



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Materials Management Program

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August 29, 2025

Angela Remus
OEM Solutions Compliance Specialist
Dynamic Lifecycle Innovations
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RE: 2026 Oregon E-Cycles Program Plan

Dear Angela,

Thank you for the initial program plan that Dynamic Lifecycle Innovations (Dynamic) submitted to the Department of Environmental Quality (DEQ) on July 1, 2025, for the 2026 Oregon E-Cycles Program. As part of DEQ's plan review process, DEQ posted online all plans received from prospective producer responsibility organizations and provided for a public input period. Input received was also posted online.


After reviewing Dynamic's program plan, and with the consideration of input received from the public, **DEQ rejects Dynamic's proposed plan.** Reasons for rejection including required revisions and requests for additional information are listed directly in Dynamic's draft program plan for easier review. DEQ's comments will be made publicly available online as well. The current program plan lacks significant details that describe:

- How the PRO will fulfill the requirements of the law, including what the prospective PRO will do, how they will do it and when, including the education and program awareness that will be conducted, how environmentally sound management practices through to final disposition of covered electronic devices are described as required at OAR 340-098-0245 and program financing as required at ORS 459A.320(2)(a), and additional areas as described in the attached comments;
- How the convenience standard will be met as required at ORS 459A.320(2)(d), including substantially equivalent collection convenience if the plan does not demonstrate an existing statutorily required convenience network is ready at program start. As currently proposed, the plan indicates that the program will not or is very unlikely to offer convenient service as required; and
- How the program will function as a whole to meet the requirements of the law, not just the services that Dynamic provides; this may mean removing some descriptions that do not fall within the scope of Oregon's program or adding detail as it pertains to other program participants.

DEQ looks forward to receiving a revised plan from Dynamic within 45 days of this date. By Monday, October 13, 2025, please submit (1) a clean copy of the revised plan in an editable format and (2) a copy of the revised plan with edits showing changes made to the revised plan, for DEQ's review. Within 45 days of receiving a revised plan, DEQ will approve, approve with conditions or reject the revised plan, as required at ORS 459A.321(3).

If you have any questions, please don't hesitate to reach out to program staff, by phone or email. Rachel Harding can be reached at 503-929-7125 or Rachel.Harding@deq.oregon.gov.

Thank you,



Cheryl Grabham (Aug 28, 2025 10:10:24 PDT)

Cheryl Grabham
Materials Management Program Manager
Oregon Department of Environmental Quality

Attachment: Comments on Dynamic's July 1, 2025 program plan proposal