shall be higher than the average base fee rates for materials that are accepted for recycling in Oregon.

Summary

- The CAA base fee-setting methodology ensures fairness for producers by differentiating material fees based on each material's supply, cost and revenue profiles
- Materials with the highest supply quantities and management costs pay the highest share of costs
- Materials generating the most commodity revenues benefit from the largest reduction in costs
- Materials that are recycled at high rates do not pay a higher share of costs relative to lower performing materials. This ensures that the core fee principles of Fairness, Material-Specific Costs and Commodity Revenues are upheld.

Separate Allocations for USCL and PRO Recycling Acceptance List Materials

In the Oregon program, there are three separate groups of covered materials: USCL, PRO recycling acceptance list, and materials not accepted for recycling. The first two groups have distinct management systems and funding obligations, e.g. the PRO is obligated to fund the expansion of on-route collection of USCL materials but not the actual collection services of USCL materials, whereas for materials on the PRO recycling acceptance list, the PRO must develop a depot network to receive these materials and then transfer them to a sorting facility or end market. To avoid cross-subsidization of the fees between these groups, the allocation of materials management costs is done within cost boundaries between these material groups.

While materials not accepted for recycling may not incur an equally high amount of management costs, they will contribute their portion of fees based on their share of supply tons multiplied by cost indices of similar materials. Specifically Identified Materials (SIMs) and other strategic materials targeted for investments are assigned investment costs directly based on their needs.

Program-Generated Revenues

Program-generated revenues are attributed to the materials that earned those revenues to reduce their share of material management costs. Crediting materials with the revenues they specifically generated rather than to the whole system provides an incentive to producers to choose packaging materials that have developed end markets.

In rare instances, materials may generate revenues that exceed their share of program costs. In such a case, the associated producer may receive an incentive payment instead of having to remit fees. To address commodities that receive negative revenues, the portion of revenues that is negative will be deducted from system revenues and treated as material-specific costs.

Where CAA only has visibility to the lump-sum system net cost for the program, we will first derive an estimate for system revenues by using the summation of material quantities recycled multiplied by each material's commodity price index. The estimated system revenue will then be allocated to materials.

Metrics and Other Data Inputs Used to Set Fees

In developing the draft fees, CAA relied on cost estimates and data modeling of critical data inputs provided by ORSOP and CAA project team members with expertise in other EPR programs. CAA relied on Oregon-specific data where possible to conform with CAA's fee-setting principles. Once the Oregon program launches, CAA will use actual supply and recycling data to inform fee-setting.

Allocation of Non-Material Management (Indirect) Costs

Non-material management costs include program operations and administration, program development and regulatory costs. These costs generally account for under 10% of annual program budgets and they have different cost drivers than material management costs. As these costs are often borne by all covered materials, they are allocated to materials using a different approach than material management costs.

Publisher In-Kind in Lieu of Paying Fees (Print and Online Advertising)

In accordance with ORS 459A.884(7), CAA shall accept the value of print and online advertising services in lieu of all or a portion of fees payable by newspaper or magazine publishers. Eligible publishers shall notify CAA of their intention to participate in the program, and CAA staff will work with each participating publisher to develop a plan for advertising opportunities that align with CAA's needs and advance the objectives of the program.

The fee payment deadline for participating publishers will be deferred with extended payment terms to accommodate CAA's validation of the in-kind contributions during the program year. Participating publishers will apply to CAA for a credit to fees payable to CAA. The credit amount shall represent a fair market value for in-kind services and is subject to audit and verification by CAA. If approved, CAA will apply the credit to the participating publisher's account. Publishers are expected to pay the base fee in its entirety as outlined in the fee schedule unless an in-kind fee credit is applied, and any remaining balance after credits are applied will need to be paid in full. More details will become available as part of the CAA policy on in-kind contributions for publishers.

Confidentiality

As per OAR 340-090-0710(2), CAA's fee-setting methodology is considered proprietary and confidential information. The detailed methodology will be included as part of a confidential addendum to the Program Plan submission.

iii. Draft Base Fee Schedule Ranges

CAA published the full detailed fee schedule for 60 material categories using two illustrative fee scenarios in the approved program plan as a requirement from DEQ's internal management directive (IMD). By using the two scenarios of fees with varying levels of estimated supply tons, CAA was creating awareness for producers about the critical impact that supply reporting has on the variability of material fee rates.

In the approved program plan, CAA published an updated program budget that was informed by the outcomes of ORSOP. CAA also published a base fee schedule with fee rate estimates for 60 reporting categories. The low and high scenarios reflect the varying levels of producer supply reporting expected.

The final 2025 Oregon base fee schedule will be published outside of this program plan amendment. It will be published in June 2025, after Oregon producers complete their supply reporting.

Draft Base Fee Rate Estimates – Full Fee Schedule for 60 Materials (Not Final)

Materials labeled N/A in the following table are not accepted on either the USCL or the PRO Recycling Acceptance List.

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
Printing and Writing Paper	Newspapers	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb
	Newsprint (inserts and circulars)	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb
	Magazines and Catalogues & Directories	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb
	Paper for General Use	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb
	Other Printed Materials	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	1.0 ¢/lb
Glass and Ceramics	Glass Bottles and Jars & Other Containers	PRO	10.0 ¢/lb	0.7 ¢/lb	0.0 ¢/lb	10.0 ¢/lb	13.0 ¢/lb	1.0 ¢/lb	0.0 ¢/lb	14.0 ¢/lb
	Ceramic – All Forms	N/A	44.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	48.0 ¢/lb	59.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	64.0 ¢/lb
Metal	Aluminum Containers	USCL	6.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	6.0 ¢/lb	8.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	8.0 ¢/lb
	Aluminum Foil and Molded Containers	PRO	42.0 ¢/lb	1.6 ¢/lb	0.0 ¢/lb	43.0 ¢/lb	56.0 ¢/lb	2.2 ¢/lb	0.0 ¢/lb	58.0 ¢/lb
	Aluminum Aerosol Containers	PRO	59.0 ¢/lb	14.0 ¢/lb	0.0 ¢/lb	73.0 ¢/lb	79.0 ¢/lb	18.7 ¢/lb	0.0 ¢/lb	98.0 ¢/lb
	Aluminum Other Forms	N/A	32.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	35.0 ¢/lb	43.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	47.0 ¢/lb
	Steel Containers	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb
	Steel Aerosol Containers	PRO	59.0 ¢/lb	14.0 ¢/lb	0.0 ¢/lb	73.0 ¢/lb	79.0 ¢/lb	18.7 ¢/lb	0.0 ¢/lb	98.0 ¢/lb
	Steel – Other Forms	N/A	21.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	24.0 ¢/lb	28.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	32.0 ¢/lb
	Metal – Small Format	PRO	23.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	23.0 ¢/lb	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	31.0 ¢/lb
	Pressurized cylinders	PRO	96.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	96.0 ¢/lb	128.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	128.0 ¢/lb
Paper/Fiber	Aseptic and Gable-top Cartons	USCL	15.0 ¢/lb	14.6 ¢/lb	0.0 ¢/lb	29.0 ¢/lb	20.0 ¢/lb	19.4 ¢/lb	0.0 ¢/lb	39.0 ¢/lb
	Kraft Paper	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb
	Corrugated Cardboard	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
	Corrugated Cardboard (Tertiary/transport) non-consumer	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb
	Paperboard	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb
	Polycoated Paperboard	N/A	28.0 ¢/lb	1.2 ¢/lb	3.2 ¢/lb	32.0 ¢/lb	37.0 ¢/lb	1.6 ¢/lb	4.3 ¢/lb	43.0 ¢/lb
	Other Paper Laminates	N/A	27.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	31.0 ¢/lb	37.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	41.0 ¢/lb
	Other Paper Packaging	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	3.0 ¢/lb
	Paper – Small Format	USCL	32.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	32.0 ¢/lb	43.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	43.0 ¢/lb
Plastic – Rigid	PET (#1) – Bottles, Jugs, and Jars (Clear/Natural)	USCL	17.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	17.0 ¢/lb	23.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	23.0 ¢/lb
	PET (#1) – Bottles, Jugs, and Jars (Pigmented/Color)	N/A	55.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	58.0 ¢/lb	73.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	78.0 ¢/lb
	PET (#1) – Thermoformed Containers, Cups, Plates, Trays	N/A	22.0 ¢/lb	30.4 ¢/lb	3.2 ¢/lb	55.0 ¢/lb	29.0 ¢/lb	40.5 ¢/lb	4.3 ¢/lb	74.0 ¢/lb
	PET (#1) – Tubs	USCL	23.0 ¢/lb	3.9 ¢/lb	0.0 ¢/lb	27.0 ¢/lb	31.0 ¢/lb	5.2 ¢/lb	0.0 ¢/lb	36.0 ¢/lb
	PET (#1) – Other Rigid Items	N/A	55.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	58.0 ¢/lb	73.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	78.0 ¢/lb
	PET (#1) – Lids	N/A	43.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	46.0 ¢/lb	57.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	61.0 ¢/lb
	HDPE (#2) – Bottles, Jugs and Jars (Clear/Natural)	USCL	17.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	17.0 ¢/lb	23.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	23.0 ¢/lb
	HDPE (#2) – Bottles, Jugs and Jars (Pigmented/Color)	USCL	19.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	19.0 ¢/lb	25.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	25.0 ¢/lb
	HDPE (#2) – Pails & Buckets	PRO/USCL	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	31.0 ¢/lb	41.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	41.0 ¢/lb

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
	HDPE (#2) – Tubs, Nursery (plant) pots & trays	USCL	19.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	19.0 ¢/lb	25.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	25.0 ¢/lb
	HDPE (#2) – Package Handles, Lids	PRO	31.0 ¢/lb	1.5 ¢/lb	0.0 ¢/lb	32.0 ¢/lb	41.0 ¢/lb	2.0 ¢/lb	0.0 ¢/lb	43.0 ¢/lb
	HDPE (#2) – Other Rigid Items	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	67.0 ¢/lb	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	89.0 ¢/lb
	PVC (#3) – Rigid Items	N/A	78.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	82.0 ¢/lb	105.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	109.0 ¢/lb
	LDPE (#4) – Bottles, Jugs and Jars	N/A	78.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	82.0 ¢/lb	105.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	109.0 ¢/lb
	LDPE (#4) – Lids	PRO	31.0 ¢/lb	2.3 ¢/lb	0.0 ¢/lb	33.0 ¢/lb	41.0 ¢/lb	3.1 ¢/lb	0.0 ¢/lb	44.0 ¢/lb
	LDPE (#4) – Other Rigid Items	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	67.0 ¢/lb	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	89.0 ¢/lb
	PP (#5) – Bottles, Jugs and Jars	USCL	44.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	44.0 ¢/lb	58.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	58.0 ¢/lb
	PP (#5) – Other Rigid Containers, Cups, Plates, Trays (non-nursery (plant))	N/A	22.0 ¢/lb	6.9 ¢/lb	3.2 ¢/lb	32.0 ¢/lb	30.0 ¢/lb	9.2 ¢/lb	4.3 ¢/lb	43.0 ¢/lb
	PP (#5) – Lids	PRO	31.0 ¢/lb	2.3 ¢/lb	0.0 ¢/lb	33.0 ¢/lb	41.0 ¢/lb	3.1 ¢/lb	0.0 ¢/lb	44.0 ¢/lb
	PP (#5) – Tubs, Pails and Buckets, Nursery (plant) pots & trays	USCL /PRO	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	31.0 ¢/lb	41.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	41.0 ¢/lb
	PP (#5) – Other Rigid Items	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	67.0 ¢/lb	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	89.0 ¢/lb
	PS (#6) Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers	N/A	190.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	194.0 ¢/lb	254.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	258.0 ¢/lb

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
	PS (#6) White Expanded/Foamed Cushioning and Void Fill	PRO	108.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	108.0 ¢/lb	144.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	144.0 ¢/lb
	PS (#6) Colored Expanded/Foamed Cushioning and Void Fill	N/A	190.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	194.0 ¢/lb	254.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	258.0 ¢/lb
	PS (#6) Rigid Non-Expanded	N/A	67.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	71.0 ¢/lb	90.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	94.0 ¢/lb
	PLA, PHA, PHB – Rigid Items	N/A	78.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	82.0 ¢/lb	105.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	109.0 ¢/lb
	Other/Mixed Rigid Plastic	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	67.0 ¢/lb	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	89.0 ¢/lb
Plastic – Flexible	HDPE (#2)/LDPE (#4) Flexible and Film Items	PRO	54.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	54.0 ¢/lb	72.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	72.0 ¢/lb
	HDPE (#2)/LDPE (#4) (Pallet Wrap) non-consumer	PRO	54.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	54.0 ¢/lb	72.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	72.0 ¢/lb
	PP (#5) Flexible and Film Items	N/A	104.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	107.0 ¢/lb	138.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	143.0 ¢/lb
	PLA, PHA, PHB – Flexible and Film Items	N/A	104.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	107.0 ¢/lb	138.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	143.0 ¢/lb
	Plastic Laminates and Other Flexible Plastic Packaging	N/A	104.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	107.0 ¢/lb	138.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	143.0 ¢/lb
Plastic – Other	Plastic – Small Format	PRO	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	31.0 ¢/lb	41.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	41.0 ¢/lb
	Plastic containers for motor oil, antifreeze, or other automotive fluids, pesticides or herbicides, or other hazardous materials (flammable, corrosive, reactive, toxic)	N/A	201.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	205.0 ¢/lb	269.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	273.0 ¢/lb

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
Wood and Other Organic Materials	Wood and Other Organic Materials	N/A	154.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	157.0 ¢/lb	206.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	210.0 ¢/lb
			Average Fee Rate		17.0 ¢/lb		Average Fee Rate		23.0 ¢/lb	

Table 22

Note the fees are directly proportional to the reported volumes, underpinning the importance of accurate producer reporting in advance of the July 1, 2025 program start date. As part of the fee-setting process, CAA aggregated some material categories because they are generally handled in the same way and they ship in the same commodity bale. Categories affected include: 1) all printed papers, 2) aluminum and steel aerosols, 3) kraft paper along with paperboard and other paper packaging, 4) lids, 5) flexible films, and 6) the majority of rigid plastics (with the exception of PET and HDPE bottles). Aggregation of those categories only occurred if the material categories had like treatment, either being collected on the USCL list, the PRO RAL, or were a non-accepted material.

Accurate fee-setting for EPR requires four key pieces of information:

- 1) An understanding of the universe of obligated producers;
- 2) Reliable program cost estimates;
- 3) Availability of critical data inputs; and
- 4) Accurate reporting of supply weights by material type across which program costs can be spread

With the completion of ORSOP, CAA is now equipped with the information necessary to finalize the program budget. Data from ORSOP also allows CAA to present more accurate, but not yet final, fee rate estimates for the proposed 60 fee reporting categories in this program plan submission. The types of information from ORSOP that were used in this program plan are described in Appendix E.

Having assessed this new information from ORSOP, CAA has determined that there is an overall, substantial cost reduction to the planned program. However, even with the refinement of estimates based on ORSOP results, it is important to note that rates can only be finalized once producer supply data is received in the first quarter of 2025.

Flat Fees

In accordance with ORS 459A.884(6), CAA proposes tiered uniform fees for low volume producers with gross revenues of less than \$10 million or covered materials sold for use in Oregon of less than five metric tons. Producers with gross revenues of less than \$10 million but supplying covered materials sold for use in Oregon greater than five metric tons, or vice-versa, may also choose to pay a flat fee according to the following schedule:

Tiered Flat Fee Structure (for producers with gross revenues of \$5m up to \$9.999m)		
Annual Supply Tons (Metric)	Low	High
1 to 2.5 tons*	\$700	\$900
Over 2.5 tons to 5 tons*	\$1,400	\$1,900
Over 5.0 to 7.5 tons	\$2,400	\$3,100
>7.5 tons	\$3,300	\$4,400

Table 23

**These flat fee tiers are also available to producers with over \$10 million in gross revenues.*

DEQ's feedback to CAA from the first program plan was to extend the tonnage tiers to allow low volume producers with greater than five tons to participate. DEQ also suggested that low volume producers who do not wish to declare which tier they belong to should pay the highest level of flat fees. Low volume producers who are eligible to pay flat fees have the option to:

1. Report all packaging weights and pay actual base fees
2. Report against a flat fee tier reflecting a producer's total weights, and pay the corresponding flat fee, or
3. Not report at all, and pay the highest flat fee

iv. Producer Fee Incentives, Other Than Graduated Fee Adjustments

Oregon's Recycling Modernization Act mandates that the average fee rate for covered materials that are not accepted for recycling be higher than the average fee rate for covered materials that are accepted for recycling, as outlined in ORS 459A.884(3)(a). This statutory requirement is arguably a fee incentive that is implemented within the base fee structure, outside of Graduated Fees.

v. Meeting the Statutory Requirement

In accordance with ORS 459A.884(3)(a), Oregon program base fees need to satisfy the requirement for the average base fees for all covered materials not accepted for recycling to be higher than the average base fees for all covered materials that are accepted for recycling in Oregon. This requirement has been met in the current draft fee schedule, as outlined in the following table:

Avg. Fee	Low	High
USCL	3 ¢/lb	4 ¢/lb
PRO	26 ¢/lb	34 ¢/lb
N/A	61 ¢/lb	81 ¢/lb
	17 ¢/lb	23 ¢/lb

Table 24

As part of CAA's fee-setting methodology, CAA also developed a discretionary state-adjustment factor (SAF) that will be activated when the average fee of not accepted materials is lower than the average fees of accepted materials. The activation transfers material management (MM) costs from the group of accepted materials to the group of non-accepted materials to generate a positive fee difference of no more than \$1/ton or 5¢/lb between the average base fee rate of not accepted materials and the average base fee rate of accepted materials. After the cost transfer is complete, the newly assigned MM costs are allocated amongst the non-accepted materials based on their material management cost proportions. The non-material management costs of the non-accepted materials will also be reallocated, as a result of this transfer of MM costs. The goal of the SAF is to ensure that the statutory fee-setting condition is met.

This factor shifts material management costs from the group of accepted materials to non-accepted materials to generate a positive delta between the average base fees of not accepted materials and accepted materials. Once transferred, the costs are allocated amongst the non-accepted materials based on their material management cost proportions. Below are the calculation steps for the state-adjustment factor:

1. One hundred percent of the material management costs are allocated by material specific supply tons using the material cost indices generated from activity-based costing. The non-material management costs are allocated by the material management cost allocation ratio.
2. The average fees of accepted and not accepted material are calculated, as shown in the below table. If the accepted material fee is lower than the not accepted material fee, then the requirement is met, and no further action is required.
3. However, if the accepted material fee is higher than the not accepted material fee, as in the below illustrative example where the fee per ton for not accepted materials is at \$88.98 and accepted material is at \$103.24 (which is lower by \$14.26), then the requirement is not met.

4. In the next step, an optimized percent (8%) of material management cost is assigned to not accepted materials to make their fees higher than accepted materials. Excel goal seek function (Newton-Raphson method) is used to calculate the optimized percent to create a positive difference between accepted and not accepted materials. The remaining 92% of material management cost is allocated using the supply tons and material cost index.
5. The non-material management costs are allocated by the new material management cost allocation ratio after the state-adjustment factor calculation.
6. The new fee per ton will meet the requirement as demonstrated in the table below:

The numbers mentioned in the example are for illustrative purposes only.

Material Type	Average Fee per Ton	Average Fee per Ton with State-Adjustment Factor
Accepted	\$103.24	\$95.10
Not Accepted	\$88.98	\$96.10
Difference	-\$14.26	\$1.00

Table 25

CAA requests the flexibility to extend the application of the SAF to adjust base fees for specifically identified materials and not-accepted materials within the eight material classes (listed in the draft base fee schedule table above) to ensure that the fee structure disincentivizes producers from choosing lower cost, non-accepted (and non-recyclable) materials. For this application, the SAF may be used to transfer material management costs within a material class, from specific materials that have a SIM designated for on ramping to the USCL, to not-accepted materials without an identified on-ramping pathway. Doing so will help ensure that the SIM work, such as on-ramping strategy for not-accepted materials and improving end market outcomes for accepted materials, will not be compromised or delayed in instances where other non-accepted materials may have much lower fees than materials with specific investments to onramp to the USCL. The fees for SIMs, which require some intervention to improve outcomes and reduce environmental impact may be substantially higher (due to the need for capital investments) than a substitutable material that is not recyclable or may cause disruption in the recycling system. If a fee differential persists, producers may be less incentivized to shift to the material slated for SIM intervention, and those anticipated beneficial outcomes of SIM investments could be delayed. Once reliable data are compiled from LCAs, CAA will need to employ the use of maluses and develop a principle for applying them to problematic materials.

CAA will only apply the SAF individually to a particular not-accepted material for the course of this program plan period. Should CAA wish to continue applying the SAF individually to a material, CAA will request approval again in the 2028-2032 program plan. Furthermore, application of the SAF to individual, non-accepted materials will not result in violation of the statutory requirement that across the material portfolio and on a ton-weighted average, non-recyclables are charged higher fees compared with recyclables.

CAA acknowledges that DEQ has authority to adjust SIM designations at any time, following a consultation with the Recycling Council. In the event that a covered product is either added to or removed from the list of SIMs, CAA would propose to keep fees the same (that is, not apply the SAF) until such time as CAA either updates the entire fee schedule for all covered products, or submits and receives approval from DEQ of an amendment to this program plan.

This additional tool in the fee-setting process supports the state's goals of reducing environmental impacts while keeping LCAs as the foundation for eco modulation under the RMA.

In the first program plan submission, CAA did consider recyclability as a performance factor in the development of the fee-setting methodology due to the requirement for relative recycling rates to be considered for eco-modulation under ORS 459A.884(4). CAA described an approach, where a portion of the costs of managing covered products in Oregon would be allocated to individual materials according to their relative recycling rate, such that the materials with higher recycling rates would be assigned a smaller portion of the cost and vice versa. CAA did not carry forward this option at the time because this would have required an "alternative membership fee structure" pursuant to ORS 459A.884(5), and CAA was also putting focus on prioritizing environmental impact reduction as the prime basis for eco-modulation.

Nonetheless, CAA anticipates revisiting the merit and feasibility of using recycling performance for covered materials, as a factor in producer fees, in subsequent plan periods.

b. Graduated Fee Algorithm and Methods

i. The Algorithm and Accompanying Descriptive Text for the Proposed Graduated Fee Structure

As per ORS 459A.875(2)(a)(F), the Oregon program shall encourage producers to make continual reductions in the environmental and human health impacts of covered materials. This will be administered through a graduated fee structure, called eco-modulation, as described in ORS 459A.884, that will be used to adjust fees for producers who make or have made (within a two-year period) impactful changes to the ways in which they produce, use and market covered materials in Oregon. According to DEQ's latest "Guidance on Ecomodulated Fees," while the law requires PRO(s) to consider at a minimum the five factors¹⁵ listed in the statute, it does not require any of those factors to be included in the fee schedule.¹⁶

CAA continues to fully support the notion of developing a graduated fee structure to incentivize producers to continually reduce environmental and human health impacts and commits to implementing a fee methodology that meets these regulatory requirements. Through the incentive of the substantial impact reduction, the bonus aims to drive innovations in packaging design, production and material selection that lead to continual impact reductions, a core objective of the RMA. A summary of LCA bonus types and how they deliver the requirement for upholding the principles of impact reduction can be found in Tables 26 and 27.

Because eco-modulation relies heavily on robust stock keeping unit (SKU)-level packaging data, CAA will ensure sufficient readiness on the part of producers to capture and report this type of data and on the part of CAA's internal processes and systems to intake non-weight supply-based data. To be prudent, CAA will also model out financial impacts to the program with the introduction of any eco-modulation scheme. Introducing eco-modulation in the first program plan period is challenging. Generally, in other jurisdictions where PROs have introduced eco-modulation, they have done so for mature programs that already have established material base fees, have had time to ensure accurate producer reporting, and have the historic data necessary to model the financial impacts of different types of fee adjustments.

The life cycle evaluation (LCE) rules, specifically OAR 340-090-0910(3), require producer responsibility organizations to grant two bonuses to producers that voluntarily evaluate and disclose the life cycle environmental impacts of their covered materials.

¹⁵ The five factors listed in ORS 459A.884(4) are (a) The post-consumer content of the material, if the use of post-consumer content in the covered product is not prohibited by federal law; (b) The product-to-package ratio; (c) The producer's choice of material; (d) Life cycle environmental impacts, as demonstrated by an evaluation performed in accordance with ORS 459A.944; and (e) The recycling rate of the material relative to the recycling rate of other covered products.

¹⁶ DEQ (2024). [Guidance on Ecomodulated Fees – Plastic Pollution and Recycling Modernization Act \(SB 582, 2021\)](#), pg. 3.

In this program plan amendment submission, CAA may grant three voluntary LCA bonuses (A, B and C) to producers¹⁷.

CAA will grant Bonus A to producers that voluntarily evaluate and disclose LCA impacts of the packaging used for their product SKU or batch of related SKUs. CAA will grant Bonuses B and C to producers that can demonstrate substantial LCA impact reductions achieved through changes made to the packaging used for their product SKU or batch of related SKUs, including switches from single-use packaging to reusable/refillable packaging formats. Producers interested in Bonus B are required to conduct an LCA before and after a packaging change is made to assess the impacts of that change to a covered material used for packaging their products.

The high-level principles underpinning the design of these bonuses are:

- Phase in implementation and introduce caps to limit financial exposure to the program.
- For Bonus A, the level of incentives should correlate with the level of supply.
- For Bonuses B and C, the level of incentives should correlate with the level of supply and environmental impact reduction.
- The level of incentives must not exceed the producer's base fees for a material category.
- All producers are paying their fair share of fees and will be eligible to receive bonuses proportional to their level of impact.

To align with administrative rules, all bonuses require the producer to conduct an LCA in accordance with DEQ's life cycle evaluation rules (LCE rules) and prepare a compliant project report for certain covered materials in their packaging portfolio. The cost of LCAs can vary widely, depending on whether a producer has in-house capabilities to develop LCAs and is already conducting LCAs as part of their normal business practice, or if a producer does not have this capability and needs to contract out LCA work. The process of third-party verification of the LCAs will also likely impact the costs.

Because of this wide variability in costs, the level of the bonus set should correlate with the level of impact achieved from the packaging changes, rather than the cost of conducting and reviewing an LCA. This approach is fair because producers will be eligible for fee incentives that are proportional to their supplied quantities and their level of environmental impacts.

For any SKU or batch of SKUs, a producer may be eligible for only one of the bonuses (A, B or C).

¹⁷ These LCA evaluation requirements for the bonuses are separate from the LCA mandated requirements of the top 25 producers who are required to conduct LCAs on their 1% of SKUs.

Bonus A – Granted to Producers for Evaluating the LCA of a SKU (or Batch¹⁸ of SKUs) and Disclosing the Results in an LCA Project Report

CAA will grant Bonus A to producers that perform an LCA and disclosure on up to 10 SKUs, in accordance with DEQ's LCA standards. In future years, CAA may consider a revision to the number of SKUs per producer eligible for this bonus, pending feedback from DEQ. The LCA needs to be completed on or after July 1, 2025. CAA will set Bonus A at 10% of base fees,¹⁹ associated with all non-exempted, primary materials in the SKU or SKU batch that is being assessed. Bonus A will be capped at \$20,000 for each LCA evaluated and disclosed in a project report that conforms to the final LCE rules and standards. As CAA gathers more data and understanding of the impact of bonuses on the budget and on producer participation, CAA may reassess the cap on the bonus.

Bonus A will be applied to all non-exempted, primary²⁰ packaging materials reported and used for a SKU or batch of SKUs. Secondary and tertiary (transport) packaging will not be eligible for the bonus because these types of packaging typically are not part of producer packaging decisions. Some exceptions may apply.

CAA will grant Bonus A as a credit on the fee invoice in the program year following receipt and approval of a compliant LCE project report (i.e., Bonus A LCEs received in 2025 will be used to grant bonuses in 2026).

The theoretical example below shows the impact of Bonus A.

¹⁸ The LCE rules allow for batch evaluations (an LCA performed on multiple SKUs using the same primary packaging material or that are part of the same product category).

¹⁹ Base fees are the material-specific fees associated with the primary material under LCA evaluation (before any bonuses). Base fees will cover the costs of material management, non-material management and accumulation of program reserves. The 10% bonus will be calculated on the base fees, excluding the portion for program reserves.

²⁰ **Primary Packaging:** Directly contains and protects the product. Designed for product integrity and ease of use.

Secondary Packaging: Groups or encases the primary packages. Facilitates handling, branding, and retail presentation.

Tertiary Packaging: Used for bulk handling, storage, and transportation. Secures multiple units of secondary packaging, often seen in pallets or shrink-wrapped setups.

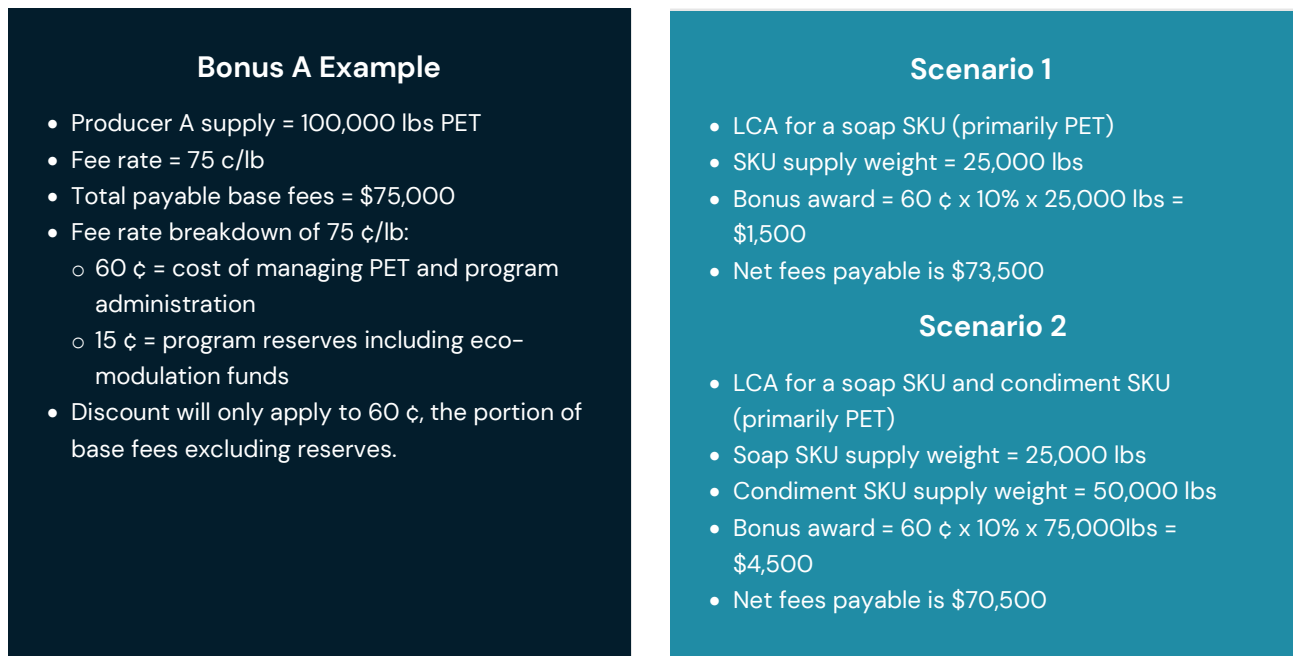


Figure 8

Bonus B – Granted to Producers for Evaluating the LCA of a SKU (or Batch of SKUs) and Disclosing the Results in an LCA Project Report, and Demonstrating Substantial Impact Reductions to their Packaging

Bonus B will be granted to producers that conduct an LCA that demonstrates substantial impact reductions through a packaging change performed on a SKU or batch of SKUs, for up to 10 SKUs (excluding switches to refillable or reusable packaging formats). Changes made to the packaging from December 2024 onward qualify; the LCA demonstrating the substantial impact reduction needs to be completed and submitted to CAA by May 31, 2026, with any bonuses granted to be applied as credits on 2027 base fees.

CAA will provide a graduated level of bonus based on three impact reduction tiers:

- Tier 1: impact reduction of 10%–40%
- Tier 2: impact reduction of greater than 40%–70%
- Tier 3: impact reduction of greater than 70%

CAA will set Bonus B higher than Bonus A across all three impact reduction tiers. The total bonus CAA grants will be based on a multiplier applied to Bonus A up to an appropriate cap that will provide greater incentive for producers to apply for Bonus B than for Bonus A. Bonus B increases based on the level of impact reduction demonstrated, up to a cap amount of \$50,000 for a SKU or batch of SKUs. Producers may demonstrate impact reductions either through improvements made to existing packaging formats or through a switch of packaging formats.

CAA designed Bonus B to incentivize producers to improve packaging or switch to packaging in ways that improve environmental outcomes, such as lightweighting, increasing PCR content, or increasing recyclability, to deliver continual impact reduction. Bonus B will reward packaging improvements for all non-exempt, primary packaging used for the SKU(s) under evaluation. Bonus B will be a multiplier of Bonus A and will represent a significantly higher amount to reward impact reduction outcomes. The bonus structure may evolve during the program plan period to ensure its relevancy, value and effectiveness in leading to improved environmental outcomes.

Bonus B will be granted to all non-exempt, covered product (if covered material) and primary packaging materials associated with the SKU or batch of SKUs. Secondary packaging and tertiary/ transport packaging are excluded unless the producer can demonstrate that they are making packaging design decisions on this type of packaging. A producer would also need to demonstrate that the tertiary packaging is not being considered for 869 exemptions.

(On this point, CAA requests a program plan variance relating to the eligible packaging type for Bonus B, removing secondary packaging from eligibility for this bonus. To be consistent across all LCA bonuses, CAA confirms that while all primary, secondary and tertiary packaging will be included in the LCA evaluation, only the primary packaging associated with the SKU will be granted bonuses.)CAA has set the bonus levels and caps to ensure that the total bonus amounts of Bonus B will always exceed those of Bonus A, in order to offer extra incentives to producers for making improvements to their packaging.

For each SKU or batch of SKUs, a producer will be eligible for either Bonus A or Bonus B, but not both bonuses. This policy is reasonable because Bonus B already accounts for the effort taken to evaluate and generate LCA reports for public disclosure. Bonus A is intended to incentivize producers to conduct an LCA and disclose the results to the public. Bonus B is intended to incentivize producers to make changes to packaging that result in impact reductions, which can be demonstrated through an LCA evaluation. Bonus B is set higher than Bonus A because of the extra effort taken to make the packaging change, along with the resulting impact reductions achieved. Both bonuses are paid out in one year. CAA has structured Bonus B in a way that creates a stronger incentive for producers to apply for the substantial impact reduction bonus for any chosen SKU or batch, rather than the voluntary disclosure bonus.

For each SKU or batch of SKUs, a producer is eligible for any of the bonuses every three years because CAA encourages producers to make assessments and packaging changes that result in impact reductions across as many SKUs as possible. Exceptions may be made where there are substantive changes made to the SKU packaging, requiring a new LCA evaluation to be submitted.

The theoretical examples below show the impact of Bonus B on the primary materials used as packaging for a product SKU or SKUs.

Bonus B Example 1

Producer A supply weight and fee rates:

- 860,00 lbs HDPE container at 19 ¢/lb
- 90,000 lbs PP cap at 35 ¢/lb
- 50,000 lbs PE label at 55 ¢/lb

Total payable base fees = \$222,400

- HDPE container base fees = \$163,400
- PP cap base fees = \$31,500
- PE label base fees \$27,500
- Discount will only apply to base fees excluding reserves

Scenario: Packaging Switch

- Packaging switch for detergent pods from HDPE container, PP cap and PE label to HDPE film pouch
- HDPE film pouch fee rate = 55 ¢/lb
- SKU supply weight = 180,000 lbs (82% impact reduction or Tier 3 improvement)
- HDPE film pouch base fees = \$99,000 (55.5% lower base fees)
- Bonus A award = \$7,920
- Bonus B Tier 3 award = 2.5 x Bonus A = \$19,800
- HDPE film pouch base fees after Bonus B award = \$79,200*

**Only larger Bonus B applies.*

Bonus B Example 2

Producer A supply weight and fee rates:

- 850,000 lbs paperboard at 3 ¢/lb
- 100,000 lbs HDPE film pouch at 55 ¢/lb
- 50,000 plastic laminate at 79 ¢/lb

Total payable base fees = \$120,000

- Paperboard base fees = \$25,500
- HDPE film pouch base fees = \$55,000
- Plastic laminate base fees = \$39,500
- Discount will only apply to base fees excluding reserves

Scenario: Packaging Improvement

- Packaging improvement for a cereal SKU paperboard package by increasing PCR content
- Producer A increased PCR content, performed an LCA that showed improvement of 51% in impact (Tier 2 improvement)
- Bonus A award = \$9,600
- Bonus B Tier 2 award = 2.25 x Bonus A = \$21,600
- Net base fees after Bonus B award = \$98,400*

**Only larger Bonus B applies.*

Figure 9

Bonus C – Granted to Producers for Evaluating the LCA of Switching from Single-Use to Reusable or Refillable formats for a SKU (or Batch of SKUs) and Disclosing the Results in an LCA Project Report, and Demonstrating Substantial Impact Reductions to their Packaging

CAA will grant Bonus C to producers that conduct an LCA that demonstrates substantial impact reductions achieved by switching from single-use packaging to reusable/refillable packaging formats for a product SKU or batch of related SKUs. To qualify, the packaging switch must have been made Dec 1, 2024, and the LCA

assessing this change must be submitted to CAA by May 31, 2026. For LCAs received by this date, CAA will grant bonuses as credits on 2027 base fees.

Refillable and reusable packaging definitions are provided in the DEQ Life Cycle Evaluation Definitions under the final DEQ Phase 2 rules as per OAR 340-090-0900(38)(41). As there are many diverse reusable and refillable product-packaging systems, further details on eligible formats and systems will be laid out in CAA producer reporting guidance documentation, intended to be released in the fall of 2025.

Current definitions in the rules read as:

(38) Refillable packaging product means a packaging product that is: (a) Designed to be refilled by consumers multiple times for the same or similar purposes in its original format; (b) Refilled without the support of any commercial or publicly-owned infrastructure and without return of the packaging to the producer or a third-party after each use; and (c) Actually refilled by consumers.

(41) Reusable packaging product means a packaging product that is: (a) Designed to be recirculated multiple times for the same or similar purpose in its original format; (b) Supported with adequate commercial or publicly-owned infrastructure to enable the highest and best reuse; (c) Returned to a producer or third party after each use; and (d) Actually reused.

CAA considers it consistent with the intent of OAR 340-090-0930(3)(c) that for transitions from single use to refillable packaging products, that the “after” scenario should encompass impacts of both the refillable packaging product and single-use refill cartridges. CAA plans to issue corresponding guidance to its member producers.

The level of impact reduction will be determined based on the break-even point,²¹ i.e., the number of reuses required for the environmental impact of a reusable or refillable packaging product to equal the environmental impact of an alternative single use covered product. Any additional reuse cycles of a reusable or refillable packaging product beyond the break-even point will result in environmental benefits of switching to reusable or refillable packaging systems. A producer must calculate a break-even point in their Bonus C submission focused on a reusable packaging product, and after a three-year period (so called “grace period”), the actual number of reuses must be compared with and exceed the break-even point to qualify for the fee adjustment.

Because of the wide variability of costs to introduce reuseable or refillable packaging systems, the level of Bonus C, like Bonus B, will correlate with the level of impact of a producer’s packaging and the corresponding level of impact reduction resulting from a producer action to address that impact. Accordingly, CAA will index Bonus C to the same impact reduction tiers as Bonus B, which correlates to a producer’s supply quantity of the covered material, as shown below in Table 24. This approach creates a level playing field for all producers, because producers are paying fees and receiving bonuses proportional to their supply quantities and are eligible to receive bonuses proportional to their level of environmental impact.

²¹ OAR 340-090-0900(4

Impact reduction tiers for Bonus B and Bonus C

Modified	Tier 1	Tier 2	Tier 3
Impact Reduction %	10 – 40%	40 – 70%	70% +
Multiplier on Bonus A	2.0	2.25	2.5
Max Payout per SKU or batch	\$40,000	\$45,000	\$50,000

Table 26

Bonus C Eligibility and Reporting Requirements

Eligibility for Bonus C

Bonus C is intended to promote sustainable, accessible and inclusive reuse/refill programs with reduced environmental impacts relative to single-use packaging alternatives. It is important that reuse and refill systems be defined to be at adequate scale and access within Oregon to qualify for the bonus.

Bonus C Eligibility:

- Producers may submit a maximum of 10 SKUs or SKU batches, with submissions starting May 31, 2026.
- For bonuses granted in 2027, LCA reports and submissions are due by May 31, 2026.
- Granted to the eligible **reusable packaging SKU(s)** each year over a three-year time frame as an adjustment to base fees paid in the first year, when eligibility conditions are met. Producers may reapply every three years if substantive changes are made to the SKU/SKU batches (i.e., warranting a new LCA study and report creation).
- Granted to the eligible **refillable packaging SKU(s)** over one year, as an adjustment to base fees paid. Producers may reapply in subsequent years if substantive changes are made to the SKU/SKU batches (i.e., warranting a new LCA study and report creation).
- Packaging switches must have been made on or after Dec. 1, 2024, and no earlier than two years prior to submission to the PRO.
 - LCA Project Reports must be completed on or after July 1, 2025, and no earlier than one year prior to submission to the PRO.
- Impact reduction of at least 10% must be achieved based on the **break-even point** analysis between LCA impacts of reusable or refillable packaging relative to impacts of alternative single use packaging.
- Packaging under evaluation for Bonuses A, B and C must be supplied in Oregon. For Bonuses A and B, the packaging must have been on the market for at least one year, and for Bonus C, the packaging must have been on the market for at least six months prior to the LCA evaluation.

Bonus C will be granted to all non-exempt, covered product (if covered material) and primary packaging materials associated with the SKU or batch of SKUs. Secondary packaging and tertiary/transport packaging are excluded unless the producer can demonstrate that they are making packaging design decisions on this type of packaging. A producer would also need to demonstrate that the tertiary packaging is not being considered for 869 exemptions.

Reporting Requirements for Bonus C

Additional data requirements for reuse/refill systems include:

- Bonus C requires key reusable/refillable product-packaging system datapoints. Actual measurements of return/refill rate factors and reuse/refill cycles (where required or provided) must be obtained through real-world tracking across the entire state using applicable global and national standards or guidance from DEQ.
- Reusable or refillable packaging materials are covered materials in Oregon and will be charged base fees. LCA bonuses are only granted on covered materials with chargeable base fees.

Producers will be asked to submit all LCA bonus submissions by May 31, 2026, as part of the annual reporting cycle. Each bonus is only applicable to the portion of the supply weight/fees associated with packaging used for the product SKU(s) in the LCA evaluation.

While bonuses granted to producers for impact reductions achieved from switching from single-use to reusable packaging are valid for 3 years, the amount of the bonus granted in each year after the first year, will be based on:

- The reported supply of the packaging covered by the LCA in the subsequent years, and
- The base fee rates from the first year of the bonus.

