

Memorandum

To	Oregon Compost System & Industry Partners
From	Cascadia Consulting Group, Inc.
Date	July 2026
Subj	Partner Interview Pre-Read

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Overview

Oregon Department of Environmental Quality (DEQ) hired Cascadia Consulting Group (Cascadia) to conduct a study that fulfills the research portion of the legislative obligation set forth by SB 582 (2021), Section 44a. The purpose of the study is to understand the impacts of “covered products,” including compostable food serviceware as well as non-compostable covered products, on both compost facilities and the finished compost product and to present policy options to support DEQ’s focus on minimizing the lifecycle impacts of managing covered products while ensuring the environmental and economic sustainability of the state’s compost industry.

This interview pre-read shares key findings from background research and presents a broad range of policy options for consideration by the compost facilities, service providers, local governments, and other interested parties on Cascadia’s interview list. The timing of this study is driven by the statutory requirement for DEQ to deliver a legislative report by December 15, 2026.

Key findings from background research

Cascadia reviewed existing research on the broad industry trends and context of the impact of covered products on compost facilities, especially packaging and food serviceware, with a particular focus on compostable products and packaging. Cascadia identified the following top challenges facing Oregon’s composters:

- Additional costs required to manage contamination (especially non-compostable lookalikes and conventional plastics)
- Incomplete disintegration of certified compostable products under real-world conditions at most facilities
- End market impacts of lower-quality finished product, including limited access to certified organic compost end markets.

Key findings that emerged from the literature review are provided in this section.

OREGON-SPECIFIC CONTEXT

- **At least nine compost facilities in Oregon do not want compostable packaging and food serviceware.** In 2019, nine Oregon compost facilities issued a [statement](#) that they do not want compostable packaging and food serviceware at their facilities. They raised several concerns, including that not all certified compostable products break down at their facilities, increased contamination, impacts to resale quality, ability to sell compost to organic farmers, and other potential environmental impacts.
- **Oregon has 12 compost facilities (11 aerobic composting and one anaerobic digester) that currently accept Type 3 feedstocks, which includes residential and commercial food scraps and food processing waste.** Most of these facilities are concentrated in the mid-to-lower Willamette Valley and the Columbia Gorge area. Three other facilities (two anaerobic digesters and one aerobic composting) are permitted to accept food waste and intend to start accepting this material in the future.
- **Oregon currently has approximately 42 jurisdictions that offer curbside food scraps collection.** Of these jurisdictions, 11 offer residential collection, 17 offer commercial collection, and 14 offer both residential and commercial collection.
- **Facility processing capacity and accepted feedstocks vary based on proximity to urban areas that have access to organics curbside collection programs.**

COMPOST FACILITY OPERATIONS

- **Certified compostable products don't effectively compost in all facilities.** Processing methods, times, and conditions vary across composting facilities, and not all facilities can effectively process compostable products, including certified compostable products, without changing their system or operations. These facilities consider certified compostable products to be contamination (unwanted materials). In Oregon, local governments, collection service providers, and facilities cannot promote or accept the collection of materials, such as compostable products, that cannot be "effectively composted," per ORS 459A.965.
- **Compostable products are a small volume with a large impact.** Compostable products compose a low percentage of the organics stream by weight and volume (for example, 0.4% by weight in Washington state) but disproportionately impact facility operational costs.
- **Adding compostable products can create significant upgrade costs.** Accepting compostable products may require significant facility upgrades, operational changes, and additional costs to effectively compost them and manage increases in contamination.
- **Anaerobic digestion systems cannot accept compostable products.** The main anaerobic digestion systems in the U.S. and Oregon are wet mesophilic (moderate temperatures between 68 degrees Fahrenheit and 113 degrees Fahrenheit) systems that need liquified feedstocks made of organic materials free of packaging. Compostable products are not acceptable feedstock for these facilities. Additionally, because compostable products do not successfully break down in these systems, they yield significantly less biogas (methane) and do not add value for anaerobic digesters.

DISINTEGRATION AND FINISHED COMPOST QUALITY

- **Compostable plastics tend to break down faster than fiber-based products but do not add value to the process**, according to field testing, although disintegration rates vary by material type and facility conditions. While they require a longer processing time, fiber-based products add carbon and can act as a bulking agent in the composting process.
- **While field testing confirms successful disintegration rates under ASTM conditions, real-world conditions (such as shorter processing times) often don't result in full disintegration.** Field testing shows that certified compostable products break down at aerobic composting facilities when conditions align with ASTM standards D6400 and D6868 (i.e., 90% biodegradation within 180 days). However, most of Oregon's compost facilities process materials faster (i.e., 45-60 days of combined active composting and curing) or under conditions that work for food and yard waste but not some compostable products.

