

Oregon Implementation Update

House Committee On Climate, Energy, and Environment

May 27, 2025

© 2025 Circular Action Alliance. All rights reserved. All third-party company names and logos used in this presentation are trademarks™ or registered® trademarks of their respective holders.

Agenda

1. Program Overview

- 2. Implementation Updates
 - System Expansion and Funding Agreements
 - Recycling Centers
 - Education & Outreach
 - Audit Center
- 3. Responsible End Markets



CAA Program Overview



Program Overview



CAA Oregon Program Plan Budget

	Pre-Program to the end of 2025	FY2O26	FY2O27
Total Budget	\$188M	\$254M	\$289.5M





Producer Engagement





Final Oregon Producer Fees

- Strong Reporting Participation: Reported weights met target ranges, indicating solid producer engagement and data submission across most categories.
- Material Category Disparities Noted: Lower-than-expected reporting in some categories led to higher fee rates for those materials due to fixed cost distribution.
- Final Fees will be Released May 29, 2025





System Expansion & Funding Agreements





System Expansion Engagement

Initial meetings with all Priority A Communities are complete.



Outreach to Priority B, C, D underway



Counties transitioning to statewide recycling list in July: Deschutes, Jackson, Lane and Marion

\$ 17.5 M+ The amount CAA plans to invest in the 16 Priority A Communities.

Next Steps



Finalize Primary Funding Agreements and addendum with Priority A communities.









Funding Agreement Structure



PRO Recycling Centers



PRO Recycling Center Overview

- In the next 2.5 years, CAA will build out a network of PROfunded Recycling Centers and collection points across the state.
- Education and outreach efforts will help communities locate and use the centers.



RecycleOn Recycling Center Concept Design



Purpose of PRO Recycling Centers

- PRO Recycling Centers collect materials that:
 - Are not collected in home or business recycling bins.
 - Cannot be easily sorted at a recycling facility.
 - Have proven responsible end markets.
- 144 Recycling Centers are needed to meet the convenience standard, by the end of 2027.
- CAA will provide the equipment, compensation, material collection and ensure materials are delivered to Responsible End Markets (REMs).



Recycling Center Acceptance List





Education & Outreach



Campaign Ecosystem of Messaging

A variety of messaging channels enables wide reach to diverse populations. Localized & Statewide messages complement each other and guide the public to where they can find information.





Education & Outreach Material Timeline





Education & Outreach Brand Look & Feel

- Mission: Make recycling easier and more effective with convenient services, clear guidance and meaningful support so all can participate in a trusted system that works.
- Attributes: Reliable, trusted, empathetic, bold.
- **Tone:** Friendly, approachable, helpful, enthusiastic.
- Main message: Be a part of making a better recycling program.





Transcreated Spanish language logo



Education & Outreach Materials



Additional E&O materials include brochure/mailer, door hangers, poste<mark>r, and enclosure si</mark>gnage.



Oregon Audit Center



Audit Center Location

- Located at City of Roses Disposal in NE Portland.
- The yellow box is approximately the area CAA will lease.
- The Audit Center will house:
 - Contamination auditing functions
 - Recycling Center material storage
 - Some office and meeting space





Responsible End Markets (REMs)



Background

- CAA **supports the Responsible End Market (REM) principles** of transparency, compliance, environmental soundness, and adequate yields.
- CAA is **committed to collaborating** on a practical, enforceable REM standard that protects proprietary information and maintains market stability.
- In the program plan, CAA proposed a preliminary REM verification, noting that more consultation was needed.
- Through that **collaborative process**, CAA learned that the submitted plan did not fully address interest holders needs.

"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



REM Consultation Engagement Timeline



REM Workstream Progress

Since the program plan submission, CAA has had five webinars with:

200	4	88	5
Attendees	Trade	Organizations	SE Asian Paper
	Associations	Represented	Trade Associations

CAA has spent more than 200 hours engaging end markets:

- Met/compared approaches with 9 certification/verification schemes
- Gather industry in a REM working group (see beside)
- Performed 1 on-site verification field test
- Conducted outreach to obtain self-attestation forms (incl. 19 entities for 869(13) exemption)(ongoing)
 - Coordination with 9 CRPFs
 - Met individually with >10 brokers and >20 end market entities

CAA REM working group

- Established on March 21st, 2025
- 15 End Market participants
- 3 meetings held

Conclusions from REM Engagement



- 2 Change management takes time. Continued engagement is required to build trust with end markets as new requirements are implemented.
- **Outstanding uncertainty and concerns remain** with immediate adoption of the REM process, such as disposition reporting, yield, and environmental impact measurement



Oregon alone is a small market to drive changes in a global industry. End markets can buy from jurisdictions with less requirements.



A phased approach is needed.





Proposed Program Plan Amendment

Overarching objective for the first program plan period

- Ensure recyclables go to end markets meeting REM requirements.
- In collaboration with DEQ, develop an impactful REM standard that is broadly embraced and adopted by industry.

Plan Amendment Overview

- Initial phase of voluntary information disclosures to demonstrate end market operational alignment with REM principles, supported by a verification body contracted by CAA.
 - O Audits may be needed for entities unable to demonstrate meeting REM legal requirements.
- Request for variances in the current regulations assessing end markets beyond recyclers (plastic and glass).
- Creation of an independently developed REM Standard that can meet REM requirements for all state programs.



REM Approach in PP

Self-attestation required to accept materials

Data review quarterly

Audit against 17 criteria

Audit results in 5 compliance categories

Variances requested for verification of several entities (e.g. landfills in North America, entities already verified)

REM Reformed Approach in Amendment

Maintain requirement

Adapt to reflect the need for CRPFs to track and report data to DEQ. CAA will report on PRO materials

Replace with voluntary disclosure against 12 impact areas aligned to what's clearly identified in rules

Postpone until an independent 3rd-party REM Verification standard is developed

 If no evidence of REM demonstration is provided, CAA may require an audit using other relevant certifications

Maintain requirement Extend yield variance to all end markets Plastic converter verification variance extended to glass converters

Compliance Reporting

- CAA will submit the first financial compliance report by July 1.
- By August 1, CAA will report the top 25 producers and all registered producer to DEQ.
- By November 15th, CAA will submit the first quarterly report on system expansion and PRO recycling centers to DEQ (July-Sept period)
- First disposition report due December 31, 2025





Key Takeaways

- CAA is ready to implement the RMA on July 1, 2025 just 35 days away.
- This is a historic moment for Oregon and Paper and Packaging EPR programs across the U.S.
- CAA remains concerned about end market's readiness to fully transition by July 1 and has developed a plan to achieve REM goals by the end of the program period.
- Groups across Oregon have done amazing work to make this moment a reality.





Ŕ Info@CircularAction.org in

CircularActionAlliance.org

Circular Action Alliance

@CircActAlliance

@CircularActionAlliance