This approach ensures that fluctuations in the supply quantities of the reusable packaging under evaluation are fairly reflected in the yearly bonuses. For example, an increase in supply due to an expansion of the reuse program in the state will lead to higher bonuses paid to producers, incentivizing producer efforts to scale and expand the reuse program. Producers may use the same LCA inventory data and reports during these three years. Lastly, should producers provide actual return rates (instead of projected rates) within their 3-year period, this can be reported alongside yearly SKU volumes and eligibility criteria but will not alter the level of the bonus award.

There are three ways to achieve Bonus C:

- Switching from Single-Use Packaging to Reusable Packaging (using Projected Return Rates)
- Switching from Single-Use Packaging to Reusable Packaging (using Actual Return Rates)
- Switching from Single-Use Packaging to Refillable Packaging (using Actual Refill Rates)

Bonus C Option 1: Switch from Single-Use Packaging to Reusable Packaging (using Projected Return Rates)

The first option to achieve Bonus C is to make a switch from a covered product single-use packaging SKU to

a reusable packaging format SKU using projected return rates. As reusable packaging systems may be nascent and take time to mature, DEQ rules allow a three-year grace period within which producers may use projected return rates, after which actual return rates must be reported. Producers are expected to provide rationale for such projections, in determining the environmental impact of a reusable or refillable packaging product.

Under Option 1, Bonus C is equivalent to Tier 1 impact reduction only, which is set to a maximum 2.0 times higher than Bonus A, up to a cap of \$40,000 for the SKU or SKU batch. The bonus award for the SKU(s) once approved will be granted each year for three years, as long as the eligibility conditions continue to be met within that time frame.

Yearly reporting will include updated SKU volumes of reusable SKUs/SKU batches each year, in which bonus will also be proportionally calculated and adjusted based on reusable packaging SKU volumes, using fee rates from the first year. LCA reports do not have to be resubmitted during this period. Producers may also choose to report actual return rates (alongside projected) if available but do not need to reassess LCA in this case. This disclosure, however, will not change their bonus allowance however, as they will still be capped to Tier 1 or \$40,000 per SKU or SKU batch. The bonus for the SKU(s) may be reapplied after the first three years using actual return rates and an updated LCA evaluation.

Bonus C Option 2: Switch from Single-Use Packaging to Reusable Packaging (using Actual Return Rates)

The second option to achieve Bonus C is to make a switch from a covered product single-use packaging SKU to a reusable packaging format using actual return rates from the outset of the bonus period. Producers will measure and report actual return rates during the three-year bonus period. Producers are expected to provide proof for the determination of their return rates, and how they are able to achieve the break-even point of their single-use packaging impacts. If producers are able to measure and report actual return rates that meet or surpass their single-use packaging break-even point, producers will be granted Bonus C which is set to at least 2 times higher than Bonus A, up to a cap of \$50,000 for the SKU or batch.

The bonus award for the SKU(s) once approved will be granted each year over a three-year timeframe as long as the eligibility conditions continue to be met within that time frame. Yearly reporting will include actual return rates and updated SKU volumes of reusable SKUs/SKU batches each year, in which bonus will also be proportionally calculated and adjusted based on reusable packaging SKU volumes. Bonus calculations will use fee rates from the first year. LCA reports do not have to be resubmitted during this period, even with fluctuations in return rates. The bonus for the SKU(s) may be reapplied every three years, provided substantial environmental impact reductions are achieved.

Bonus C Option 3: Switch from Single-Use Packaging to Refillable Packaging (using Actual Refill Rates)

The third option to achieve Bonus C is to make a switch from a covered product single-use packaging SKU to a refillable packaging format using actual refill rates. Producers must measure and report actual refill rates to be eligible for the bonus each year. There is no eligible grace period for refillable packaging. Under Option 3, Bonus C is set to at least 2 times higher than Bonus A, up to a cap of \$50,000 for the SKU or batch.

Producers are expected to provide data and the methodology to substantiate the reported refill rates

utilized for their LCA calculations. Producers of refillable packaging products must use actual data, obtained through real-world tracking or testing of refillable packaging products sold across the state. As refillable packaging systems may include multiple SKUs (i.e., a larger bulk refill container and a smaller refillable container), bonuses will be paid to the proportion of relevant SKUs substantiated by producers as part of the refill packaging system. The bonus for the SKU(s) will be granted for one year only; the specific SKU(s) can be reapplied for future bonuses every three years provided substantial environmental impact reductions are achieved.

Summary of Bonus C Options

Data	Bonus Size	\$ Cap/SKU or Batch	Duration
Projected <u>return</u> rates (for reusable packaging)	<u>Capped at 2x higher</u> than Bonus A	\$40,000	3 years
Actual <u>return</u> rates (for reusable packaging)	At <u>least 2x higher</u> than Bonus A	\$50,000	3 years
Actual <u>refill</u> rates (for refillable packaging)	At <u>least 2x higher</u> than Bonus A	\$50,000	1 year

Table 27

Below is an example of a Bonus C calculation on the primary materials used for a refillable product SKU.

Bonus C Example – Refillable hand soap sold in regular-size dispenser and bulk refill container

Producer supply weight and fee rates:

- 680,000 lbs HDPE container at 22 ¢/lb
- 37,000 lbs HDPE cap at 26 ¢/lb
- 145,000 lbs PET container + pump at 58 ¢/lb

Total payable base fees = \$243,320

- HDPE container base fees = \$149,600
 - HDPE cap base fees = \$9,620
 - PET container + pump base fees \$84,100
- Discount will only apply to base fees excluding reserves

Scenario: Switch from a single-use soap dispenser to refillable soap dispenser package

- Producer switches from single-use soap dispenser to refillable soap dispenser with bulk refill container format, resulting in a Tier 1 impact reduction (2x Bonus A).
- Bonus A is set at 10% of total base fees, up to a maximum of \$20,000.
- Bonus A award = \$20,000
- Bonus C Tier 1 award = 2x Bonus A = \$40,000
- Net payable base fees after Bonus C award = \$203,320

Figure 10

LCA Submission and Bonus Application Timelines

CAA will offer to grant Bonus A starting in the 2026 program year (the year in which producers will pay 2026 fees). CAA will require producer LCA project reports to be submitted in early fall 2025, before CAA sets the 2026 base fees in October 2025. Therefore, producers will know the bonus percentage they will be eligible for when they submit their project reports, but they will not know the actual dollar amount of the bonus because it is relative to their base material fees, which would not yet have been set.

CAA will offer to grant Bonuses B and C starting in the 2027 program year and will begin to receive LCA submissions by May 2026, to allow producers extra time for data collection, to conduct LCA analyses of their impact reductions and to convert packaging to the improved design. Producers may apply for Bonus C yearly, starting from May 31, 2026. The switch from single-use packaging SKUs to reusable or refillable packaging format SKUs must have been made on or after December 1, 2024, and no earlier than two years prior to LCA report submission to CAA. LCA Project Reports must be completed on or after July 1, 2025, and no earlier than one year prior to submission to the PRO.

Note that beginning in August 2025, DEQ will announce the top 25 producers. These producers are required to disclose LCAs for 1% of SKUs by December 31, 2026. It is CAA's intention to allow the SKUs used in these top 1% disclosures to be eligible for LCA Bonuses B and C as the single-use packaging SKU which undergoes packaging improvements or switches to reusable packaging formats. Any eligible SKU or SKU batch may be reapplied for bonus submissions (A, B, C) every three years, with demonstrated substantive changes to the packaging.

CAA will issue net fee invoices with bonuses credited beginning in January 2026 for Bonus A. Beginning in 2026, producers will submit LCA reports and bonus applications along with their producer supply reports on May 31 of each year. Thereafter, CAA will issue fee invoices, including bonuses granted, each January of each following year.

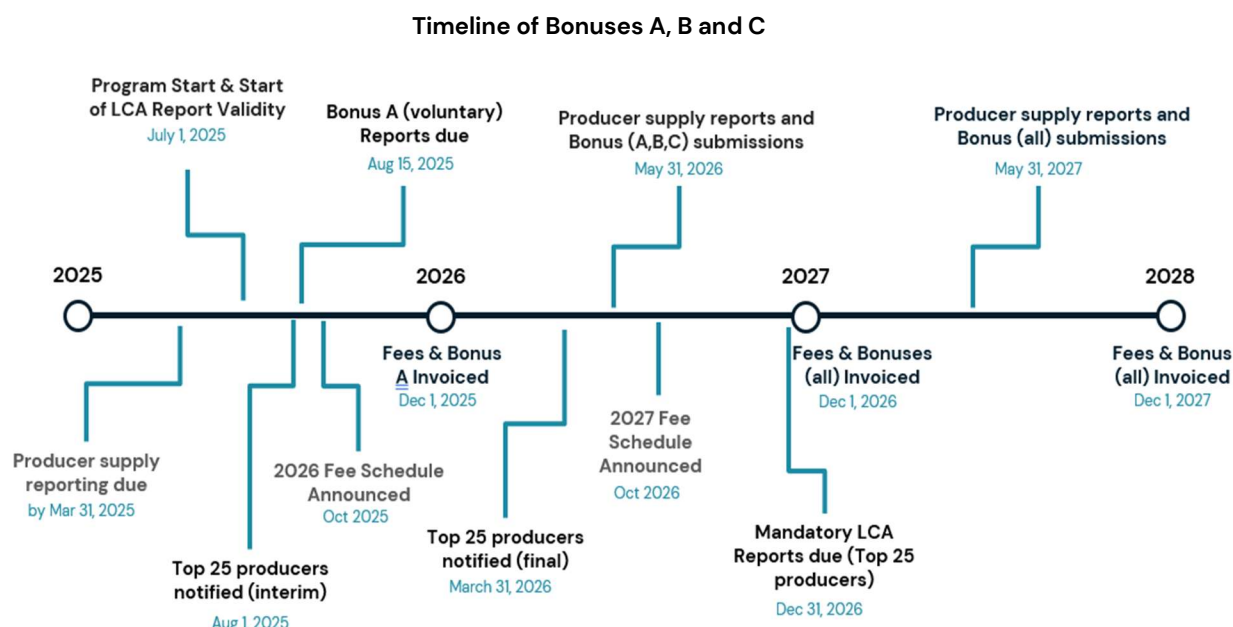


Figure 11

Funding the Bonus

As per the CAA reserves policy, a portion of the reserves may be used for the purpose of funding incentives in the initial years when malus fees are not in use.

Prior to having detailed producer data, CAA cannot foresee the number of producers that will apply for bonuses but will still need to budget for granting the bonuses to qualifying producers. Whereas in a fully mature eco-modulation program, malus fees may be introduced to help fund part of the bonuses, CAA will need to use a part of the program reserves (separate eco-modulation reserve funds for different material categories) to help fund the bonus program.

Each producer will contribute their proportionate share toward reserve funds through the base fees they pay. This will allow for eco-modulation to move forward on a temporary basis.

Program reserves could be made up of operating reserves and eco-modulation funds (at the material class level).

- Operating reserves are used for risk management, working capital, cost overruns or revenue shortfalls
- Eco-modulation funds are used to administer bonuses where malus fees are inadequate to offset the bonuses

- With this approach, all producers will pay into both reserves each time they pay fees, but how much they actually pay is proportional to their supply weights

The eco-modulation reserve fund will exist in addition to operating reserves, which the PRO will use for risk management, working capital, cost overruns or revenue shortfalls. CAA will use eco-modulation reserves, on the other hand, to administer bonuses. All producers will pay into both reserves each time they pay their fees, but the amount they will pay will be proportional to their supply weights. The bonuses will be paid out from each applicable material category eco-modulation reserve fund, until CAA develops enforceable malus fees to in whole or in part replenish funds in each of the material class reserve pools. The funding strategy for the bonus scenarios are outlined in Tables 26 and 27. For Bonus A and Bonus B, when no material switches are occurring, bonuses are funded by producers in the same material categories. In the instance of a Bonus B award where a material switch is occurring, the bonus will be funded by a pool of contributions paid by all manufacturers across all material categories.

Within the three various options to submit Bonus C, the material chosen for a producer's switch from single-use packaging to reusable/refillable packaging formats will have different funding implications:

1. **Without a material switch:** producers convert a single-use packaging to a reusable/refillable SKU using the same material type and composition (ex. HDPE shampoo bottle)
 - As with Bonus B, CAA proposes to fund the bonus by levying a surcharge on each material category in the SKU, proportionate to the share of fees paid by each material making up the SKU.
2. **With a material switch:** producers switch from single-use packaging to a reusable/refillable SKU using a different material type and composition (ex. take-out food containers)

As with Bonus B, CAA proposes to fund the bonus using a generic pool of funds charged to all producers in all packaging material categories.

CAA considered two options to limit its financial exposure in the design of its LCA bonus program for the Oregon program plan. For the initial years of the program, CAA considered either: (1) allocating a total dollar amount to each of the two types of bonuses required to be offered (i.e., a limited pool of bonus funds that is first-come, first-serve), or (2) capping the amount of the bonus granted to an individual producer's SKU.

If, after the first year, it is determined the capped amounts are too low, CAA will raise the individual bonus cap amounts in subsequent annual eco-modulation fee schedule updates to encourage more producer participation.

In addition, CAA also decided, as a principle, the basis for setting the level of bonus is not intended to cover costs but to be correlated to impact.

Summary of LCA Bonuses

The following tables summarize the different types of bonuses.

Summary of Bonus A and Bonus B

LCA Bonus Type	Purpose	Bonus Award and Apportioning	Funding Source	Incentives for Impact Reduction	Avoids Cross-subsidization
Bonus A – evaluation and disclosure only	Granted to producers for conducting and disclosing LCAs	Set at 10% of base fees for all materials in the SKU, up to a cap of \$20,000.*	Funding provided through proportionate base fees of all materials in the SKU.	Bonus is applied to all primary sales packaging. Magnitude of bonus is reasonably set to incentivize producers to evaluate their SKU impacts and then take further action to reduce impacts to achieve Bonus B.	Bonus grants are funded by producers in the same material category in the SKU (material specific).
Bonus B – changes to existing packaging	Granted to producers for conducting and disclosing LCAs AND demonstrating substantial impact reductions	Indexed to Bonus A. Increases based on 3 graduated impact reduction tiers, using a multiplier associated with the level of reduction. Capped at \$50,000 per SKU or batch.		Offers escalating multiplier for granting the bonus based on impact reduction tier. Bonus B set at least twice as much as Bonus A.	
Bonus B – packaging switch		Indexed to Bonus A applied to the <u>new packaging materials</u> . Increases based on 3 graduated impact reduction tiers, using a multiplier associated with the level of reduction. Capped at \$50,000 per SKU or batch.	Funding provided through pooled contributions from all producers of packaging material categories.	Not a primary requirement for eco-modulation in this case.	

Table 28

*Bonus A is set at 10% discount of base fees (excluding the portion of reserves in the base fees, which is estimated at approximately 20%). This results in a net reduction of approximately 8% and not approximately 10% of base fees, after the application of Bonus A.

Summary of Bonus C

LCA Bonus Type	Purpose	Bonus Award & Apportioning	Funding Source	Incentives for Impact Reduction	Avoids Cost Cross-Subsidization
Bonus C – Switch from single-use to reusable (PROJECTED return rates)	Granted to producers for conducting and disclosing LCAs AND demonstrating substantial impact reductions.	Bonus C is equivalent to Tier 1 only (i.e. indexed to Bonus A and set to 2x higher than Bonus A, up to a cap of \$40,000 for the SKU or batch).	If the switch is made using the same material type, funding will be provided through levying a surcharge on each material category in the SKU. If the switch is made using a different material, funding will be provided through pooled contributions from all producers of packaging material categories.	Bonus C granted to the eligible SKU(s) over 3 years based on the base fees in the first year. Producer may reapply after the first three years using actual return rates.	Bonus grants are funded by producers in the same material category in the SKU (material specific).
Bonus C – Switch from single-use to reusable (ACTUAL return rates)		Bonus C is equivalent to impact reduction tiers (i.e. indexed to Bonus A and set to <u>at least 2x higher</u> than Bonus A, up to a cap of \$50,000 for the SKU or batch, after the grace period).		Bonus C granted to the eligible SKU(s) over one year based on the base fees. Producer may reapply every three years, provided substantial environmental impact reductions are achieved.	
Bonus C – Switch from single-use to refillable (ACTUAL refill rates)		Bonus C is equivalent to impact reduction tiers (i.e. indexed to Bonus A and set to <u>at least 2x higher</u> than Bonus A, up to a cap of \$50,000 for the SKU or batch).			

Table 29

Consideration of Other Eco-modulation Factors

ORS 459A.884(4) requires producer responsibility organizations to consider five factors for eco-modulation in their graduated fee structure. These five factors are:

- a. The post-consumer content of the material, if the use of post-consumer content in the covered materials is not prohibited by federal law;
- b. The product-to-package ratio;
- c. The producer's choice of material;
- d. Life cycle environmental impacts, as demonstrated by an evaluation performed in accordance with ORS 459A.944; and
- e. The recycling rate of the material relative to the recycling rate of other covered materials.

Post-consumer content of the material

A literature review of life cycle assessments generally shows that use of recycled materials results in a lower product environmental footprint than use of virgin materials within the same material category. The amount of the reduction varies by material. DEQ's life cycle evaluation (LCE) rules in OAR 340-090-0930 Core Product Category Rule (1)(b)(E) states, "If a covered materials will use recovered materials, fuels, or energy then those inputs must be included in the assessment in such a way as to avoid double counting or undercounting of burdens, as described in ISO 21930:2017 §7.1.6." Inventory data associated with recycled materials in comparison to virgin materials will be included by producers in their LCEs. If a producer increases recycled content in a material category, the single score impact factor will show the impact and benefit of increasing the use of post-consumer recycled content. Consideration of post-consumer content of the material, therefore, is already included in the LCE rules, and producers are incentivized to increase their use of post-consumer recycled material. The LCEs, however, must ensure that the benefit of recycling the material as well as the benefit of using recycled content is not calculated in a way that results in double counting of environmental benefits. Instances when CAA will consider additional bonuses or malus fees related to post-consumer content in a future program plan or amendment to this plan are described later in this section.

Product-to-package ratio

DEQ's LCE rules require producers' project reports to present results on the functional unit basis of one cubic meter of capacity or one square meter of coverage, whichever is applicable to the covered material. Producers that make a change to improve their product-to-package ratio and apply for a Substantial Impact Reduction bonus will be incentivized for making this improvement – this is because the functional unit as defined in the LCE rules measures and reports on the basis of product-to-package ratio, or the amount of product delivered per kilogram or square meter of packaging. As a producer reduces the amount of packaging used to deliver an equivalent amount of product to consumers, the environmental benefit of doing so will be realized by producers in two ways. First, in reduced base fees (because less packaging is used to deliver products to consumers), and second, through the Substantial Impact Reduction bonus, which

grants a bonus on the basis of product-to-package ratio. Because incentives to producers are already provided through base fees and the Substantial Impact Reduction Bonus, CAA does not envision providing additional incentives for this factor in Oregon.

Producer's choice of material

As with the other factors specified in the RMA, a producer's choice of material is reflected in the inventory data used to construct the life cycle impact assessment. A material that is less impactful on the environment on an equivalent functional unit basis than another will have a better single score impact factor calculation, and if a producer switches to it, that producer can receive a Substantial Impact Reduction bonus. In this respect, a producer's choice of material is already reflected in the Substantial Impact Reduction bonus that CAA has included in this program plan. Instances where CAA will consider additional bonuses or malus fees related to a producer's choice of material in a future program plan or amendment to this plan are described later in this section.

Life cycle environmental impacts

DEQ's LCE rules require the use of this factor. CAA will comply with the rules and grant bonuses for Voluntary Disclosure and Substantial Impact Reduction (including granting bonuses for a producer transitioning from single-use to reusable covered materials if the LCE shows a reduction in impacts). At the current time, CAA does not anticipate granting additional bonuses or malus fees for the assessment of life cycle environmental impacts beyond those required by DEQ.

The recycling rate of the material relative to the recycling rate of other covered materials

DEQ's life cycle evaluation (LCE) rules allow for granting a Substantial Impact Reduction bonus when a producer switches between materials where the recycling rate of the material increases as per OAR 340-090-0930 Core Product Category Rule (2)(c)(G), "The outputs from recycling (e.g. recycled materials) that substitute for primary production of like materials shall be granted as a credit." In this sense, the existing LCE rules already include eco-modulation incentives to switch to higher recycling rate materials. However, depending on the material, switching from a lower recycling rate material to a higher recycling rate material may increase overall environmental impacts. Because of this, CAA fully supports the use of the single score impact approach in the LCE rules as the litmus test to be used for incentivizing changes among materials with different recycling rates, but only when doing so will result in a reduction of environmental impacts. CAA does not anticipate incentivizing shifts among materials simply on the basis of recycling rate.

It is not a best practice to implement eco-modulation of producer fees in the initial couple of years of a new EPR program because doing so introduces risk to the financial solvency of the program. This is because costs and revenues are unknown at program start due to a lack of firm data. Therefore, CAA does not intend to implement any other eco-modulation factors beyond the Voluntary Disclosure and Substantial Impact Reduction bonuses required by DEQ in its LCE rules. As part of its annual report and review process under

this initial program plan, CAA will assess when the timing may be right to add in additional eco-modulation factors beyond the initial two DEQ requires. CAA will add any additional eco-modulation factors in a subsequent program plan or a plan amendment to this program plan.

c. Alternative membership fee structure (if applicable)

CAA is not considering developing an alternative fee structure at this time.

d. Adequacy of Financing

In accordance with ORS 459A.875(2)(i), CAA is required to establish fees that adequately fund the program operations, ensuring the fulfillment of the RMA requirements and enabling program implementation. These fees shall cover the expected management costs of materials, including collection service expansion, depot network setup and CRPF compensation as well as REM and other strategic development costs. The fees will also cover reimbursement of DEQ costs related to administering the program, a waste prevention and reuse fee, administrative fees, PRO operations and program reserves.

For the first year of the program, CAA developed a refined estimate that informed the amount of producer fees to be generated. As noted above, this estimate was reduced based on the data gathered through ORSOP.

CAA expects to generate \$190 million in year one of the program. See Appendix E for details.

Program Reserves and Contingencies

CAA is committed to striking an appropriate balance between maintaining a healthy balance sheet while also running an efficient organization with high value for fees for participating producers. Guided by a corporate reserves policy, CAA has established a reserve target and operating contingencies to protect the program from unforeseen financial risks and to build up working capital based on the needs of the Oregon program.

As per ORS 459A.875(2)(m), the updated program budget includes provisions for program reserves and operating contingencies of \$43.5 million and \$12.0 million, respectively, in 2025.

This reserve level reflects the amount to be raised in the first year of fees. The operating reserves will accumulate over two and half years to reach the reserves target by the end of the 2027 program year, which is being considered as steady state. The program reserves target reflects six months of projected annual variable operating costs under a steady-state program year in 2027.

Variable expenses include transportation reimbursement, contamination programming and evaluations, PCRf and CMF fees, PRO depot operating costs, local government curbside collection incentives, or any costs tied to tonnages or households.

Operating contingencies will cover any unexpected cost increases due to the variable nature of the recycling system. Program reserves and operating contingencies are intended to cover the most variable and hard to predict elements of program implementation, namely the operations and funding requirements for recycling services that are affected by many unforeseeable factors.

Program reserves in year one are composed of:

- Operating reserves: \$25.6 million
- Additional risk reserves: \$17.9 million
- Eco-modulation incentive provision (to start in 2026) \$0

Reserves are used for operating risk presented by cost overruns or revenue shortfalls. Additional risk reserves are designed for unforeseen expenditure items that may arise due to factors beyond the control of CAA Oregon such as regulatory changes, emergency interventions and one-time liabilities. Eco-modulation funds are used to administer bonuses where malus fees are inadequate to offset the bonuses.

All producers will pay program reserves each time they pay fees, but how much they actually pay is proportional to their supply weights.

Operating contingencies intend to cover variability in operating costs and they are currently indexed to 15% of operating costs each year. These costs are reported outside of program reserves.

Equity

There is no one-size-fits-all solution to recycling because motivators and barriers vary across age, region, race, ethnicity and other factors.²² In particular, CAA recognizes that the following factors may influence equity and outcomes in the Oregon recycling system:

- Lack of access to infrastructure and/or practical knowledge about how to recycle properly
- Lack of transportation
- Functional barrier of preparing items to recycle (cleaning, emptying, breaking down items)
- Ability and disability (for example, color blindness might affect a resident's ability to understand educational materials)
- Knowledge barriers (for example, residents might not feel confident in their ability to recycle properly)
- Recycling programs not being set up for full community participation
- Investment in relevant resources and tools as well as information shared differently across the resident population
- Language barriers
- How community members see themselves represented in the education and outreach materials (visuals, language, staff handing out resources)
- Geography/location and practical considerations tied to location
- Process for actively identifying and evaluating equity gaps within the recycling system
- Following the identification of equity gaps, working to resolve those gaps, and continuing to measure progress towards equity

CAA's Proposed Approach to Equity

CAA's approach to equity is to strive toward meeting our program goals while being as fair and inclusive as possible in providing access to recycling services and recycling information in Oregon.

For the purposes of the administration of the RMA in Oregon, CAA is using a definition of equity that is modeled from the federal definition of equity established through Executive Order in 2021.

The CAA guiding definition is as follows:

The term "equity" means the consistent and systematic fair, just, impartial treatment and meaningful involvement of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons,

²² <https://recyclingpartnership.org/equitable-recycling-outreach>

Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty, inequality or negative effects of decisions on the environment. r

The term “underserved communities” refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of “equity.”

As CAA is a national organization, serving compliance functions across multiple states, a definition based on the federal definition is the best fit at this time, but CAA may develop an organization-specific definition over time.

To help meet equity objectives, CAA has sought the expertise of the community-based organization (CBO) Trash for Peace in developing the equity components of this plan. If selected, CAA will continue to work with Trash for Peace and other CBOs in operationalizing its plan in Oregon.

To assess and review equity issues during program plan implementation CAA will consult regularly with the ORSAC and the DEQ to ensure that CAA’s activities in Oregon align with the equity requirements of the RMA and CAA’s goals for equity.

CAA also proposes some specific equity approaches corresponding to key aspects of its operations plan:

Equity in the Establishment of a PRO Depot Network

CAA proposes to explore a number of approaches to ensure its depot network is tailored to the varying needs of different Oregonians.

First, the depot network will adhere to statutory and regulatory requirements around convenience standards. Meanwhile, CAA will identify opportunities to provide collection for people with mobility challenges, including considering funding for at-home collection, store drop-off, and neighborhood collection events.

Because transportation is an equity issue, CAA proposes to prioritize events and mobile collections that bring recycling closer to communities that must travel farther distances to existing recycling depots.

Furthermore, CAA is continuing to work to locate depot sites on Tribal lands= and is continuing to prioritize contracting with these sites. Through a continually growing understanding of the Oregon landscape, CAA has initially identified the following existing depots on Tribal land, and CAA intends to explore incorporating these two depots in the system as well as have conversations with the other seven Tribes about opportunities to create collection points in their communities. As of mid-November 2024, CAA had not entered into LOIs with the two sites below, but dialogue is continuing.

- Tribal Environmental Recovery Facility, Pendleton, OR – operated by the Confederated Tribes of the Umatilla Indian Reservation which represents a union of the Cayuse, Umatilla and Walla Walla Tribes.

- Grand Ronde Depot, Yamhill County – operating on the land of the Confederated Tribes of the Grand Ronde Community of Oregon, which represents over 30 Tribes and Bands from western Oregon, northern California, and southwest Washington.

CAA will continue to engage with Tribes along with local governments over the next year as system expansion and PRO depot planning occurs. While no specific investments or additional collection points have yet been identified, CAA has earmarked funds to support Tribal investments when they are ready, and CAA will work with DEQ regional technical specialists and service providers to provide ongoing technical assistance.

CAA will also explore how compensation plans for collection point staff can be made fair and equitable. After consulting with permitted and existing facilities, as required by statute, CAA plans to prioritize conversations with CBOs to fill in any program gaps. If costs to contract with CBOs are prohibitive, defined as exceeding 110% of the average costs for depots, then CAA will continue to explore other avenues. CAA plans to provide a per ton material rate to incentivize greater collection and thus move Oregon closer to its recycling rate goals. A living wage for CBO-managed sites will be built into the base service fee CAA will pay monthly, based on the projected number of employee hours needed to handle PRO materials. And CAA will explore partnerships with community groups that collect PRO depot materials but may not qualify for permits or meet the definition of “depot” or “drop off center.” Identification of these opportunities is still ongoing and will continue to be top of mind throughout the ORSOP and program implementation process.

Equity in Responsible End Markets

CAA will work to ensure that new markets for materials collected in Oregon are developed in ways that minimize risks to public health and worker health and safety.

For materials CAA owns, and wherever possible, CAA will also explore options to:

- Provide opportunities to businesses that are small businesses, veteran owned businesses, owned by a disadvantaged class, are not-for-profit businesses, or are B Corp certified
- Provide opportunities to businesses with affirmative labor practices, such as hiring preferences for underserved groups, providing living wages, or utilizing organized labor

Equity in Education and Outreach

As described in the Education and Outreach section above, CAA plans to ensure that educational materials and campaigns are culturally responsive to diverse audiences across Oregon by:

- Translating and transcreating all education and outreach materials into Spanish, Simplified Chinese, Traditional Chinese, Korean, Arabic, Russian, Vietnamese, Tagalog, Hindi, Somali and Ukrainian
- Applying a co-creation approach to give community members a chance to participate in campaign design through community-level listening, Partnering with CBOs as advisors to education and outreach development, as well as implementation partners

- Designing for accessibility, ensuring all collateral follows ADA compliance and best practices as well as the principles of universal design, where products, services or environments are designed so that anyone – no matter their age or ability – can use that design with minimal or no accommodations
- Accounting for disparities in access to information technology, ensuring rural audiences are engaged as well as urban populations

Equity in PRO Administration

When contracting work to third parties, CAA will develop an approach that provides opportunities to businesses that have certification under the Oregon Certification Office for Business Inclusion and Diversity (COBID) as minority-owned businesses, women-owned businesses, service-disabled veteran-owned businesses, or emerging small businesses. We are engaging with every hauler in the State and continuing to offer equal opportunities for system expansion and depot collection, which we believe creates a level playing field for small and minority-owned haulers, ensuring that investments are made comparatively to ensure that market share for these identified haulers is not being negatively impacted throughout the RMA. CAA will utilize the COBID website to obtain information on these potential business partners.

The RMA was designed to place 30% of the financial responsibility of the recycling system on the PRO. Additionally, the RMA has created opportunities to bring new functions into the State to support the system, such as developing the statewide contamination evaluation system. As CAA develops new job opportunities in the state, the organization will abide by equitable employment practices that create opportunities for all Oregonians. Hiring within Oregon has already begun with the onboarding of an Oregon-based Oregon Executive Director and other staff. Preference for Oregon-based staff will remain top of mind throughout the hiring process.

CAA Management and Compliance

In this section, CAA describes its plans for day-to-day management of the program, communications, data gathering, and reporting processes; managing producer compliance; and related policies and procedures. This section directly addresses CAA's Objective 4 for this program plan: "Create a system that fulfills the needs and regulatory requirements of the PRO, its members, and all other relevant interest holders."

CAA is committed to upholding the highest standards of ethics, integrity, and compliance with all relevant local, state, and federal laws and regulations. CAA recognizes the importance of adhering to legal requirements to ensure the trust and confidence of our interest holders, including the Oregon Department of Environmental Quality (DEQ), producers, partners, employees, service providers, local municipalities, and the state of Oregon as a whole.

a. Overall Day-to-Day Management

CAA will provide management of the program's overall day-to-day program operations, steward services, finance and administration, and local government and community activities, utilizing key qualified personnel dedicated to the Oregon program. Collaboration with CAA National and additional CAA state program personnel will occur to ensure all programs are functioning in the most consistent and efficient manner. The CAA management team will conduct activities in accordance with defined policies and procedures.

CAA will staff the program with dedicated resources responsible for the success of the overall program. The CAA National office will also provide support where applicable.

The following resources will be the main points of contact and responsible for program compliance:

Primary Contact

Name: Kim Holmes

Position: Oregon Executive Director

Phone: (833) 424-7285

Email: info@circularaction.org

Secondary Contact

Name: Shane Buckingham

Position: EPR Program Planning Lead

Phone: (833) 424-7285

Email: info@circularaction.org

A full list of CAA Oregon team members and their roles will be maintained on the staff page on the website. CAA will notify DEQ within 30 days of key personnel changes related to the Oregon program.

b. Communications

In this subsection, CAA describes its planned approach to communication and coordination with key decision makers as part of the implementation of this plan. It also outlines a proposed approach to gathering data and key metrics to inform the measurement of key outcomes, and how key metrics will address elements of the annual reporting structure required by the RMA.

CAA Plans for Communication and Coordination

CAA understands that effective collaboration and communication with Oregon recycling interest holders is critical to CAA successfully meeting RMA obligations and delivering on anticipated recycling system improvements.

CAA proposes several multi-participant coordination and communication activities and welcomes feedback from Oregon DEQ regarding these proposals. Note that the frequency of each activity will, by necessity, fluctuate to reflect the program's evolving needs. A set cadence for each effort will be determined that is agreeable to the relevant participants and reflects the program's ongoing needs.

CAA will engage with other interested parties not specifically highlighted here as necessary.

General Communications

CAA's website already features a professionally designed and maintained [section](#) dedicated to Oregon and the Recycling Modernization Act. This online resource is currently geared toward potential producers, but it will be expanded to target additional audiences, including sections tailored to Oregonians (waste generators), service providers, local governments, and others.

CAA expects it will employ other effective communication tools as demand for information is established in both format and frequency.

Oregon DEQ

CAA will establish meetings between relevant CAA representatives and Oregon DEQ. CAA and Oregon DEQ would select the appropriate project team members to be included on the recurring event, and each party would be expected to invite others when relevant for specific discussion items identified in advance. This step builds on the strong communication ties that have already been developed between CAA and DEQ.

CAA will also communicate updates and data to DEQ through required reports and according to recommendations developed in consultation between CAA/DEQ and ORSAC.

Oregon Recycling System Advisory Council (ORSAC)

CAA will appoint a single point of contact for ORSAC, and CAA will have standing attendance at ORSAC meetings and offer the opportunity for consultation as needed.

CAA expects to engage in a regular series of meetings with ORSAC and DEQ to review implementation issues that could arise after submission of this program plan.

Local Governments and Service Providers

CAA has undertaken a significant amount of communication and coordination activity with local governments and their service providers as part of the proposed Oregon Recycling System Optimization Project.

As detailed in the “Collection and Recycling of USCL Materials” section of this plan, CAA intends to utilize an online portal to process local government and service provider funding requests under different local government reimbursement programs. These programs will be supported by dedicated CAA operations staff that will facilitate interested parties' participation.

CAA will also provide an online portal for local governments and their designated service providers to easily access, customize, print and mail education and outreach collateral at no cost, as described in the “Education and Outreach” section of this plan.

CAA will also host dedicated webinars to support program implementation, and local governments and service providers will be a key audience for these communication efforts.

In addition, CAA will plan to connect with and inform local government interest holders through connections with groups such as the Association of Oregon Counties and the League of Oregon Cities.

Commingled Recycling Processing Facilities (CRPFs)

CAA will form a CRPF working group to establish a forum for interaction with processors and also to provide technical assistance, review relevant program timelines and requirements, discuss investment opportunities, and more. CAA will continue to cultivate relationships with processors on an individual level as well in an effort to understand needs and shifting realities at the materials processing level.

CAA will establish standing meetings with the Oregon Refuse & Recycling Association (ORRA), a statewide trade group that serves as a key conduit to processing entities.

Producers

CAA acknowledges that it is critical for producers to fully comprehend their compliance requirement in order to facilitate successful implementation. Regardless of whether a producer is just starting to learn about their EPR obligations in Oregon or whether they have been following the RMA from its inception, CAA is

committed to being transparent about the implementation process and to supporting producers in their EPR journey.

To support producers with their compliance goals, CAA has created educational, informational, and guidance resources, which are summarized below.

Producer Resource Center

CAA created the [Producer Resource Center](#) (available on CAA's website) to help producers better understand and prepare for their obligations in states that have enacted EPR laws for paper and packaging. The Producer Resource Center features answers to commonly asked questions, action items for producers, and links to webinars and other opportunities for producers to engage with CAA. CAA's website also features an evolving FAQ.

Producer Onboarding Sessions

CAA has been hosting [Producer Onboarding Sessions](#) since May 2024. In these regularly scheduled webinars, the basics of EPR, CAA, producer requirements, and producer registration with CAA are covered. The webinars are geared towards companies just starting their EPR journey and substantial time is reserved to address producer questions. Participation is open to all producers, trade associations representing producers, and legal counsel to producers.

Producer Working Group

CAA has been hosting Producer Working Group (PWG) meetings since November 2023, and more than 2,700 individuals representing hundreds of companies have attended. PWG meetings are a monthly opportunity for registered producers, their legal representatives, and trade associations to learn about and discuss priority producer issues. PWG meetings are a step deeper than the Onboarding Sessions, where CAA shares information and answers questions on the details of a wide variety of EPR topics, with a focus on producer compliance. Previous PWG meeting topics have included:

- A discussion of registration requirements, including the Participant Producer Agreement (PPA), which is a legal agreement between CAA and the producer that outlines terms and conditions
- A preview demonstration of the producer reporting portal currently in development
- A high-level review of CAA's fee modeling approach, including the guiding principles adopted by CAA in the fee-setting process
- A review of preliminary reporting categories and preliminary fee schedules to support companies in budgeting EPR fees
- Program updates, including an explanation of recyclability determinations, i.e. USCL, PRO Acceptance Lists, Specifically Identified Materials

CAA also maintains a library of past PWG meeting summaries and slide decks for registered producers to reference at their convenience.

Reporting Q&As

Starting in November 2024, CAA launched a series of reporting Q&A sessions aimed at providing a deeper dive on upcoming reporting requirements and deadlines. These sessions are an opportunity for registered

producers, their legal representatives, EPR reporting consultants, and trade associations to prepare producers with the latest developments from CAA on reporting requirements, policies, guidance and tools.

Forums for Varied Interest Holders

CAA has hosted four informational webinars in the past year, which were designed for a broader, multi-participant audience, e.g., value chain members, converters, trade associations, and others. These webinars generally highlight status updates on CAA's latest activities in EPR states, including timelines and producer registration.

Participation in DEQ hosted webinar series

DEQ has contracted with the Product Stewardship Institute (PSI) to host a series of webinars to help producers understand compliance obligations. CAA coordinated with DEQ to prepare for content for these webinars and participated in each event, offering information about how producers can register with CAA.

Other Communications

CAA's monthly email newsletter has an open rate that is 300% higher than the industry average open rate, and CAA's LinkedIn engagement rate is 240% higher than the average LinkedIn engagement rate. These statistics demonstrate that CAA is providing information – particularly guidance – that producers want and need.

Producer Consultation

CAA also values a consultative relationship with all producers and has held hundreds of one-on-one meetings with producers since December 2022. Through one-on-one meetings and customized group meetings with coalitions and trade associations, CAA has discussed producers' statutory obligations, the development of CAA, and reporting and fee payment requirements for producers. Recently, CAA's consultation with producers has centered on the contents and process for producers to sign the Participant Producer Agreement, or the legal agreement that each producer will be required to sign with CAA as a requirement of participation in the program.

Producer Reporting Guidance

CAA is currently developing reporting guidance for producers and plans to release it in the fourth quarter of 2024. The goal of the reporting guidance is to provide a resource for companies that meet the definition of obligated producer in Colorado, California, and/or Oregon. Among other things, the reporting guidance will outline details to support producers' EPR data preparation, reporting and compliance.

The reporting guidance will be accompanied by access to a producer portal, through which producers can initially find a producer registration form. In future releases, the portal will include a reporting questionnaire to help producers determine their specific reporting requirements and a step-by-step process to input or upload data. The portal will also ask for additional information such as a producer's legal structure to determine its affiliation status and the methodology used for calculating its data.

For producers, the CAA producer portal will enable secure registration and password protected login, transaction and balance history, and reports and notices. It will also allow producers to submit their production volumes to CAA for annual fee calculations via structures file upload, or direct entry.

Trade Associations

The Association of Oregon Recyclers (AOR) is an important interest holder relationship, as AOR membership spans the entire materials management industry in Oregon. CAA will participate in the organization's annual conference (including presenting at the discretion of AOR's conference planning committee) and collaborate on educational forums and/or webinars for AOR members. CAA is open to other forms of engagement that mutually benefit CAA and AOR.

As mentioned earlier, ORRA is another important interest holder relationship, with ORRA members accounting for a large portion of the solid waste management sector in Oregon. Ongoing communication and relationship-building within ORRA has been, and will continue to be, a key focus for CAA.

Other PROs and Multi-PRO Coordination

Currently, CAA is the only PRO that has submitted an RMA PRO program plan. If additional PROs indicate an interest in submitting program plans, CAA will work with DEQ and those prospective PROs to develop an interim coordination process as required by the RMA framework.

With respect to program plan development tasks, CAA is tracking all program development costs that should be shared with future PROs if they join the Oregon RMA program prior to CAA's recovery of those start-up costs from membership fees.

CAA will include a breakdown of 2024 start-up costs in the proposed 2024 Annual Report anticipated by DEQ in its Phase II RMA rule concepts. CAA's 2025 Annual Report will also identify program development start-up costs incurred in 2025 prior to the start of the program that will need to be recovered from producer fees once the program starts on July 1, 2025.

CAA will then track the recovery of these start-up costs over time so that in the event a new prospective PRO emerges, DEQ and CAA can identify remaining program start-up costs applicable to that new PRO at the time of its proposed entry into the RMA program.

c. Reporting

Metrics and Data Collection

Many aspects of this plan will require tracking of key outcomes and metrics to measure the achievement of program goals articulated in the “Program Goals” section. CAA will use its interactions with key participants to collect data relevant to the goals, objectives, expected outcomes, and key metrics discussed in that section. CAA will establish survey, reporting, and other data collection mechanisms for routine program measurement. CAA will develop standardized reporting templates to ensure consistency of records and provide clear guidelines to all interested parties required to report data to CAA.

CAA will also ideally receive critical information from DEQ on key elements, in particular related to inbound contamination, capture rate and outbound bale quality at CRPFs. CAA may in some instances pursue studies or other data-gathering exercises to collect essential information. It will use this data and corresponding analytics to report annually to DEQ on plan implementation and goal achievement. CAA will also use this performance information to update its goals, to adjust its plan, and to suggest or recommend overall adjustments to RMA implementation. CAA’s intention is to use the submittal of its five-year plan updates as the main mechanism for altering program goals.

Producer Reporting

CAA will provide participant producers with access to a secure online reporting portal to facilitate the submission of annual supply data. This reporting portal will allow for CAA to capture and aggregate the information that must be submitted to Oregon in the PRO Annual Report, as well as the applicable individual producer data where required.