INBOUND CONTAMINATION: LEVELS, LOOKALIKES, AND COSTS

- **Conventional plastic is the most common contaminant for most compost facilities**, whether or not they accept compostable products. Oregon facilities also report conventional plastic as their most common contaminant.
- **Compost facilities in Oregon and elsewhere commonly reject inbound loads or impose penalties on inbound loads that are contaminated** as a way to reduce contamination. Contamination levels are commonly determined by volume using visual assessments.
- **Facilities that accept compostable products report higher levels of contamination caused by non-compostable lookalikes.** However, field-based evidence is limited on the contamination impact of adding food to previously yard-debris-only collection compared to adding compostables to previously food and yard waste collection.
- **Contamination management has a significant impact on facility operations and costs.** Contamination removal may have a greater impact on smaller, low-cost facilities and on facilities that accept compostable products.

END MARKET ACCEPTANCE

- **Some compost facility operators report that accepting compostable products as feedstock reduces the quality of their finished compost.** Marketability depends on quality, visible cleanliness, buyer confidence, and product certification (such as by the Organic Materials Review Institute or OMRI, based on National Organic Program standards).
- **Compostable products are not allowed in certified organic compost.** The National Organic Program prohibits compostable polymers as feedstock, so adding compostable products eliminates access to markets for certified organic compost. Based on a survey of Oregon compost facilities, an estimated 88% of end products were OMRI-certified in 2024.
- **Compost facilities in Oregon sell finished compost to a variety of end markets**, with retail, agriculture, and industrial infrastructure, restoration, and public works being some of the most common.

ENVIRONMENTAL IMPACTS

- **Evidence does not show that compostable packaging is a "greener" option.** While "compostability" is widely assumed to be a more sustainable option for single-use items,

compostability alone is not strongly correlated with reduced environmental impacts when compared against other single-use products.¹ There is also a lack of robust evidence on whether or not compostable packaging and food serviceware increases the capture of food.

- **Non-compostable packaging is the primary source of microplastics and PFAS.** Microplastics and PFAS are an ongoing concern, but they enter compost primarily due to conventional plastic (including lookalikes and depackaging remnants) and non-compostable packaging. As of January 1, 2025, Oregon has prohibited the sale of foodware containers with intentionally added PFAS.

Policy options

This section provides a list of draft policy options for consideration in Oregon, some of which may require changes to statute, existing rule language, or both. The policy options do not assess funding needs or potential funding sources necessary for implementation. DEQ does not currently plan to pursue statutory changes in the 2027 legislative session.

In this memo, a compost facility is a site or facility composting feedstocks to produce a useful product through a managed process of controlled biological decomposition. Examples of types of composting facilities include turned windrow, aerated static pile, in-vessel, anaerobic digestion (AD), vermiculture, vermicomposting and agricultural composting (OAR 340-093-0330), among others. Below is a summary table of the draft policy options grouped by category:

Category	Policy Options
Assessment-based options	Policy option #1: Compostable covered products needs assessment Policy option #2: Expanded compostable covered products assessment and disclosure
Facility-facing options	Policy option #3: Compostable products management fee Policy option #4: Contamination management fee
Generator-facing options	Policy option #5: Education campaign Policy option #6: Contamination reduction and monitoring requirements
Collection requirement options	Policy option #7: Food waste collection requirement Policy option #8: Compostable packaging and food serviceware collection requirement
Product and labeling-based options	Policy option #9: Compostable product labeling law Policy option #10: Food serviceware law Policy option #11: Plastic produce sticker ban

¹ Oregon Department of Environmental Quality, “The Significance of Environmental Attributes as Indicators of the Life Cycle Environmental Impacts of Packaging and Food Service Ware,” August 2018, <https://www.oregon.gov/deq/FilterDocs/MaterialAttributes.pdf>

Assessment-based options

POLICY OPTION #1: COMPOSTABLE COVERED PRODUCTS NEEDS ASSESSMENT

Require the producer responsibility organization (PRO) to conduct a needs assessment to fully understand the needs of compost facilities, local governments, and service providers to effectively manage compostable covered products in Oregon. Require the PRO to update its program plan based on the outcomes of the needs assessment to address the capital, operational, educational, and financial upgrades needed for compost facilities, local governments, and service providers to manage compostable covered products in Oregon, whether desired by compost facilities (desired feedstock) or not (contamination). The needs assessment might also address the management of contamination from other covered products. This policy option would require statutory changes.

POLICY OPTION #2: EXPANDED COMPOSTABLE COVERED PRODUCTS ASSESSMENT AND DISCLOSURE

To re-focus producers and consumers on discussions of greater environmental importance (life cycle impacts), require large producers of compostable food serviceware to conduct a lifecycle assessment and disclose the environmental impacts of compostable covered products. Currently, Oregon DEQ requires the top 25 largest producers of covered materials to evaluate and disclose impacts of 1% of their products every two years. This policy option would require statutory changes.