CAA will monitor the effectiveness of this reporting portal and make adjustments as necessary to improve efficiency and accuracy. CAA will also provide necessary training and support to all producers and relevant interested groups on the reporting portal's use.

Annual Reporting

CAA will submit Annual Reports to Oregon DEQ no later than July 1 of each program year, starting in 2026. CAA’s Annual Report will contain all information required by 459A.887(2)(a), OAR 340-090-0660(1)(a), OAR 340-090-0670(4), and OAR 340-090-0700(1)(d). It will be written and presented in a manner that can be understood by the general public. The Annual Report will be delivered each year to Oregon DEQ as a searchable electronic file.

CAA will follow the outline for annual reporting proposed in DEQ’s management directive including the following elements.

PRO Description: Total amount, by weight and type of material, of covered materials sold or distributed in or into this state by participating producers in the prior calendar year

Goals of the Program: Description of progress toward meeting topline goals in relation to identified program plan outcomes and metrics along with any recommendations to improve recovery and recycling outcomes.

Program Operations: Summary of program operations including:

- Progress toward implementing local government recycling system service expansions and improvements
 - Progress toward meeting PRO Recycling Acceptance List material collection targets and convenience and performance standards
 - Measures taken to address the recycling of specifically identified materials
 - Summary of performance in relation to fulfilling responsible end market (REM) obligations including:
 - A summary of quarterly disposition reports and evaluation of adequacy of REMs
 - A summary of actions taken in support of REMs
 - A summary of certification and verification results
 - A description of actions taken in relation to upholding progress in relation to achieving the statewide plastic recycling goal
 - A summary of education and outreach activities, with metrics on the utilization of online resources by local governments and haulers
 - Results of any in-person site inspections, material tracking or other audits conducted during the reporting year, including whether any major safety or environmental management practices were not properly followed and, if so, the corrective actions taken

Financing and Budget: Annual reports would include:

- A summary of the financial status of CAA, including annual expenditures, revenues and assets
- A description of the membership fee schedule, along with information on the number of producers that received fee adjustments and total fee revenues and an evaluation of the effectiveness of membership fee adjustments in reducing the environmental and human health impacts of covered materials
- A complete accounting and summary of payments requested by local governments and local governments' service providers and paid by CAA related to:
 - Service expansion requests
 - Transportation funding
 - Contamination reduction funding
 - Roll cart funding
 - Contamination reduction evaluation funding
- A summary of payments requested by local governments or local governments' service providers that were denied or reduced by CAA

- A summary of payments made to CRPFs
- A summary of all other payments made to satisfy CAA's obligations under ORS 459A.860 (Legislative Findings) to 459A.975 (Rules), including but not limited to payments made to support responsible recycling of specifically identified materials (SIMs), as described in ORS 459A.917

Finally, annual reports will include any additional information required by RMA rules and statute. Reports will detail updates around organizational compliance and include findings from an independent accountant's audit of CAA's financial statements.

d. Managing Compliance

To encourage the compliance of all interest holders with the RMA, CAA will offer robust support and training to educate producers about program plan requirements. Any material changes to program plan requirements impacting participants will be communicated to producers.

Records pertaining to CAA's implementation and administration of its producer responsibility program will be retained in accordance with applicable law and with CAA's records retention policy.

CAA is committed to maintaining open lines of communication with state and local rule makers and will actively seek clarification on any regulations deemed unclear. Internal controls will be designed to promote adherence to regulatory standards.

Producer Compliance

Per ORS 459A.869(8), CAA will establish a searchable registry on its website disclosing all CAA's compliant members and the identities of any members determined to be non-compliant members through DEQ enforcement processes alongside the reasons for their non-compliance. In instances where a member or non-member organization is potentially non-compliant with the program plan and/or the RMA, CAA will notify DEQ and the allegedly delinquent producer of the deficiency and provide the producer an opportunity to respond and to cure the delinquency as applicable.

CAA will endeavor to monitor compliance by producer members by conducting periodic operational and record audits, utilizing an audit cycle that will include desktop audits. When a desktop audit is performed, documentation via photos, promotional efforts, and compliance documentation will be requested. In the event of a non-compliant finding, CAA will send a notification to DEQ after completing its internal compliance processes and at least 90 days have passed with the producer out of good standing with CAA.

Preventive Measures

CAA is undertaking several producer education activities prior to the start of the program plan designed to educate producers of their obligations under the RMA in Oregon. This includes direct outreach to producers, informational webinars, and engagement with relevant trade associations to disseminate broad awareness of the new program requirements. CAA will also develop additional outreach materials to facilitate producer packaging reports required by the program as the RMA moves closer to implementation.

These preventative measures are intended to support the processes outlined below for notifying DEQ, ORSAC, and producers of potential non-compliance.

Policies

CAA will develop a set of policies related to fee payments and reporting requirements. Policies will specify producer reporting and fee payment obligations, and may address such issues such as reporting obligations, voluntary reporter agreements, reporting timelines and categories, errors in reports, membership-initiated adjustment requests, billing process, timing of fee payments, penalties and interest associated with late

payments, verification audits process, and compliance process along with a timeline by which a non-compliant member would be referred to the DEQ for potential disciplinary action and/or dispute settlement.

Compliance Process

Below are components of a compliance process that could be incorporated into the policies:

- Duty to Pay Required Fees – CAA may impose financial penalties and interest on members for failure to pay invoices in accordance with membership rules
- Retention of Records – CAA members will be required to retain records to substantiate and verify the accuracy of the information submitted in their reports for a to-be-determined period following the submission, and such records will be subject to inspection by CAA
- Duty to Comply with Requests for Documentation – Upon written request from CAA, participant producers shall provide documentation in support of their reports to CAA. This may include specific data, calculation methodologies, and/or audit reports, among other items.
- Duty to Provide Access – Participant producers will be required to grant access during business hours to CAA or its authorized representatives to inspect and review records relevant to information submitted in their reports as maintained in accordance with the Retention of Records policy
- Duty to Cooperate with a Verification Audit – At the request of CAA, participant producers must cooperate with CAA's verification process, described in the "Responsible End Markets" section of this plan. This may include providing requested documentation, data, records, and reports within a reasonable timeline of such requests, providing confirmation from a senior officer with authority to confirm and oversee reporting, and providing access to the member's business premises.

Notification of Non-Compliance

For non-compliance related to a producer who is or was a participant of CAA in accordance with RMA requirements, but which failed to comply with reporting and/or fee payment requirements, CAA policies would include notification to DEQ after certain internal compliance processes and timelines had passed.

CAA would notify DEQ of any members that are not in good standing (this may include a membership suspension and process), subject to a time frame outlined in the policies. For example, participants who had failed to report and/or pay fees within the specified time frame could be:

- Suspended by CAA and considered producers out of good standing, following requisite due process of the reasons for the suspension and the steps necessary to remove the suspension or become in good standing
- Reported to DEQ to take such corrective action as DEQ deems necessary or appropriate

CAA would also propose that in a multiple PRO situation, a searchable online database be maintained by DEQ, where PROs could confirm whether producers were members of an approved PRO and in compliance with RMA requirements.

Obligated Producers under the RMA

CAA reporting review and assessments may identify situations where there is a dispute between producers about which entity is an obligated producer with respect to a particular material obligation. In such circumstances, CAA may consult with DEQ regarding the interpretation of RMA “obligated producer” provisions to ensure that the application of the RMA to producers is consistent with statutory and rule intent.

CAA may also become aware of producers that are not CAA participants but that appear to be obligated producers under the RMA. CAA will conduct outreach to encourage such producers to register with a PRO to fulfill their obligations under the RMA. In such situations, however, CAA may not necessarily have access to information that would confirm whether a non-participant producer is actually obligated under the RMA. If such producers fail to take action, CAA would refer these producers to DEQ, along with the information that led it to believe the producer was obligated under the RMA, for DEQ to take such action as it may deem necessary

Non-Compliance with LCA Requirements

Failure of a CAA member to conduct and report on required LCA requirements in the case of the 25 largest producers in the state is also a potential RMA non-compliance. Given the unique nature of LCA process and related rules, CAA would propose to develop specific compliance reporting processes and protocols related to this issue that would likely be different than processes and protocols in place to address violations of CAA producer reporting and fee payment requirements. CAA would propose to develop a specific membership compliance process and policy related to producer LCA requirements and would consult with DEQ regarding timelines and steps that would be taken to regain compliance.

e. Dispute Resolution (Local Governments, Service Providers and CRPFs)

A number of areas under the RMA might require dispute settlement processes to address potential disagreements between CAA, local governments, service providers, processors, and other interest holders that are receiving funding from CAA pursuant to a funding agreement under various RMA programs.

In many cases, standard commercial dispute settlement mechanisms, such as an agreement by the parties to refer a dispute to a third-party arbitrator, can be utilized to resolve such disputes. CAA aims to make all funding terms and conditions clear in the funding agreements to minimize the potential for dispute resolution to the extent possible. However, in the event a dispute does arise, CAA will deploy the following five-step dispute resolution process for any party in Oregon receiving funding from CAA. CAA will also ensure that DEQ has the right to access information from CAA's dispute resolution process with jurisdictions or service providers if needed for DEQ enforcement actions related to rule or statutory rule interpretation.

(Note: the chart below is the same as the one shown in the plan's description of funding for local government system expansion.)

Step	Dispute Resolution Approach	Summary	Duration of the Process
1	Working group review (with CAA, Local Governments, Service Providers, and DEQ to address anticipated agreements)	This group will offer review and interpretation on areas of ambiguity where CAA's obligations are not clearly defined in statute or rule. This group could choose to offer an interpretation of the issue for the parties to consider.	90 days
2	DEQ review	For disputes that involve statutory or rule interpretation, DEQ may choose to conduct an independent review and issue an interpretation.	90 days, concurrent with step 1
3	Mandatory Negotiation	When parties do not both agree to the recommendation from the working group, the issue would be elevated to mandatory negotiation. This would require both parties to meet and make a good-faith effort to resolve such dispute themselves through designated representatives.	90 days
4	Mediation	If resolution cannot be reached by the parties themselves within ninety (90) days, the parties shall engage in non-binding mediation with a mediator (who, for the avoidance of doubt, may be selected from a mediation tribunal panel of neutrals) to be mutually agreed on by the parties. The parties shall participate in mediation in good faith, including by cooperating to select a mediator and in scheduling the mediation proceedings. Mediation costs will be shared equally between the parties. Mediation may be conducted in-person or remotely through a videoconference platform approved by the mediator and parties.	90 days
5	Binding Arbitration	If resolution cannot be reached by the parties through non-binding mediation, or the parties fail to complete	

		mediation within ninety (90) days of submission of the dispute to the mediator, any outstanding dispute, controversy, or claim shall be resolved by binding arbitration. The decision of the arbitrator(s) shall be final and binding on the parties, and the parties waive any right to appeal the decision, to the extent that a waiver can be made under applicable law.	
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Table 30

f. General Policies, Procedures, and Practices

CAA will regularly monitor the state of operations for the entirety of the program. CAA recognizes that defined and consistently executed policies, procedures, and practices are critical for ensuring the well-being of its personnel and the integrity of data provided to various interest holders.

CAA has developed national policies, procedures, and practices to enable consistent handling of activities while providing services required to operate key aspects of the program. The policies, procedures, and practices are defined to address specific tasks and to ensure the below concepts are addressed where applicable.

Consistent with best practices, CAA anticipates that it will periodically review and update its policies, procedures, and practices as determined to be necessary or appropriate.

i. Management of Contracts

CAA will maintain appropriate records of contracts that have been entered into in writing pertaining to the Oregon Recycling Modernization Act. Prior to execution, written contractual agreements between CAA and relevant parties will undergo appropriate internal review in accordance with CAA's business practices and policies.

CAA strives for fairness in the bidding process and in evaluating proposals without favoring respondents. We do this by practicing a transparent and open process, where all bidders and service providers have access to the same information and are treated in the same manner. CAA's detailed RFP process is available upon request.

ii. Workplace Safety and Conduct

CAA is committed to maintaining a safe work environment. In order to provide a safe and healthy work environment, personnel will be required to take appropriate and reasonable precautions by complying with established safety and workplace conduct standards. CAA is committed to providing proper equipment, procedures, and training in safe practices to aid in awareness and prevention of potential individual and community safety issues. Employees will be encouraged to familiarize themselves with their safety and conduct responsibilities, to follow safety and conduct practices at all times, and to make every effort to prevent accidents and injuries. Failure to adhere to safety and conduct rules could result in disciplinary action, up to and including termination of employment.

CAA will promptly and thoroughly investigate all reports of suspected nonconformance by personnel with safety or conduct requirements.

CAA will comply with all applicable laws pertaining to workplace safety and conduct.

iii. Protection of Confidential Information

CAA will adopt an information security plan that outlines appropriate technical, physical, and organizational measures designed to protect against unauthorized or accidental access, destruction, loss, alteration, or disclosure of nonpublic information subject to confidentiality undertakings.

The information security program will address native encryption of all data, event monitoring, audit trails, and other relevant topics. When information is no longer needed or required to be maintained by organizational policy or applicable law, CAA will securely dispose of all data and records in accordance with its records retention policy and information security program requirements.

All personnel will be required to periodically undergo appropriate training on their responsibilities for protecting confidential information.

iv. Successful and Timely Delivery

CAA will establish contractual agreements with service providers that outline the requirements and expectations designed to foster the successful and punctual achievement of project objectives by contractors.

Communication will be maintained with all contractors, with verbal and written notifications issued if timelines are not met or project outcomes are delayed. Additionally, contractors will be asked to submit status reports as deemed necessary by CAA.

CAA will request the contractual capability to inspect contractors and conduct quality checks to ensure that projects meet the standards of the program. Furthermore, CAA will offer comprehensive training and support to all contractors to ensure they understand and meet CAA's expectations.

v. Retention of Information

Per ORS 459A.962, CAA will retain records related to the implementation and administration of its producer responsibility program plan for at least five years and have them available for inspection by DEQ upon request. All documents are stored and managed by CAA's national organization within its cloud storage and contract management systems. This architecture ensures secure access, maximizes uptime, and maintains backups for all CAA mission-critical information. CAA does not intend to store documents physically in the State of Oregon, as there is no legal requirement to do so. A copy of CAA's records retention policy is available upon request.

CAA will designate a records custodian who will be responsible for the administration of the records retention policies. These documents will facilitate the creation of the annual report elements specified in ORS 459A.878 and addressed in the "Reporting" section of this plan. The annual report will be submitted to DEQ on July 1 of each year.

g. Closure Plan

CAA financing proposals include the development of program reserve targets equivalent to at least six months of variable operating expenses. Recent experience with the wind up of a number of stewardship programs in the province of Ontario suggests that the six-month reserve policy will provide any ample buffer for fully resolving all CAA obligations related to a potential closure of its program. While there are different ways to measure wrap-up or closure costs, the range of these costs in Ontario for different programs has been between 15 and 30 percent for different stewardship programs.²³ Six months of reserves will ensure that CAA has the necessary resources for a transition period in the event CAA ceases operations as a PRO in Oregon.

Potential closure scenarios related to CAA operations in Oregon may include but are not limited to:

1. A decision by the CAA Board of Directors to cease operations in Oregon
2. Failure to maintain membership representing 10% market share or other qualifying criteria of a PRO as is required by the RMA
3. Changes in relevant laws, regulations, or other RMA program requirements

With respect to Scenario 3 above, CAA assumes that a change to the statutory and/or regulatory framework requiring CAA to cease operations in Oregon would likely be accompanied by conditions that provide notification and timing of required program termination dates. As such, this closure plan will focus on the other two possible closure scenarios.

In the case of an internal CAA decision to cease operations in Oregon (Scenario 1 above), CAA will endeavor to give its producers, service providers, DEQ, the ORSAC, local governments and other RMA interest holders a minimum of six months' notice that it intends to cease operations as a PRO in Oregon. CAA would also endeavor to align such a decision, if suitable under the circumstances, with the renewal dates associated with RMA Producer Plans.

In the case of Scenario 2 above, where CAA closure is due to a failure to maintain membership representing the required 10% market share or other qualifying criteria, CAA would implement a closure plan that aligns with timelines related to closure of operations associated with OAR 340-090-0730.

A notice of closure would include the intention for the termination of CAA's Oregon program, the anticipated CAA program termination date, and an outline of the steps CAA would take to wind up its operations in Oregon in an orderly fashion.

The CAA closure plan will include the following information:

²³ Ontario transitioned to a new legislative structure for EPR programs which resulted in the wind up of existing stewardship programs for tires, waste electronics, hazardous waste and packaging (the Ontario Tire Stewardship program was the first to wind up on December 31, 2018). While the transition of the Stewardship Ontario program for blue box packaging is not yet complete, actual and estimated wind-up transition costs for these programs has ranged between 15 and 30 percent of annual operating costs (less reserve contributions). More information on the wind up of these programs and related costs is available on the Resource Productivity and Recovery Authority website at <https://rpra.ca/>.

- Key steps and activities CAA will undertake before and after the termination date to ensure:
 - That RMA obligations have been maintained during the wind up of activities
- That service providers, local governments, and other participant are given adequate notice of the wrap up of individual CAA programs and contractual arrangements
- Implementation timelines, key steps and cut off dates for various program operations (final day to submit transportation compensation claims, for example)
- Communications plan and interested party notifications
- A closure financial plan and budget, including the process to ensure resolution of any liabilities and resolution of tax and other financial issues
- A plan to disburse any remaining assets and reserves once all financial and operational obligations have been addressed

Please note that in order to cease operations, CAA will have to conduct a number of activities after the termination date for the CAA RMA program. This would include final payments required under the RMA for activities that took place prior to the termination date.

Once CAA completes the steps required under the closure plan, it will provide notice to DEQ of the completion of the closure plan.

Certification and Attestation

a. Contents

i. Contact Information

Authorized Representative:	Jeffrey Fielkow
Title:	Chief Executive Officer, Circular Action Alliance
Address:	20 F Street NW, Suite 700, Washington, D.C. 20001
Phone Number:	833-424-7285
Email Address:	info@circularaction.org

ii. The Prospective PRO's Employer Identification Number

The Employer Identification Number for Circular Action Alliance is **92-3197259**.

The Employer Identification Number for Circular Action Alliance Oregon, LLC is 33-2160409.

iii. Proof of the Prospective PRO's Status as a Nonprofit

Circular Action Alliance Oregon, LLC is a nonprofit organization (and part of a group of nonprofit organizations) eligible to serve as a Producer Responsibility Organization under O.R.S. 459A.863(16) and (23).

Circular Action Alliance is a nonprofit corporation exempt from taxation under section 501(c)(3) of the Internal Revenue Code. Circular Action Alliance has organized separate, wholly owned subsidiaries, which are likewise tax-exempt under Section 501(c)(3) as disregarded entities of Circular Action Alliance in accordance with 26 C.F.R. § 301.7701-3(c)(1)(v)(A) and IRS Announcement 99-102, 1999-43 I.R.B. 545, to serve as the representative stewardship organization for producers in each state that passes an extended producer responsibility law, including Circular Action Alliance Oregon. This approach is consistent with the corporate structure of other recycling stewardship programs and preserves fees paid by Oregon producers for their intended use to support the implementation of the Recycling Modernization Act in Oregon.

Documents showing proof of Circular Action Alliance's and Circular Action Alliance Oregon's status as 501(c)(3) nonprofit organizations able to operate in Oregon are located in the [Appendices](#) as follows:

- Circular Action Alliance’s Restated Articles of Incorporation and Bylaws: [Appendix H](#)
- Circular Action Alliance’s 501(c)(3) determination letter from the Internal Revenue Service: [Appendix I](#)
(Note: Circular Action Alliance Oregon, LLC is wholly-owned by Circular Action Alliance and disregarded for tax purposes. As such, and in accordance with 26 C.F.R. § 301.7701-3(c)(1)(v)(A), Circular Action Alliance’s tax-exemption determination extends to Circular Action Alliance Oregon, LLC.)
- Circular Action Alliance’s proof of registration a charitable organization with the Oregon Department of Justice: [Appendix J](#)
(Note: Oregon Department of Justice does not separately register entities disregarded for tax purposes. The registration of Circular Action Alliance is treated as covering the activities of Circular Action Alliance Oregon, LLC.)
- Circular Action Alliance’s and Circular Action Alliance Oregon’s proof of registration as a foreign corporation with Oregon’s Secretary of State: [Appendix K](#)
- Circular Action Alliance Oregon, LLC’s Certificate of Formation and Operating Agreement: [Appendix L](#)

iv. Certifying Statement

I hereby declare under penalty of false swearing (Oregon Revised Statute 162.075²⁴ and ORS 162.085²⁵) that the above information and all of the statements, documents and attachments submitted with this plan are true and correct.

Circular Action Alliance Oregon, LLC

By: Circular Action Alliance, its sole member

Jeffrey Fielkow, Chief Executive Officer

Date: May 16, 2025

Signed: 

²⁴ oregonlegislature.gov/bills_laws/ors/ors162.html

²⁵ oregonlegislature.gov/bills_laws/ors/ors162.html

Appendices

The following appendices are available in separate documents:

- Appendix A: Definitions
- Appendix B: List of Member Producers and Market Share Calculation
- Appendix C: CAA Organizational Structure
- Appendix D: Interest Holder Engagement
- Appendix E: Itemized Budgets by Program Year
- Appendix F: PRO Depot Lists and Coverage
- Appendix G: Detailed Fee-Setting Methodology (confidential)
- Appendix H: CAA Restated Articles of Incorporation and Bylaws
- Appendix I: CAA 501(c)(3) Letter of Determination from the Internal Revenue Service
- Appendix J: CAA Proof of Registration as a Charitable Organization with Oregon DoJ
- Appendix K: CAA and CAA OR LLC's Proof of Registrations – Foreign Corporation
- Appendix L: CAA OR LLC Certificate of Formation & Operating Agreements
- Appendix M: Updated Program Implementation Timelines
- Appendix N: Response to Oregon Recycling System Advisory Council Feedback
- Appendix O: Legal Notices

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Appendix A:

Definitions

Below are the definitions used in **ORS 459A.863**, along with additional terms that have been used in this program plan.

- (1) **“Brand”** means any mark, word, name, symbol, design, device or graphical element, or a combination thereof, including a registered or unregistered trademark, that identifies a product and distinguishes the product from other products.
- (2) **“Certification Body”** as adapted from ISO 17000, means an independent organization contracted to provide the service of auditing, certifying an entity’s conformance with an established protocol. Certification bodies must meet defined standards for governance, impartiality, capability, confidentiality, and personnel management.
- (3) **“Certification Schemes”** as adapted from ISO 17000, also referred as Third-party Certification, means specially designed methods for verifying conformance of a product, process, or organization. Certification Schemes specify rules and procedures, objects of conformity, requirements, and the methodology for performing conformity assessments. These are frequently based upon internationally developed standards, such as those from ISO or ANSI. Certification Schemes approve Certification Bodies to perform auditing and certification of their scheme according to the defined methodology.
- (4) **“Certification Scheme Owner”** means, who is responsible for the development, publishing, and maintenance of the Certification Scheme. These organizations could be government agencies, NGOs, and certification bodies themselves.
- (5) **“Collection rate”** means the percentage of a specific material that is collected for recycling calculated by dividing the tonnage collected into the tonnage generated on an annual basis.
- (6) **“Commingled recycling”** means the recycling or recovery of two or more materials that are mixed together and that generally would be separated into individual materials at a commingled recycling processing facility in order to be marketed.
- (7a) **“Commingled recycling processing facility” means a facility that:**
 - (A) Receives source separated commingled recyclable materials that are collected commingled from a collection program providing the opportunity to recycle; and
 - (B) Separates the recyclable materials described in subparagraph (A) of this paragraph into marketable commodities or streams of materials that are intended for use or further processing by others.
- (7b) **“Commingled recycling processing facility” does not include:**
 - (A) Scrap metal recycling facilities;
 - (B) Scrap automotive or appliance recycling facilities;

(C) Full-service redemption centers or dealer redemption centers, as those terms are defined in ORS 459A.700, and recycling facilities owned and operated by a distributor cooperative established under ORS 459A.718;

(D) Recycling facilities handling covered electronic devices, as defined in ORS 459A.305;

(E) Recycling processing facilities that process only noncommingled, source separated recyclable material from commercial entities;

(F) Recycling processing facilities that recover commingled recyclable material primarily from the construction and demolition debris waste stream;

(G) Recycling depots;

(H) Recycling reload facilities; or

(I) Limited sort facilities, as defined by rule by the Environmental Quality Commission.

(8) **“Community Based Organization”** means a public or private nonprofit organization that has demonstrated capability in representing or meeting the needs of a specific community or a significant segment of a community.

(9) **“Contaminant” means:**

(A) A material set out for recycling collection that is not properly prepared and on the list of materials accepted for recycling collection by a recycling collection program; or

(B) A material shipped to a recycling end market that is not accepted or desired by that market.

(10) **“Contamination”** means the presence of one or more contaminants in a recycling collection or commodity stream in an amount or concentration that negatively impacts the value of the material or negatively impacts a processor’s ability to sort that material.

(11a) **“Covered product” means:**

(A) Packaging;

(B) Printing and writing paper; and

(C) Food serviceware.

(11b) **“Covered product” does not include:**

(A) A beverage container, as defined in ORS 459A.700.

(B) Bound books.

(C) Napkins, paper towels or other paper intended to be used for cleaning or absorbing liquids.

(D) Rigid pallets used as the structural foundation for transporting goods lifted by a forklift, pallet jack or similar device.

(E) Specialty packaging items that are used exclusively in industrial or manufacturing processes, including but not limited to:

(i) Cores and wraps for rolls of packaging sold by a mill to a packaging converter or food processor; and

(ii) Trays, whether designed for a single use or multiple uses, used for the transport of component parts from a parts supplier to a manufacturer that assembles those parts.

(F) Liquified petroleum gas containers that are designed to be refilled.

- (G) A material that the producer demonstrates is exempt under section ORS 459A.869.
- (H) Pallet wrap or similar packaging used to secure a palletized load if added by a person that is not the producer of the palletized covered products.
- (I) Packaging related to containers for architectural paint, as defined in ORS 459A.822, that has been collected by a producer responsibility organization under the program established under ORS 459A.820 to 459A.855.
- (J) Any item that is not ultimately discarded inside this state, whether for purposes of recovery or disposal.
- (K) Items sold on a farm or used on a farm, including items used for farm use, as defined in ORS 215.203, or for processing on a farm, provided that an item used on a farm is not subsequently sold at a retail establishment that is not located on a farm.
- (L) Items used by a nursery licensed under ORS 571.055 that generates the majority of the nursery's revenue through the sale of nursery stock, as defined in ORS 571.005, provided that the items are not sold through retail sales.
- (M) Packaging and paper products sold or supplied in connection with:
 - (i) Prescription drugs as defined in ORS 689.005;
 - (ii) Nonprescription drugs as defined in ORS 689.005;
 - (iii) Drugs marketed under a brand name as defined in ORS 689.515; or
 - (iv) Drugs marketed under a generic name as defined in ORS 689.515.
- (N) Packaging and paper products sold or supplied in connection with drugs that are used for animal medicines, including but not limited to parasiticide drugs for animals.
- (O) Packaging and paper products sold or supplied in connection with:
 - (i) Infant formula as defined in 21 U.S.C. 321(z);
 - (ii) Medical food as defined in 21 U.S.C. 360ee(b)(3); or
 - (iii) Fortified oral nutritional supplements used for individuals who require supplemental or sole source nutrition to meet nutritional needs due to special dietary needs directly related to cancer, chronic kidney disease, diabetes, malnutrition, or failure to thrive, as those terms are defined as by the International Classification of Diseases, Tenth Revision, or other medical conditions as determined by the commission.
- (P) Wine and spirit containers for which a refund value is established under Oregon law.
- (Q) Packaging for products:
 - (i) That are required under 40 C.F.R. 156.140, or other federal regulation pertaining to toxic or hazardous materials, to state on the label or container that the packaging should not be recycled or should be disposed of in a manner other than recycling; or
 - (ii) Identified by the commission by rule as product that is required by law to state on the label or container that the packaging should not be recycled or should be disposed of in a manner other than recycling.
- (R) Any other material, as determined by the commission by rule, after consultation with the Oregon Recycling System Advisory Council.

- (12) **“Desk audit”** means an analytical process that is conducted using data or information readily available on the computer that does not entail additional on-site or field-based research or analysis.
- (13) **“Eco-modulation”** means the use of fee adjustments issued to producers based on their actions (or inactions) to improve the environmental performance of their packaging. The monetary adjustments are typically in the form of incentives (bonuses) or disincentives (maluses) applied to the producer’s base fees that are payable for a particular material category.
- (14) **“Equity”** means the consistent and systematic fair, just, impartial treatment and meaningful involvement of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty, inequality or negative effects of decisions on the environment. (The term “underserved communities” is defined later in this appendix.)
- (15) **“Food serveware”** means paper or plastic plates, wraps, cups, bowls, pizza boxes, cutlery, straws, lids, bags, aluminum foil or clamshells or similar containers:
 - (A) That are generally intended for single-use; and
 - (B) That are sold to a retailer or a dine-in food establishment or a take-out food establishment, regardless of whether the item is used to prepackage food for resale, is filled on site for food ordered by a customer or is resold as is.
- (16) **“Generator”** means a household, business, or other entity that utilizes and then discards packaging or printed materials to be managed as waste or as reusable, refillable or recyclable material.
- (17) **“Large producer”** means a producer that is among the 25 largest producers of covered products based on market share.
- (18) **“Licensee”** means a person that is licensed by a brand and manufactures a covered product or a packaged item under that brand.
- (19) **“Litter”** means waste that is improperly placed so as to be a nuisance or aesthetic, health or environmental concern.
- (20) **“Local government”** means:
 - (A) A city;
 - (B) A county; or
 - (C) A metropolitan service district.
- (21) **“Local government’s service provider”** means:
 - (A) A collection service franchise holder under ORS 459A.085;
 - (B) Any person authorized by a city or county to provide recycling collection services described in subsection (25)(a) to (d) of this section; or

(C) Any person authorized by a metropolitan service district to provide recycling collection services described in subsection (25)(d) of this section.

- (22) **“Market share”** means a producer’s percentage of all covered products sold in or into this state during a specified time period, as calculated in accordance with methods established by the commission by rule.
- (23) **“Mechanical recycling”** means a form of recycling that does not change the basic molecular structure of the material being recycled.
- (24) **“Metropolitan service district”** means a metropolitan service district established under ORS chapter 268.
- (25) **“Nonprofit organization”** means an organization or group of organizations described in section 501(c)(3) of the Internal Revenue Code that is exempt from income tax under section 501(a) of the Internal Revenue Code.
- (26) **“Opportunity to recycle”** has the meaning given that term in ORS 459A.005.
- (27a) **“Packaging” means:**
 - (A) Materials used for the containment or protection of products, including but not limited to paper, plastic, glass or metal or a mixture thereof;
 - (B) Single-use bags, including but not limited to shopping bags; and
 - (C) Nondurable materials used in storage, shipping or moving, including but not limited to packing materials, moving boxes, file boxes and folders.
- (27b) **“Packaging” does not include:**
 - (A) Food serviceware; or
 - (B) Sharps, as defined in ORS 459.386.
- (28) **“Parent facility”** means a preexisting permitted or other larger facility that may also host a potential PRO depot.
- (29) **“Person”** has the meaning given that term in ORS 459.005.
- (30) **“Printing and writing paper”** includes, but is not limited to, newspaper, magazines, flyers, brochures, booklets, catalogs, telephone directories and paper used for copying, writing or other general use.
- (31) **“Processor”** means a person that owns or operates a commingled recycling processing facility.
- (32) **“Producer”** means a person that is determined to be the producer of a covered product under ORS 459A.866.
- (33) **“Producer responsibility organization”** means a nonprofit organization established by a producer or group of producers to administer a producer responsibility program.
- (34) **“Producer responsibility program”** means a statewide program for the responsible management of covered products that is administered by a producer responsibility organization pursuant to a plan approved by the Department of Environmental Quality under ORS 459A.878.
- (35) **“Recyclate”** means recycled material that is used in the manufacturing of new packaging or other products.
- (36) **“Recycling collection”** means the act or process of gathering recyclable materials by:
 - (A) On-route residential collection from the generator at the place of generation;
 - (B) On-site nonresidential collection from the generator at the place of generation;

(C) Multifamily on-route residential collection from each multifamily dwelling that has five or more units;

(D) Recycling depots at a disposal site or another designated location that is more convenient to the population being served and expanded depots as described in ORS 459A.007; or

(E) Other collection methods included in an approved producer responsibility program plan.

- (37) **“Recycling depot”** means a location where recyclable materials are accepted from the public or commercial businesses and transported to a location for processing or to an end market.
- (38) **“Recycling rate”** means the percentage or ratio of a material or set of materials that is collected and processed for recycling divided into the amount of that material or set of materials that is generated.
- (39) **“Recycling reload facility”** means a facility other than a recycling depot where recyclable materials are received, consolidated and made ready for transport to another location for processing or to a responsible end market.
- (40) **“Recycling system”** means all aspects of the programs and participants that have a role in Oregon’s statewide recycling structure, including producers of products sold in or into Oregon, generators of recyclable materials, governments that regulate materials management programs, businesses that collect and process recyclable materials and persons that receive recyclable materials to convert to new feedstock or products.
- (41) **“Responsible end market”** means a materials market in which the recycling or recovery of materials or the disposal of contaminants is conducted in a way that benefits the environment and minimizes risks to public health and worker health and safety.
- (42) **“Responsible management”** means the handling, tracking and disposition of covered products from the point of collection through the final destination of the collected material in a way that benefits the environment and minimizes risks to public health and worker health and safety.
- (43) **“Responsible recycling”** means the handling of covered products for recycling and removal of contaminants by a certified or permitted processor and disposition to a responsible end market.
- (44) **“Reverse logistics”** means the process of returning discarded materials that were distributed to generators back through a supply chain to reuse, refillable or manufacturing end uses.
- (45) **“rPET”** designates PET (polyethylene terephthalate) resin derived from discarded PET that has been collected, sorted, and processed into feedstock for the purpose of manufacturing new packaging or other products.
- (46) **“Small producer”** means a producer that:
- (A) Is a nonprofit organization;
 - (B) Is a public body, as defined in ORS 174.109;
 - (C) Has a gross revenue of less than \$5 million for the organization’s most recent fiscal year;
 - (D) Sold in or into Oregon less than one metric ton of covered products for use in this state in the most recent calendar year;
 - (E) Is a manufacturer of a beverage sold in a beverage container, as those terms are defined in ORS 459A.700, that sold in or into Oregon less than five metric tons of covered products, including but not limited to secondary and tertiary packaging for beverage containers, for use in this state in the most recent calendar year;

(Fa) Is a restaurant, food cart or similar business establishment that primarily sells to members of the public food that is generally intended to be consumed immediately and without the need for further preparation, either on or off the premises; and

(Fb) Is not a producer of food serveware as described in ORS 459A.866; or

(G) Operates a single retail sales establishment, has no online sales and is not supplied or operated as part of a franchise or a chain.

- (47) **“Specifically identified material”** means a material or covered product identified by the department under ORS 459A.917.
- (48) **“Transcreation”** means text that is made coherent and understandable in another language, not simply translated word for word.
- (49) **“Underserved communities”** refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the definition of “equity” earlier in this appendix.
- (50) **“Uniform statewide collection list”** means the list of materials established in accordance with the requirements of ORS 459A.914 (4).
- (51) **“Wasteshed”** means a designated area where material is physically generated and managed for disposal, reuse, refilling or recycling.

Appendix B:

List of Member Producers and Market Share Calculation

Inclusion on the list of registered producers at this time does not in itself serve as verification of whether a company is an obligated producer.

List of Member Producers

As of November 2024, CAA received over 1,550 producer registrations representing producers in Oregon. Approximately 90-95% appear to be above the \$5 million revenue de minimis threshold based on preliminary third-party data. CAA's 20 Founding Members as well as a full list of the registered companies is given in the list below.

CAA's 20 Founding Members are:

- | | |
|------------------------|----------------------------|
| 1. Amazon | 11. Mondelez |
| 2. Clorox | 12. Nestlé USA |
| 3. Colgate-Palmolive | 13. Niagara Bottling, LLC |
| 4. Danone | 14. PepsiCo |
| 5. Ferrero US | 15. Procter & Gamble |
| 6. General Mills | 16. SC Johnson |
| 7. Keurig Dr Pepper | 17. Target |
| 8. Kraft Heinz | 18. The Coca-Cola Company |
| 9. L'Oréal | 19. Unilever United States |
| 10. Mars, Incorporated | 20. Walmart |

Producers registered with CAA in Oregon are:

1A Auto Inc	AGREM BTY, LLC
3D Barrier Bags Incorporated.	Agri-Mark, Inc. DBA Cabot Creamery Cooperative
3M, Meguiars	AKU Outdoor Inc.
4imprint, Inc.	Albaugh LLC
5.11 Inc.	Albertsons Companies Incorporated
6th Sense Lure Co. LLC.	ALDO US INC
7-Eleven, Inc.	AlEn International Inc.
8th Avenue Food & Provisions	Alimentation Couche-Tard / Circle K Stores, Inc.
A. O. Smith Corporation	ALKHEMY LLC
AAON, Inc.	All-One-God-Faith, Inc. DBA Dr. Bronner's
Abbott Laboratories	Allbirds, Inc.
Abercrombie and Fitch Company	Allergan, Inc., an AbbVie company
Accredo Packaging, Inc.	Altenloh, Brinck & Co. US, INC.
Ace Hardware Corporation	Altria Client Services LLC
Acer America Corporation	AMAZING CONCEALER COSMETICS INC
Acme Smoked Fish Corporation	Amazon.com Services, LLC
Acqua di Parma LLC	Amer Sports Company
Active Brands North America Inc.	American Colloid Company
Adams & Brooks, Inc	American Honda Motor Company, Inc.
adidas America, Inc	American Licorice Company
Advance Polybag Inc.	American Studio Designs Ltd
Advance Stores Company, Incorporated	American Textile Company, Incorporated
AE Outfitters Retail Co.	American Tuna Inc
Aesop USA Inc	Ames Research Laboratories, Inc.
Aexcel	Amesbury Industries Inc. d.b.a. AmesburyTruth
AFC Ecoplastics	Amika Benefit LLC
AFTCO MFG CO, INC.	AMOREPACIFIC US, INC.
AG1 USA Inc.	Amway Corporation
	Amy's Kitchen Inc.

Anagram International, LLC	Astral Brands
Anastasia Beverly Hills, LLC.	Athea Laboratories, Inc.
Anchor Packaging, LLC	Atlantic Corporation of Wilmington, d.b.a. "Atlantic Packaging"
Andersen Corporation	Atlas Roofing Corporation
Anheuser-Busch, LLC	Atmus Filtration Technologies Inc
Aniket Metals Pvt Ltd	"ATTENDS HEALTHCARE PRODUCTS, INC & ASSOCIATED HYGIENIC PRODUCTS LLC"
Ansell Healthcare Products LLC	Australian Gold, LLC
Apple Inc.	AutoPartSource
Aqua Clear Industries, LLC	AutoZone, Inc.
Aqua Divers, Inc.	Avenger Products LLC
Aqua Leisure Recreation, LLC	Axiology LLC
ARAMARA BEAUTY LLC dba Glow Recipe	Axium Foods
ARBONNE INTERNATIONAL, LLC	B D Loops, Inc
Arctica Inc.	B.F. Ascher & Co., Inc.
Arista Networks, Inc.	Bacardi-Martini
Arla Foods	Bahlsen North America Inc.
Arlee Home Fashions, Inc.	Bakerly LLC
Armstrong World Industries, Inc.	Ball Corporation
Arovast Corporation	Ball, Bounce and Sport, Incorporated
Arthur Schuman Incorporated	Ballard Pacific Resources, Inc.
Arttoy Industrial Limited	Balsam Brands Inc.
Artsana USA, Incorporated	Bandai Namco Toys & Collectibles America Inc.
AS America d/b/a American Standard Brands	Banzai International Limited
Ascent Battery Supply, LLC	Bard Manufacturing Company, Inc.
ASEA LLC	Barilla America, Inc.
Asepsis, Inc.	Basic Fun, Inc.
Ashley Furniture Industries, LLC	Bath & Body Works
Aspire Bakeries LLC	
Assa Abloy Americas Residential	

BAYER U.S. LLC	Bi-Mart Corporation
Baylis & Harding PLC	BICO INTERNATIONAL CO.,LTD
BBB Industries, LLC	Bicycle Tools Incorporated dba Park Tool Company
Bean Brothers LLC dba The Seat Shop	Big Lots, Inc.
Beccair, LLC. DBA Briogeo Hair Care	Big Tree Farms Inc.
Beecher's Handmade Cheese, LLC AND Sugar Mountain Livestock, LLC	Bigelow Trading, LTD.
BEF Foods Inc.	Bil-Jac Foods, Incorporated
Behr Process LLC	Bimbo Bakery USA
Beiersdorf Inc	BioBag Americas, Inc
Beko US Inc.	Bioceres Crop Solutions Corp.
Bel Brands USA	BioLab, Inc.
Bendon, Inc.	Bioplastics International
Benjamin Moore & Co.	BISSELL Homecare, Inc.
BENQ AMERICA CORP	BKBG Enterprises aka Devanco Foods
Bento Inc.	Black Diamond Equipment
Berry Global	Blanco America Inc.
Berryman Products, Incorporated	Blistex Inc.
Best Buy Co., Inc.	Blount Fine Foods, Corp
Best kept treasures	Blue Diamond Growers
Bestway (HongKong) International Ltd	Bluemercury Inc.
BESTWAY (HONGKONG) INTERNATIONAL LTD.	BlueTriton Brands, Inc.
Betallic, LLC	Bob's Red Mill Natural Foods, Inc.
Betco Corporation LLC	BOOM! By Cindy Joseph, LLC
Better Earth, LLC	Bosch Thermotechnology Corporation
Better Planet Brands LLC	Boston Beer Company
Beyond Meat Inc.	Bradford White Corporation
beyondGREEN biotech, Inc.	Brakebush Brothers, Inc
BHARAT EXPORT	Brand Evangelists for Beauty Incorporated
	Branded Custom Sportswear, Inc.

Brandt Consolidated, Inc.	dba BLACKWING"
Brasscraft Manufacturing Company	California Olive Ranch Inc.
BRAV USA Inc.	Calipak LLC DBA Queen of Cups
Bright Star Products LLC	Campari America LLC
Britannica Home Fashions	Campbell Soup Company
Britax Child Safety, Inc., Britax	Campers World Apparel
Broan-NuTone LLC	Canary LLC
Brooklyn Brands Inc.	Canon U.S.A., Inc.
Brooks Running	CAP Barbell, Inc.
Brother International Corporation	Capital Lighting Fixture Company
Brown-Forman Corporation	Car-Freshner Corporation
BRP US Inc.	Carboline Global
BSH Home Appliances Corporation	Cargill, Incorporated
Buckle Inc.	Carhartt, Inc.
Buffalo Games	Carl Karcher Enterprises Restaurants Inc.
Build A Bear Retail Management	Carl Zeiss Vision
Bumble Bee Foods, LLC	Carma Laboratories, Incorporated
Bunzl Distribution USA, LLC	Carpenter Co.
Burco (DE), LLC	Carrier Corporation
Burnham Holdings, Inc.	Cascade Designs Incorporated
ButcherBox OpCo LLC	Cascade Ice, LLC
BUZZ BEE TOYS (HK) CO. LIMITED	CCA and B, LLC dba The Lumistella Company
C.A.L Marketing Proprietary Limited	Celine Inc.
C.A.M.P. SpA Costruzione Articoli Montagna Premana	CELLAP LABORATOIRE SA
C.P Loewen Enterprises Ltd.	Centric Brands
Cadres Columbia Inc	Certified Origins INC
Cafe Valley, Inc.	cfeb SISLEY
Califia Farms, LLC	Champion Petfoods USA Inc.
"California Cedar Products Company	Chanel

CHANGYA NEWMATERIAL TECHNOLOGY CO., LTD	CLEARSTEM Skincare
Chap Mei Plastic Toys Mfy Ltd.	Clopay Corporation
CHARLES KOMAR & SONS, INC. (Komar Brands)	Closet Complete, LLC
Chase Products Company	Club Car, LLC
Cheese Merchants of America LLC	Cocofloss, Inc.
CHEM-PAK INC	Colgate-Palmolive Company
Chick-fil-A, Inc	Colonial Chemical, Inc.
China Window Industry Co., Ltd.	ColorMetrics LLC
Chobani, LLC	Columbia Frame Inc.
Chocolate Quality Chocolate, Inc.	Columbia Sportswear Company
Christian Dior Perfumes LLC	Combe Incorporated
Christy Sports	Community Playthings LLC
ChromaDex, Inc.	Compass GreenTech Limited
Chuan's Promise LLC dba Erleia	Compass Minerals America Inc.
Church & Dwight Co., Inc.	Conagra Brands Inc.
Cimpress USA Manufacturing Incorporated	Conair LLC.
CIRANDA INC.	Condair Group AG
Cisco Systems, Inc.	Conquest Sport Group, LLC
CITGO Petroleum Corporation	Consilium Tech Limited Liability Company (LLC)
CJDE Treats LLC d/b/a Treat House	Constellation Brands, Inc.
CKE Restaurants, Inc.	Continental Mills, Inc
CKF Incorporated	Cooperative Regions of Organic Producer Pools
Clarins USA Inc.	Copeland LP
Clarks Americas, Inc.	Copra Inc
Clean Age Inc	Cornerstone Brands, Inc.
CLEAN BEAUTY COLLECTIVE INC.	Corteva Agriscience
Clean Beauty for All, Inc.	Cosco Home & Office Products
Clean Body Care, LLC	COSMETICS FACTORY INC
Clean Control Corporation	Cosonic Intelligent Technologies Co., Ltd.

Costco Wholesale Corporation	Decathlon America LLC
COTY USA	DECIEM USA LLC
COUNTRY MAID, INC	Dedoles LLC
CP Flexible Packaging	DEHUIDA VIETNAM TECHNOLOGY COMPANY LIMITED
Crazy Aaron Enterprises	Delorio Foods Incorporated
CRC Industries, Inc.	Del Monte Foods, Inc.
Crocs, Inc.	Delicato Vineyards, LLC
Crofters Food Ltd.	DELL Technologies
CRP Industries Inc.	DeLonghi America Inc
Cultskin Apothecary Inc. dba Dieux Skincare	Delta Faucet Company
Cummins, Inc.	Delta Galil Industries
Curio Brands, LLC	Delta T LLC dba Big Ass Fans
Custom Accessories, Inc.	Density Inc.
CVS Pharmacy	Design Resources, Inc.
CY Top, PTE	Designer Brands Inc
D.P.I. (H.K.) LIMITED	DEZI Cosmetics, LLC
D&S Cable Industries (HK) Limited	DHC USA Incorporated
D&W Fine Pack	Diageo Americas, Inc.
Da Bomb LLC	Diamond Vogel, Inc.
Dairy Farmers of America	DICK'S Sporting Goods
DANESSA MYRICKS BEAUTY, LLC	Direct Pack, Inc.
Danfoss A/S	"DiscoverFresh Foods Inc
Dania, Incorporated	DBA DiscoverFresh Foods"
Danone US, LLC	Discovery Energy, LLC
DAP Global Inc.	Distinctive Foods, LLC
Dart Container	Diversey, Inc.
Dawn Food Products Inc.	Dixon Ticonderoga Company
DBK (HK) COMPANY LIMITED	DMA Industries LLC
DDP Specialty Electronic Materials US, LLC	Doctor Rogers Skin Solutions Inc

DOLAN DESIGNS INCORPORATED

Dollar General Corporation

Dollar Tree Stores, Inc.

Dolphin Hat Games, LLC

Domaine Chandon

Domino's Pizza, Inc.

Domo Industry Inc

Domtar Paper Company, LLC

Dongguan Lung Cheong Technology Co.,LTD

Dongguan Xinhai Environment-Friendly Materials Co . ,
Ltd

Dorman Products, Inc.

doTERRA Intl, LLC.

Doughboy Commissary, LLC.

Douglas County Bottling Company

Dr. Squatch

Dr. Wolff USA Distribution Inc.

Drake Holdings Inc dba DPS Skis

Dream On Me Industries, Inc.

DreamHigh Toys Co., Ltd

DRI Duck Traders, Inc.

DribbleUp, Inc.

Driscoll's, Inc.

DS Services of America (DBA Primo Water)

Duchess Cookies, Inc.

Duckhorn Wine Company

Duke Cannon Supply Co.

Dulcich, Incorporated

Dunn-Edwards Corporation

DUX Interiors, Inc., dba DUXIANA

Dynamic Discs Inc

Dyno, LLC

E.D. Bullard Company

e.l.f. Cosmetics, Inc

Earth Animal Ventures, Inc.

East West Tea, LLC.

Eastman Kodak Company

EastPoint Sports Ltd.,LLC

Easy 1 2 3 Pool Care LLC

Eco-Chic LLC dba Credo Beauty

Eco-Shell, LP

Ecolab Inc.

EcoSafe Zero Waste Inc.

Ecosense Environmental Technology Sdn. Bhd.

Edgewell Personal Care LLC

Edward Don and Company

Elanco US Inc.

Electrolux Consumer Products, Inc.

Element Electronics Holdings, LLC

ELENCO ELECTRONICS, LLC

Elevate Outdoor Collective, LLC

Elkay Plastics, Co., Inc.

Elmich joint stock company

Emerson Electric

Energizer Holdings

Epic Designer Limited.

Epic Trend & Distribution Services Inc.

EPIC GARMENTS DWC-LLC"

Epoca International, LLC	Federated Group, INC
Equal Exchange, Inc.	Feit Electric
EQUIP OUTDOOR TECHNOLOGIES USA, LLC	Fender Musical Instruments Corporation
ESI Cases & Accessories	Fenix Outdoor Import LLC
ESSICK AIR PRODUCTS, INC	Fera Pets, Inc
Estee Lauder Companies	Ferguson HVAC West Coast
ET Browne Drug Co Inc	Fernando Saavedra
Etekcite Corporation	Ferrara Candy Company
Ethical Earth Brands LLC	Ferrero U.S.A., Inc.
Ethique Haircare	Fewer Better Things Inc.
Euromarket Designs, Inc.	FGF Brands LLC
EuroPharma, Inc	Fine Americas Inc.
Eurow O Reilly Corporation	First Day Life Inc.
Eva NYC Benefit LLC	First Learning Company Limited
Everest Group USA, INC.	First Lite, LLC
Evereve	First Quality Tissue
Everlane Inc	FISHER FOOTWEAR LLC MB FISHER LLC
Evre Self-Care Ince	Fizz Creations Ltd
Exxel Outdoors, LLC	Floor and Decor Outlets of America, Inc.
ExxonMobil	Flowers, Inc.
Fabletics, Inc.	Fluidra
Fanatics, LLC	Flybar, Inc.
Fanimation, Inc.	Flylow Sports Inc DBA: Flylow Gear
FAR OUT TOYS (HK) CO., LIMITED	FMC CORPORATION
Farmdale Creamery, LLC	Fonterra USA, Inc.
Fascinations, Inc.	Food Northwest
Fastenal Company	Foppen Paling en Zalm
Faultless Brands	Ford Motor Company
FCA US LLC	FORMA Brands, LLC.

Fortune Brands Water Innovations LLC

Foundation Consumer Brands

FOURSTAR GROUP INC.

FOUSINE (HONG KONG) INDUSTRIAL HOLDINGS
LIMITED

Franke Home Solutions North America, LLC

Franklin Sports Incorporated

FRATELLI BERETTA USA, INC.

Free Country Ltd

Free Fly Fishing Company, LLC

French Farmacie, LLC dba French Farmacie

Fresh Inc.

Freshpet, Incorporated

Frog Bikes Inc

Frontier Distribution, LLC

FUJIFILM North America Corporation

Fujitsu General America, Inc.

Funai Corporation Inc.

FUNBOY, INC.

Funko

Furlani Foods Limited

G-III Apparel Group Ltd.

G-Tex Apparel Inc.

GAF

Gallo

Games Workshop Retail Inc.

GANZHOU DEHUIDA TECHNOLOGY CO., LTD.

Gap Inc.

Garden-Fresh Foods, Inc.

Gardner Enterprises inc.

Gardner-Gibson, Inc.

Garmin International

Garven LLC

GE Appliances, a Haier Company

GEAR AID INC

Generac

General Mills

General Motors Company

Genesis Industries Limited

Genie Supply Inc

Genpak, LLC

Genuine Parts Company

Georgia-Pacific LLC

Gerber Childrenswear LLC

GESIN (ZHANGPU) CO., LTD

GG Brands Company

GI-GO TOYS FACTORY LTD

Gillyboo Corporation

Ginsey Industries, Inc

Give Back Beauty LLC

Giving Beauty LLC

Glanbia Performance Nutrition (NA), Inc.

Global Uprising (PBC) - Known as Cotopaxi

Global-Pak, Inc.

Glossier, Inc.

Go BRIXY, Inc.

Goetze's Candy Company, Inc.

GOJO Industries, Incorporated

Gold, Inc., dba Goldbug	Guangdong Ecosource Environmental Technology Co., Ltd.
Golden Artist Colors, Inc.	Guayaki Sustainable Rainforest Products Inc
Golden Cannoli Shells Co. Inc.	Guerlain Inc.
Golden West Trading LLC	Guthy-Renker, LLC
Good Molecules, LLC	Gymshark USA Incorporated
Good Smile Company U.S., Inc.	H&M Fashion USA, Inc. / H&M Group
GoodCrop Inc	Habermaass Corp. Inc.
Google LLC	Haddad Apparel Group Limited
Google, Inc.	Hakubaku USA, Inc.
GoPro	HAKVIR, LLC dba Reflekt
Gordini USA, LLC	Haleon US Holdings LLC
Gorton's Inc	Halfdays Apparel Corp.
Gowan Company	Hallmark Cards, Incorporated
Granny B's Cookies	Hamedata Technology Co., Limited
Graphic Packaging International LLC.	Hamilton Beach Brands, Inc.
Great Lakes Label LLC	HAN Skincare Cosmetics
Green Paper Products, LLC	Hanchett Paper Company d/b/a Shorr Packaging Corp
Greenheck Fan Corporation	hand2mind
Greensource Brand Apparel, Inc.	HANGZHOU GREATSTAR INDUSTRIAL CO.,LTD
Grocery Delivery E-Services USA, Inc. dba HelloFresh	Hansgrohe INC
Group Rossignol USA INC	Happy Arts & Crafts Ningbo Co., Ltd
Groupe SEB USA	Harmless Harvest, Inc.
Grove Collaborative Holdings, Inc.	Harry's Inc.
Gruma Corporation	Hartex Rubber Private Limited, India
Grundens USA, Ltd.	Hartford-Jackson, LLC
Grupo Alsur USA, Inc.	Hasbro Inc.
GS Beauty LLC	Hawaiian Host Group
Guangdong Compass GreenTech Limited	Haws Corporation

HD SUPPLY INC	HONGKONG HONOR HIGH TECH CO., LIMITED
Head USA, Inc.	HOPPE North America, Inc.
Heaven Hill Distilleries, Inc.	Horizon Group USA, Inc.
Heineken USA Incorporated	Horizon Organic Dairy, LLC
Helen of Troy L.P.	Hormel Foods Corporation
Helena Agri-Enterprises, LLC	Hotaling & Co., LLC
HELLY HANSEN U.S., INC.	HP Hood LLC
Henkel Corporation	HP Inc
Herb Pharm LLC	HR Beauty aka rhode skin
Herbert Malarkey Roofing Company	Hubei Aishida Electrical Equipment CO Ltd
Herbruck Poultry Ranch, Inc.	Hughson Nut, Inc.
Heritage Specialty Foods	Huhtamaki
HERO ECOTECH LIMITED	HUIZHOU WEIDE ELECTRONICS CO., LTD
HESINGINT ' L TRADING CO.,LTD	Hunter Fan Company
Hestra Gloves, LLC	Husqvarna Professional Products, Inc.
Highline Warren LLC	Hussmann Corporation
Hillyard, Inc.	Hyper Bicycles, Inc.
Hilti	Icelantic Skis LLC
Himatsingka Linens (A division of Himatsingka Seide Ltd.)	ICP Group
HLB90067, Inc.	IERO BEAUTY LLC
Hoffmaster Group, Inc.	IKEA Food Supply (US) Inc.
Holcim Solutions and Products US LLC	IKEA North America Services
Holstein Parts	IKEA Supply AG
Home Depot USA, Inc	ILIA Inc.
HomeCare Labs	Illinois Tool Works Inc.
Honey Can Do International, LLC	Image International Manufacturing, LLC dba Image Skincare
Honeysticks Limited	Imperial Bag and Paper LLC
Hong Kong Etech Groups Ltd	Implus Footcare, LLC.

Impossible Foods Inc.	JEGS Automotive, LLC
Independent Bakers Association (IBA)	JELD-WEN
Indo Count Industries Ltd	Jelly Belly Candy Company
Innersense Organic Beauty, Inc	Jelmar LLC
Inno-Pak, LLC	Jiangsu Phoenix Art Materials Technology Co., Ltd.
Innovative Water Care Global Corporation	Jim Beam Brands Co.
Inspired Beauty Brands, Inc.	JMW Sales, Inc.
Intel Corporation	101 A Street Ashland, OR 97520 USA"
International Vitamin Corporation	JOANN Inc.
INTERPARFUMS, USA LLC	Jockey International, Inc.
Intertape Polymer Corp.	John B. Sanfilippo & Son, Inc.
Intex Recreation Corp	John Paul Mitchell Systems
Intradeco Apparel Inc	John Soules Foods, Inc
IPL US Holding Company	Johns Manville
iRobot Corporation	Johnson Controls, Inc.
Irving Consumer Products Ltd	Johnson Outdoors Inc.
ITG Holdings USA Inc.	Joie Children's Products, Inc.
Itoen North America Inc.	Josh Rosebrook Skin and Hair Care LLC
J&B Importers, Inc	Josie Maran Cosmetics, LLC
Jack in the Box Inc.	JSP Limited
Jackson Family Wines, Inc.	Just Born, Inc.
Jadex Inc.	JustSteven, LLC dba Jones Road Beauty
Jafrá Cosmetics International Inc	JVCKENWOOD USA Corporation
JAM Packaging LLC.	K Source Inc.
Jamieson Wellness Inc.	Kai Rui Company Limited
Jazwares, LLC	Kai Rui Enterprises (Hong Kong) Limited
JBR (John Barry Rogers) Inc Dbá San Francisco Bay Coffee	KAI USA LTD.
JDEP Blue Moon	kaia naturals inc.
	Kan-Pak, LLC

KAO USA	Kodiak Cakes, LLC
Kaper Industrial Limited	Kohler Company
Kari Gran Incorporated	Koki Holdings America Ltd.
Kellanova	Kolbe and Kolbe Millwork Co., Inc.
Kem Krest	Kosas Cosmetics, LLC
Ken's Foods, Inc.	KQS INC.
Kendo Holdings Inc.	Kraft Heinz Foods Company
Kent International Inc.	Kraus USA Plumbing LLC
Kent Pet Group, Inc	KraveBeauty LLC
Kent Precision Foods Group, Inc.	Kruger Products Inc.
Keurig Dr Pepper	KSF Acquisition Corp.
KHANG AN FOODS JOINT STOCK COMPANY	Kuat Innovations LLC
Kia America, Inc.	Kubota North America
Kichler Lighting LLC	KUIU LLC
KIK Consumer Products	Kunal Housewares Private Limited.
KIK International	Kureha Corporation
KIK Pool Additives, Inc.	L. L. Bean, Inc.
Kimberly-Clark Corporation	L. Perrigo Company
Kinfield, Inc.	L'Occitane, Inc.
King Koil Manufacturing West (KKMW)	L'Oreal
KIRK'S NATURAL LLC	La Jolla Group Inc
Kirker Enterprises Inc.	LA SAVONNERIE ROYALE
Kitchen Fresh Candies, Inc.	La Sportiva N.A., Inc.
Kittrich Corporation	LA-CO Industries Inc.
Klean Kanteen, Inc.	Lachman Imports Inc.
Kleen Products, Inc.	LaCrosse Footwear, Inc.
Kleen Test Products Corporation	Lactalis Cheese and Dairy Holding, Inc
Klein Tools, Inc.	LALA U.S., Inc.
KnitWell Intermediate, Inc.	Lamb Weston Holdings, Inc.

LAMUES TECHNOLOGY CO., LTD.Â	Liansheng Corporation
Lancaster Colony Corporation	Liberty Hardware Manufacturing Corporation
Land O'Lakes, Inc.	LIBRA PACIFIC CO., LTD
Landsberg Orora	Life 360 Inc.
Lassonde Pappas and Company, Inc.	LifeWave Inc.
LATICRETE International, Inc	LIMINAL, LC
Lavender Lingerie, LLC	Lindt & Sprüngli (North America), Inc
Lawson Products	LINHAI BOLI-FAR LIGHTING PRODUCING CO.,LTD
Layfield Group	Linhai Pingfeng Lighting Co., Ltd.
Leapfrog Product Development, LLC	Linhai Yinhe Electric Lamp Company
Learning Resources	Liphatech, Inc.
Leclerc Foods USA, inc.	Liqui Moly GmbH
Lee Kum Kee (U.S.A.) Inc.	Little Caesar Enterprises, Littles Caesars, LCE
LEGELITE TECHNOLOGY LIMITED	LIXIL
Legend Brands	Ljulja Beauty Inc. dba Makeup by Mario
LEGO Brand Retail, Inc.	LOLE BRANDs CANADA ULC
Legrand AV, Inc.	Lorax EPI
Legrand Connectrac, LLC	Loveland Products, Inc.
LEKI USA, Inc	Low Pressure Studio B.V
Lennox International Inc.	Lowe's Companies, Inc.
Lenovo (United States) Inc.	LUIGI LAVAZZA S.p.A.
Lenox Corporation	lululemon usa inc.
Leprino Foods Company	Lush USA Inc
Les Aliments Dainty Foods Inc.	Lutron Electronics Co., Inc.
Levi Strauss & Co.	Luxshare Precision Limited
LG Electronics USA, Inc.	LVMH Fragrance Brands LLC
Lian Sheng (Dongguan) Packing & Printing Co .,Ltd	Lynden Door Inc.
Lian Sheng (Putian) Packing & Printing Co .,Ltd	Lynn Packaging, Inc.
Lian Sheng (Xiamen) Offset Printing Co .,Ltd	M+ODE Products LLC

MABLE Brush LLC	McDonald's USA, LLC
Macy's, Inc.	MCG international
Made By Dentists, Inc.	McKee Foods Corporation
Made For Retail Inc.	McLaughlin, Gormley and King
Maelys Cosmetics USA Inc	MCS Industries, Inc.
Maesa LLC	Mead Johnson & Company, LLC
Maestri d'Italia Inc.	Medal Sports Taiwan Corp.
Mahco Inc	Mederer of North America, Inc.
Majesty Skis America LLC	Medify Air LLC
MAKALOT Industrial Co., Ltd.,	MegaMex Foods, LLC
Make UP Forever LLC.	Mellow, Inc
Makhteshim Agan of North America, Inc.	Mercuries Asia Ltd.
MANN+HUMMEL, Inc.	Merit Distribution Group, L.L.C.
MANSCAPED, INC	Merkury Innovations LLC
Mantrose-Haeuser Co.	Mervin Manufacturing
Maple Leaf Foods Inc.	Meta Platforms Technologies, LLC
Marc Jacobs International, L.L.C.	Metagenics LLC
Mars Incorporated Inc.	Mettler-Toledo, LLC
Martin's Famous Pastry Shoppe, Inc.	MGA Entertainment
Mary Kay Inc.	Michael Kors (USA), Inc.
Masco Canada Limited	Michaels Stores, Inc.
Massimo Zanetti Beverage USA, Inc.	Microsoft Corporation
Masterfit Enterprises, Inc.	Midea America Corp.
Mattel, Inc.	Midlab, Inc.
Maverik, Inc.	Miele Inc
Max Base Industrial Limited	Migoal Technology Co., Ltd
Maxim Company (Taiwan) LTD.	MILIKA INC
McCain Foods Limited	MillerKnoll
McCormick & Company, Inc.	Millet Mountain Group SAS

Millipore, Sigma-Aldrich	Nation Botanics
Mindful Nourishment LLC dba Zing Bars	National Presto Industries, Inc.
Minky Homecare LLC	Natpets, LLC
Minnark Group LLC	Natural Factors Nutritional Products Inc.
Mitsubishi Electric US Holdings, Inc.	Nature's Path Foods Inc.
Mitsubishi Motors North America, Inc.	Natures Treats LLC
Mizkan America, Inc.	NatureSeal, Inc.
MJC Confections LLC	Navitas LLC dba Navitas Organics
MOB BEAUTY INC.	NC Brands L.P.
Mobility Holdings, Limited	NCH Corporation
Modern Recreational Technologies, Inc. (MRT)	Negative Inc.
Moet Hennessy USA, Inc.	Nehemiah Manufacturing Company, LLC
Molson Coors Beverage Company	Neil International
Mon Chateau LLC	NEMO Equipment, Inc.
Mondelez International	Neo G USA Inc.
Moody Dunbar, Inc.	NEOPERL Incorporated
Moose Toys	Neoteric Cosmetics, Inc.
Morinaga America, Inc.	Nestle USA
MOS Inc.	NetApp, Inc.
Motherlove Herbal Company	NETGEAR, Inc.
Motobatt USA LTD INC.	Never Summer Industries, Inc
Mountain Khakis, Inc.	New Balance Athletics, Inc.
Mountain Origins Design D.b.a Stio	New Belgium Brewing Company, Inc.
Mountain Rose Herbs	New Frontier Bio, Inc
Mud\WTR, Inc	New Milani Group LLC
Musco Olive Products Inc.	New WinCup Holdings, Inc.
Musco Sports Lighting, LLC	New World Imports, Incorporated
NAOS USA INC.	Newegg Inc.
Nash Publishing Group, LLC	Newell Brands, Inc.

Newton Vineyard	Niu Body Inc. o/a Three Ships
Niagara Bottling, LLC	No7 Beauty Company
Nice-Pak Products Inc.	Nordstrom, Inc.
Nichols Pistachio	Normeernational Corporation.
Nicole Tonic Studios Inc.	Northern Technologies International Corporation (NTIC)
Nien Made Enterprise Co., LTD.	Northland Aluminum Products dba Nordic Ware
Nike Incorporated	Novolex Holdings LLC
Nikwax North America Inc.	Nu Skin Products, Inc.
Ningbo Beslight Imp.&Exp.,Ltd.	Nulastin, Inc.
Ningbo Brothers Optoelectronics Technology Co., LTD.	Nuna Baby Essentials, Inc.
Ningbo Feihong Stationery Co.,Ltd	Nursery Supplies, Inc.
NINGBO FEIHONG STATIONERY LIMITED CORPORATION	Nutraceutical Corporation
NINGBO FENGZE DAILY-USE COMMODITY CO., LTD	Nutrien Ag Solutions, LLC
NINGBO FULLRIGHT ELECTRONIC CO.,LTD	NUVIK USA Inc. DBA Crocodile Cloth
NINGBO GOLDLAND INDUSTRY AND TECHNOLOGY CO.,LTD	O'Reilly Automotive, Inc.
NINGBO KINGTOP INDUSTRY AND TECHNOLOGY CO.,LTD	Oatey Co.
Ningbo Lisi Import and Export Co Ltd	Oatly AB
NINGBO MERRYART GLOW-TECH CO.,LTD.	Oboz Footwear LLC
Ningbo Paramount US Inc.	Ocean Spray Cranberries, Inc. dba Ocean Spray
NINGBO TAIOR COOKWARE CO., LTD	Odele, LLC
Ningbo Zhonghao Electric Co., Ltd.	ODL
Ninghai Xiecheng Rubber and Plastic Co.,Ltd.	OFD Foods, LLC
Nintendo of America Inc.	Olam Holdings Inc.
Nisco (Thailand) Co., Ltd	Olaplex Inc.
Nissan Motor Co. Ltd.	Old hickory smokehouse
Nissens Automotive	Old World Industries, LLC
Nissin Foods (U.S.A.) Company, Inc.	Old World Spices and Seasonings, dba OWS Foods, LLC
	Olds Products Co of Illinois

Ole Smoky Distillery	Pacifica Beauty, LLC
Ollie	Packaging with Print
OLLY Public Benefit Corporation	Pact Collective
Omega Acquisition Corp.	Pactiv Evergreen Inc.
Once Upon A Farm, Public Benefit Corporation	Paisley Crafts, LLC, DBA iLoveToCreate
One Frozen LLC	Panasonic Corporation of North America
ONNIT LABS, INC	Pandora Jewelry, LLC
Oral Care Products, LLC	Panera Bread, LLC
Orangebox Limited	Pant Saggin, LLC
Orbit Irrigation Products, LLC	Papatui LLC
Oregon Potato Company	PARADISE KIDS LLC
Oregon Precision Industries, Inc. D/B/A Paktech	Parfums de Coeur Ltd
Oribe Hair Care, LLC	Parfums Francis Kurkdjian, LLC.
Ornua Foods North America	Paris Presents Incorporated
Orora Packaging Solutions	Patagonia Works
Orora Visual	PCHI
Ortlieb USA LLC	Peanut Butter & Co, Inc.
Otis Mcallister, Inc.	Pearl Banyan LLC DBA Banyan Botanicals
Otter Products, LLC	Peerless-AV
Over & Back LLC	Peet's Coffee, Inc
Overseas Food Trading LTD.	Pella Corporation
Overtone Color, LLC	Peloton Interactive, Inc.
Owens Corning	Penn Emblem Company
Oxford Industries, Inc.	Penny Plate, LLC
Oystershell Consumer Healthcare, Inc.	Pentland Brands Limited
P.J Chonburi PARAWOOD co.,LTD.	PepsiCo, Inc
PAC Worldwide	Perfetti Van Melle Group
Paceline Products, Inc.	Performance Designed Products LLC
Pacific Coast Producers	Perlick Corporation

Peruana de Moldeados S.A.C.	POSHI LLC
Pescanova Inc.	Positec Technology China Co., Ltd.
Pescanova, Inc.	Post Holdings, Inc.
Petco Animal Supplies Stores Inc.	Power Beauty Co.
Petcurean Pet Foods Ltd.	Powpack LLC
Peter Thomas Roth LLC	PPG Industries, Inc.
PetSmart	Pratt Industries, Inc
Pfizer	Pregis LLC
Pharmaceutical Specialties, Incorporated	Premier Brands of America Inc.
Pharmavite LLC	Premier Nutrition Company
Pierre Fabre Dermo-Cosmetique Inc.	Premium Waters, Inc.
Pilot Pen Corporation of America	Pressed Paperboard Technologies, L.L.C.
Ping, Inc.	Prestone Products Corporation
Pinnpack Capital Holdings, LLC	Prime Resins, Inc.
Piping Rock Health Products, LLC	Prime Time Toys Ltd.
Plaine Products	Primera Technology, Inc.
Plastic Perfect	Printing Partners Group OU
PLAYGO TOYS ENTERPRISES LIMITED	ProAmpac Holdings LLC.
Playground For All, Inc.	Productos Alimenticios DIANA, S.A. de C.V.
Plexus Worldwide, LLC	Professional Disposables International, Inc. (PDI)
PLZ Corp	Professor Puzzle Ltd
Polaris Industries Incorporated	Profile Food Ingredients
Poly-America, L.P.	Prokoz, Inc.
Polyconcept North America Inc	ProVia
Polygroup North America, Inc.	PT.LUNG CHEONG BROTHERS INDUSTRIAL
Polyvinyl Films, Inc.	Purlisse Beauty, Inc
Pompeian, Inc.	PurposeBuilt Brands
Popzup Popcorn	PVH Corporation
Porsche Cars North America, Inc.	Pyramex Safety Products, LLC.

QTOP USA INC	REMY COINTREAU USA, INC.
Quality Bicycle Products	Renfro Brands LLC
QUANTUM HOLDINGS LLC	Renfro Foods, Inc.
Quebec Inc.	Repligen Corporation
QuestSpecialty Corporation	Republic Plastics LTD
QVC, Inc.	rePurpose Inc
R. M. Palmer Company, LLC	Reser's Fine Foods
R&G Divergency LLC	RESPONSIBLE PRODUCTS LIMITED
Rad Power Bikes	Retail Concepts, Inc.
Radians, Inc.	Revision, LLC
Rainbow Balloons Inc.	Revlon Consumer Products LLC
Ralph Lauren Corporation	Revolution Beauty Group PLC
Rana Meal Solutions, LLC	Revolution Sustainable Solutions, LLC
Rand Design Ltd	Reynolds American Inc.
Rare Beauty, LLC	Reynolds Consumer Products
Raw Sugar Living, LLC.	Reznor LLC
Razor USA, LLC	Rheem Manufacturing Company
RB Health (US) LLC	Rheya Inc.
Real Value LLC. DBA Simple Modern	Ribbon Communications Operating Company, Inc.
Reckitt Benckiser LLC	Rich Products Corporation
Recochem	Richemont North America, Inc.
Recreational Equipment, Inc	Righteous Gelato LTD
Recreational Water Products, Inc.	Riverside Natural Foods Ltd.
Recycline, Inc dba Preserve	RL INDUSTRY COMPANY LIMITED
Red Bull North America	RMS Organics, LLC
Red Gold, Inc.	Rob's Brand's LLC D?B?A Vegan Rob's
Red River Foods Inc.	Robert Bosch LLC
RefrigiWear, LLC	Rockline Industries, Inc.
Regal Rexnord Corporation	Rodan & Fields Beauty, LLC

Ronpak, Inc.	Sauder Woodworking Co.
Room & Board, Inc.	Savant Technologies LLC
Ross Stores, Inc.	Savencia Fromage & Dairy
Royce Too LLC	Sazerac
RPM Industrial Coatings Group, Inc.	SBM Life Science Corp
Ruff Wear, Inc.	Scale Media, Inc
Rust-Oleum Corporation	Scentsy, Inc
S.C. Johnson and Son, Inc.	Schaeffler Group USA, Inc.
S.M. Products (B.C.) Ltd.	Schneider Electric IT Corporation
Sabert Corporation	Schroeder & Tremayne, Incorporated
Sabra Dipping Company, LLC	SCHURE SPORTS U.S.A., INC.
Saf-Gard Safety Shoe Company	Schwabe North America, Inc.
Saigon Furniture Company Limited	Schwan's Company
Saint-Gobain Corporation	Schylling Inc.
Salem One Incorporated	Science of Skincare dba Innovative Skincare
Sales Force Won! LTD	SCIH Salt Holdings Inc.
Salewa USA LLC	Sealed Air Corporation
Sally Beauty Holdings, Inc.	Seaman Paper of Massachusetts, Inc.
Salt Lake Mattress and Manufacturing Company	Second Bite Foods, Inc.
Sambazon Inc.	SECRETLAB US, INC.
Samsonite LLC	Seda North America
Samsung Electronics America, Inc.	Seda Packaging Group
Samsung Lennox HVAC North America, LLC	See's Candy Shops, Incorporated
SanMar Corporation	Seirus Innovative Accessories Inc.
Santoki Limited Liability Company	Seneca Foods corporation
SAP SE	SePRO Corporation
Saputo Cheese USA, Inc.	Sev-Rend
Sara Lee Frozen Bakery, LLC	Seville Classics, Inc
Sargento Foods Inc.	Shakedown street

SHANDONG EXCEL LIGHT INDUSTRIAL PRODUCTS CO.,LTD
Shandong Glassware Corporation
Shanghai Phoenix Imp. & Exp. Co., Ltd
Shaoneng Group Guangdong Luzhou ECO Technology Co., Ltd.
SharkNinja Operating LLC
Sheboygan Paint Company
Shenzhen Cannice Technology Co.,Ltd
Shenzhen Fenda Technology CO., LTD.
Shiseido Americas Corporation
Shurtape Technologies, Limited Liability Company
Shutterfly Holdings, Inc.
SIDEM NV
Sierra Pacific Windows (a division of Sierra Pacific Industries)
Signify North America Corporation
Simple Mills
SiriusXM Radio, Inc
Skechers USA Inc.
Skims Body, Inc.
Skinfix Inc.
Sky Organics LLC
Sleep Number Corporation
SM GLOBAL KOREA CO., LTD.
SM Global, LLC.
Smart Planet Technologies, Inc.
SmartyPants Inc.
SMEG S.p.A.
Smith Sport Optics, Inc.

Smithfield Foods, Inc
Smithfoods, Inc.
Snak-King LLC
Snap-on Incorporated
Snow Peak USA, Inc.
Sol Angeles, Inc.
Sol de Janeiro USA, Inc.
Solspring Market
Solventum Corporation
Sonos Inc.
Sony Biotechnology Inc.
Sony Digital Audio Disc Corporation
Sony Electronics Inc.
Sony Interactive Entertainment America
Sony Pictures Entertainment Inc.
Sound n Light Animatronics Co. Ltd.
Southern Telecom Inc
Southwire Company LLC
Spangler Candy Company
Spartan Chemical Company, Inc.
Specialty Technologies LLC dba SVS
Specialty Technologies, LLC
Spectrum Brands, Inc.
Spin Master, Inc.
Sprite Industries Incorporated
SRAM, LLC
Standard Motor Products
Staples, Inc.
Starbucks Corporation

Stark Future USA LLC
 StarKist Co.
 State Industrial Products Corporation
 Ste. Michelle Wine Estates LLC
 Steelcase Inc
 STERIL-AIRE, LLC
 Steven Madden Limited
 Stevison Ham Company
 STIHL Incorporated
 Stila Styles, LLC
 Stockli Swiss Sports AG
 Stoli Group USA, LLC
 Stonewall Kitchen LLC
 Stonhard, Division of StonCor Group, Inc.
 Storck USA, L.P.
 Stout Stuff, LLC
 Streamlight Inc.
 Suave Brands Co, LLC
 Subaru of America, Inc.
 Subzero Group, Inc.
 Suit Up Brands LLC.
 Summer Fridays LLC
 Sun Bum. LLC
 Sunkist Growers, Inc.
 SUNNY DAYS ENTERTAINMENT, LLC
 SunOpta Grains and Foods Inc.
 Sunshine Makers, Inc.
 Superior Foods, Inc.
 Superior Group of Companies, Inc.

SUPPLIER
 Sustainable Packaging Industries LLC
 Sutter Home Winery, Inc.
 Suzhou Cleva Electric Appliance Co., Ltd.
 Suzuki Marine USA, LLC
 Suzuki Motor USA, LLC
 Swanson Health Products
 SWAROVSKI U.S. HOLDING LIMITED
 Swedish Match North America LLC
 Sweet Candy Company
 Sweet Street Desserts, Inc.
 Swen Products, Inc.
 Sylvamo North America, LLC
 Syngenta Crop Protection, LLC
 Sysco Corporation
 T-Mobile USA, Inc.
 Tack Cheung Plastic Manufactory Ltd
 Taco Bell Corp.
 Taffy Town, Inc.
 Taizhou Honglai Electronic Technology Co., Ltd
 TaiZhou HuangYan ZhaoXing Crafts Co.,Ltd
 TAIZHOU JUJIN ARTS&CRAFTS CO.,LTD
 Taizhou Meiqile Handicraft Co., Ltd
 Talking Rain Beverage Company, Inc.
 Target Corporation
 Tarte
 Tatcha LLC
 Taylor Fresh Foods, Inc.
 Taylor Made Golf Company, Inc.

TC Transcontinental Packaging Inc.	The Honest Company, Inc.
TCF Holdings, Inc	The Honey Pot Company (DE), LLC
Tecnica Group	The J.M. Smucker Company
Tempur Sealy International, Inc.	The Kroger Co.
Tenacious Holdings Inc.	The Kyjen Company LLC, dba Outward Hound
TENWEI (HONGKONG) TECHNOLOGY CO., LIMITED	The Lagunitas Brewing Company
TePe Oral Health Care, INC.	The LIV Group Inc.
Terry Precision Cycling, LLC	The Martin-Brower Company, L.L.C.
Textron Specialized Vehicles	The Marvin Companies, Inc.
TFG Holding, Inc.	The Modern Fan Company
Thanh Phu Plastic Packaging Joint Stock Company	The Nunes Company, Inc.
The Bazooka Companies, LLC	The Original Cakerie Co.
The Body Firm, LLC	The Pampered Chef, Ltd.
The Brass Key Inc.	The Pictsweet Company
The Burton Corporation	The Procter & Gamble Distributing LLC
The Children's Place, Inc.	The Purple Cow Advents LLC
The Clorox Company	The Purple Cow America Inc.
The Coca-Cola Company	The QUIKRETE Companies LLC
The Decorated Cookie Company, LLC d/b/a Corso's Cookies	The Radio Flyer Company
The Dow Chemical Company	The Scotts Miracle Gro Company
The Edrington Group USA, LLCC	The Sherwin-Williams Company
The Finish Line Inc.	The SYGMA Network
The Foreign Candy Company, Inc.	The TJX Companies, Inc.
The Future of Latinx Beauty Inc.	The Toro Company
The Hain Celestial Group, Inc.	The Walt Disney Company
The Hartz Mountain Corporation	The Wendy's Company
The HC Companies	The Westland Distillery Company, Limited
The Hershey Company	The William Carter Company
	The Wiremold Company

The Wonderful Company LLC	Trinidad Benham Corporation
Thea Pharma Inc.	True Sons Grooming Inc
Theo Chocolate Inc	TSL Snowshoes, LLC
Thermos L.L.C.	TTE Technology, Inc. dba TCL North America
Thomas Foods International USA	Tu-K Industries
Three Trees Foods, Inc.	Tube Investments of India (Unit - TI Cycles of India)
Tiffany and Company; Tiffany and Company U.S. Sales, LLC	Tumi, Inc.
Tillamook County Creamery Association	TV GPMC, L.L.C.
Time's Up Inc	Twin City Foods, Inc.
Timex Group USA Inc	Uline, Inc.
TIONG TAT PRINTING INDUSTRY SDN BHD	Ulta Beauty, Inc.
Tire Seal, Inc. dba TSI Supercool	Ulta Inc.
Tko Evolution Apparel, Inc.	Ultraorganics Worldwide
Toaster Labs LLC, DBA Pulse	Under Armour, Inc.
Todson Inc.	Unilever
Tommy Bahama Group, Inc.	UNIQLO USA LLC
Topco Associates, LLC	Unique Industries, Inc.
Topgolf Callaway Brands Corporation	United Construction Products dba Bison Innovative Products
Topway EM Enterprise Ltd	United Legwear and Apparel Company
Totalenergies Marketing USA Inc (TEMUSA)	United Natural Foods, Inc. dba UNFI
Toy Box Brands, LLC.	United States Bakery dba Franz Family Bakeries
Toyota Motor North America	UNIVERSAL CANDLE CO LTD
TPBI Public Company Limited	Universal Candle Vietnam Company Limited
Tractor Supply Company	Universal Protein Supplements Corp. DBA Universal Nutrition
Tree Top Inc.	UPL NA Inc.
Treehouse California Almonds, LLC	UPM-Kymmene Investment, Inc.
Trek Bicycle Corporation	Uponor, Inc.
TREMCO CPG, INC.	Urban Farmer, Limited Liability Company

Ursa Major Natural Care LLC	Vital Farms, Inc.
US Foods, Inc.	Vitamin World USA Corporation
USANA Health Science	Viva 5, LLC doing business as Growve
Utz Brands, Inc	VIZIO, Inc.
UV RESOURCES, LLC	Volkswagen Group of America, INC.
Valent USA LLC	Volm Companies
Valio USA Inc	Vornado Air LLC
Valken, Inc.	VOXX Electronics Corporation
Valve Corporation	Vuori, Inc.
Vanguard Soap LLC	W Sternoff LLC
Vanicream	W. F. Young Incorporated
Vegamour Inc.	W. L. Gore & Associates
Velong Enterprises Co., LTD;VELONG (CAMBODIA) INDUSTRIES CO., LTD	W.L. ACTIVEWEAR
VELUX America LLC	W.M. Barr & Co., Inc.
Ventura Foods, LLC	W&K Import and Export Company Limited
Venus Laboratories Incorporated dba Earth Friendly Products	Wahl Clipper Corporation
Verde Bioresins	Wahoo Fitness L.L.C.
Versuni USA Corporation	Wald Family Foods Limited Liability Corporation Company
VerTerra Ltd	Walgreens
Vesync Corporation	Walker and Company Brands
VF Corporation	Walmart, Inc
VF North America, Inc.	Warn Industries, Inc.
VGP Holdings, LLC	Water Tech Corp
Victoria's Secret & Co	Watkins Incorporated
Viega LLC	Watts Water Technologies, Inc.
ViewSonic Corporation	WAY DONG COMPANY LIMITED
Virtue Labs, LLC	Wayfair
Vista Outdoor, Inc and/or Revelyst, Inc.	WD-40 Company

We evolvetogether Limited Liability Company	WinField United
Weather Shield Mfg., Inc.	Winix America Inc.
Wehah Farm, Inc. dba Lundberg Family Farms	Winland Foods, Inc.
WEIHAI LUDA ART&CRAFT CO., LTD	Winning Solutions Inc, dba WS Game Company
Welch Foods Inc., A Cooperative	Wintersteiger, Incorporated
WeldWerks Brewing Co., LLC	Wire and Cable Specialties, Inc.
Wellness Marketing Corp dBa Endless Pools	WISEROYAL INDUSTRIAL PTE.LTD.
Wellness Pet Company	WK Kellogg Co
Wells Enterprises, Inc.	WN Pharmaceuticals Inc.
WELLWARES (SHIJIAZHUANG) LIMITED	Woodstream Corp.
Welly Health PBC (Public Benefit Corporation)	Work Sharp
Wenzhou Jinfeng Crafts Co.,Ltd	Workwear Outfitters, LLC
West Liberty Foods LLC	World Centric
Western Ice Company, LLC	World of Jeans & Tops dba Tilly's
Western Plastics Association	World Richman Manufacturing Corporation
Westinghouse Lighting	WORLD PAC, Inc.
Westman Atelier, LLC	Worthington Industries
WestRock CP Limited Liability Company	Xerox Corporation
Weyco Group, Inc.	Xiamen Lian Sheng Smart-Tech Packaging Co., Ltd.
Wheels Manufacturing, LLC	Xiang Tai Multi-color Packaging Printing (Wujiang) Co., Ltd
WHIRLPOOL CORPORATION	XIANGGANG HANYUAN INDUSTRIAL CO.,LIMITED
White Castle Management Company	XOMD Skincare
Whole Foods Market Services, Inc	XYMOGEN INC
Wilbur-Ellis Holdings II, LLC	Yamaha Corporation of America
Wildlife Research Center, inc.	Yanmar America Corporation
William Grant & Sons, Inc.	Yaxin Inc.
Wilton Brands	YENSA Beauty INC.
WinCo Foods	Yerba Prima, Inc.
Windsor Windows & Doors	

YETI Coolers, LLC

Yeti Cycling LLC

YG Laboratories, Inc.