Facility-facing options

POLICY OPTION #3: COMPOSTABLE PRODUCTS MANAGEMENT FEE

To address facility upgrades and operational costs associated with managing compostable products, require the PRO to reimburse compost facilities that accept compostable products for all or a portion of the higher capital and operational costs and/or lost revenue associated with accepting compostable packaging and food serviceware as feedstock. This includes equipment upgrades needed to manage increased contamination, adding pick-lines and/or more staff to monitor contamination, longer processing times, or other changes to processing conditions needed to accept covered products. This policy option, which requires a fee obligation on the PRO, would require statutory changes.

POLICY OPTION #4: CONTAMINATION MANAGEMENT FEE

To address contamination from covered products that are received by facilities that do not accept this material, require the PRO to compensate compost facilities for their removal and disposal of covered product contamination, defined as any covered product they cannot effectively compost. This policy option, which requires a fee obligation on the PRO, would require statutory changes.

Generator-facing options

POLICY OPTION #5: EDUCATION CAMPAIGN

To reduce inbound contamination and increase organics material recovery, require the development and delivery of an educational campaign about proper preparation of materials for composting and the impacts of contaminants in compost. The education program could include, but is not limited to, statewide campaigns developed by the PRO similar to those related to recycling laid out in ORS 459A.893 or by DEQ; the program could be delivered by local governments and/or service providers. This policy option would require statutory changes to authorize and fund the campaign.

POLICY OPTION #6: CONTAMINATION REDUCTION AND MONITORING REQUIREMENTS

To reduce the amount of contamination entering compost facilities in composting feedstock, establish contamination reduction and monitoring requirements for local governments or their compost collection service providers (similar to policies in effect for recycling, pursuant to ORS 459A.929). This could include education and feedback to generators on contamination (i.e., cart tagging) as well as financial or collection service consequences (fees or service cancellation) for repeat contaminators. This policy option would require statutory changes.

Collection requirement options

POLICY OPTION #7: FOOD WASTE COLLECTION REQUIREMENT

This policy would require food waste collection statewide. Variations of the policy could include limiting collection to certain types of customers or larger food waste generators.

While jurisdictions could make this a local requirement at any time, a statewide policy would require a statutory change.

POLICY OPTION #8: COMPOSTABLE PACKAGING AND FOOD SERVICEWARE COLLECTION REQUIREMENT

This policy would require collection of compostable packaging food serviceware. Some variations to consider include (but are not limited to) requiring collection only in areas with food waste collection, statewide (but only within a certain distance of compost facilities or compost facilities that accept food waste and/or serviceware), or only large commercial generators.

While jurisdictions could mandate this requirement now, a statewide requirement would need changes to statute.

Product and labeling-based options

POLICY OPTION #9: COMPOSTABLE PRODUCT LABELING LAW

To reduce contamination in the organics stream caused by generator confusion and non-compostable lookalikes, adopt a statewide compostable packaging labeling law. The policy would:

- Define criteria for when a product may be labeled as compostable.
- Define labeling requirements for compostable products such as required colors and wording or use of an independent, third-party certification logo(s).
- Restrict the use on non-compostable products with wording, colors, and other labeling features associated with compostable products.
- Ban the use of on-package terms like "biodegradable," "degradable," or "decomposable."

Note that Oregon's definition of "effectively composted" is facility-specific (not just material-specific), which would need to be considered when developing statewide labeling criteria. This policy option would require statutory changes.

POLICY OPTION #10: FOOD SERVICEWARE LAW

To reduce the number of single-use food serviceware lookalike items that must be managed by compost facilities, require food service vendors to use only reusable food serviceware for dine-in and/or only compliant compostable food serviceware for take-out. This option could reduce the amount of single-use food serviceware generated and/or disposed. Restricting take-out containers to compostable products could reduce food contamination in recycling and non-compostable food serviceware contamination in composting by making it simpler for generators to identify where to discard single-use food serviceware (always in compost; never in recycling). The requirement could be implemented in two separate parts:

- Require all single-use food serviceware to be certified compostable aligned with geographic areas where compostable food serviceware must be collected (policy option #8).
- Prohibit single-use food serviceware for dine-in service.

While jurisdictions could mandate this requirement now, a statewide policy would require statutory changes.

POLICY OPTION #11: PLASTIC PRODUCE STICKER BAN

To reduce plastic contamination in inbound feedstock that is especially difficult to screen out, ban plastic produce stickers and require compostable stickers. A global standard for compostable produce stickers has not yet been adopted and could impact the produce that Oregon receives from overseas. The cost and limited supply of compostable stickers could also be a barrier, and no other states in the US have implemented this ban. This policy option would require statutory changes.