YIWU DAMING TOY CO., LTD

YUM! Brands, Inc.

Z-Lite US, Incorporated

Zara USA Inc.

Zep, Inc.

Zephyr Ventilation, LLC

Zhejiang Lingrong Crafts Co., Ltd

Zhejiang Taizhou Diya Houseware Co.,Ltd.

ZHEJIANG TONGFENG ARTS & CRAFTS CO.,LTD

ZHONGSHAN NEWECAN ENTERPRISE DEVELOPMENT
CORPORATION LIMITED

ZHONGSHAN BENG ELECTRIC APPLIANCE
MANUFACTURING Co., LTD

HODI(HK) INDUSTRIAL CO., LTMITED"

Zinus, Inc

ZO Skin Health, Inc.

Zodiac Pool Systems LLC

Zoetis Inc

Zurn Elkay Water Solutions Corporation

CAA Oregon Market Share Calculation Methodology

CAA took the following steps to calculate an estimate of CAA's member companies' supply to the Oregon market.

Estimate of CAA Producer Member Supply (Numerator)

To estimate the numerator, CAA carried out a data analysis and modeling exercise to develop a potential range in the amount of supplied material from producer members. Because the majority of producers have not submitted any data to CAA as yet, there is a relatively high degree of uncertainty in the estimated range. The following steps outline the process that CAA undertook to calculate producer member supply:

- For the first program plan submission, CAA asked its 20 founding member companies to provide the total tons of packaging they supplied into Oregon in 2022. The 20 Founding Member companies listed above represent an array of consumer-packaged goods firms and hold significant market share nationally across an array of consumer products that are under the scope of Oregon's Recycling Modernization Act. CAA provided instructions to these companies on the types of packaging to include and exclude (e.g., exclude packaging covered under Oregon's container deposit program). Once this data was received, CAA made minor adjustments to ensure all data was in the same unit (pounds). Some member companies were only able to provide national data. For the companies that provided national data, U.S. Census data was used to calculate the percentage of the U.S. population living in Oregon and applied that percentage to the companies' national data to extrapolate a supply estimate for Oregon.
- Subsequent to the submission of the first program plan, further analysis of the supplied data and subsequent revisions provided by some of the founding members suggested that the expected supplied tons from founding members would likely lie within the range of 130,000 tons to 160,000 tons.
- In preparation for the second program plan, CAA modeled the amount of supply tons based on current membership. CAA estimated that producers registered at the time of the second program plan supply around 380,000 to 630,000 tons of covered material to the Oregon market annually. (Note: Between the submission of the second program plan and Nov. 1, 2024, just under 300 additional producers registered with the prospective PRO for Oregon. The additional tonnages supplied by those new producers have not been factored into the market share calculation outlined below. While the market share has certainly increased with these additional producers, the initial estimates already reflected a range, due to the supply estimations required prior to an actual reporting cycle by producers. As CAA completes an initial round of producer reporting, a more accurate view of actual supply tons of CAA's registered producers will be available. CAA is working to minimize free riders, but even so, total tonnage in the system will still be an estimate and will become better understood as the program matures and all obligated producers continue to register and report their supply data.)

Between now and the data reporting deadline of March 31, 2025, it is anticipated that additional producers will register with CAA, and therefore the total supplied tons from member producers will increase from the estimate range given above. As it is not known how many or what size of producers are still to register, it is not possible to estimate additional tons with any accuracy. However, an additional 5% is added to the supplied tons to anticipate some further increase. This gives an estimated range of member producer supplied tons between 400,000 and 660,000.

Please note: CAA anticipates that the scope of obligated covered product packaging for purposes of producer supply reports will become clearer for producers once related RMA rulemaking processes are completed and CAA develops more detailed educational and resource materials. As such, actual member supply tonnage may vary.

Estimate of Total Print and Packaging Generation in Oregon (Denominator)

Oregon DEQ provided access to data developed for DEQ by the consulting firm Cascadia Consulting Group, Inc. that was used to estimate impacts of infrastructure improvements and various material collection scenarios. CAA used the data from the 2020 pre-RMA work to produce an estimate of the overall covered paper product and packaging supply to Oregon for the purpose of calculating a market share denominator.

Please Note: Although this data represents the best available diversion data at this time for the purposes of estimating total covered product supply, more accurate information will become available when all producers generate supply reports as the program plan begins operations. Total state covered product supply based on producer supply reports may be significantly lower than this initial estimate.

Utilization of this dataset required a set of “reduction” elements to account for materials which are not covered products under the RMA, including Bottle Bill materials, some industrial or other non-consumer facing materials, and materials produced by “small producers.” These factors were deployed against the denominator estimate to reduce the overall number.

The Cascadia dataset includes the material volumes generated from residential and commercial sources in 2017 and projected for 2025 (forecast to 2026), for a total of 50 materials. Forty of those materials are considered to be print and packaging related. Note that the data suggests that ~35% of materials are generated from residential routes while ~54% are generated from commercial routes. See table below:

Total Print & Packaging Tonnage	2017	2026 (Projected)	Change
	1,476,000	1,630,000	154,000
Share of Total Percent			
Single-family Residential (on-route)	29%	27%	-2%
Multifamily Residential (on-route)	7%	6%	0%
Commercial (on-route)	31%	31%	0%
Other Commercial	22%	24%	2%
Self-Haul (excl. Bottle Bill)	7%	7%	0%
Bottle Bill	5%	5%	0%
TOTAL	100%	100%	0%

Table i

Between 2017 and 2026, volumes are projected to increase by 154,000 tons or 10.4%. Cardboard, PE film and HDPE tubs are expected to increase the most during this period (on a percentage basis) while newspaper, printing and writing paper are expected to decrease the most.

The average year-over-year percent change in volumes for each material over the 10-year period was applied to the 2017 baseline and escalated to the 2022 year, which is the year for which producer supply data is being requested. This results in total generated tons of **1,561,000 tons**.

In accordance with the scope of the Oregon program, further analysis was undertaken to reduce the total estimated tons to account for exemptions and exclusions.¹ The following reductions were estimated from the Cascadia dataset and applied to the estimated tonnage in 2022:

Exclusions	Reduced Tonnage	Reason and Assumptions
Compostable paper	86,857	
Non-Recoverable Material²	121,973	
Beverage Containers on Deposit³	141,965	Tonnage of PET, HDPE, aluminum, steel, glass beverage containers on deposit was reduced
Small Producers' Materials⁴	181,531	Tonnage associated with packaging materials generated by small producers and free riders. The de minimis thresholds are less than \$5 million in gross revenues or up to one ton of packaging supplied. Assumed 15% reduction to overall net tons based on past experience in Canadian jurisdictions.
Contamination/Moisture Adjustment to Collected Materials	102,867	Tonnage associated with contamination and moisture in the collected materials will not be reported by producers as supply. Assumed 10% reduction to overall net tons.
TOTAL	925,807	

Table ii

In addition, an analysis was undertaken of the differentials between the reporting from PROs in Canada and the figures above, taking into account the following factors to ensure comparable extrapolation:

- Purchasing power parity

¹ Based on definitions under ORS 459A.863(6).

² Cascadia defines 'non recoverable material' as material which is not covered under the RMA.

³ Based on beverage container definition, under ORS 459A.700.

⁴ Based on ORS 459A.863(32). Volume of material associated with small producers will be difficult to accurately assess until all producers are reporting supply into the Oregon market.

- Disposable household incomes
- Adjustments for historic lightweighting effects of participation in fee payable paper and packaging stewardship (EPR) schemes
- Scope of materials – particularly the difference in coverage of commercial waste streams

Resulting Market Share Estimate

As mentioned above, there is a high degree of uncertainty in the market share projections at this point, due to the very limited data available prior to reporting deadlines in March 2025.

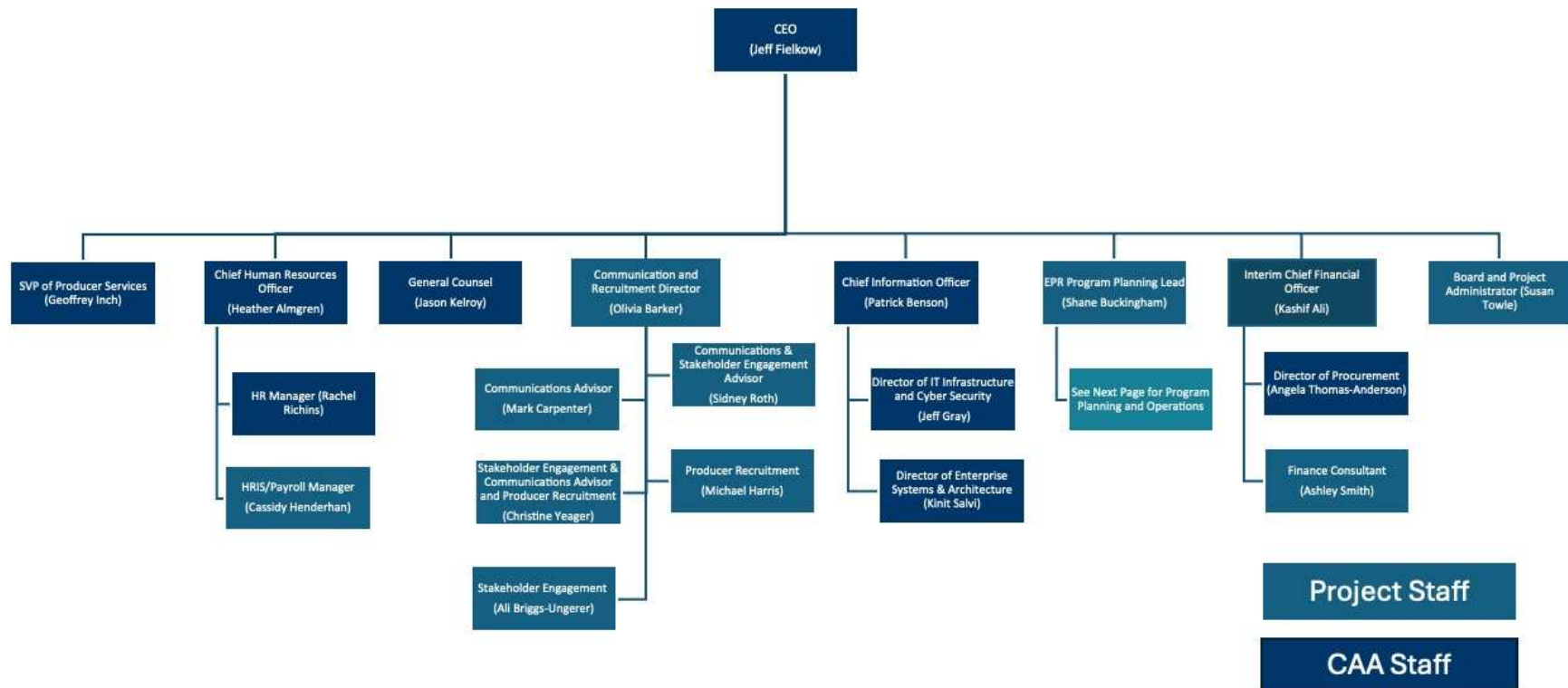
Dividing the range of numerator estimates by the range of denominator estimates results in an estimate of current CAA member companies covered product market share supply by weight in Oregon. In the second version of the program plan, CAA estimated it had captured at least 40% of the market share of supply by weight and had registered another 250 to 300 producers in the nine weeks between the two submissions. A larger market share is possible, but the availability of data relating to producer counts, supply weights and potential non-reporters/free riders all limit a more precise estimation of this figure at present. CAA anticipates further increases in membership that will add to the total CAA market share prior to program plan implementation, with more accurate estimates of market share being possible after member company data has been submitted and verified.

Appendix C:

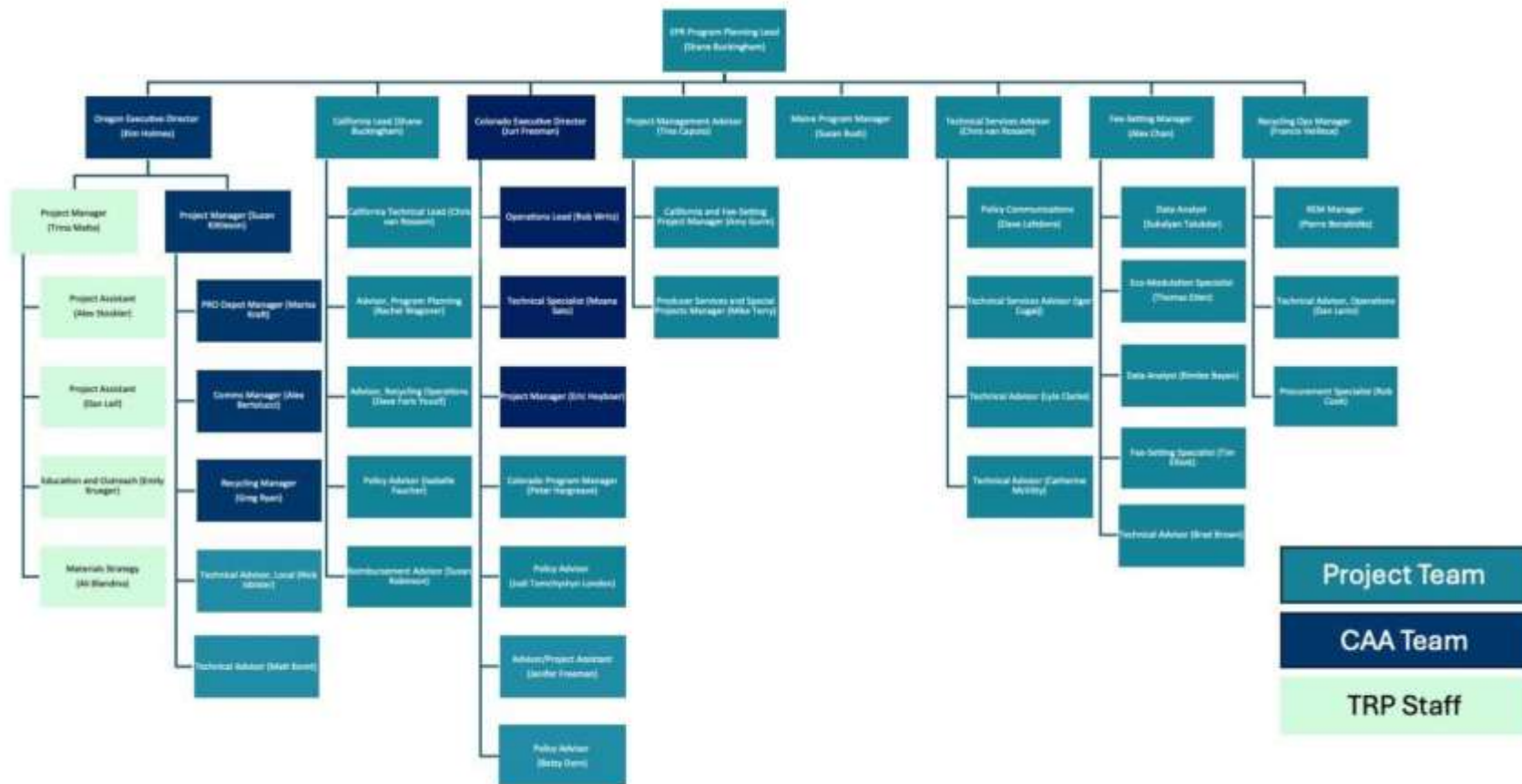
CAA Organizational Structure

As noted in the program plan, Circular Action Alliance (CAA) is a nonprofit organization established to fulfill producer obligations related to EPR statutes in a number of states, including Oregon. CAA has utilized the services of The Recycling Partnership (TRP) to support the development of the Oregon program plan. An organizational chart is included on the following pages.

Current State – Overall CAA Organizational Structure



Current State – Program Planning and Operations



Appendix D:

Interest Holder Engagement

During the development of this program plan, CAA and its partners have engaged and consulted with a large number of relevant interest holders. While insights from some have been included within the narrative of the plan, others preferred their perspective to remain unofficial at this stage.

Local Governments, Service Providers (select groups and existing depot operators)

Note: The list below does not include all entities that participated in the Oregon Recycling System Optimization Project (ORSOP).

- Metro Regional Governments (group) – multiple engagements across different topic areas
- City of Salem and service providers
- City of Roses Disposal
- Columbia County Government
- Deschutes County Government with Cities and service providers
- Lane County Government with Cities and service providers
- Marion County Government with Cities and service providers
- Lincoln County Government with Cities and service providers
- Milton-Freewater and DEQ regional rep
- City of Corvallis
- Rogue Disposal, Thompson’s Sanitary Service, Dahl Disposal Service, Pendleton Sanitary Service
- Tillamook County Government with Cities and service providers
- Washington County and all cities in the IGA
- Waste Management
- Recology
- Waste Connections
- Republic Services
- Dahl Disposal Service
- North Lincoln Sanitary Service
- Thompson’s Sanitary Service
- Southern Oregon Sanitation
- Brandt’s Sanitary Service
- Royal Refuse
- Loren’s Sanitation Services
- Valley Recycling and Disposal
- Nestucca Valley Recycling
- Sutherlin Sanitary
- Humbert Refuse
- Roseburg Disposal Company
- Pacific Sanitation
- Suburban Garbage Service
- Pride Disposal and Recycling Company
- Apex Recycling and Disposal
- D&O Garbage Service, Inc
- City Sanitary Service
- Cascade Disposal Co.
- South Umpqua Disposal Company
- Valley Recycling and Disposal
- Safety Kleen

Potential Additional Depot Material Partners

- Habitat ReStore (multiple affiliates)
- St. Vincent de Paul
- BRING
- Mattress Recycling Council
- PaintCare
- Metro HHW program
- Ridwell
- Oregon Beverage Recycling Cooperative
- James Recycling
- Ground Score
- The Arc of Portland
- Trash for Peace
- Oregon Ecycles- SCP and MRM
- New Seasons

End Markets

- D6
- DirectPack
- Denton Plastics
- EFS-Plastics
- Merlin Plastics
- ORPET
- Indorama
- KW Plastics
- FoamCycle
- Intco
- Polystyvert
- Rennueva
- FreePoint Ecosystems
- Nexus Circular
- PureCycle
- Royal Interpack
- Reynolds Foil
- Gottlieb
- Real Alloy
- Recycle Aerosol
- NORPAC
- Sonoco
- Cascade
- Nucor
- PakTech
- New Indy Recycling
- Georgia Pacific
- Pratt Industries
- Port Townsend Paper
- K&S Recycling
- Juno LLC
- Glass-to-Glass Inc.
- Sibelco (formerly Strategic Materials)
- Knauf Insulation
- CellMark
- SeaPort International
- Canusa Hershman
- Town Trading
- National Fiber
- Potential Industries
- ICF Global
- Pioneer International
- Allan Company
- America Chung Nam
- Federal International
- rPlanet Earth
- Cascades
- Cascell Trading Group, Inc

CRPFs

- EFI Recycling
- Far West Recycling
- Garten Services
- Eco Sort
- International Paper
- Pioneer Recycling Services
- Walla Walla Recycling
- Waste Connections of West Vancouver
- Waste Management (WM)

Other / Trade Associations

- American Forest & Paper Association (AF&PA)
- Association of Plastic Recyclers (APR)
- Can Manufacturers Institute (CMI)
- Carton Council of North America
- Closed Loop Partners / NextGen Consortium
- Foodservice Packaging Institute (FPI)
- Glass Packaging Institute (GPI)
- Household and Commercial Products Association (HCPA)
- North American Insulation Manufacturers Association (NAIMA)
- Oregon Refuse & Recycling Association (ORRA)
- Recycled Materials Association (ReMA)
- Recycle Right
- The Recycling Partnership
- RRS
- Tribal Solid Waste Advisory Network
- Vietnam Pulp & Paper Association

Community Based Organizations (CBOs)

- The Arc of Portland
- Ground Score
- St. Vincent de Paul
- Trash for Peace
- Habitat for Humanity (multiple affiliates)
- James Recycling

Appendix E:

Itemized Budgets by Program Year

Updated Program Cost Estimate Ranges over Two-and-a-Half Years of Operations

CAA developed a range of preliminary program cost estimates in the first program plan. Presenting a range of anticipated program costs was reasonable at the time, given the lack of program data and financial information that could be ascertained from the first needs assessment. As described in the Financing section of this program plan, the results of ORSOP indicate a significant reduction in CAA's cost estimates. Specifically, reduced collection services, expansion requirements and depot operating costs contribute to overall lower program cost estimates, reflected in Table iii.

The program budget presented in this program plan represents the estimated costs to launch and manage the program from July 1, 2025 until December 31, 2027, as well as the recovery of start-up costs incurred to develop the program plan. The estimates are based on findings and actual data requests made during ORSOP, which took place from May through October 2024.

The local government service expansion budget item now reflects the requests made by local governments to meet their obligations under the Opportunity to Recycle Act and provide convenient access to recycling statewide. Most of the requests involve trucks, carts, and expansion of local depot service. A portion of funds will be used to update existing reload facilities and significantly expand two facilities where needed.

The contamination reduction programming (CRP) and transportation reimbursements expense items are relatively unchanged except for the potential advance funding allowance of CRP for smaller local governments.

The "Other" expenses budget item now includes CAA's contamination audit program for sampling materials and providing reporting.

Expected payments for materials management to CRPFs have increased to cover for higher than anticipated contamination coming through the commingled recycling stream, a trend shown in the latest data on contamination levels in the commingled recycling stream.

The budget line for PRO Materials Management (Depots) reflects the delay of adding pressurized cylinders and aerosols until 2028, and the newly proposed approach for block white EPS. The budget shift also accounts for the fact that deployment of the new system will be phased in over the duration of the program plan to ensure a successful implementation.

REM development and verification are now part of a national initiative for CAA, reducing the cost burden for Oregon producers.

Overall Special Material investments and Education and Outreach investments remain relatively unchanged. Investments will occur mostly in the second year because of the time needed to receive the necessary supporting investments.

Regulatory costs reflect expected disbursements over the program plan and include the DEQ producer responsibility fund and waste prevention and reuse fees.

The cost for PRO Management and Administration has increased because of the initial start-up costs and the costs allocated by CAA's National program to the Oregon state program.

Program Plan Cost Estimates (in \$ Millions)

	Pre-Program + 2025	FY2026	FY2027
Local Government Collection Services Expansion	\$12.1	\$32.7	\$78.4
Contamination Reduction Programming	\$20.2	\$14.2	\$7.8
Transportation Reimbursement	\$5.5	\$12.8	\$10.6
Others (audit center)	\$2.0	\$2.1	\$2.3
Payments to CRPFs (MRFs)	\$32.9	\$71.1	\$81.2
PRO Materials Management (Depots)	\$20.7	\$46.6	\$36.2
REM Development and Verification	\$0.7	\$0.9	\$0.9
Special Material Investments incl. SIMs	\$3.3	\$5.2	\$2.6
Education and Outreach	\$10.0	\$6.0	\$6.0
Regulatory	\$4.0	\$7.6	\$13.6
Start-up Costs	\$9.5	-	-
PRO Management and Administration	\$15.1	\$10.2	\$10.7
Program Reserves	\$43.5	\$31.3	\$24.6
Financing Charge	\$9.5	\$12.8	\$14.6
Total Budget	\$188.0	\$254.0	\$289.5

Table iii

For comparison, the base case scenario presented in the March program plan submission showed a 2025 cost estimate of \$219 million, a 2026 estimate of \$335 million, and a 2027 estimate of \$374 million.

Description of Budget Category Estimate Methodology

Local Government Collection Services Expansion

Local government collection services expansion covers the anticipated costs of funding local government recycling service expansions and improvements. This includes capital requirements for on-route service, depot and reload facility upgrades and expansions. It also includes eligible operating costs relating to existing local government depot operations and reload facilities.

In the first program plan, CAA estimated a total of 201 trucks. Based on the results of ORSOP, in this update to the program plan, 136 were actually requested. However, CAA consultations with the local governments and service providers identified duplicate requests and non-eligible requests among those 136, reducing the actual need to 97 trucks and dramatically reducing the program cost. With respect to depots, CAA assumed both an expansion of existing facilities and the sourcing of new facilities over the course of the first program plan for 36 depots. ORSOP uncovered requests for 24 (CAA capital asset costs have not been amortized in these estimates). In this third program plan, the number of new or expanded reload facilities remained at two, but smaller in nature, with a number of new upgrades at other sites.

Contamination Reduction Programming

CAA has assumed a funding requirement equivalent to the \$3 per capita cap created under the RMA. Updated CRP costs reflect potential upfront funding for small local governments (under 25,000 population) that will be eligible to request two years in advanced funding.

Transportation Reimbursement

Based on preliminary information, CAA has assumed that local governments and their service providers will transport approximately 233,000 tons of material that is eligible for transportation subsidies on an annual basis. An hourly base rate was identified as the leading alternative because it addresses challenges of per mile and zonal approaches by accounting for both travel time and distance. This approach is also commonly used in the industry. Transportation cost estimates were based on actual hauling rates. These rates were applied to time between wastesheds and the closest commingled recycling processing facility available for processing (where transportation distances were greater than 50 miles). CAA also factored some facility handling costs into this estimate.

Others

"Others" represents the cost of setting up and operating an audit center to conduct waste characterizations for the program. There is no longer an anticipated need for additional costs to cover the price premium to ensure post-consumer content in roll carts as market research shows PCR content carts can be purchased at the same price as those without PCR.

Payments to CRPFs

These costs relate to anticipated CAA payments to CRPFs (that are reflective of commodity revenues), compensate them for receiving and sorting covered materials, disposing of contaminants and residue, managing material cost fluctuations and implementing facility improvements required to meet CRPF RMA requirements.

Estimates of CAA payments to CRPFs were largely based on volume estimates and fee rates for the Processor Commodity Risk Fee (PCRF) and the Contamination Management Fee included in *Study Results Processor Commodity Risk Fee Contamination Management Fee: March 7, 2024 Final Report* by Crowe. These estimates will be revised based on recently finalized rulemaking from DEQ.

Expected payments for materials management to CRPFs have increased to cover for higher than anticipated contamination coming through the commingled recycling stream, a trend shown in the latest data on contamination levels in the commingled recycling stream.

PRO Materials Management

These costs relate to CAA's obligation to establish a depot system to manage PRO materials from collection to recycling. These costs reflect the estimated funding requirements based on Oregon system needs to operate PRO depots, set up collection events and activate curbside collection of certain PRO materials. Depot cost estimates in the plan are based on CAA cost modeling informed by the costs of managing similar materials through depots in other jurisdictions and cross-referenced with material volume and cost estimate information from [Overview of Scenario Modeling: Oregon Plastic Pollution and Recycling Modernization Act](#).

There was significant depot cost reduction from the first plan to the current one, with the reduction largely driven by much lower than anticipated costs to collect PRO materials (namely glass) at curbside.

There was also a decrease in expected PRO material depot costs, reflecting the changes in the handling requirements and performance standards of certain materials like pressurized cylinders, aerosols, and block white EPS. The deployment of the new PRO depot system will also be phased in over the duration of the program, to ensure a more successful implementation.

Although ORSOP is complete, there is still uncertainty with respect to these cost estimates and the number of existing depots that will actually choose to partner with CAA in collecting PRO acceptance list materials. Given this uncertainty, there is an additional operating contingency set at 15% of operating costs each year, to cover for cost variabilities in the recycling system.

REM Development and Verification

REM development and verification costs were budgeted based on an estimate of the number of audits to be conducted during the course of the program along with required REM infrastructure and potential costs associated with CAA actions taken to address REM compliance. REM development and verification costs were estimated separately for USCL and PRO Recycling Acceptance List materials.

REM development and verification costs have decreased for the Oregon program budget because these functions are now part of the CAA national service model.

Special Materials Investments including SIMs

These costs relate to CAA estimates of investments (research, trials, studies, etc.) earmarked to improve the recycling of SIMs and other materials. CAA has identified 11 materials that are candidates for investments and their associated costs of initial studies and field trials. PET thermoforms and glass are two high focus materials at present. This preliminary estimate may be adjusted as further outreach with producers and other stakeholders focuses on potential recycling changes for additional covered product materials.

Education and Outreach

These costs represent CAA's estimates of the cost to deliver the RMA mandated statewide education and outreach program to support local government communications activity related to the collection of USCL materials as well as driving awareness among residents about the acceptance of PRO materials at PRO depots. The budget was developed in collaboration with The Recycling Partnership (TRP), who have extensive experience in the design and delivery of recycling communications. Estimates include research, creative development and distribution of materials as well as multilingual translations. On average, the proposal costs close to \$2 per capita.

Regulatory

Regulatory costs include the program plan review fee, annual administrative fees payable to DEQ and potential CAA contributions to the Waste Prevention and Reuse Fund. As per ORS 459A.941, CAA's initial estimate has assumed annual contributions equivalent to 10% of its annual expenditures based on a rolling three-year average, starting in 2026. These estimates will be revised once RMA rules related to the calculation of these amounts are finalized. Regulatory costs have decreased in this version of the plan due to the reduction in the Waste Prevention and Reuse fee projections. As this fee is indexed to the three-year average of annual operating costs, and the program costs have decreased significantly, this fee is also projected to be significantly lower.

PRO Management and Administration

These estimates reflect CAA's initial estimate of PRO administration and operational costs in Oregon necessary to administer various RMA programs. This includes Oregon PRO office expenses, staffing, consulting, overhead, and cost of shared services support allocated from National CAA. This includes recovery of program start-up and program development costs.

Program Reserves

Program reserves estimates were established based on operating, risk and eco-modulation reserves requirements of the program, guided by CAA reserves policy. The proposed operating reserves targets reflect six months of variable operating expenses under steady-state program operations (assuming 2027).

A portion of fees collected will contribute to the accumulation of the reserves target.

Operating contingencies have been included in the material management costs to cover unexpected cost increases stemming from negotiations with local governments.

Financing Charge

In addition, a financing charge at five percent of overall program budget is a new addition to the program budgets to cover for allowance for bad debt.

Appendix F:

PRO Depot Lists and Coverage

CAA has made significant progress reaching out to existing recycling facilities and prospective new collection facilities to establish the foundation of the PRO collection network. CAA prioritized outreach to DEQ permitted facilities and recycling locations used by jurisdictions. Those facilities indicating willingness to explore participation in the PRO collection network are reflected in Table iv. This represents a mix of DEQ permitted facilities, existing recycling points used by jurisdictions, CBOs and other convenient locations.

Table v represents the locations that fall outside of the specific jurisdiction boundaries set forth by the convenience standards, but CAA is requesting administrative discretion to use alternative sites for meeting compliance standards in certain jurisdictions. If administrative discretion is granted, these locations will potentially serve as the foundation for building the PRO collection network.

Not every permitted DEQ facility or existing recycling facility has expressed a willingness to explore participation in the PRO collection network. Table vi shows facilities that CAA reached out to that either declined to participate or remain unresponsive to the outreach. CAA will reach out to the sites that have yet to respond one more time when broad outreach for initiating funding agreements is made in the first quarter of 2025.

The final table in this section, Table vii, details, by county and by the communities within each county and their populations, the distribution of the 118 potential PRO RAL depots that have indicated interest and will form the first group of sites CAA will be working with to establish the network. Together, the proposed depot sites reach approximately 94.6% of the state's population.

Sites that Responded "Yes" to Potentially Hosting a PRO Materials Depot*			
County	Site	City	From DEQ List of Sites or Additional
Baker	Baker Sanitary Service	Baker City	Additional
Benton	Corvallis Disposal	Corvallis	DEQ
Benton	First Alternative Coop (3 rd Street)	Corvallis	Additional
Benton	Philomath Public Works	Philomath	Additional
Clackamas	Waste Connections Canby Transfer & Recycling Center	Canby	DEQ
Clackamas	Waste Connections KB Recycling MRF	Clackamas	DEQ
Clackamas	New Seasons Market Happy Valley	Happy Valley	Additional

Clackamas	New Seasons Market Palisades	Lake Oswego	Additional
Clackamas	New Seasons Market Milwaukie	Milwaukie	Additional
Clackamas	Metro South Transfer Station	Oregon City	DEQ
Clackamas	Clackamas County Sandy Transfer Station	Sandy	DEQ
Clatsop	Recology Astoria Transfer Station	Astoria	DEQ
Columbia	Columbia County HHW & Transfer Station	St. Helens	DEQ
Coos	Beaver Hill Solid Waste Facility	Coos Bay	DEQ
Coos	Waste Connections West Coast Recycling and Transfer	Coos Bay	DEQ
Crook	Paulina Transfer Station	Paulina	DEQ
Crook	Republic Services Prineville Disposal Reload Station	Prineville	DEQ
Deschutes	Alfalfa Transfer Station	Bend	DEQ
Deschutes	Deschutes Recycling/Knott Landfill	Bend	DEQ
Deschutes	Republic Services Mid-Oregon Recycling	Bend	Additional
Deschutes	Republic Services La Pine	La Pine	Additional
Deschutes	Southwest Transfer Station	La Pine	DEQ
Deschutes	Negus Transfer Station	Redmond	DEQ
Deschutes	Republic Services High Desert Disposal	Redmond	Additional
Deschutes	Northwest Transfer Station	Sisters	DEQ
Douglas	Camas Valley Transfer Station	Camas Valley	DEQ
Douglas	Canyonville Transfer Station	Canyonville	DEQ
Douglas	Elkton Transfer Station	Elkton	DEQ
Douglas	Glide Transfer Station	Glide	DEQ
Douglas	Myrtle Creek Transfer Station	Myrtle Creek	DEQ
Douglas	Oakland Transfer Station	Oakland	DEQ
Douglas	Reedsport Transfer Station	Reedsport	DEQ
Douglas	Roseburg Transfer Station	Roseburg	DEQ

Douglas	Sutherlin Sanitary Service	Sutherlin	Additional
Douglas	Tiller Transfer Station	Tiller	DEQ
Douglas	Yoncalla Transfer Station	Yoncalla	DEQ
Gilliam	Waste Connections Condon Transfer Station	Condon	DEQ
Harney	Rim Rock Recycling	Hines	Additional
Hood River	Waste Connections Cooper Spur	Hood River	Additional
Hood River	Waste Connections Hood River Transfer Station	Hood River	DEQ
Hood River	Waste Connections Mt. Hood Recycling Depot	Mt. Hood	DEQ
Jackson	Waste Connections-Rogue Disposal Glass 4 – Ray's Market	Central Point	Additional
Jackson	Southern Oregon Sanitation – Eagle Point	Eagle Point	DEQ
Jackson	Waste Connections-Rogue Disposal Glass Depot #6 – Ray's Market	Jacksonville	Additional
Jackson	Goodwill of Southern Oregon	Medford	Additional
Jackson	Habitat Restore Rogue Valley	Medford	Additional
Jackson	Waste Connections-Rogue Disposal Glass 1 – Sherm's Thunderbird	Medford	Additional
Jackson	Waste Connections-Rogue Disposal Glass 2 – Food4Less	Medford	Additional
Jackson	Waste Connections-Rogue Disposal Glass 3 – Rogue Credit Union	Medford	Additional
Jackson	Waste Connections-Rogue Disposal Glass Depot – Phoenix	Phoenix	Additional
Jackson	Waste Connections-Rogue Disposal Transfer Station and MRF	White City	DEQ
Jackson	Recology Ashland Recycling Depot	Ashland	Additional
Jackson	Recology Valley View Transfer Station	Ashland	DEQ

Jefferson	Madras Sanitary Recycle Depot (a.k.a. Owenjay)	Madras	DEQ
Josephine	Republic Services Josephine Recycling and Transfer Station	Grants Pass	DEQ
Josephine	Southern Oregon Sanitation Redwood Transfer Station	Grants Pass	DEQ
Lane	Cottage Grove Garbage	Cottage Grove	DEQ
Lane	Cottage Grove Transfer Station	Cottage Grove	DEQ
Lane	St. Vincent De Paul	Cottage Grove	Additional
Lane	Bring Recycling	Eugene	Additional
Lane	Glenwood Central Receiving Station	Eugene	DEQ
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	St. Vincent De Paul	Eugene	Additional
Lane	Waste Connections	Eugene	Additional
Lane	Waste Connections Ecosort Material Recovery Facility	Eugene	DEQ
Lane	Florence Transfer Station	Florence	DEQ
Lane	St. Vincent De Paul	Florence	Additional
Douglas	Glendale Transfer Station	Glendale	DEQ
Lane	St. Vincent De Paul	Junction City	Additional
Lane	St. Vincent De Paul	Springfield	Additional
Lane	St. Vincent De Paul	Springfield	Additional
Lincoln	North Lincoln Sanitary Service (AKA Next Gen)	Lincoln City	DEQ
Lincoln	Schooner Creek Public Transfer Station	Lincoln City	DEQ
Lincoln	Newport Recycling Center	Newport	DEQ
Lincoln	Thompsons Transfer and Disposal Agate Beach Transfer Station	Newport	DEQ
Lincoln	Toledo Transfer Station	Toledo	DEQ
Lincoln	South Lincoln Recycle & Transfer Station	Waldport	DEQ
Linn	Divert Albany Processing Facility	Albany	DEQ

Linn	Republic Services Albany-Lebanon Recycling Depot	Albany	DEQ
Linn	St. Vincent De Paul	Albany	Additional
Linn	Waste Connections-Sweet Home Sanitation Transfer Station	Sweet Home	DEQ
Malheur	Waste Connections Ontario Sanitary Service Transfer Station	Ontario	DEQ
Marion	Loren's Sanitation Service	Keizer	DEQ
Marion	D&O Garbage	Salem	DEQ
Marion	Gaffin Road Transfer Station	Salem	DEQ
Marion	Garten Recycling Center	Salem	DEQ
Marion	Marion Resource Recovery Facility	Salem	DEQ
Marion	Pacific Sanitation	Salem	DEQ
Marion	St. Vincent de Paul	Salem	Additional
Marion	Suburban Garage	Salem	DEQ
Marion	Republic Services of Marion County - Silverton	Silverton	DEQ
Marion	North Marion County Recycling & Transfer Station	Woodburn	DEQ
Morrow	Boardman Recycling Depot (Front Street NE)	Boardman	DEQ
Morrow	Waste Connections North Morrow County Transfer Station	Boardman	DEQ
Morrow	Waste Connections South Morrow Transfer Station	Lexington	DEQ
Multnomah	Habitat for Humanity Portland Metro	Gresham	Additional
Multnomah	New Seasons Market Mountain Park	Lake Oswego	Additional
Multnomah	COR Recycling	Portland	DEQ
Multnomah	Far West Recycling	Portland	DEQ
Multnomah	Ground Score	Portland	Additional
Multnomah	Habitat for Humanity Portland Metro	Portland	Additional
Multnomah	James Recycling	Portland	Additional
Multnomah	Metro Central Transfer Station	Portland	DEQ

Multnomah	Metro RID Deployment Center	Portland	Additional
Multnomah	New Seasons Market Arbor Lodge	Portland	Additional
Multnomah	New Seasons Market Concordia	Portland	Additional
Multnomah	New Seasons Market Grant Park	Portland	Additional
Multnomah	New Seasons Market Hawthorne	Portland	Additional
Multnomah	New Seasons Market Raleigh Hills	Portland	Additional
Multnomah	New Seasons Market Sellwood	Portland	Additional
Multnomah	New Seasons Market Seven Corners	Portland	Additional
Multnomah	New Seasons Market Slabtown	Portland	Additional
Multnomah	New Seasons Market University Park	Portland	Additional
Multnomah	New Seasons Market Williams	Portland	Additional
Multnomah	New Seasons Market Woodstock	Portland	Additional
Multnomah	The Arc of Portland	Portland	Additional
Polk	Republic Services – Dallas	Dallas	DEQ
Polk	Recology Western Oregon Waste	Grand Ronde	Additional
Polk	Brandt's Sanitary	Monmouth	DEQ
Sherman	Sherman County Transfer Station	Biggs	DEQ
Sherman	Waste Connections Grass Valley glass depot	Grass Valley	Additional
Sherman	Waste Connections Rufus glass depot	Rufus	Additional
Tillamook	Manzanita Transfer Station	Manzanita	DEQ
Tillamook	Pacific City Transfer Station	Pacific City	DEQ
Tillamook	Tillamook Transfer Station	Tillamook	DEQ
Umatilla	Humbert Refuse Landfill	Athena	DEQ
Umatilla	Waste Connections City of Echo Recycling Depot	Echo	Additional

Umatilla	Waste Connections Hermiston Recycling Depot	Hermiston	DEQ
Umatilla	Waste Connections–Sanitary Disposal Transfer Station	Hermiston	DEQ
Umatilla	Milton–Freewater Recycling Depot	Milton–Freewater	DEQ
Umatilla	Milton–Freewater Sanitary Landfill	Milton–Freewater	DEQ
Umatilla	Pendleton Recycling Depot (downtown)	Pendleton	DEQ
Umatilla	Pendleton Transfer Station	Pendleton	DEQ
Umatilla	Waste Connections–Sanitary Disposal Stanfield	Stanfield	Additional
Umatilla	Umatilla Recycling Depot	Umatilla	DEQ
Wasco	Waste Connections City of Maupin Recycling Depot	Maupin	Additional
Wasco	St. Vincent de Paul	The Dalles	Additional
Wasco	Waste Connections The Dalles Transfer Station and HHW Facility	The Dalles	DEQ
Washington	Swatco	Banks	Additional
Washington	Habitat for Humanity Portland Metro	Beaverton	Additional
Washington	New Seasons Market Cedar Hills	Beaverton	Additional
Washington	New Seasons Market Progress Ridge	Beaverton	Additional
Washington	Metro Cornelius property	Cornelius	Additional
Washington	Habitat Restore West Tuality	Forest Grove	Additional
Washington	Far West Recycling	Hillsboro	DEQ
Washington	New Seasons Market Orenco Station	Hillsboro	Additional
Washington	Pride Recycling Company	Sherwood	DEQ
Washington	New Seasons Market Nyberg Rivers	Tualatin	Additional
Washington	Republic Willamette Resources TS/MRF	Wilsonville	DEQ
Wheeler	Fossil Solid Waste Transfer Station and Recycling Station	Fossil	DEQ
Yamhill	Recology Valley Recovery Zone	McMinnville	DEQ

Yamhill	Waste Management Newberg Transfer and Recycling Center	Newberg	DEQ
* Nearly all sites are existing recycling locations.			

Table iv

The following table indicates the depot locations that will satisfy convenience standard requirements using one of the components of administrative discretion described in the PRO Recycling Acceptance List section of the main body of the program plan:

Local Government	Satisfies "base" convenience standard	Satisfies "enhanced" convenience standard	Facility Name	Address	City	Zip Code	Alternative Compliance Request
Gladstone	No	Yes	Waste Connections KB Recycling MRF	9602 SE Clackamas Rd	Clackamas	97015	Less than a mile from city limits and 5 miles from city center. Well established drop-off point for surrounding community.
Bend	Yes	Yes	Republic Services Deschutes Recycling	61050 SE 27th St	Bend	97702	Just outside of city limits. Known as the go-to location for disposal and recycling for the city and county. Located 3.8 miles from city center.
Roseburg	Yes	Yes	Roseburg Transfer Station	165 McClain West Ave	Roseburg	97470	~1.5 miles from city limits. Known as the go-to for disposal and recycling for the city and county. Located 4 miles from city center.
Gilliam County	Yes	Yes	Waste Connections Condon Transfer Station	18342 Brown Ln	Condon	97823	~1.5 miles from city center. Known as the go-to for disposal and recycling for the city and county.
Central Point	Yes	Yes	Waste Connections-Rogue Disposal Transfer Station & MRF	8001 Table Rock Rd	White City	97503	~6 miles from city center. Known as the go-to for disposal and recycling for city and county.

Grants Pass	No	Yes	Republic Services Josephine Recycling and Transfer Station	1749 Merlin Rd	Grants Pass	97526	7.5 miles from city center. Known as the go-to for disposal and recycling for city and county.
Eugene	Yes	Yes	Waste Connections	1650 Glenwood Blvd	Eugene	97403	3.5 miles from city center.
Eugene	Yes	Yes	Glenwood Central Receiving Station	3100 E. 17th Ave	Eugene	97403	3.5 miles from city center. Known as the go-to for disposal and recycling for the City.
Eugene	Yes	Yes	Bring Recycling	4446 Franklin Blvd	Eugene	97403	3.6 miles from City center. Known as the go to for alternative recycling opportunities for the City.
Salem	Yes	Yes	Suburban Garage	6075 State St	Salem	97317	6 miles from city center and 1.5 miles from city border.
Woodburn	Yes	Yes	North Marion County Recycling & Transfer Station	17827 Whitney Ln NE	Woodburn	97071	3 miles from city center and 1.5 miles from city border.
Portland	Yes	Yes	New Seasons Mountain Park	3 Monroe Pkwy Suite R	Lake Oswego	97035	Meters from City of Portland border.
Phoenix	No	Yes	Recology TS	3000 N Valley View Rd	Ashland	97520	4 miles from city center.
Talent	No	Yes	Recology TS	3000 N Valley View Rd	Ashland	97520	8 miles from city center.

Table v

Sites that Responded “No” to Potentially Hosting a PRO Materials Depot or for which a Response is Pending			
County	Site	City	Response to Outreach
Baker	LaRue Transfer Station	Halfway	Response pending
Benton	Republic Services Coffin Butte Landfill	Corvallis	Response pending
Clackamas	Universal Recycling Technologies	Clackamas	Response pending
Clatsop	Seaside Recycle Depot	Seaside	Response pending
Curry	Waste Connections Brookings Transfer Station	Brookings	Response pending

Gilliam	Waste Management Columbia Ridge Landfill/Transfer Station	Arlington	Response pending
Grant	Monument Transfer Station	Monument	Response pending
Grant	City of Seneca Transfer Station	Seneca	Response pending
Jefferson	Culver Recycling Depot	Culver	Response pending
Josephine	Republic Services Grants Pass Sanitation Depot	Grants Pass	Response pending
Marion	Woodburn Recycle Center and Transfer Station	Woodburn	Response pending
Tillamook	City Sanitary Recycling Depot	Tillamook	Response pending
Wallowa	Recycling Center	Enterprise	Response pending
Washington	Waste Management Forest Grove Transfer Station	Forest Grove	Response pending
Washington	Waste Management Tualatin Valley Waste Recovery	Hillsboro	Response pending
Baker	Baker Sanitary Landfill	Baker City	No
Baker	Haines Landfill	Haines	No
Baker	Huntington Transfer Station	Huntington	No
Baker	Unity Transfer Station	Unity	No
Clackamas	Safety-Kleen	Clackamas	No
Clatsop	Trails End Recovery MRF	Warrenton	No
Columbia	Waste Management Vernonia Transfer Station	Vernonia	No
Crook	Crook County Landfill	Prineville	No
Curry	Wridge Creek Transfer Station	Brookings	No
Curry	Waste Connections Nesika Beach Transfer Station	Gold Beach	No
Curry	Waste Connections Port Orford Transfer Station	Port Orford	No
Deschutes	La Pine Redi Mix, Inc	La Pine	No
Douglas	Roseburg Landfill	Roseburg	No
Grant	Hendrix (Clark's) Transfer Station	John Day	No
Grant	Long Creek Transfer Station	Long Creek	No
Grant	Silvies Valley Ranch LLC	Seneca	No
Harney	Burns-Hines Disposal Site	Burns	No
Harney	Diamond Disposal Site	Diamond	No
Harney	Drewsey Disposal Site	Drewsey	No
Harney	Fields Disposal Site	Fields	No
Harney	Frenchglen Disposal Site	Frenchglen	No
Harney	Riley Disposal Site	Riley	No

Jackson	Dry Creek Landfill	Eagle Point	No
Jefferson	Camp Sherman Transfer Station	Camp Sherman	No
Jefferson	Box Canyon Transfer Station	Madras	No
Josephine	Kerby Transfer Station	Kerby	No
Klamath	Beatty Transfer Station	Beatty	No
Klamath	Bonanza Transfer Station	Bonanza	No
Klamath	Chemult Landfill	Chemult	No
Klamath	Chiloquin Transfer Station	Chiloquin	No
Klamath	Crescent Transfer Station	Crescent	No
Klamath	Keno Transfer Station	Keno	No
Klamath	Klamath Falls Landfill and Transfer Station	Klamath Falls	No
Klamath	Rogue Klamath Transfer Station	Klamath Falls	No
Klamath	Merrill Transfer Station	Merrill	No
Klamath	Odessa Transfer Station	Rocky Point	No
Klamath	Sprague River Transfer Station	Sprague River	No
Lake	Christmas Valley Transfer Station	Christmas Valley	No
Lake	Fort Rock Transfer Station	Fort Rock	No
Lake	Thomas Creek Road Transfer Station	Lakeview	No
Lake	Paisley Transfer Station	Paisley	No
Lake	Silver Lake Transfer Station	Silver Lake	No
Lane	McKenzie Bridge Transfer Station	Blue River	No
Lane	Low Pass Transfer Station	Cheshire	No
Lane	London Transfer Station	Cottage Grove	No
Lane	Creswell Transfer Station	Creswell	No
Lane	Sharps Creek Transfer Station	Culp Creek	No
Lane	Rattlesnake Transfer Station	Dexter	No
Lane	Lane Apex Disposal Service	Eugene	No
Lane	McKenzie Recycling	Eugene	No
Lane	Rexius Yard Debris Recycling	Eugene	No
Lane	Short Mountain Landfill	Eugene	No
Lane	Vida-Leaburg Transfer Station	Leaburg	No
Lane	Marcola Transfer Station	Marcola	No
Lane	Oakridge Transfer Station	Oakridge	No

Lane	Swisshome Transfer Station	Swisshome	No
Lane	Veneta Transfer Station	Veneta	No
Lane	Walton Transfer Station	Walton	No
Lincoln	G-P Toledo MRF	Toledo	No
Malheur	Lytle Boulevard Landfill	Vale	No
Marion	Clayton Ward-DTG	Salem	No
Marion	Construction Waste Processing and Transfer Center	Salem	No
Marion	Marion County HHW Collection Facility	Salem	No
Marion	American Gypsum Recycling	Turner	No
Morrow	Waste Connections Finley Buttes Regional Landfill	Boardman	No
Multnomah	Gresham Sanitary Service	Gresham	No
Multnomah	Environmentally Conscious Recycling (ECR)	Portland	No
Multnomah	Greenway Recycling	Portland	No
Multnomah	Recology Suttle Road Recovery Facility	Portland	No
Multnomah	Urban Gypsum	Portland	No
Multnomah	WasteXpress	Portland	No
Multnomah	Waste Management Troutdale Transfer Station	Troutdale	No
Polk	Valley Recycling and Disposal	Salem	No
Union	Elgin Transfer Station	Elgin	No
Union	Waste Pro Recovery Transfer Station	La Grande	No
Union	Willow Street Recycling Depot	La Grande	No
Wallowa	Ant Flat Landfill	Enterprise	No
Wallowa	Joseph Transfer Station	Joseph	No
Wallowa	Lostine Transfer Station	Lostine	No
Wallowa	Wallowa Transfer Station	Wallowa	No
Wasco	Shaniko Transfer Station	Shaniko	No
Wasco	Wasco County Landfill	The Dalles	No
Wasco	Wasco County Landfill Barge Unloading Facility	The Dalles	No
Washington	Hillsboro Garbage and Disposal	Hillsboro	No
Wheeler	Mitchell Transfer Station and Recycling Station	Mitchell	No
Wheeler	Spray Solid Waste Transfer Station and Recycling Station	Spray	No
Yamhill	Waste Management Riverbend Landfill	McMinnville	No

Table vi

(Note: These sites are drawn from a DEQ list of permitted solid waste facilities known to have a recycling depot on-site, permitted solid waste facilities that accept solid waste from the public but that do not have a recycling depot on-site, and additional depots that are not permitted but which are used by local governments to comply with Oregon's Opportunity to Recycle requirements.)

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
State of Oregon	4,237,256	4,009,552	227,704	94.6%	113	140	118	0	Yes	No
Baker County	16,668	13,298	3,370	79.8%	1	1	1	N/A	Yes	Yes
Baker City	10,099	10,099	0	100.0%	1	1	1	0	Yes	Yes
Greenhorn	3	0	3	0.0%	0	0	0	0	Yes	Yes
Haines	373	373	0	100.0%	0	0	0	0	Yes	Yes
Halfway	351	0	351	0.0%	0	0	0	0	Yes	Yes
Huntington	502	0	502	0.0%	0	0	0	0	Yes	Yes
Richland	165	0	165	0.0%	0	0	0	0	Yes	Yes
Sumpter	204	0	204	0.0%	0	0	0	0	Yes	Yes
Unity	40	0	40	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	4,931	2,826	2,105	57.3%	N/A	N/A	N/A	N/A	N/A	N/A
Benton County	95,184	94,490	694	99.3%	3	4	4	N/A	Yes	Yes
Adair Village	994	994	0	100.0%	0	0	0	0	Yes	Yes
Albany	9,117	9,117	0	100.0%	0	0	0	0	Yes	Yes
Corvallis	59,922	59,922	0	100.0%	2	3	2	1	Yes	Yes with Discretion
Monroe	647	647	0	100.0%	0	0	0	0	Yes	Yes
Philomath	5,350	5,350	0	100.0%	0	1	1	0	Yes	Yes
<i>All other areas of county</i>	19,154	18,460	694	96.4%	N/A	N/A	N/A	N/A	N/A	N/A
Clackamas County	421,401	419,968	1,433	99.7%	8	10	7	N/A	No	No
Barlow	133	133	0	100.0%	0	0	0	0	Yes	Yes
Canby	18,171	18,171	0	100.0%	1	1	1	0	Yes	Yes
Estacada	4,356	4,356	0	100.0%	0	0	0	0	Yes	Yes
Gladstone	12,017	12,017	0	100.0%	0	1	0	1	Yes	Yes with Discretion

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Happy Valley	23,733	23,733	0	100.0%	1	1	1	0	Yes	Yes
Johnson City	539	539	0	100.0%	0	0	0	0	Yes	Yes
Lake Oswego	38,107	38,107	0	100.0%	1	1	1	0	Yes	Yes
Milwaukie	21,119	21,119	0	100.0%	1	1	1	0	Yes	Yes
Molalla	10,228	10,228	0	100.0%	0	1	0	0	Yes	No
Oregon City	37,572	37,572	0	100.0%	1	1	1	0	Yes	Yes
Portland	843	843	0	100.0%	0	0	0	0	Yes	Yes
Rivergrove	495	495	0	100.0%	0	0	0	0	Yes	Yes
Sandy	12,612	12,612	0	100.0%	0	1	0	1	Yes	Yes with Discretion
Tualatin	24,786	24,786	0	100.0%	0	0	0	0	Yes	Yes
West Linn	27,373	27,373	0	100.0%	1	1	0	0	No	No
Wilsonville	24,522	24,522	0	100.0%	1	1	1	0	Yes	Yes
<i>All other areas of county</i>	186,425	184,992	1,433	99.2%	N/A	N/A	N/A	N/A	N/A	N/A
Clatsop County	41,072	40,125	947	97.7%	2	2	2	N/A	Yes	Yes
Astoria	10,181	10,181	0	100.0%	1	1	1	0	Yes	Yes
Cannon Beach	1,489	1,489	0	100.0%	0	0	0	0	Yes	Yes
Gearhart	1,793	1,793	0	100.0%	0	0	0	0	Yes	Yes
Seaside	7,115	7,115	0	100.0%	1	1	1	0	Yes	Yes
Warrenton	6,277	6,277	0	100.0%	0	1	0	0	Yes	No
<i>All other areas of county</i>	14,217	13,270	947	93.3%	N/A	N/A	N/A	N/A	N/A	N/A

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Columbia County	52,589	49,073	3,516	93.3%	2	2	2	N/A	Yes	Yes
Clatskanie	1,716	1,716	0	100.0%	0	0	1	0	Yes	Yes
Columbia City	1,949	1,949	0	100.0%	0	0	0	0	Yes	Yes
Prescott	82	82	0	100.0%	0	0	0	0	Yes	Yes
Rainier	1,911	1,911	0	100.0%	0	0	0	0	Yes	Yes
Scappoose	8,010	8,010	0	100.0%	1	1	0	0	No	No
St. Helens	13,817	13,817	0	100.0%	1	1	1	0	Yes	Yes
Vernonia	2,374	0	2,374	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	22,730	21,588	1,142	95.0%	N/A	N/A	N/A	N/A	N/A	N/A
Coos County	64,929	63,099	1,830	97.2%	2	3	2	N/A	Yes	No
Bandon	3,321	3,321	0	100.0%	0	0	0	0	Yes	Yes
Coos Bay	15,985	15,985	0	100.0%	1	1	1	0	Yes	Yes
Coquille	4,015	4,015	0	100.0%	0	1	1	0	Yes	Yes
Lakeside	1,904	1,904	0	100.0%	0	0	0	0	Yes	Yes
Myrtle Point	2,475	2,475	0	100.0%	0	0	0	0	Yes	Yes
North Bend	10,317	10,317	0	100.0%	1	1	0	0	No	No
Powers	710	0	710	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	26,202	25,082	1,120	95.7%	N/A	N/A	N/A	N/A	N/A	N/A
Crook County	24,738	24,026	712	97.1%	1	1	1	N/A	Yes	Yes
Prineville	10,736	10,736	0	100.0%	1	1	1	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
<i>All other areas of county</i>	14,002	13,290	712	94.9%	N/A	N/A	N/A	N/A	N/A	N/A
Curry County	23,446	14,757	8,689	62.9%	1	1	1	N/A	Yes	Yes
Brookings	6,744	6,744	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Gold Beach	2,341	0	2,341	0.0%	0	0	0	0	Yes	Yes
Port Orford	1,146	0	1,146	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	13,215	8,013	5,202	60.6%	N/A	N/A	N/A	N/A	N/A	N/A
Deschutes County	198,253	174,493	23,760	88.0%	6	8	6	N/A	Yes	No
Bend	99,178	99,178	0	100.0%	4	4	3	1	Yes with Discretion	Yes with Discretion
La Pine	2,512	0	2,512	0.0%	0	0	0	0	Yes	Yes
Redmond	33,274	33,274	0	100.0%	2	2	1	1	Yes with Discretion	Yes with Discretion
Sisters	3,064	0	3,064	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	60,225	42,041	18,184	69.8%	N/A	N/A	N/A	N/A	N/A	N/A
Douglas County	111,201	100,001	11,200	89.9%	3	4	4	N/A	Yes	Yes
Canyonville	1,640	815	825	49.7%	0	0	0	0	Yes	Yes
Drain	1,172	0	1,172	0.0%	0	0	0	0	Yes	Yes
Elkton	183	0	183	0.0%	0	0	0	0	Yes	Yes
Glendale	858	0	858	0.0%	0	0	0	0	Yes	Yes
Myrtle Creek	3,481	3,481	0	100.0%	0	0	0	0	Yes	Yes
Oakland	934	934	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Reedsport	4,310	4,310	0	100.0%	0	1	0	1	Yes	Yes with Discretion
Riddle	1,214	1,214	0	100.0%	0	0	0	0	Yes	Yes
Roseburg	23,683	23,683	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Sutherlin	8,524	8,524	0	100.0%	1	1	1	0	Yes	Yes
Winston	5,625	5,625	0	100.0%	0	1	1	0	Yes	Yes
Yoncalla	1,021	0	1,021	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	58,556	51,415	7,141	87.8%	N/A	N/A	N/A	N/A	N/A	N/A
Gilliam County	1,995	1,037	958	52.0%	1	1	1	N/A	Yes	Yes
Arlington	628	0	628	0.0%	0	0	0	0	Yes	Yes
Condon	711	711	0	100.0%	0	0	0	0	Yes	Yes
Lonerock	25	0	25	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	631	326	305	51.7%	N/A	N/A	N/A	N/A	N/A	N/A
Grant County	7,233	0	7,233	0.0%	1	1	0	N/A	No	No
Canyon City	660	0	660	0.0%	0	0	0	0	Yes	Yes
Dayville	132	0	132	0.0%	0	0	0	0	Yes	Yes
Granite	32	0	32	0.0%	0	0	0	0	Yes	Yes
John Day	1,664	0	1,664	0.0%	0	0	0	0	Yes	Yes
Long Creek	173	0	173	0.0%	0	0	0	0	Yes	Yes
Monument	115	0	115	0.0%	0	0	0	0	Yes	Yes
Mount Vernon	548	0	548	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Prairie City	841	0	841	0.0%	0	0	0	0	Yes	Yes
Seneca	165	0	165	0.0%	0	0	0	0	Yes	Yes
All other areas of county	2,903	0	2,903	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Harney County	7,495	6,009	1,486	80.2%	1	1	1	N/A	Yes	Yes
Burns	2,730	2,730	0	100.0%	0	0	0	0	Yes	Yes
Hines	1,645	1,645	0	100.0%	0	0	0	0	Yes	Yes
All other areas of county	3,120	1,634	1,486	52.4%	N/A	N/A	N/A	N/A	N/A	N/A
Hood River County	23,977	22,525	1,452	93.9%	1	1	1	N/A	Yes	Yes
Cascade Locks	1,379	0	1,379	0.0%	0	0	0	0	Yes	Yes
Hood River	8,313	8,313	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
All other areas of county	14,285	14,212	73	99.5%	N/A	N/A	N/A	N/A	N/A	N/A
Jackson County	223,259	221,349	1,910	99.1%	6	8	8	N/A	Yes	Yes
Ashland	21,360	21,360	0	100.0%	1	1	1	0	Yes	Yes
Butte Falls	443	443	0	100.0%	0	0	0	0	Yes	Yes
Central Point	18,997	18,997	0	100.0%	1	1	1	0	Yes	Yes
Eagle Point	9,686	9,686	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Gold Hill	1,335	1,335	0	100.0%	0	0	0	0	Yes	Yes
Jacksonville	3,020	3,020	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Medford	85,824	85,824	0	100.0%	3	4	2	2	Yes with Discretion	Yes with Discretion
Phoenix	4,475	4,475	0	100.0%	0	0	0	0	Yes	Yes
Rogue River	2,407	2,407	0	100.0%	0	0	0	0	Yes	Yes
Shady Cove	3,081	3,081	0	100.0%	0	0	0	0	Yes	Yes
Talent	6,282	6,282	0	100.0%	0	1	0	1	Yes	Yes with Discretion
<i>All other areas of county</i>	66,349	64,439	1,910	97.1%	N/A	N/A	N/A	N/A	N/A	N/A
Jefferson County	24,502	23,999	503	97.9%	1	1	1	N/A	Yes	Yes
Culver	1,602	1,602	0	100.0%	0	0	0	0	Yes	Yes
Madras	7,456	7,456	0	100.0%	1	1	1	0	Yes	Yes
Metolius	978	978	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	14,466	13,963	503	96.5%	N/A	N/A	N/A	N/A	N/A	N/A
Josephine County	88,090	77,670	10,420	88.2%	3	3	2	N/A	No	No
Cave Junction	2,071	0	2,071	0.0%	0	0	0	0	Yes	Yes
Grants Pass	39,189	39,189	0	100.0%	2	2	2	0	Yes	Yes
<i>All other areas of county</i>	46,830	38,481	8,349	82.2%	N/A	N/A	N/A	N/A	N/A	N/A
Klamath County	69,413	0	69,413	0.0%	2	3	0	N/A	No	No
Bonanza	404	0	404	0.0%	0	0	0	0	Yes	Yes
Chiloquin	767	0	767	0.0%	0	0	0	0	Yes	Yes
Klamath Falls	21,813	0	21,813	0.0%	1	1	0	0	No	No

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Malin	731	0	731	0.0%	0	0	0	0	Yes	Yes
Merrill	821	0	821	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	44,877	0	44,877	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Lake County	8,160	0	8,160	0.0%	1	1	0	N/A	No	No
Lakeview	2,418	0	2,418	0.0%	0	0	0	0	Yes	Yes
Paisley	250	0	250	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	5,492	0	5,492	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Lane County	382,971	372,986	9,985	97.4%	10	13	12	N/A	Yes	No
Coburg	1,306	1,306	0	100.0%	0	0	0	0	Yes	Yes
Cottage Grove	10,574	10,574	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Creswell	5,641	5,641	0	100.0%	0	1	0	0	Yes	No
Dunes City	1,428	1,428	0	100.0%	0	0	0	0	Yes	Yes
Eugene	176,654	176,654	0	100.0%	6	6	2	4	Yes with Discretion	Yes with Discretion
Florence	9,396	9,396	0	100.0%	1	1	1	0	Yes	Yes
Junction City	6,787	6,787	0	100.0%	1	1	1	0	Yes	Yes
Lowell	1,196	1,196	0	100.0%	0	0	0	0	Yes	Yes
Oakridge	3,206	0	3,206	0.0%	0	0	0	0	Yes	Yes
Springfield	61,851	61,851	0	100.0%	2	3	3	0	Yes	Yes
Veneta	5,214	5,214	0	100.0%	0	1	0	0	Yes	No
Westfir	259	0	259	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
<i>All other areas of county</i>	99,459	92,939	6,520	93.4%	N/A	N/A	N/A	N/A	N/A	N/A
Lincoln County	50,395	41,405	8,990	82.2%	2	2	2	N/A	Yes	Yes
Depoe Bay	1,515	1,515	0	100.0%	0	0	0	0	Yes	Yes
Lincoln City	9,815	9,815	0	100.0%	1	1	1	0	Yes	Yes
Newport	10,256	10,256	0	100.0%	1	1	1	0	Yes	Yes
Siletz	1,230	1,230	0	100.0%	0	0	0	0	Yes	Yes
Toledo	3,546	3,546	0	100.0%	0	0	0	0	Yes	Yes
Waldport	2,249	0	2,249	0.0%	0	0	0	0	Yes	Yes
Yachats	994	0	994	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	20,790	15,043	5,747	72.4%	N/A	N/A	N/A	N/A	N/A	N/A
Linn County	128,610	124,820	3,790	97.1%	4	5	3	N/A	No	No
Albany	47,355	47,355	0	100.0%	2	2	2	0	Yes	Yes
Brownsville	1,694	1,694	0	100.0%	0	0	0	0	Yes	Yes
Gates	46	0	46	0.0%	0	0	0	0	Yes	Yes
Halsey	962	962	0	100.0%	0	0	0	0	Yes	Yes
Harrisburg	3,652	3,652	0	100.0%	0	0	0	0	Yes	Yes
Idanha	71	0	71	0.0%	0	0	0	0	Yes	Yes
Lebanon	18,447	18,447	0	100.0%	1	1	0	0	No	No
Lyons	1,202	1,159	43	96.4%	0	0	0	0	Yes	Yes
Mill City	1,617	0	1,617	0.0%	0	0	0	0	Yes	Yes
Millersburg	2,919	2,919	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Scio	956	956	0	100.0%	0	0	0	0	Yes	Yes
Sodaville	360	360	0	100.0%	0	0	0	0	Yes	Yes
Sweet Home	9,828	9,828	0	100.0%	1	1	1	0	Yes	Yes
Tangent	1,231	1,231	0	100.0%	0	0	0	0	Yes	Yes
Waterloo	222	222	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	38,048	36,035	2,013	94.7%	N/A	N/A	N/A	N/A	N/A	N/A
Malheur County	31,571	26,823	4,748	85.0%	1	2	1	N/A	Yes	No
Adrian	157	0	157	0.0%	0	0	0	0	Yes	Yes
Jordan Valley	130	0	130	0.0%	0	0	0	0	Yes	Yes
Nyssa	3,198	3,198	0	100.0%	0	0	0	0	Yes	Yes
Ontario	11,645	11,645	0	100.0%	1	1	1	0	Yes	Yes
Vale	1,894	1,852	42	97.8%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	14,547	10,128	4,419	69.6%	N/A	N/A	N/A	N/A	N/A	N/A
Marion County	345,920	343,870	2,050	99.4%	9	12	11	N/A	Yes	No
Aumsville	4,234	4,234	0	100.0%	0	1	1	0	Yes	Yes
Aurora	1,133	1,133	0	100.0%	0	0	0	0	Yes	Yes
Detroit	203	0	203	0.0%	0	0	0	0	Yes	Yes
Donald	1,009	1,009	0	100.0%	0	0	0	0	Yes	Yes
Gates	502	0	502	0.0%	0	0	0	0	Yes	Yes
Gervais	2,595	2,595	0	100.0%	0	0	0	0	Yes	Yes
Hubbard	3,426	3,426	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Idanha	85	0	85	0.0%	0	0	0	0	Yes	Yes
Jefferson	3,327	3,327	0	100.0%	0	0	0	0	Yes	Yes
Keizer	39,376	39,376	0	100.0%	2	2	1	1	Yes with Discretion	Yes with Discretion
Mill City	354	0	354	0.0%	0	0	0	0	Yes	Yes
Mount Angel	3,392	3,392	0	100.0%	0	0	0	0	Yes	Yes
Salem	146,139	146,139	0	100.0%	6	7	4	2	Yes with Discretion	No
Scotts Mills	419	419	0	100.0%	0	0	0	0	Yes	Yes
Silverton	10,484	10,484	0	100.0%	1	1	1	0	Yes	Yes
St. Paul	434	434	0	100.0%	0	0	0	0	Yes	Yes
Stayton	8,244	8,244	0	100.0%	1	1	0	0	No	No
Sublimity	2,967	2,967	0	100.0%	0	0	0	0	Yes	Yes
Turner	2,454	2,454	0	100.0%	0	0	0	0	Yes	Yes
Woodburn	26,013	26,013	0	100.0%	1	1	1	0	Yes	Yes
<i>All other areas of county</i>	89,130	88,224	906	99.0%	N/A	N/A	N/A	N/A	N/A	N/A
Morrow County	12,186	10,492	1,694	86.1%	1	1	2	N/A	Yes	Yes
Boardman	3,828	3,828	0	100.0%	0	1	0	1	Yes	Yes with Discretion
Heppner	1,187	106	1,081	8.9%	0	0	0	0	Yes	Yes
Ione	337	337	0	100.0%	0	0	0	0	Yes	Yes
Irrigon	2,011	2,011	0	100.0%	0	0	0	0	Yes	Yes
Lexington	238	238	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
<i>All other areas of county</i>	4,585	3,972	613	86.6%	N/A	N/A	N/A	N/A	N/A	N/A
Multnomah County	815,428	815,297	131	100.0%	14	18	14	N/A	Yes	No
Fairview	10,424	10,424	0	100.0%	0	1	0	0	Yes	No
Gresham	114,247	114,247	0	100.0%	2	3	1	0	No	No
Lake Oswego	2,621	2,621	0	100.0%	0	0	0	0	Yes	Yes
Maywood Park	829	829	0	100.0%	0	0	0	0	Yes	Yes
Portland	650,019	650,019	0	100.0%	9	13	13	0	Yes	Yes
Troutdale	16,300	16,300	0	0.0%	1	1	0	0	No	No
Wood Village	4,387	4,387	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	16,601	16,470	131	99.2%	N/A	N/A	N/A	N/A	N/A	N/A
Polk County	87,433	87,407	26	100.0%	3	4	3	N/A	Yes	No
Dallas	16,854	16,854	0	100.0%	1	1	1	0	Yes	Yes
Falls City	1,051	1,051	0	100.0%	0	0	0	0	Yes	Yes
Independence	9,828	9,828	0	100.0%	1	1	0	0	No	No
Monmouth	11,110	11,110	0	100.0%	1	1	1	0	Yes	Yes
Salem	29,396	29,396	0	100.0%	0	0	0	0	Yes	Yes
Willamina	924	924	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	18,270	18,244	26	99.9%	N/A	N/A	N/A	N/A	N/A	N/A
Sherman County	1,870	1,487	383	79.5%	1	1	1	N/A	Yes	Yes
Grass Valley	149	0	149	0.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Moro	367	367	0	100.0%	0	0	0	0	Yes	Yes
Rufus	268	268	0	100.0%	0	0	0	0	Yes	Yes
Wasco	417	417	0	100.0%	0	0	1	0	Yes	Yes
<i>All other areas of county</i>	669	435	234	65.0%	N/A	N/A	N/A	N/A	N/A	N/A
Tillamook County	27,390	22,386	5,004	81.7%	1	1	2	N/A	Yes	Yes
Bay City	1,389	1,389	0	100.0%	0	0	0	0	Yes	Yes
Garibaldi	830	830	0	100.0%	0	0	0	0	Yes	Yes
Manzanita	603	0	603	0.0%	0	0	0	0	Yes	Yes
Nehalem	270	0	270	0.0%	0	0	0	0	Yes	Yes
Rockaway Beach	1,441	1,441	0	100.0%	0	0	0	0	Yes	Yes
Tillamook	5,204	5,204	0	100.0%	0	1	1	0	Yes	Yes
Wheeler	422	0	422	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	17,231	13,522	3,709	78.5%	N/A	N/A	N/A	N/A	N/A	N/A
Umatilla County	80,075	78,907	1,168	98.5%	3	3	4	N/A	Yes	Yes
Adams	389	389	0	100.0%	0	0	0	0	Yes	Yes
Athena	1,209	1,209	0	100.0%	0	0	0	0	Yes	Yes
Echo	632	632	0	100.0%	0	0	0	0	Yes	Yes
Helix	194	194	0	100.0%	0	0	0	0	Yes	Yes
Hermiston	19,354	19,354	0	100.0%	1	1	1	0	Yes	Yes
Milton- Freewater	7,151	7,151	0	100.0%	1	1	1	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Pendleton	17,107	17,107	0	100.0%	1	1	1	0	Yes	Yes
Pilot Rock	1,328	1,328	0	100.0%	0	0	0	0	Yes	Yes
Stanfield	2,144	2,144	0	100.0%	0	0	0	0	Yes	Yes
Ukiah	159	0	159	0.0%	0	0	0	0	Yes	Yes
Umatilla	7,363	7,363	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Weston	706	706	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	22,339	21,330	1,009	95.5%	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
Union County	26,196	0	26,196	0.0%	1	1	0	N/A	No	No
Cove	620	0	620	0.0%	0	0	0	0	Yes	Yes
Elgin	1,717	0	1,717	0.0%	0	0	0	0	Yes	Yes
Imbler	245	0	245	0.0%	0	0	0	0	Yes	Yes
Island City	1,144	0	1,144	0.0%	0	0	0	0	Yes	Yes
La Grande	13,026	0	13,026	0.0%	1	1	0	0	No	No
North Powder	504	0	504	0.0%	0	0	0	0	Yes	Yes
Summerville	119	0	119	0.0%	0	0	0	0	Yes	Yes
Union	2,152	0	2,152	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	6,669	0	6,669	0.0%	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
Wallowa County	7,391	5,844	1,547	79.1%	1	1	1	N/A	Yes	Yes
Enterprise	2,052	2,052	0	100.0%	0	0	1	0	Yes	Yes
Joseph	1,154	1,154	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Lostine	241	241	0	100.0%	0	0	0	0	Yes	Yes
Wallowa	796	0	796	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	3,148	2,397	751	76.1%	N/A	N/A	N/A	N/A	N/A	N/A
Wasco County	26,670	23,707	2,963	88.9%	1	1	1	N/A	Yes	Yes
Antelope	37	0	37	0.0%	0	0	0	0	Yes	Yes
Dufur	632	632	0	100.0%	0	0	0	0	Yes	Yes
Maupin	427	0	427	0.0%	0	0	0	0	Yes	Yes
Mosier	468	468	0	100.0%	0	0	0	0	Yes	Yes
Shaniko	30	0	30	0.0%	0	0	0	0	Yes	Yes
The Dalles	16,010	16,010	0	100.0%	1	1	1	0	Yes	Yes
<i>All other areas of county</i>	9,066	6,597	2,469	72.8%	N/A	N/A	N/A	N/A	N/A	N/A
Washington County	600,372	599,839	533	99.9%	11	14	12	N/A	Yes	No
Banks	1,837	1,837	0	100.0%	0	0	0	0	Yes	Yes
Beaverton	97,494	97,494	0	100.0%	2	3	2	1	Yes	Yes with Discretion
Cornelius	12,694	12,694	0	100.0%	1	1	1	0	Yes	Yes
Durham	1,944	1,944	0	100.0%	0	0	0	0	Yes	Yes
Forest Grove	26,225	26,225	0	100.0%	1	1	1	0	Yes	Yes
Gaston	670	670	0	100.0%	0	0	0	0	Yes	Yes
Hillsboro	106,447	106,447	0	100.0%	2	3	3	0	Yes	Yes
King City	5,184	5,184	0	100.0%	0	0	0	0	Yes	Yes

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
Lake Oswego	3	3	0	100.0%	0	0	0	0	Yes	Yes
North Plains	3,441	3,441	0	100.0%	0	0	0	0	Yes	Yes
Portland	1,641	1,641	0	100.0%	0	0	0	0	Yes	Yes
Rivergrove	50	50	0	100.0%	0	0	0	0	Yes	Yes
Sherwood	20,450	20,450	0	100.0%	1	1	1	0	Yes	Yes
Tigard	54,539	54,539	0	100.0%	1	2	1	0	Yes	No
Tualatin	24,786	24,786	0	100.0%	1	1	1	0	Yes	Yes
Wilsonville	2,142	2,142	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	240,825	240,292	533	99.8%	N/A	N/A	N/A	N/A	N/A	N/A
Wheeler County	1,451	641	810	44.2%	1	1	1	N/A	Yes	Yes
Fossil	447	447	0	100.0%	0	0	0	0	Yes	Yes
Mitchell	138	0	138	0.0%	0	0	0	0	Yes	Yes
Spray	139	0	139	0.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	727	194	533	26.7%	N/A	N/A	N/A	N/A	N/A	N/A
Yamhill County	107,722	107,722	0	100.0%	3	4	4	N/A	Yes	Yes
Amity	1,757	1,757	0	100.0%	0	0	0	0	Yes	Yes
Carlton	2,220	2,220	0	100.0%	0	0	0	0	Yes	Yes
Dayton	2,678	2,678	0	100.0%	0	0	0	0	Yes	Yes
Dundee	3,238	3,238	0	100.0%	0	0	0	0	Yes	Yes
Gaston	6	6	0	100.0%	0	0	0	0	Yes	Yes
Lafayette	4,423	4,423	0	100.0%	0	1	0	0	Yes	No

Population Covered by CAA RAL Depots - 15 Mile Buffer Distance + Convenience Analysis										
County	Total Population (2020 Census)	Population within 15 Miles	Population Beyond 15 Miles	Percent of Population within 15 Miles	Base Target	Enhanced Target	Depots Count	Variance Depot Count	Meets Base	Meets Enhanced
City										
McMinnville	34,319	34,319	0	100.0%	1	2	1	0	Yes	No
Newberg	25,138	25,138	0	100.0%	1	1	0	1	Yes with Discretion	Yes with Discretion
Sheridan	4,639	4,639	0	100.0%	0	1	1	0	Yes	Yes
Willamina	1,315	1,315	0	100.0%	0	0	0	0	Yes	Yes
Yamhill	1,147	1,147	0	100.0%	0	0	0	0	Yes	Yes
<i>All other areas of county</i>	26,842	26,842	0	100.0%	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>

Table vii

Appendix G:

Detailed Fee-Setting Methodology

(confidential)

Appendix G is confidential and has been shared with DEQ separately.

Appendix H:

CAA Restated Articles of Incorporation and Bylaws

VENABLE LLP600 MASSACHUSETTS AVE., NW WASHINGTON, DC 20001
T 202.344.4000 F 202.344.8300 www.Venable.com

March 28, 2023

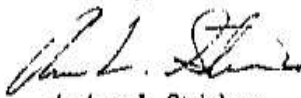
T 202.344.4202
F 202.344.8300
ALSteinberg@Venable.com***SENT VIA COURIER***Department of Licensing and Consumer Protection
Corporations Division
1100 4th St. SW
Washington, DC 20024***Re: Restated Articles of Incorporation of Circularity Alliance, File No.: N00007528311***

To Whom It May Concern,

On behalf of Circularity Alliance, a District of Columbia nonprofit corporation with file number N00007528311, enclosed please find Restated Articles of Incorporation for filing with the Corporations Division, along with a check in the amount of \$180.00 for the applicable filing and in-person processing fees. Please file the Restated Articles of Incorporation and then return evidence of the Certificate of Restated Articles of Incorporation via email to me at ALSteinberg@Venable.com.

Should you have any questions, please do not hesitate to contact me at (202) 344-4202. Thank you for your assistance.

Sincerely,



Andrew L. Steinberg

Enclosures

Initial File #: N00007528311

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF LICENSING AND CONSUMER PROTECTION
CORPORATIONS DIVISION



C E R T I F I C A T E

THIS IS TO CERTIFY that all applicable provisions of the District of Columbia Business Organizations Code have been complied with and accordingly, this ***CERTIFICATE OF RESTATED ARTICLES*** is hereby issued to:

Circular Action Alliance

Effective Date: 3/28/2023

IN WITNESS WHEREOF I have hereunto set my hand and caused the seal of this office to be affixed as of 3/28/2023 4:35 PM

Business and Professional Licensing Administration



Rebecca Janovich

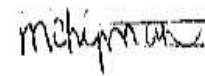
REBECCA JANOVICH
Deputy Superintendent of Corporations,
Corporations Division

Muriel Bowser
Mayor

Tracking #: RxDbdloy

LILCP Corp. Dkt. 7

MAR 28 2023



**RESTATED ARTICLES OF INCORPORATION
OF
CIRCULARITY ALLIANCE**

Pursuant to the provisions of the District of Columbia Nonprofit Corporation Act (the "Act"), the domestic filing entity listed below hereby applies for a Certificate of Restated Articles of Incorporation and for that purpose submits the statements below.

1. The name of the corporation (hereinafter referred to as the "Corporation") is: Circularity Alliance.
2. The Articles of Incorporation of the Corporation are hereby amended as follows:
 - A. Article FIRST is hereby amended by replacing the existing provision with the following:

ARTICLE I. NAME

The name of the corporation (hereinafter referred to as the "Corporation") is: Circular Action Alliance.

- B. Article SECOND is hereby amended by replacing the existing provision with the following:

ARTICLE II. DURATION

The duration of the Corporation shall be perpetual.

- C. Article THIRD is hereby amended by replacing the existing provision with the following:

ARTICLE III. PURPOSES

- a. The Corporation is incorporated as a nonprofit corporation under the Act and is organized and shall be operated exclusively for charitable, scientific, literary, and educational purposes as defined under Section 501(c)(3) of the Internal Revenue Code of 1986 and the Regulations thereunder, as they now exist or as they may hereafter be amended, or the corresponding provision of any subsequent federal tax laws (hereinafter collectively referred to as the "Code"). Specifically, and without limitation, the Corporation shall:
 - i. Develop, implement, and operate community level, post-consumer paper, packaging, and packaging-like items stewardship programs, in compliance with and as mandated by local and state legislation (as well as where not mandated by law), which may include, but is not limited to:

DLCF Corp. Div.

MAR 20 2023

- File Copy
- (1) Public outreach and education to businesses, consumers, the public, and other relevant stakeholders on reducing waste, how to recycle, and how to increase the recycling of packaging material;
 - (2) The collection and recycling of post-consumer paper, packaging, and packaging-like items;
 - (3) Program administration related to and required by (1) and (2) above; and
- ii. Undertake other activities consistent with purposes permissible for organizations described in Section 501(c)(3) of the Code.
- b. The Corporation shall have and may exercise, to the extent that they are not inconsistent with the purposes of the Corporation, any and all powers conferred upon nonprofit corporations organized pursuant to the Act; provided, however that:
- i. No part of the net earnings of the Corporation shall inure to the benefit of, or be distributed to, any director, or officer of the Corporation, or any private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services actually rendered to the Corporation and to make payments and distributions in furtherance of Code Section 501(c)(3) purposes;
 - ii. Except as provided and permitted under Sections 501(h) and 4911 of the Code, no substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Corporation shall not participate in or intervene in (including the publication or distribution of statements) any political campaign on behalf of or in opposition to any candidates for public office;
 - iii. Notwithstanding any other provisions of these Articles, the Corporation is organized and at all times shall be operated exclusively as a corporation not organized for profit, and the Corporation shall not conduct or carry on any activities not permitted to be conducted or carried on by an organization described in Section 501(c)(3) of the Code, and exempt from taxation under Section 501(a) of the Code;
 - iv. During any period that the Corporation is deemed to be a private foundation as described in Code Section 509(a), the Corporation:
 - (1) shall distribute its income for each taxable year at such time and in such manner as not to become subject to the tax on undistributed income imposed by Code Section 4942;
 - (2) shall not engage in any act of self-dealing as defined in Code Section 4941(d);
 - (3) shall not retain any excess business holdings as defined in Code Section 4943(c);

ELECT. CORP. UNIT.

MAR 26 2023

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- (4) shall not make any investments in such manner as to subject it to tax under Code Section 4944; and
- (5) shall not make any taxable expenditures as defined in Code Section 4945(d).

- v. The Corporation shall not have authority to issue capital stock in the Corporation.

- D. Article FOURTH is hereby amended by replacing the existing provision with the following:

ARTICLE IV. MEMBERS

The Corporation shall have members, whose qualifications, rights and obligations shall be as prescribed in the Bylaws of the Corporation.

- E. Article FIFTH is hereby amended by replacing the existing provision with the following:

ARTICLE V. BOARD OF DIRECTORS

Provisions for the regulations of the internal affairs of the Corporation shall be set forth in the Bylaws, which may contain any provision that is not inconsistent with law or these Articles. The business and affairs of the Corporation shall be managed under the direction of its Board of Directors. The number of directors and the method of election or appointment of the directors of this Corporation shall be as provided in the Bylaws of this Corporation.

- F. Article SIXTH is hereby amended by omitting the names of the initial directors as permitted by Section 29-409.03(b)(2) of the Act and replacing the existing provision with the following:

ARTICLE VI. REGISTERED AGENT AND ADDRESS

The principal office of the Corporation shall be located within or without the District of Columbia as determined by the Board of Directors. The name and address of the registered agent of this Corporation in the District of Columbia is:

Corporation Service Company
1090 Vermont Ave. NW
Washington, District of Columbia 20005

- G. Article SEVENTH is hereby amended by replacing the existing provision with the following:

ARTICLE VII. INCORPORATORS AND INITIAL DIRECTORS

The name and address of each incorporator of the Corporation, who also served as the initial directors of the Corporation, are:

<u>Name</u>	<u>Address</u>
Stephanie Potter	Nestlé USA 1812 N. Moore Street, Suite 3500 Arlington, VA 22209
Kirsten Witt	The Coca-Cola Company 1 Coca-Cola Plaza NW Atlanta, GA 30313
Anke Boykin	PepsiCo 700 Anderson Hill Road Purchase, NY 10577
John Breedlove	Niagara Bottling 1440 Bridgegate Drive Diamond Bar, CA 91765
Rachel Goldstein	Mars 6885 Elm Street McLean, VA 22101
Neil Menezes	General Mills 1 General Mills Boulevard Minneapolis, MN 55426
Charles Schwarze	Keurig Dr Pepper 53 South Avenue Burlington, MA 01803

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H. Article EIGHTH is hereby amended by replacing the existing provision with the following:

ARTICLE VIII. MISCELLANEOUS

Other lawful provisions for the conduct and regulation of the business and affairs of the Corporation, for its voluntary dissolution, or for limiting, defining or regulating the powers of the Corporation or its directors are as follows:

- a. In the event of the termination, liquidation, dissolution, or winding up of the Corporation in any manner or for any reason whatsoever, and after paying or making provision for the payment of all of the liabilities of the Corporation, all assets of the Corporation shall be distributed for one or more of the Corporation's exempt purposes within the meaning of Code Section 501(c)(3), or shall be distributed to the federal

government, or to a state or local government, for a public purpose, in such manner as the Board of Directors may determine, and, to the extent required by the Act and the Bylaws, by the members.

- b. The personal liability of the officers and directors of the Corporation is hereby eliminated to the fullest extent permitted by law and by the provisions of the Act. Specifically, and without limitation, a director or officer of the Corporation shall not be liable to the Corporation or its members for money damages for any action taken, or failure to take action, as a director or officer, except for liability for (i) the amount of financial benefit received by the director or officer to which the director or officer was not entitled; (ii) an intentional infliction of harm; (iii) an unlawful distribution authorized by the officer or director in a manner outside the standards of conduct mandated for the officer or director by the Act; or (iv) an intentional violation of criminal law.
- c. To the fullest extent permitted by the Act, the Corporation shall indemnify and hold harmless each officer and director of the Corporation against any and all liabilities, costs and expenses (including attorneys' fees and expenses) reasonably incurred by him or her or on his or her behalf in connection with any proceeding to which he or she may be a party by reason of his or her being or having been an officer or director of the Corporation. Such indemnity shall not be deemed exclusive of any other rights to which those indemnified may be entitled under any Bylaw, agreement or otherwise. Such indemnity shall inure to the benefit of the heirs, executors or administrators of each officer and director.
- d. The Corporation may purchase liability insurance for the indemnity specified above to the fullest extent as determined from time to time by the Board of Directors of the Corporation. If so purchased, as required by the Act, such liability insurance shall provide a minimum limit of coverage of not less than \$200,000 per individual claim and \$500,000 per total claims that arise from the same occurrence, or such other amount as provided by the Act.

G. A new Article NINTH is hereby added as follows:

ARTICLE IX. AMENDMENT

These Articles of Incorporation may be amended from time to time in any and as many respects as may be desired; provided: (i) that the Articles of Incorporation as amended may contain only such provisions as might be lawfully contained in original Articles of Incorporation; (ii) an amendment to the Articles of Incorporation may be proposed without approval of the Board of Directors if proposed by 25% or more of the members entitled to vote on the amendment, and any such proposed amendment must be adopted by the affirmative vote of two-thirds of the voting membership of the Corporation; and (iii) that

otherwise any such amendments are made in the manner and pursuant to the procedures and requirements prescribed by the Act, provided, however that approval of the Board to an amendment to the Articles of Incorporation requires an affirmative vote of a majority of the total number of members of the Board of Directors then in office.

3. The text of the Restated Articles of Incorporation, which consolidates the foregoing amendments and all previous amendments to the Articles of Incorporation in a single document, is as follows:

[Remainder of page intentionally blank]

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MAR 20 2025
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4. The foregoing amendments and Restated Articles of Incorporation were duly adopted by the Board of Directors in accordance with the requirements of the Act at a meeting of the Board of Directors held on March 22, 2023, at which a quorum was present, and was approved by the members in the manner required by the Act and by the Corporation's Articles of Incorporation and Bylaws.

IN WITNESS WHEREOF, the undersigned have signed and attested to these Restated Articles of Incorporation as of the dates written below. These Restated Articles of Incorporation may be executed in separate counterparts.

By: 
Charles Schwarze, Chair

Date: 3-24-23

Attest: _____
John Breedlove, Secretary

Date: _____

BYLAWS
of
CIRCULAR ACTION ALLIANCE

ARTICLE I

Name, Registered Agent, and Offices

Section 1.01. Name. The name of this corporation (hereinafter referred to as the “Corporation”) shall be Circular Action Alliance.

Section 1.02. Registered Agent and Offices. The Corporation shall maintain in the District of Columbia a registered agent. The Corporation may have offices inside or outside of the District of Columbia as the Board of Directors of the Corporation (the “Board”) may designate or as the business of the Corporation may require from time to time.

ARTICLE II

Purposes and Limitations

Section 2.01 Purposes and Limitations. The Corporation is organized as a nonprofit corporation under the District of Columbia Nonprofit Corporation Act of 2010, as amended from time to time (the “Act”), for the purposes as set forth in the Corporation’s Articles of Incorporation.

ARTICLE III

Members

Section 3.01 Membership Classes. The Corporation shall have one class of members known as Founding Members. The Founding Members of the Corporation are those companies who have been approved by the Board to be a Founding Member, agreed to support the purposes of the Corporation and entered into a Membership Agreement with the Corporation. Founding Members shall each be eligible to appoint one Director to serve on the Board and shall have no other governance rights.

Section 3.02 Resignation and Termination of Membership. Membership in the Corporation may be terminated by the member’s submission of written notice of membership resignation or non-renewal to the Corporation, or by the Board for cause by the affirmative vote of a majority of the Directors present at a meeting of the Board called for the purpose of considering termination of the member and at which a quorum is present. Circumstances constituting “cause” shall be solely determined by the Board, and includes but is not limited to (i) failure to timely pay fees, membership dues, or assessments, (ii) failure or refusal to comply with the Membership Agreement, or (iii) engaging in conduct that is detrimental to the reputation, mission, or operations of the Corporation. Prior to terminating or expelling a member for cause,

the member shall be provided prior notice of the proposed termination or expulsion and the reasons therefor, and be provided an opportunity to be heard, orally or in writing as determined by the Board using such reasonable procedures for hearing as determined by the Board, before the effective date of the termination or expulsion.

Section 3.03 Effect and Timing of Termination and Resignation. The termination, non-renewal, or resignation of membership shall not extinguish or relieve such member's financial obligations then accrued pursuant to Section 8.02, including unpaid dues, fees, assessments, or other charges previously accrued, if any. The termination of membership shall take effect immediately or as of a later date determined by the Board. The resignation of membership shall take effect at the time specified in the notice of resignation, or, if no time is specified, at the time such resignation is tendered. The non-renewal of membership will take effect as of the expiration of the then-current term of membership at the time the notice of non-renewal is provided.

ARTICLE IV

Board of Directors

Section 4.01. General Powers. The affairs of the Corporation shall be managed by its Board. It shall be the Board's duty to carry out the objectives and purposes of the Corporation, and to this end the Board may exercise all powers of the Corporation, except such powers reserved to the Members as provided in the Act, the Articles of Incorporation, or these Bylaws.

Section 4.02. Election, Number, and Term of Office. The Board shall consist of the number of Founding Members of the Corporation. Each Founding Member shall appoint one person to serve as a Director, and such person shall serve as a Director until the member appoints a different person to serve as the Director. Founding Member Directors shall serve one-year terms of office and until their successors take office. Founding Member Directors may serve consecutive terms of office.

Section 4.03. Board Meeting. The Board shall hold an annual meeting at a time and place determined by the Board for the purpose of transacting such business as may properly come before the meeting. The Board may also hold other regular Board meetings at such times and places as may be determined by the Chair or the Board. Special meetings of the Board may be called by or at the request of the Chair or at least 20% of the Directors of the Corporation and shall be held at such time and place as set by the Directors calling the meeting.

Section 4.04. Notice. Notice of the place, if any, date, and time of each regular meeting of the Board shall be given to each Director by mail, overnight courier, e-mail, other mode of written communication or over the telephone not less than 24 hours before the time set for such a meeting. Notice of the place, if any, date, and time of each special meeting of the Board shall be given to each Director by mail at least two days before the special meeting, or by telephone or electronic transmission (including e-mail) or delivery in person not later than the day before the day of the meeting. Notice shall be deemed effective if given in person or by telephone, mail addressed to such Director at such Director's physical or e-mail address as it appears on the records of the Corporation, or by other means of electronic transmission.

Notice may be waived in writing, prior to or after the meeting, by those Directors not present. Attendance at a meeting in person shall constitute a waiver of notice of such meeting, except where the Director attends such meeting for the express purpose of objecting, at the commencement of the meeting, to the transaction of any business because the meeting was not lawfully called or convened.

Section 4.05. Quorum and Manner of Acting. A majority of the Directors in office shall constitute a quorum for the transaction of business at any meeting of the Board, provided, that if less than a majority of the Directors are present at any meeting, a majority of the Directors present may adjourn the meeting from time to time without further notice. The act of a majority of the Directors then in office at a meeting at which a quorum is present shall be the act of the Board except when a greater vote is required by the Act or by these Bylaws. Directors shall not be permitted to vote by proxy.

Section 4.06. Teleconferencing. Any person participating in a meeting of the Board may participate by means of telephone or video conference or by any means of communication by which all persons participating in the meeting are able to hear one another, and otherwise fully participate in the meeting. Such participation shall constitute presence in person at the meeting.

Section 4.07. Action by Unanimous Written Consent. Board action may be taken without a meeting if all the voting Directors consent thereto in writing (including by electronic transmission).

Section 4.08. Removal or Resignation of Directors. Any Director may be removed from office with or without cause by the Board provided advance written notice of the intent to remove is provided to the Founding Member whose Director is being removed. Any Director may resign at any time by giving written notice to the Chair or the Secretary of the Corporation. Such resignation shall take effect at the time specified in such notice, or, if no time is specified, at the time such resignation is tendered.

Section 4.09. Vacancies. Any vacancy occurring in the Board, or any Directorship to be filled by reason of an increase in the number of Directors, may be filled at any time in the same manner in which regular appointments are made. A Director selected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

Section 4.10. Compensation. Directors and Officers shall not receive any compensation for their services as such; provided, however, that Officers and Directors are not precluded from serving the Corporation in any other capacity and receiving reasonable compensation for such service with the approval of the Board.

ARTICLE V

Officers

Section 5.01. Officers. The Officers of the Corporation shall be a Chair, Vice Chair, Treasurer, Secretary, and President, and such other Officers as may be determined by the Board, each to have such duties and authority as may be specified in these Bylaws or as shall be prescribed by the Board. The offices of President (or if there is no President, then Chair) and Treasurer may

not be held by the same person; otherwise, the same individual may simultaneously hold more than one office.

Section 5.02. Election and Term. The Officers of the Corporation shall be elected by the Board at any meeting of the Board. Each Officer other than the President shall hold office for a one-year term; provided, however, that Officers shall serve until their successors are duly elected and qualified. The President shall serve at the pleasure of the Board. There shall be no limit on the number of terms, consecutive or otherwise, that an Officer may serve.

Section 5.03. Removal or Resignation of Officers. Any Officer may be removed from office at any time by the Board whenever in the Board's sole judgment the best interests of the Corporation would be served thereby. Any officer may resign at any time by giving written notice to the Secretary of the Corporation. Such resignation shall take effect at the time specified in such notice, or, if no time is specified, at the time such resignation is tendered.

Section 5.04. Vacancies. A vacancy in any officership, because of death, resignation, removal, disqualification, or otherwise, may be filled at any time by the Board for the unexpired portion of the term. Vacancies may be filled or new offices created and filled at any meeting of the Board.

Section 5.05. Chair. The Chair shall preside at all meetings of the Board. If the Corporation does not have a President, then the Chair shall also have the powers otherwise given to the President of the Corporation and, subject to the control and direction of the Board, shall supervise and control all the affairs of the Corporation until such time as a President is appointed. The Chair in general shall perform all duties incident to the office of Chair and such other duties as may be prescribed by the Board from time to time.

Section 5.06 Vice Chair. The Vice Chair shall assume the duties of the Chair in the Chair's absence or incapacity and perform such other duties as from time to time may be assigned by the Chair or by the Board.

Section 5.07. Treasurer. The Treasurer shall have charge and custody of and be responsible for, all funds and securities of the Corporation; receive and give receipts for monies due and payable to the Corporation from any sources whatsoever; and deposit all such monies in the name of the Corporation in such banks, trust companies, or other depositories as shall be selected in accordance with the provisions of these Bylaws. The Treasurer shall keep or cause to be kept complete and accurate financial records of the Corporation and in general shall perform all of the duties incident to the office of Treasurer and such other duties as from time to time may be assigned by the Chair or by the Board.

Section 5.08. Secretary. The Secretary shall record or cause to be recorded the minutes of all meetings of the Board; maintain such minutes in the Corporation's permanent records as required under the Act; see that all notices are duly given in accordance with the provisions of these Bylaws or as required by law; be the custodian of the corporate records, and in general perform all of the duties incident to the office of Secretary and such other duties as from time to time may be assigned by the Chair or by the Board.

Section 5.09. President. The Board shall select and employ a President (who may have the title of President or President and Chief Executive Officer) who shall be a corporate officer and responsible for the administration and management of the Corporation's business and operations. Subject to the oversight of the Board, the President shall: supervise, coordinate and manage the Corporation's day-to-day business and activities; formulate plans and advise on policies for the accomplishment of the Corporation's objectives; prepare an annual budget for approval by the Board; have charge of the Corporation's funds, discharge its obligations, and maintain its accounts; carry into effect all directions and resolutions of the Board; and perform such other duties and have such other powers as may be prescribed by the Board or these Bylaws. The President shall report to the Board and keep the Board apprised of his or her activities in carrying out his or her duties hereunder. The President shall serve at the pleasure of the Board of Directors. Any removal of the President will be without prejudice to his or her rights under a contract of employment, and the appointment of such person shall not itself create contract rights.

ARTICLE VI

Committees

Section 6.01. Committees of the Board. The Board may, by resolution adopted by a majority of all the Directors then in office, create one or more committees, each consisting solely of three or more Directors, to serve at the discretion of the Board (each a "Board Committee"). Board Committees shall have and exercise the authority of the Board in the management of the Corporation, to the extent provided in the respective Board resolution. Notwithstanding the foregoing, a Board Committee may not (i) authorize distributions; (ii) approve or propose to the Founding Members action required by the Act to be approved by the Founding Members; (iii) fill vacancies on the Board or any Board Committee; or (iv) adopt, amend, or repeal these Bylaws. The designation and delegation of authority to a Board Committee shall not operate to relieve the Board, or any individual Director, of any responsibility imposed upon them by law.

Section 6.02. Advisory Committees. Advisory committees not having and exercising the authority of the Board in the management of the Corporation may be designated by the Board at any meeting of the Board. Except as otherwise provided in such resolutions, the Board or anyone designated by the Board shall appoint the members of such committees. Individuals who are not Directors may serve as members of any such committee.

Section 6.03. Term. Each member of a committee shall continue as such until his or her successor is appointed, unless the committee shall be sooner terminated, or unless such member shall cease to qualify or shall be removed or shall resign as a member thereof.

Section 6.04. Removal; Resignation; Vacancies. Any member of a Board Committee may be removed from office at any time by the Board, and any member of an advisory committee may be removed from office at any time by the Board, except as otherwise provided by the Board. Any committee member may resign at any time by giving written notice to the Chair or to the Secretary of the Corporation. Such resignation shall take effect at the time specified in such notice, or, if no time is specified, at the time such resignation is tendered. Vacancies in the membership of any committee may be filled at any time by appointments made in the same manner as provided in the case of the original appointments.

Section 6.05. Committee Meetings. Meetings of any Board Committee shall conform to the same standards for notice, quorum, voting, manner and method of acting, and other procedures applicable to meetings of the Board as are set forth in Article IV of these Bylaws, except as otherwise provided by these Bylaws, committee charter, or resolution of the Board. Meetings of any advisory committee shall conform to the standards for notice, quorum, voting, and manner and method of acting as may be established by the committee chair, with the approval of the committee members, except as otherwise provided in these Bylaws, committee charter, or resolution of the Board.

ARTICLE VII

Sundry Provisions

Section 7.01 Contracts. The Board may authorize any Officer or Officers of the Corporation, or agent or agents of the Corporation, in addition to the Officers so authorized by these Bylaws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Corporation, and such authority may be general or confined to specific instances.

Section 7.02 Checks, Drafts, Etc. All checks, drafts or orders for the payment of money, notes or other evidences of indebtedness issued in the name of the Corporation shall be signed by the Chair, the Treasurer, the Vice Chair, or such Officer or Officers of the Corporation, or agent or agents of the Corporation, and in such manner as shall from time to time be determined by resolution of the Board.

Section 7.03 Deposits. All funds of the Corporation shall be deposited from time to time to the credit of the Corporation in such banks or other depositories as the Board may select.

Section 7.04 Gifts. The Board may accept on behalf of the Corporation any contribution, gift, bequest or devise for the general purposes of the Corporation or for any special purpose approved by the Board if all such purposes are within the scope of the purposes of the Corporation as set forth in the Articles of Incorporation as amended from time to time.

Section 7.05 Books and Records. The Board may engage the services of a recognized auditing firm which shall review the Corporation's books and statements, and which shall prepare annually, or more frequently if required, an operating statement, balance sheet and tax returns. The Corporation shall keep correct and complete books and records of account and shall also keep: (i) minutes of all meetings of the Board; (ii) records of all actions taken without a meeting by the Board; and (iii) records of all actions taken by a Board Committee on behalf of the Corporation. The Corporation also shall keep at its principal office (i) the Corporation's Articles of Incorporation, (ii) the Corporation's Bylaws, (iii) minutes and other required records described above for the last three (3) years; (iv) a list of the names and business address of the Corporation's current Directors and officers; and (v) the most recent biennial report filed by the Corporation with the District of Columbia.

Section 7.06 Limitation of Liability; Indemnification; and Insurance. To the fullest extent permitted by the Act and the Internal Revenue Code of 1986, as amended, or the corresponding provisions of any future internal revenue laws of the United States (i) the personal liability of each Director, Officer, employee of the Corporation is hereby eliminated, and (ii) the

Corporation shall indemnify and advance expenses to any individual who was, is, or is threatened to be made, a party to a proceeding because he or she is or was a Director, Officer, employee, and/or agent of the Corporation. The Corporation may purchase liability insurance for the indemnity specified above, as determined from time to time by the Board

ARTICLE VIII

Fiscal Year and Budget

Section 8.01 Fiscal Year. Except as from time to time otherwise provided by the Board, the fiscal year of the Corporation shall be the calendar year.

Section 8.02 Budget, Fees, Dues, and Assessments. The Board shall adopt a budget for each fiscal year, setting forth categories of expenses and totals, as well as expected revenue and sources. The Board shall set fees, dues, and other assessments (collectively, “Dues”) on an annual basis, and no Member shall be obligated to pay Dues in a subsequent year if it terminates membership pursuant to Section 3.02. If the Board increases Dues during a year, a Member may terminate membership and will not be subject to the increased Dues, but will be subject to Dues established for that year.

ARTICLE IX

State Program Boards

Section 9.01 Establishment of State Program Boards. The Corporation may establish governing bodies for one or more state producer responsibility programs in which the Corporation or its subsidiaries participates as the designated producer responsibility organization, as authorized by the Board (each, a “State Board”). Each State Board shall function as a designated body of the Corporation as defined in D.C. Code section 29-406.12. Each State Board shall have responsibility to approve the program plan and budget for that state and provide strategic oversight and guidance to the Corporation regarding that state’s program, subject to final approval and oversight by the Board.

Section 9.02 State Board Meetings. Each State Board shall have a governing charter approved by the Board. The charter shall operate as internal operating rules for the State Board and shall address the composition, selection process, and term of members of the State Board, as well as the procedures for meetings, notice, quorum, and manner of acting of the State Board. Unless such rules provide otherwise or in the absence of such rules, each State Board shall be subject to the requirements for meetings, notice, and manner of acting applicable to the Board of the Corporation.

Section 9.03 Minutes. Minutes of each meeting of a State Board and records of each action taken without a meeting by a State Board shall be recorded and maintained permanently among the records of the Corporation, as required by law.

ARTICLE X

Amendments

Section 10.01 By the Board. At any meeting these Bylaws may be altered, amended or repealed in whole or in part upon approval of a majority of the Directors then in office.

Adopted by the Board of Directors on March 1, 2023, as amended by the Board of Directors on March 15, 2023.

Appendix I:

CAA 501(c)(3) Letter of Determination from the Internal Revenue Service



Appendix CAA - Determination Letter



Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

CIRCULAR ACTION ALLIANCE
c/o THE RECYCLING PARTNERSHIP
20 F STREET NW 7TH FLOOR
WASHINGTON, DC 20001

Date: 05/08/2023
Employer ID number: 92-3197259
Person to contact: Name: Gary McCorkle
ID number: 32231
Telephone: 877-829-550
Accounting period ending: December 31
Public charity status: 509(a)(2)
Form 990 / 990-EZ / 990-N required: Yes
Effective date of exemption: December 21, 2022
Contribution deductibility: Yes
Addendum applies: No
DLN: 26053514005433

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990 or Form 990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.



For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

We sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,

A handwritten signature in dark ink that reads "Stephen A. Martin".

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

Appendix J:

CAA Proof of Registration as a Charitable Organization with Oregon DoJ



ELLEN F. ROSENBLUM
Attorney General

LISA M. UDLAND
Deputy Attorney General

Appendix:
CAA – Proof of Charitable
Organization in Oregon



DEPARTMENT OF JUSTICE
PORTLAND OFFICE

November 29, 2023

100 SW Market Street
Portland, Oregon 97201
FAX: (971) 673-1882
Telephone: (971) 673-1880
TTY (800) 735-2900
charitable@doj.state.or.us
www.doj.state.or.us

Circular Action Alliance
20 F Street NW, 7th Floor
Washington, DC 20001

Registration #64847

Re: Registration under the Charitable Trust and Corporation Act
and Required Annual Reports

Dear Officers/Directors:

This will acknowledge registration of your organization under the Charitable Trust and Corporation Act.
Your registration number with this office is **64847**.

According to the above mentioned Act, annual reports (form CT-12, CT-12F or CT-12S) will be due no later than four months and 15 days after the close of your accounting period. Our records indicate that your accounting period ends on December 31st. Your annual reports will be due by May 15th of each year. Reporting forms will automatically be sent to you. If you do not receive forms within 60 days prior to the due date for filing your report, you can contact this office to obtain the prescribed forms or find them at www.doj.state.or.us/charitable-activities/annual-reporting-for-charities/file-your-annual-report. Depending on the date of your organization's registration, the due date for its initial annual report may be different than the usual due date described above.

Questions about annual reports should be directed to the Annual Report Specialist at (971) 673-1880. Please note that our annual reports are in addition to and different from the annual reports that nonprofit corporations must file with the Oregon Corporation Division, Office of the Secretary of State.

Please keep this letter with your permanent records as it contains your registration number.

Sincerely,

Wendy Lambo

Wendy Lambo
Charities Registrar
Charitable Activities Section

Appendix K:

CAA and CAA OR LLC's Proof of Registrations – Foreign Corporation

Appendix: CAA - Proof of Registration Foreign Corporation in Oregon



Application for Authority to Transact Business - Nonprofit

Secretary of State - Corporation Division - 255 Capitol St. NE, Suite 151 - Salem, OR 97310-1327 - sos.oregon.gov/business - Phone: (503) 986-2209

REGISTRY NUMBER: 220134597
For office use only

FILED: DEC 18, 2023
OREGON SECRETARY OF STATE



220134597-25592306

CIRCULAR ACTION ALLIANCE

NEWAUT

In accordance with Oregon Revised Statute 192.410-192.490, the information on this application is public record. We must release this information to all parties upon request and it will be posted on our website.

Please Type or Print Legibly in Black Ink. Attach Additional Sheet if Necessary.

1) NAME OF CORPORATION: Circular Action Alliance

NOTE: Must be identical to the name of record in home jurisdiction.

2) REGISTRY NUMBER IN HOME JURISDICTION: NO0007528311

OR: CERTIFICATE OF EXISTENCE ☐ (ATTACHED)

(Please provide a web-verifiable registry number from the entity's home jurisdiction. Certain states, such as Delaware and New Jersey, do not provide status information online. Entities from such places must instead attach an official certificate of existence, current within 60 days of delivery to this office.)

3) DATE OF INCORPORATION: 12/21/2022 DURATION, IF NOT PERPETUAL: Perpetual

4) STATE OR COUNTRY OF INCORPORATION: District of Columbia

5) TYPE OF CORPORATION:

☒ PUBLIC BENEFIT ☐ MUTUAL BENEFIT ☐ RELIGIOUS

6) WILL THE CORPORATION HAVE MEMBERS?

☒ YES ☐ NO

ORS 65.001(28)

(a) "Member" means any person or persons entitled, pursuant to a domestic or foreign corporation's articles or bylaws, without regard to what a person is called in the articles or bylaws, to vote on more than one occasion for the election of a director or directors.

(b) A person is not a member by virtue of any of the following rights the person has:

- (A) As a delegate;
- (B) To designate or appoint a director or directors;
- (C) As a director; or
- (D) As a holder of an evidence of indebtedness issued or to be issued by the corporation.

(c) Notwithstanding the provisions of paragraph (a) of this subsection, a person is not a member if the person's membership rights have been eliminated as provided in ORS 65.164 or 65.167.

7) ADDRESS OF PRINCIPAL OFFICE OF THE BUSINESS:
(Address, city, state, zip)

20 F Street NW, 7th Floor
Washington, DC 20001

8) NAME OF OREGON REGISTERED AGENT:

Corporation Service Company

9) REGISTERED AGENT'S PUBLICLY AVAILABLE ADDRESS: (Must be an Oregon Street Address which is identical to the registered agent's business office.)

1127 Broadway Street NE, Suite 310
Salem, OR 97301

10) ADDRESS FOR MAILING NOTICES:

20 F Street NW, 7th Floor
Washington, DC 20001

11) NAME AND ADDRESS OF PRESIDENT AND SECRETARY:

President: Charles Schwarze (Chair)

Address: 20 F Street NW, 7th Floor
Washington, DC 20001

Secretary: John Breedlove

Address: 20 F Street NW, 7th Floor
Washington, DC 20001

12) EXECUTION: (Must be signed by at least one officer or director.)

I declare as an authorized signer, under penalty of perjury, that this document does not fraudulently conceal, obscure, alter, or otherwise misrepresent the identity of any person including officers, directors, employees, members, managers or agents. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.

Signature:

Charles Schwarze

Printed Name:

Charles Schwarze

Title:

Chair

CONTACT NAME: (To resolve questions with this filing.)

Andrew Steinberg

PHONE NUMBER: (Include area code.)

202-344-4202

60 - Application for Authority to Transact Business - Nonprofit (11/17)

FEES	
Required Processing Fee	\$50
Processing Fees are nonrefundable. Please make check payable to "Corporation Division."	
Free copies are available at sos.oregon.gov/business using the Business Name Search program.	

APPLICATION FOR AUTHORITY

Corporation Division
sos.oregon.gov/business

E-FILED
Jan 16, 2025
OREGON SECRETARY OF STATE

REGISTRY NUMBER

235171394

TYPE

FOREIGN LIMITED LIABILITY COMPANY

1. ENTITY NAME

CIRCULAR ACTION ALLIANCE OREGON LLC

2. MAILING ADDRESS

20 F ST NW FL 7
WASHINGTON DC 20001 USA

3. NAME & ADDRESS OF REGISTERED AGENT

15872088 - CORPORATION SERVICE COMPANY

1127 BROADWAY ST NE STE 310
SALEM OR 97301 USA

4. MEMBERS/MANAGERS**MEMBER**

220134597 - CIRCULAR ACTION ALLIANCE

20 F ST NW FL 7
WASHINGTON DC 20001 USA

5. MANAGEMENT

This Limited Liability Company will be member-managed by one or more members

6. DATE OF ORGANIZATION

10-16-2024

7. DURATION

PERPETUAL

8. JURISDICTION

DE

9. PRIMARY PHYSICAL LOCATION

20 F ST NW FL 7
WASHINGTON DC 20001 USA



I declare, under penalty of perjury, that this document does not fraudulently conceal, fraudulently obscure, fraudulently alter or otherwise misrepresent the identity of the person or any officers, managers, members or agents of the limited liability company on behalf of which the person signs. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct, and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.

By typing my name in the electronic signature field, I am agreeing to conduct business electronically with the State of Oregon. I understand that transactions and/or signatures in records may not be denied legal effect solely because they are conducted, executed, or prepared in electronic form and that if a law requires a record or signature to be in writing, an electronic record or signature satisfies that requirement.

ELECTRONIC SIGNATURE**NAME**

JASON KELROY

TITLE

GENERAL COUNSEL

DATE

01-15-2025

Appendix L:

CAA OR LLC Certificate of Formation & Operating Agreements

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "CIRCULAR ACTION
ALLIANCE OREGON LLC", FILED IN THIS OFFICE ON THE SIXTEENTH DAY
OF OCTOBER, A.D. 2024, AT 7:33 O'CLOCK P.M.



5591956 8100
SR# 20243969012

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBullock", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Authentication: 204657620
Date: 10-17-24



State of Delaware
Secretary of State
Division of Corporations
Delivered 07:33 PM 10/16/2024
FILED 07:33 PM 10/16/2024
SR 20243969012 - File Number 5591956

Circular Action Alliance Oregon LLC

CERTIFICATE OF FORMATION

THIS CERTIFICATE OF FORMATION of **Circular Action Alliance Oregon LLC** (the "Company") is being executed by the undersigned for the purpose of forming a limited liability company pursuant to the Delaware Limited Liability Company Act.

FIRST: The name of the Company shall be **Circular Action Alliance Oregon LLC**.

SECOND: The address of the registered office of the Company in the State of Delaware is c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808. The name of the registered agent at such address is Corporation Service Company.

IN WITNESS WHEREOF, the undersigned has executed these Articles of Organization on this 16th day of October, 2024.

ORGANIZER:

Jason Kelroy
Jason Kelroy
Authorized Person

**OPERATING AGREEMENT
OF
Circular Action Alliance Oregon LLC**

THIS OPERATING AGREEMENT (this “Agreement”) of **Circular Action Alliance Oregon LLC**, a Delaware limited liability company under the Delaware Limited Liability Company Act (“Act”), is effective as of December 2, 2024.

Recitals

- A. A Certificate of Formation (the “Certificate”) has been filed with the Delaware Secretary of State to form a limited liability company under the name Circular Action Alliance Oregon LLC (the “LLC”), which Certificate is attached hereto as Exhibit A.
- B. Circular Action Alliance is the sole voting member of the LLC (the “Voting Member”).
- C. By executing this Agreement, the Voting Member hereby (i) ratifies the formation of the LLC and the filing of the Certificate, and (ii) adopts this Agreement to set forth the terms governing the affairs of the LLC and the conduct of its business.

Terms of Agreement

1. **Name.** The name of the LLC is **Circular Action Alliance Oregon LLC**.
2. **Purpose.** The purpose for which the LLC is formed is to engage in any lawful act or activity for which a limited liability company may be organized under the laws of the State of Delaware.
3. **Sole Voting Member.** Circular Action Alliance is the sole member of the LLC. Voting Member voting rights shall be vested in the Voting Member’s Board of Directors or a designated body acting on behalf of the Board of Directors.
4. **Management.**
 - a. *Manager.* Subject to the other provisions of this Agreement, the business and affairs of the LLC shall be managed by one (1) Manager (the “Manager”). The Manager shall be the Chief Executive Officer & President of the Voting Member or his or her designee. The Manager may be removed and replaced at any time and from time to time, with or without cause, by the Voting Member. The Manager shall have full, exclusive, and complete discretion, power, and authority, subject in all cases to the other provisions of this Agreement and the requirements of applicable law, to manage, control, administer, and operate the business and affairs of the LLC, and to make all decisions affecting such business and affairs.

- b. *Officers.* The Manager may, from time to time, designate one or more persons to be officers of the LLC (collectively, “Officers”), with such titles as the Manager may assign to such persons. No Officer need be a Voting Member or Manager of the LLC or a resident of the State of Delaware. Officers so designated will have such authority and perform such duties as the Manager may, from time to time, delegate to them and, unless otherwise specified by the Manager, will have the authority and responsibilities generally held by officers of a State of Delaware corporation holding the same respective titles, if any. Any number of offices may be held by the same person. Any Officer may resign as such at any time. Such resignation shall be made in writing and will take effect at the time specified therein, or if no time is specified, at the time of its receipt by the Manager. Any Officer may be removed as such, either with or without cause, by the Manager, in its sole discretion. Any vacancy occurring in any office of the LLC may be filled by the Manager.
 - c. *Employees.* The Manager or the Manager’s designees may appoint employees who shall have such authority and perform such duties as may be prescribed by the Manager. The Manager or the Manager’s designees may remove any employee at any time with or without cause. Removal without cause shall be without prejudice to such person’s contract rights, if any, and the appointment of such person shall not itself create contract rights.
- 5. **Term.** The LLC shall dissolve, and its affairs shall be wound up, at the election of the Voting Member or upon the occurrence of an event of dissolution under the Act; *provided, however*, that upon the occurrence of an event of dissolution under the Act, the Voting Member may elect to continue the LLC to the extent permitted under the Act.
- 6. **Distributions.** Distributions shall be made to the Voting Member at such times and in such amounts as determined by the Voting Member from time to time in accordance with applicable law.
- 7. **Limitation on Liability; Indemnification.**
 - a. To the fullest extent permitted by the Act and the Internal Revenue Code of 1986, as amended, the personal liability of the Voting Member, Manager, and Officers of the LLC is hereby eliminated.
 - b. To the fullest extent permitted by law, the LLC shall indemnify any person made or threatened to be made a party to any proceeding by reason of that person’s former or current status as a Voting Member, Manager, or Officer against any liability incurred with respect to such proceeding (including without limitation reasonable attorney’s fees and expenses).
 - c. The LLC, or the Voting Member on behalf of the LLC, may purchase liability insurance on behalf of the Manager or any Officer, and/or any employee, and any person who is or was serving at the request of the LLC as a board member,

manager, officer, or employee of another enterprise against any liability asserted against him, her, or it or incurred by him, her, or it in any such capacity or status.

8. **Winding Up and Distribution upon Dissolution.** Upon dissolution of the LLC, the Voting Member or, upon the election of the Voting Member, the Manager shall wind up the business and affairs of the LLC, and shall cause all property and assets of the LLC to be paid and distributed as follows:
 - a. first, all of the LLC's debts, liabilities, and obligations, including any loans or advances from the Voting Member, shall be paid in full or reserves therefor shall be set aside; and
 - b. second, any remaining assets shall be distributed to the Voting Member.
9. **Amendments.** The Voting Member at any time, and from time to time, may amend this Agreement by executing a written amendment to this Agreement.
10. **Governing Law.** This Agreement shall be governed by and construed in accordance with the laws of the State of Delaware, including the Act, without giving effect to any choice or conflict of law provision or rule whether of the State of Delaware or otherwise.
11. **Uncertificated Interests.** The limited liability company interests of the LLC shall not be certificated.

Signature to Follow

IN WITNESS WHEREOF, the Voting Member has duly executed this Operating Agreement, which such Agreement shall be deemed effective as of the date first written above.

MEMBER:

Circular Action Alliance

By:


Jason Kelroy
General Counsel

Date:

12-02-2024

Exhibit A

Certificate of Formation

Delaware

The First State

Page 1

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DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "CIRCULAR ACTION
ALLIANCE OREGON LLC", FILED IN THIS OFFICE ON THE SIXTEENTH DAY
OF OCTOBER, A.D. 2024, AT 7:33 O'CLOCK P.M.



5591956 8100
SR# 20243969012

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Authentication: 204657620
Date: 10-17-24



State of Delaware
Secretary of State
Division of Corporations
Delivered 07:33 PM 10/16/2024
FILED 07:33 PM 10/16/2024
SR 20243969012 - File Number 5591956

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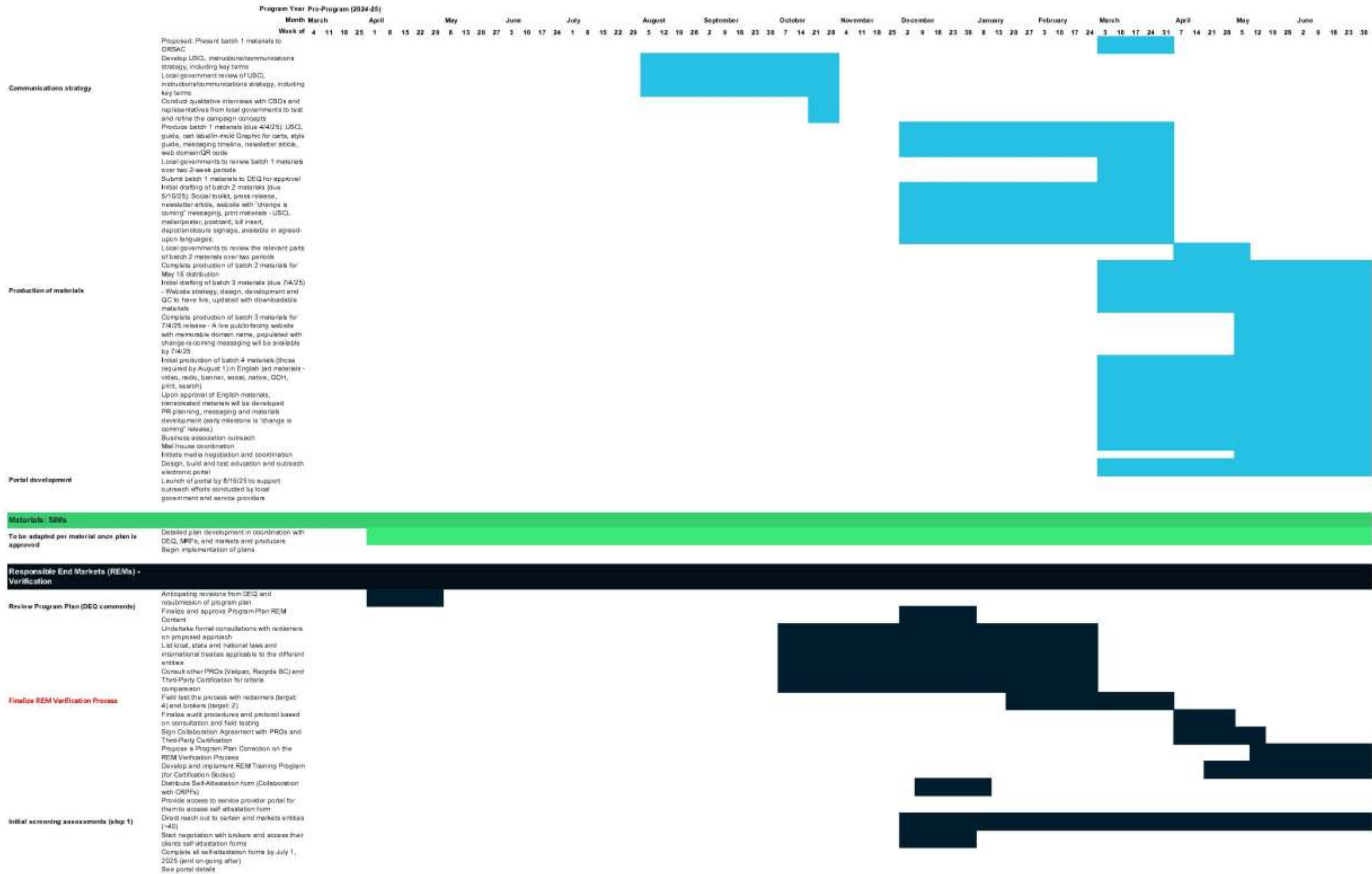
ORGANIZER:

Jason Kelroy
Jason Kelroy
Authorized Person

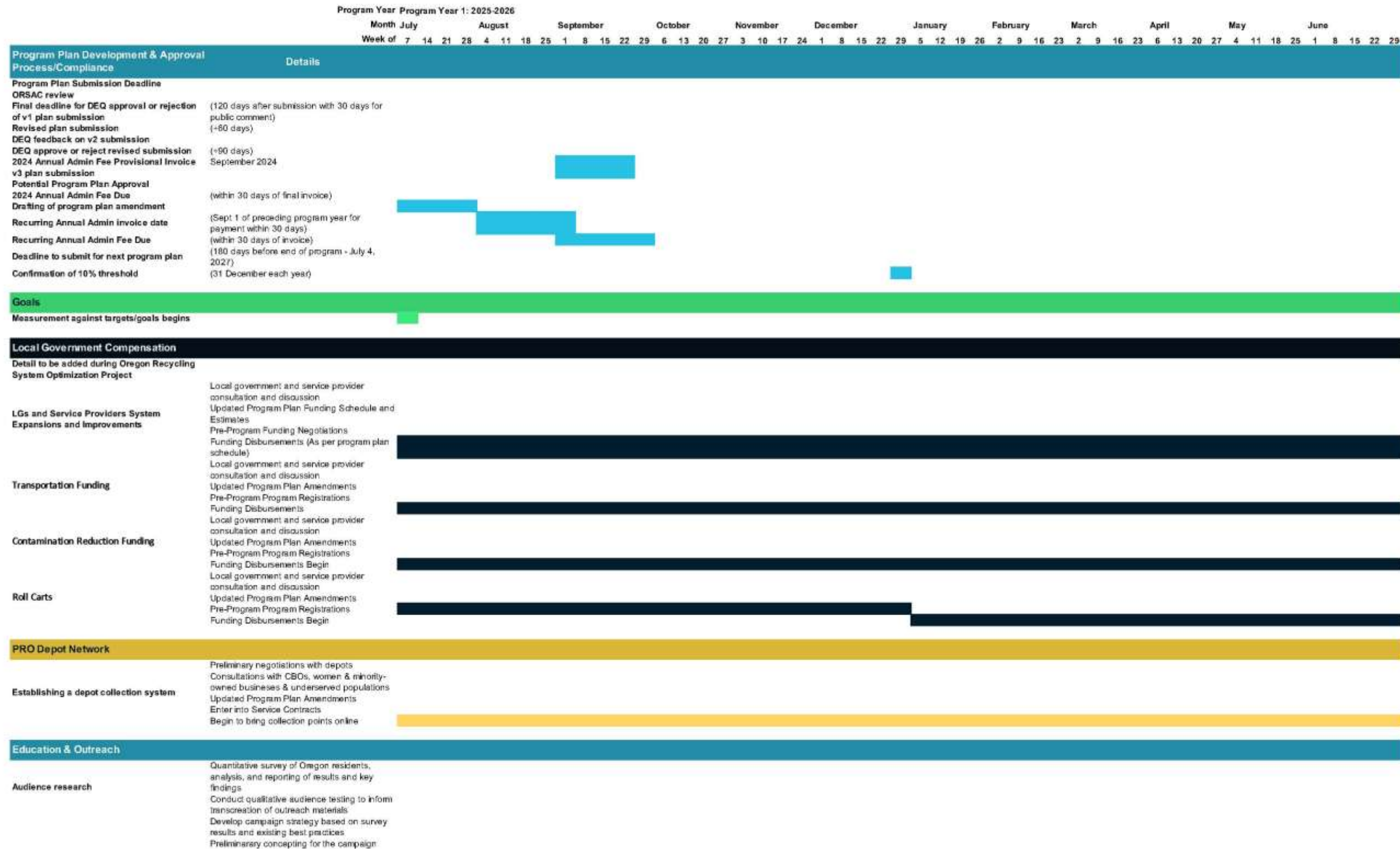
Appendix M:

Updated Program Implementation Timelines



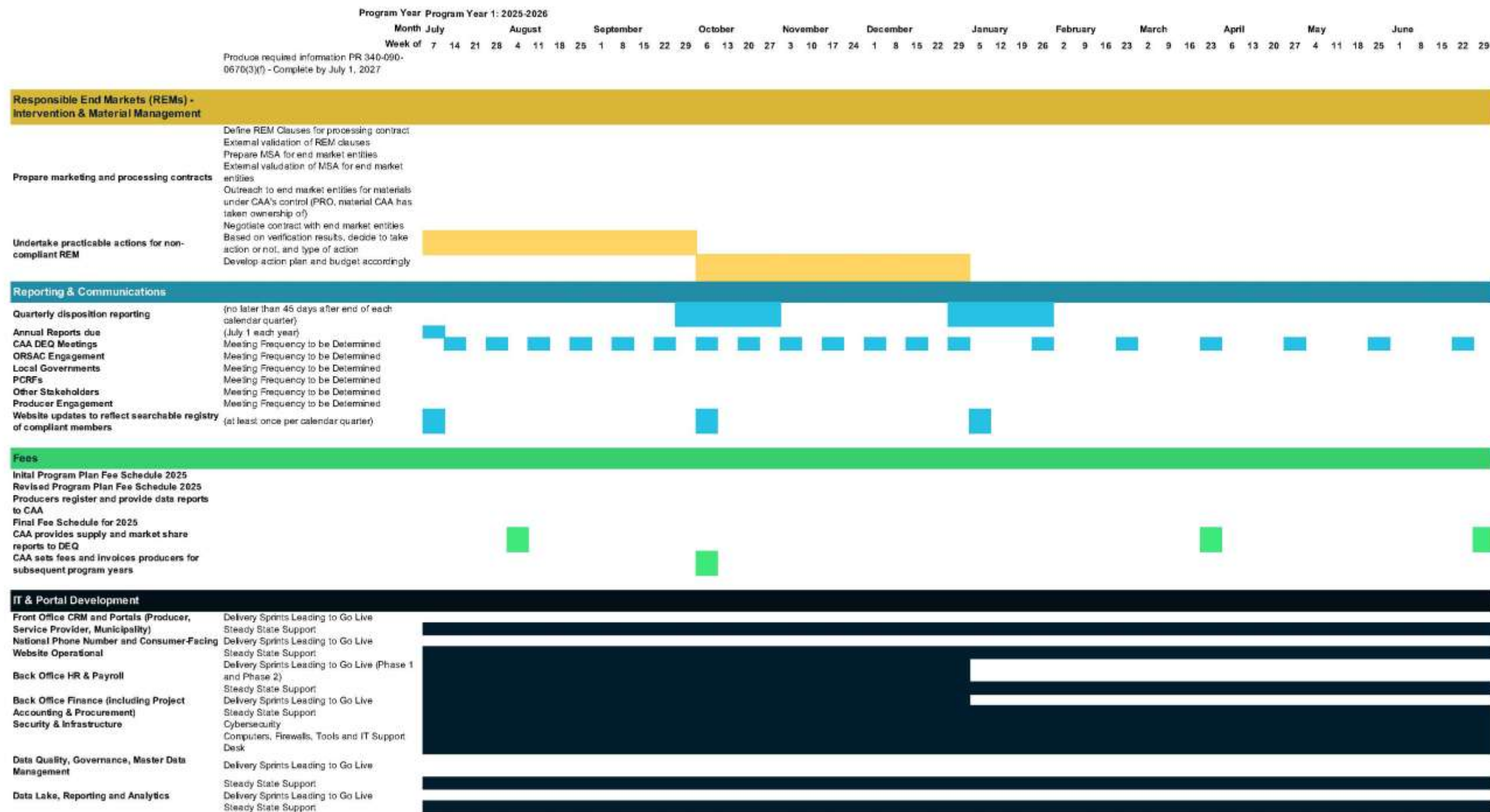


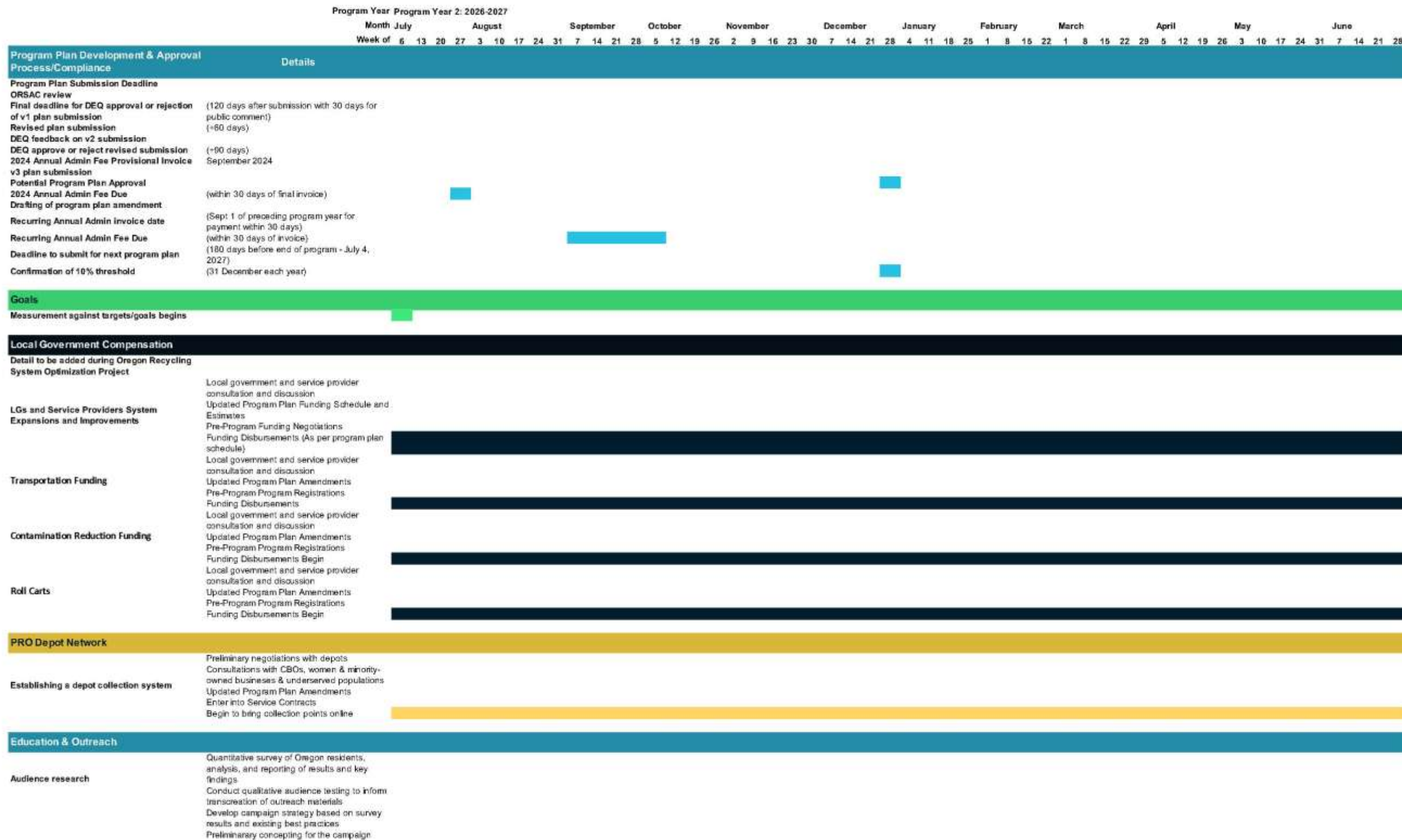




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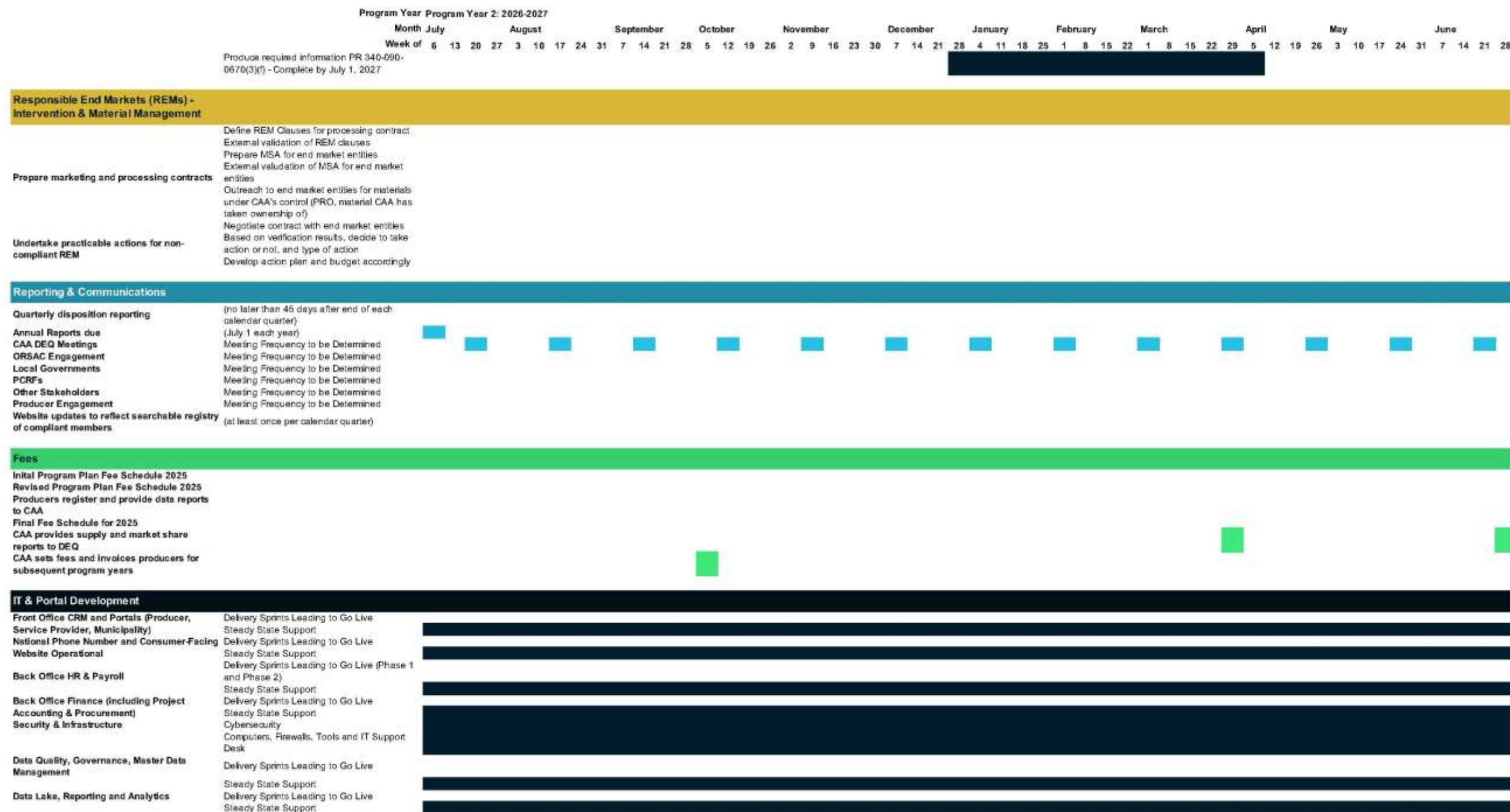
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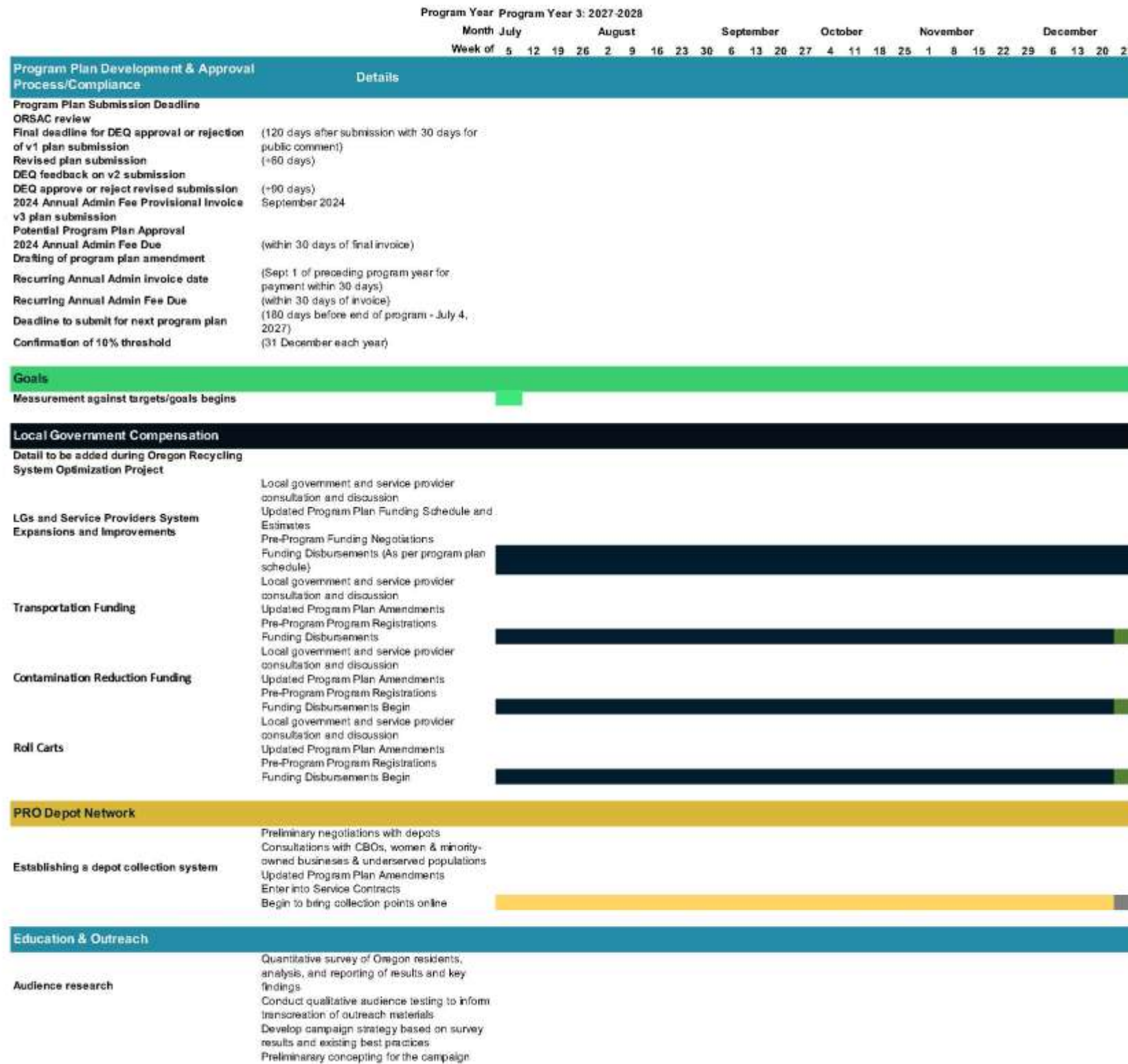




[illegible]

[illegible]





[illegible]

[illegible]

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Appendix N:

Response to Oregon Recycling System Advisory Council Feedback

DEPOTS	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
a. More detail and coordination is needed between DEQ and CAA on permit/site requirements needed for CBO's and other non-profit partners to actively engage in exploring options for collection of PRO depot listed materials	To be considered in December submission of program plan.
b. Update the depot list in Appendix F to show who has agreed to collaborate with PRO, as well as those who have declined.	To be considered in December submission of program plan.
c. Provide guidance on how they intend to report back over time re: transparency in contracting (i.e., working with CBOs, what materials are being accepted, equitable payments, etc.).	To be considered in December submission of program plan.
d. Include additional info about how it will consider the overhead costs (e.g., training requirements, onsite and desk audits, etc.) associated with providing depot or other collection services for host organizations.	To be considered in December submission of program plan.
e. Verify how they are calculating the "convenience standard" with respect to depots and on- route/curbside collection of materials.	To be considered in December submission of program plan.
f. Update the temporary variance from convenience standards to take into account rural and urban differentiation.	To be considered in December submission of program plan.
g. Regarding enhanced convenience to underserved populations, provide more detail and state an actual commitment to one of the options proposed.	To be considered in December submission of program plan.
h. More detail on prospective collaborations with local community-based organizations, women and minority-owned businesses and tribal nations.	To be considered in December submission of program plan.
i. Regarding alternative programs being proposed to substitute for convenience standards, provide the necessary supporting information to meet requirements listed under OAR 340- 090- 0640(6)(a)-(c). Analysis of how the alternative compliance approach impacts collection rates is not provided. V2 of the plan should also address the suitability of different PRO materials for	To be considered in December submission of program plan.

curbside collection.	
j. Though commercial businesses may have been thought of when establishing the options/approach for PRO depot materials, it's not clearly stated. In fact, the subcommittee feels like access for commercial generators was not addressed.	To be considered in December submission of program plan.
k. Consider additional support for onsite visits (1/yr or more) with a midyear check-in or desk audit as a phase-in to build relationships between PRO and communities (especially with service providers and depot staffers/operators). Factor in the additional costs to service providers and depots for this work (additional costs for operations and relationship to PRO costs).	To be considered in December submission of program plan.
l. Provide details about how CAA will handle non-covered products that may show up at depots as contamination but could have some marketable value to it, such as a plastic kids pool. Also address how CAA will handle/dispose of contamination in a timely manner.	Outside scope of compliance, but will be indirectly addressed in education materials.
m. Provide more details/transparency in how collection points will be compensated (collection points generally, not just their staff), including anticipated wage scales for staffing compensation, any compensation per amount of materials collected, and overhead.	To be considered in December submission of program plan.
n. Provide more detail as to how certain materials could play a unique role in reuse/refill effort (e.g., certain recovered glass wine bottles ending up at Revino, pressurized 1 pound propane canisters, etc.).	Outside scope of compliance.
o. Provide details about contingency plans related to depots and collection events, to ensure success of collection of materials changing from a current local government recycling acceptance list one list to the PRO Recycling Acceptance List (e.g., shredded paper, aluminum foil and foil-pressed products and aerosol containers in the metro area).	To be considered in December submission of program plan.
p. Provide more detail about collection and the safe handling of pressurized canisters (1 pound propane canisters).	To be considered in December submission of program plan.
q. Page 46: Table related to HHW – Remove Washington County as permitted HHW site (no such site); clarify the population figures and what they represent within the table – numbers shared for events do not seem to align with population numbers – add a new column for number of HHW events, and indication if the “event” is a one-time activity or a permanent facility for HHW collections.	To be considered in December submission of program plan.

r. Strong support to maintain current infrastructure and ensure that service does not only go curbside/on-route, which does not serve many people without permanent addresses and other currently underserved community sectors.	To be considered in December submission of program plan.
s. What does the community engagement process look like when the PRO reaches out to tribal nations? Will there be a tribal liaison? Recommendation for close consideration about how to connect to and work with tribal nations, in consultation with DEQ and other Oregon government entities with tribal government engagement experience. i. Compensation for tribal nations is not necessarily reflected in RMA, recommendation for elements of compensation for tribal nations be considered.	To be considered in December submission of program plan.
t. Clarification needed around contracting process for current depots, and transparency in those contracts to ensure equitable rates and information sharing among depots.	To be considered in December submission of program plan.
u. Acknowledgement of wage structure for these staff needing to be reflective of the physical difficulty of the jobs, alignment with CRPF living wage principles encouraged.	To be considered in December submission of program plan.
v. PROs to report annual on the income versus expenses of their depots and related operations to collect PRO materials, and also to report on the distribution of economic opportunity (subcontracting) – such as, which organizations/businesses are subcontracted, how they do or don't meet equity goals, and what their rates are (payment/amount of materials processed/hours of operation).	To be considered in December submission of program plan.

<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
a. Consider reuse and reduce messaging in communication.	Outside scope of compliance.
b. Clarify the role of CBOs in the delivery of education and outreach services, and specify the compensation that will be provided for CBO engagement.	To be considered for future program plans.
c. Additional detail would be helpful on the intended change management approach, how to keep CBOs and others informed and excited about the projected system changes and supporting materials.	Outside scope of compliance.
d. Continue improving translation and transcreation into multiple languages, and provide an avenue for folks to request materials in specific languages.	Accepted.
e. Ensure materials align with Opportunity to Recycle requirements for local governments to reduce duplication and	Accepted.

community member confusion.	
f. Provide further metrics to understand how success will be tracked, measured and reported in the annual report and to the Recycling Council. DEQ's recent contamination report can be set as a baseline.	To be considered for future program plans.
g. Distinguish marketing, paid/earned media from education and outreach, and who is leading in these respective areas.	Outside scope of compliance.
h. Provide community engagement and culturally responsive strategy, and how The Recycling Partnership will work with local governments and service providers to ensure materials get to the right communities and photos reflect community (not talent models in staged homes).	To be considered for future program plans.
i. Maintain neutral voice and branding in educational materials and media campaigns. We recommend campaigns and materials be non-branded, follow national color standards and complement existing local materials that follow The Recycling Partnership's methodology and behavior change best practices.	Accepted.
j. Consider how community members keep up to date with list changes and develop materials that are easy to print on an office printer, so it is a positive experience and keeps it simple for users. Out community members have shared that recycling is confusing, and if the list changes every couple of years, that will add to the confusion.	To be considered for future program plans.
k. Consider how messages are communicated in different parts of the state at different stages. For example, Eastern Oregon will have new items added to their recycling bins whereas the Portland area will have items removed, and there will be a transition to meet collection points. Public outreach/engagement should begin in February 2025 and ought to focus broadly on the RMA's many benefits to Oregonians (increased resiliency of our recycling system, increased access for all Oregonians and universal collection lists in all communities of all sizes across the state, decrease in adverse impacts to environment and public health by ensuring responsible end markets - both domestic and international).	Accepted.

PRODUCER FEES	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
a. More information is needed to fully assess whether or not the requirement for base rates being set so materials do not cross-subsidize each other is met.	Accepted.
b. Prioritize the development of the eco-modulation framework and provide the statutorily required level of specificity and data	To be considered for future program plans.

in the plan.	
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RESPONSIBLE END MARKETS	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
a. A verification standard needs to be created that fully addresses Oregon's four-element "responsible" definition. Using the existing approval of end markets by other PROs for variances may not ensure that a market meets Oregon's "responsible" bar (page 76). The metrics should include operational guidelines and sideboards that are developed from an equity-based perspective.	To be considered in a program plan correction.
b. More clarity is needed on how different parties will work together to provide desired transparency - for example, CAA could illustrate how the proposal to implement single track-and-trace will intersect with the CRPFs' joint obligation to ensure that materials go to responsible end markets.	Accepted.
c. On page 76, add examples of types of non-conformance (e.g. documentation error vs waste is stored outside and freely entering the environment etc.) that would fall into each of the three non-conformance categories (i.e., minor, major, disqualifying). Explain how the approach to non-conformance will take environmental performance of domestic markets into account with respect to key US environmental laws (e.g. Clean Water and Air Acts). Explain how a broker repeatedly sending materials to non-compliant markets would be addressed.	Accepted.
d. Provide a benchmarking of CAA's detailed verification standard against other standards pertinent to the temporary variance requests #1 and 2 on pages 76-77 (CAA proposes to count verifications/certifications by other parties—PROs operating in other jurisdictions and third-party certifications—toward a facility meeting the "responsible" standard).	To be considered in a program plan correction.
e. Regarding the random bale auditing proposal on page 82, the plan could clarify that trackers containing lithium ion batteries will not be used at the curb due to fire risk.	*Accepted.
f. Page 75: Replace "environmental compliance" with "environmental soundness" (i.e., environmental performance of the facilities should be measured, not just compliance, in accordance with the "responsible" definition in rule at OAR 340-090-0670(2)(b)).	Accepted.
g. Support for local and PNW markets as new development; materials that are limited in their end markets and ability to encourage more local economic development where possible (focus area for new market development)	Accepted.

h. Equity-related concern regarding the qualitative impacts of increased compliance costs and unintended consequences for markets - may see depressive impacts on markets and producers or disincentive to use recycled materials (displacing with virgin materials), general awareness of trade-offs for compliance in global end markets.	Outside the scope of compliance.
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SYSTEM EXPANSION	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
A. Prioritization of system expansion requests a. Concern around equity relating to prioritization of system expansion requests. Smaller communities may not have the resources to even engage and provide the needed details to finalize system expansion agreements. Will they receive assistance? b. Recommendation: The prioritization in rule may not be completely sufficient. Priority level #2 includes a very large population, which makes it difficult to determine criteria to help prioritize within that priority level (ex: Lane County falls into multiple priority levels) (Page 23). The subcommittee recommends suggest that in version 2 CAA lay out a matrix of which projects and programs fall into each priority group. c. More details needed on the intent and plan for maximizing use of existing infrastructure, and availability of efficiencies across wastesheds (page 24).	To be considered in December submission of program plan.
B. Approach to dispute resolution a. More details needed on the stakeholder/mediation workgroup that may work on resolution dispute, clarification on whether that group will provide general direction or mediate specific disputes, and reminder to involve all affected parties in the membership of that workgroup. b. Details must be provided in the next Plan proposal related to criteria or protocols for the operations of the dispute resolution process and workgroup.	To be considered in December submission of program plan.
C. Transportation reimbursement a. More info is needed about how the pre-approval process will work and assurance that it will not result in delays. b. More detail is needed around calculation of the standard fee i. Consideration: Is a calculation better based on a standard mileage fee versus one that has a zoned approach based on geographic differentiation for the costs incurred for transportation types? Additional considerations may include time of travel as a factor of the standard rate. c. No clear guidance on when baling would be allowed – noted because baling of materials hampers sorting and reduces recovery. How will CAA limit/disincentivize baling? (Page 30)	To be considered in December submission of program plan.
D. Potential additional funding for protection of ratepayers	To be considered in December submission of program plan.

(page 33): CAA proposes providing an annual summary of funding. What data will be provided to the local governments or their service providers, and at what level of specificity? The subcommittee advises CAA to provide more details in the next plan on what data will be provided, and at what level, to the local governments and service providers for this element.	
E. Funding for recycled-content roll carts: Can CAA assist with coordination to leverage economy-of-scale contracting that benefits all parties needing to access new carts? This approach benefits cart producers, service providers and CAA and ensures compliance with the related requirements. a. Consideration: In communities where color choice of recycling containers is less specific or less established, consider recommending a standard color for future purchases.	To be considered in December submission of program plan.
F. Contamination reduction program (page 30): Streamline administration of that program; Council support to have a non-punitive approach that is not based on service removal or fines for individuals/households; use a strengths-based approach to better support and elevate multifamily sector when reducing contamination.	To be considered in December submission of program plan.

UNIFORM STATEWIDE COLLECTION LIST ON-RAMP	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
A. Provide a more descriptive narrative of CAA's vision for the on-ramping of new materials to the USCL in the short- and long-term. This should include: i. An overview of how SIMs and pilot programs may contribute to on-ramping of new USCL materials, including PRO Depot materials ii. How the program plan will contribute to meeting collection targets for plastics and other materials, iii. And the general sequencing, timeline or process flow for these activities.	At the request of DEQ the specifics of on-ramping certain materials will be detailed in future program plan amendments.
B. Reference the outreach and education processes specific to the SIMs, USCL and PRO lists as cross-references to ensure clarity and consistency across sections	Accepted.
C. More detail needed for the proposed trial for commingled collection of non-USCL materials (polycoated paper packaging and single-use cups, pages 66-68)	Outside of scope of compliance.
D. More detail needed for the preliminary plastic recycling rate projections (pages 68-72)	Accepted.
E. Either delete or clarify the use of the term "transparent" related to blue and green PET bottles (page 60) – support for the addition, but clarification needed for the specific wording.	Accepted.
F. Provide information on environmental factors from a life cycle perspective on shipping steel can bales containing spiral wound containers to markets outside Oregon (pages 61-62)	Accepted.
G. More detail needed on polycoated gable-top cartons and aseptic cartons (pages 62-63)	Accepted.

EQUITY	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
A. Include a consolidated list of intended partners and community-based organizations, and the types of organizations CAA intends to prioritize in subcontracting throughout the implementation of the Plan, specifically included in the equity section, rather than cross- referenced throughout the Plan.	To be considered for future program plans.
B. Request permission from specific CBOs/organizations before including them as contacts/partners in subsequent plans.	Accepted.
C. Include more concrete values, definitions and measures/metrics to track success over time, into the next version of the Plan.	To be considered for future program plans.
D. Clarity needed: Are there other solutions when it comes to enhanced collection to be considered? E.g., is it reasonable to recommend that the PRO financially support more electric trucks/fleet electrification for service providers, instead of conventionally fueled vehicles, since there will be heightened traffic in some areas due to the increase in service which could have environmental impacts?	Outside of scope of compliance.
E. Clarity needed: What are the resources and considerations to provide enhanced service to multifamily homes and commercial entities?	Accepted.
F. Clarity needed: How is CAA measuring who gets contracts for depots and what are the calculations for reasonable costs? Recommend a per ton material rate, in addition to standard base rate for staffing, being paid for additional materials brought in.	Accepted.
G. Clarity needed: What are the intentions of having alternative compliance, in lieu of depot system, and will on-route/curbside provide sufficient equitable access? If the total number of available depots are reduced due to including on-route and event-based recycling opportunities, how does that affect the overall convenience standard, and will currently underserved populations benefit from those changes or be further harmed?	Accepted.
H. Clarity needed: What materials on the PRO list will be collected on-route (detail needed) and the transition to USCL.	To be considered for future program plans.
I. Developing, and increasing, capacity of CBOs and new businesses is a strong economic development opportunity, recommend the articulation of targeted goals to be achieved in the program plan (e.g. % of depots operated by CBOs and businesses of color).	Outside of scope of compliance.

J. Certification as COBID is a very significant process and may be a potential barrier (business structure requirements may prohibit the certification, etc.) - consider alternative pathways that provide same outcome and intent without certification hurdles, especially for new and emerging businesses.	Outside of scope of compliance.
K. Broader engagement is needed with additional sectors and organizations: disability/rights communities; rural communities; culturally-specific communities and organizations; organizations that represent the communities disproportionately affected by the economic and environmental impacts of packaging and covered products and other materials in recycling system (focus on economic opportunities and provisions of service) – list included on page 8 of the Plan does not meet the objectives/goals of meaningful engagement and equity approach.	Accepted.
L. Specificity needed on the requested engagement, and provided compensation, for community members and organizations when consultation is requested by CAA or its contracted entities.	Accepted.
M. Equity and sustainability: What does the provision of the materials (printing, re-printing, etc.) mean for a sustainability solution - balancing the language access with updates and information being current and costs for printing and distribution by local governments.	Accepted.
N. Roll carts: Recommend color standardization whenever possible for types/classifications of collection bins/roll carts (page 32).	Accepted.
O. Add specific shared definitions of equity for Program Plan in Appendix A: Definitions, page 30. Below are a few examples. a. Equity (Oregon Health Authority): When people are not disadvantaged by race, ethnicity, language, disability, age, gender identity, sexual orientation, social class, or other socially determined circumstances, and can reach their full health potential and well-being. i. State of Oregon definition of equity (2021): Equity acknowledges that not all people, or all communities, are starting from the same place due to historic and current systems of oppression. Equity is the effort to provide different levels of support based on an individual's or group's needs in order to achieve fairness in outcomes. Equity actionably empowers communities most impacted by systemic oppression and requires the redistribution of resources, power, and opportunity to those communities. a. Historically marginalized (Metro): Groups who have been denied access and/or suffered past institutional discrimination in the United States.	Outside of scope of compliance.

b. Inclusion (Metro): The degree to which diverse individuals are able to participate fully in the decision-making process within an organization or group. While a truly “inclusive” group is necessarily diverse, a “diverse” group may or may not be “inclusive.”

c. Targeted universalism (Metro): Addressing the disparities that affect the most disadvantaged will generate solutions to address most of the needs of other vulnerable groups

d. Community engagement (Metro): Meaningful community engagement requires transparent and trusting relationships that guide the planning of all phases of the cycle of engagement, including what happens before and after staff engage with community members. Community engagement must be approached holistically, with equal focus given to what is happening when staff are not collecting input as when they are. It is best understood as a cyclical and iterative process that will change based on relationships and community feedback and will shape future engagement opportunities.

Appendix O:

Legal Notices

Below please find two separate documents.

- The first, denoted by footnote 5, is a letter addressed to CAA from the American Forest & Paper Association (AF&PA) outlining their concerns with battery powered tracking devices in paper bales.
- The third, denoted by footnote 6, is a letter addressed to CAA from the Association of Plastic Recyclers (APR) outlining their concerns about the use of battery-powered trackers from compliance with responsible end market regulations.



August 30, 2024

Ms. Kim Holmes
Executive Director, Oregon
Circular Action Alliance
via email: kim.holmes@circularaction.org

RE: Concerns with Battery Powered Tracking Devices in Paper Bales

Dear Ms. Holmes,

On behalf of the American Forest & Paper Association (AF&PA), we appreciate the opportunity to weigh in on the use of battery-powered tracking devices in bales to address the random bale tracking requirements of Oregon's Plastic Pollution and Recycling Modernization Act (the Act). On this subject, AF&PA must firmly advise against this course of action as an unnecessary, duplicative measure that raises serious safety concerns.

AF&PA serves to advance U.S. paper and wood products manufacturers through fact-based public policy and marketplace advocacy. The forest products industry is circular by nature. AF&PA member companies make essential products from renewable and recyclable resources, generate renewable bioenergy and are committed to continuous improvement through the industry's sustainability initiative — [Better Practices, Better Planet 2030: Sustainable Products for a Sustainable Future](#). The forest products industry accounts for approximately 5% of the total U.S. manufacturing GDP, manufactures about \$350 billion in products annually and employs about 925,000 people. The industry meets a payroll of about \$65 billion annually and is among the top 10 manufacturing sector employers in 43 states.

Recycling is integrated into our business to an extent that makes us unique among material manufacturing industries — our members own and operate over 100 materials recovery facilities (MRFs) and 80 percent of U.S. paper mills use some amount of recycled fiber. With our members both owning many MRFs that process recovered material and representing nearly 80 percent of US consumption of recovered fiber, AF&PA is particularly qualified to weigh in on subjects related to safe and effective recycling methods.

GPS-Based Tracking Device in Bales is Unnecessary

Existing chain of custody standards such as the Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC) are sufficient to track the needed information for responsible end markets under the Act. Chain-of-custody standards, which apply to suppliers and manufacturers, require the tracking of certified fiber through the supply chain, and allow use of certified content claims and labels on products. These standards function as an accounting system to track forest fiber content through production and manufacturing to the end product. They are backed by extensive research to capture the necessary data without double-counting or putting facilities at risk. A secondary process involving inserting GPS tracking devices into bales adds complexity but is unlikely to result in new or more useful information than is already registered by AF&PA members through SFI and FSC requirements.

1101 K Street, N.W., Suite 700 • Washington, D.C. 20005 • (202) 463-2700 • afandpa.org

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⁵ Letter provided by the American Forest & Paper Association (AF&PA)

Circular Action Alliance
August 29, 2024
Page 2

Safety is AF&PA's Top Priority

Companies that process large amounts of flammable material, such as paper facilities, need to be vigilant in managing fire safety risks and liability. Knowingly exposing those facilities, and their employees, to heightened fire risk by introducing mandated GPS trackers that would most likely use lithium batteries is irresponsible and unnecessary. The obligation under the Act could be accomplished in a less dangerous manner. The National Fire Protection Association states "the likelihood of them [batteries] overheating, catching on fire, and even leading to explosions increases when they are damaged or improperly used, charged, or stored."¹ The environmental stressors (such as heat and water exposure) and physical manipulation of bales that can be inherent in the shipping, sorting, and processing of recyclable materials are counter to most guidelines for battery safety and best practices.

The random bale tracking program would entail intentionally adding batteries to paper bales despite guidelines from Oregon officials explicitly advising against similar actions.

1. The City of Portland launched a curbside battery recycling service in June 2024 to reduce battery fires in garbage trucks and recycling centers. Their battery recycling page states:
"Never put batteries - or things with batteries in them - in your garbage or mixed recycling. They can spark and cause fires... Battery-caused fires in garbage trucks and waste processing facilities have increased dramatically in recent years. These fires put workers' lives in danger and can cost millions of dollars in damage. To prevent fires, batteries must be collected separately from other waste, and the batteries most likely to cause fires must be taped."²
2. Similarly, Beaverton, OR advises "discarded batteries can spark fires. Please, never place batteries or items with batteries in them into your garbage or mixed recycling."³
3. Clackamas County says, "Discarded batteries can spark and cause fires when not handled properly, creating dangerous situations for garbage and recycling truck drivers, processing facilities, and our communities."⁴

Thank you for the opportunity to weigh in on this important topic. AF&PA believes that intentionally introducing lithium batteries to paper bales is an unnecessary risk to our members' employees and facilities when there is already a proven and internationally accepted process to track recovered fiber. Any steps taken to lessen the potential risk of adding batteries to the bales is still adding risk when a safe, proven procedure is already in effect. We look forward to continued dialogue with Circular Action Alliance and the State of Oregon on this and other matters.

Sincerely,

Terry Webber
Vice President, Industry Affairs
American Forest & Paper Association

¹ <https://www.nfpa.org/education-and-research/home-fire-safety/lithium-ion-batteries>

² <https://www.portland.gov/ps/garbage-recycling/battery-recycling>

³ <https://beavertonoregon.gov/1542/Batteries>

⁴ <https://www.clackamas.us/recycling/batteries>



September 3, 2024

Ms. Kim Holmes
Oregon Executive Director
Circular Action Alliance
Via email: kim.holmes@circularaction.org

Dear Ms. Holmes:

We are writing to express our significant concerns about the use of battery-powered trackers for compliance with Responsible End Markets (REMs) regulations.

The APR is a U.S.-based, international non-profit association and the only North American organization focused exclusively on improving the recycling of plastics. APR members are the entirety of the plastics recycling industry from design to collection to recovery to remanufacturing, including two Oregon-based processors (reclaimers). Plastics recycling is what APR does every day, APR understands the challenges facing the industry and the solutions needed to scale recycling effectively to move toward a more sustainable, circular economy.

APR members have concerns about the efficacy of tracking devices on recyclable items, as detailed in an 8/28/24 APR blog. Specific to battery-powered trackers, members have additional safety and hazard concerns, including:

- The increased risk of fires at MRFs and disposal sites.
- Trackers and batteries are difficult to automatically remove from the material stream. This will cause machine damage and may contaminate the water systems, both leading to increased costs.
- If removed, these batteries will enter the landfill where they pose additional risks.
- There has been work done to reduce the impacts of battery trackers on MRFs, and to reduce their detection by MRF equipment to improve traceability. Unfortunately, this means more trackers would end up in the reclaimers' process, potentially affecting recycled material quality and yield.
- Battery-powered RFIDs are not compatible with recycling processes for the same reasons as battery powered trackers.
- The increase of fires at recycling and disposal sites has led to rising insurance costs and difficulties procuring insurance coverage.

⁶ Letter provided by the Association of Plastic Recyclers (APR)

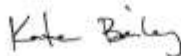
Alternative approaches

Transparency and verification are important to ensure materials are being processed through REMs. There are other viable alternatives to reach these goals that do not carry the substantial risk of battery-powered devices. For example, ISO has proposed draft language on traceability under its standard for mechanical recycling. While this language has not been finalized, it provides insights into other potential pathways being proposed by leading standards organizations to utilize barcoding and passive (non-battery) RFID labels to track batches of recycled materials as they move through the recycling process. This technology would provide real-time data on the location and status of materials. However, it's also important to note that a single RFID tag (e.g., one attached to a package label that may be hidden from reader or damaged during the full recycling process) is most effective at tracking material within one industrial process, e.g., collection to MRF, and not from collection, to MRF, to a reclaimer market. To effectively track material from inbound material stream through to reclaimer would require devices inserted at random at both inbound material and outbound MRF bale stages in the process.

The ISO work is indicative of keen interest in improved traceability systems, and the work underway to build strong programs. The use of battery-powered trackers can be replaced with safer, less damaging, and more accurate systems, providing the use of these tools is well-considered to effectively meet the OR DEQ objectives. APR recommends that CAA not require or recommend the use of battery-powered devices under the PRO Program Plan. APR is committed to continuing to work with CAA and OR DEQ to ensure compliance with the REM standards in a manner that does not pose risks to existing North American REMs.

Please contact me with any questions or concerns at kate.bailey@plasticsrecycling.org.

Thank you,



Kate Bailey
Chief Policy Officer