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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) **“Ecomodulation”** 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 serviceware”** 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 |



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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.
Artoy 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
Etekciti 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	Gardner Enterprises inc.
Foundation Consumer Brands	Gardner-Gibson, Inc.
FOURSTAR GROUP INC.	Garmin International
FOUSINE (HONG KONG) INDUSTRIAL HOLDINGS LIMITED	Garven LLC
Franke Home Solutions North America, LLC	GE Appliances, a Haier Company
Franklin Sports Incorporated	GEAR AID INC
FRATELLI BERETTA USA, INC.	Generac
Free Country Ltd	General Mills
Free Fly Fishing Company, LLC	General Motors Company
French Farmacie, LLC dba French Farmacie	Genesis Industries Limited
Fresh Inc.	Genie Supply Inc
Freshpet, Incorporated	Genpak, LLC
Frog Bikes Inc	Genuine Parts Company
Frontier Distribution, LLC	Georgia-Pacific LLC
FUJIFILM North America Corporation	Gerber Childrenswear LLC
Fujitsu General America, Inc.	GESIN (ZHANGPU) CO., LTD
Funai Corporation Inc.	GG Brands Company
FUNBOY, INC.	GI-GO TOYS FACTORY LTD
Funko	Gillyboo Corporation
Furlani Foods Limited	Ginsey Industries, Inc
G-III Apparel Group Ltd.	Give Back Beauty LLC
G-Tex Apparel Inc.	Giving Beauty LLC
GAF	Glanbia Performance Nutrition (NA), Inc.
Gallo	Global Uprising (PBC) - Known as Cotopaxi
Games Workshop Retail Inc.	Global-Pak, Inc.
GANZHOU DEHUIDA TECHNOLOGY CO., LTD.	Glossier, Inc.
Gap Inc.	Go BRIXY, Inc.
Garden-Fresh Foods, 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	Habermass 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	Icelandic 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
Jafra 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 DbA 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	KUIIU 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.Ã	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	Ljilja 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
Ollie
OLLY Public Benefit Corporation
Omega Acquisition Corp.
Once Upon A Farm, Public Benefit Corporation
One Frozen LLC
ONNIT LABS, INC
Oral Care Products, LLC
Orangebox Limited
Orbit Irrigation Products, LLC
Oregon Potato Company
Oregon Precision Industries, Inc. D/B/A Paktech
Oribe Hair Care, LLC
Ornua Foods North America
Orora Packaging Solutions
Orora Visual
Ortlieb USA LLC
Otis Mcallister, Inc.
Otter Products, LLC
Over & Back LLC
Overseas Food Trading LTD.
Overtone Color, LLC
Owens Corning
Oxford Industries, Inc.
Oystershell Consumer Healthcare, Inc.
P.J Chonburi PARAWOOD co.,LTD.
PAC Worldwide
Paceline Products, Inc.
Pacific Coast Producers

Pacifica Beauty, LLC
Packaging with Print
Pact Collective
Pactiv Evergreen Inc.
Paisley Crafts, LLC, DBA iLoveToCreate
Panasonic Corporation of North America
Pandora Jewelry, LLC
Panera Bread, LLC
Pant Saggin, LLC
Papatui LLC
PARADISE KIDS LLC
Parfums de Coeur Ltd
Parfums Francis Kurkdjian, LLC.
Paris Presents Incorporated
Patagonia Works
PCHI
Peanut Butter & Co, Inc.
Pearl Banyan LLC DBA Banyan Botanicals
Peerless-AV
Peet's Coffee, Inc
Pella Corporation
Peloton Interactive, Inc.
Penn Emblem Company
Penny Plate, LLC
Pentland Brands Limited
PepsiCo, Inc
Perfetti Van Melle Group
Performance Designed Products LLC
Perlick Corporation



Peruana de Moldeados S.A.C.
Pescanova Inc.
Pescanova, Inc.
Petco Animal Supplies Stores Inc.
Petcurean Pet Foods Ltd.
Peter Thomas Roth LLC
PetSmart
Pfizer
Pharmaceutical Specialties, Incorporated
Pharmavite LLC
Pierre Fabre Dermo-Cosmetique Inc.
Pilot Pen Corporation of America
Ping, Inc.
Pinnpack Capital Holdings, LLC
Piping Rock Health Products, LLC
Plaine Products
Plastic Perfect
PLAYGO TOYS ENTERPRISES LIMITED
Playground For All, Inc.
Plexus Worldwide, LLC
PLZ Corp
Polaris Industries Incorporated
Poly-America, L.P.
Polyconcept North America Inc
Polygroup North America, Inc.
Polyvinyl Films, Inc.
Pompeian, Inc.
Popzup Popcorn
Porsche Cars North America, Inc.

POSHI LLC
Positec Technology China Co., Ltd.
Post Holdings, Inc.
Power Beauty Co.
Powpack LLC
PPG Industries, Inc.
Pratt Industries, Inc
Pregis LLC
Premier Brands of America Inc.
Premier Nutrition Company
Premium Waters, Inc.
Pressed Paperboard Technologies, L.L.C.
Prestone Products Corporation
Prime Resins, Inc.
Prime Time Toys Ltd.
Primera Technology, Inc.
Printing Partners Group OU
ProAmpac Holdings LLC.
Productos Alimenticios DIANA, S.A. de C.V.
Professional Disposables International, Inc. (PDI)
Professor Puzzle Ltd
Profile Food Ingredients
Prokoz, Inc.
ProVia
PT.LUNG CHEONG BROTHERS INDUSTRIAL
Purlisse Beauty, Inc
PurposeBuilt Brands
PVH Corporation
Pyramex Safety Products, LLC.



QTOP USA INC
Quality Bicycle Products
QUANTUM HOLDINGS LLC
Quebec Inc.
QuestSpecialty Corporation
QVC, Inc.
R. M. Palmer Company, LLC
R&G Divergency LLC
Rad Power Bikes
Radians, Inc.
Rainbow Balloons Inc.
Ralph Lauren Corporation
Rana Meal Solutions, LLC
Rand Design Ltd
Rare Beauty, LLC
Raw Sugar Living, LLC.
Razor USA, LLC
RB Health (US) LLC
Real Value LLC. DBA Simple Modern
Reckitt Benckiser LLC
Recochem
Recreational Equipment, Inc
Recreational Water Products, Inc.
Recycline, Inc dba Preserve
Red Bull North America
Red Gold, Inc.
Red River Foods Inc.
RefrigiWear, LLC
Regal Rexnord Corporation

REMY COINTREAU USA, INC.
Renfro Brands LLC
Renfro Foods, Inc.
Repligen Corporation
Republic Plastics LTD
rePurpose Inc
Reser's Fine Foods
RESPONSIBLE PRODUCTS LIMITED
Retail Concepts, Inc.
Revision, LLC
Revlon Consumer Products LLC
Revolution Beauty Group PLC
Revolution Sustainable Solutions, LLC
Reynolds American Inc.
Reynolds Consumer Products
Reznor LLC
Rheem Manufacturing Company
Rheya Inc.
Ribbon Communications Operating Company, Inc.
Rich Products Corporation
Richemont North America, Inc.
Righteous Gelato LTD
Riverside Natural Foods Ltd.
RL INDUSTRY COMPANY LIMITED
RMS Organics, LLC
Rob's Brand's LLC D?B?A Vegan Rob's
Robert Bosch LLC
Rockline Industries, Inc.
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 Material ²	121,973	
Beverage Containers on Deposit ³	141,965	Tonnage of PET, HDPE, aluminum, steel, glass beverage containers on deposit was reduced
Small Producers' Materials ⁴	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.

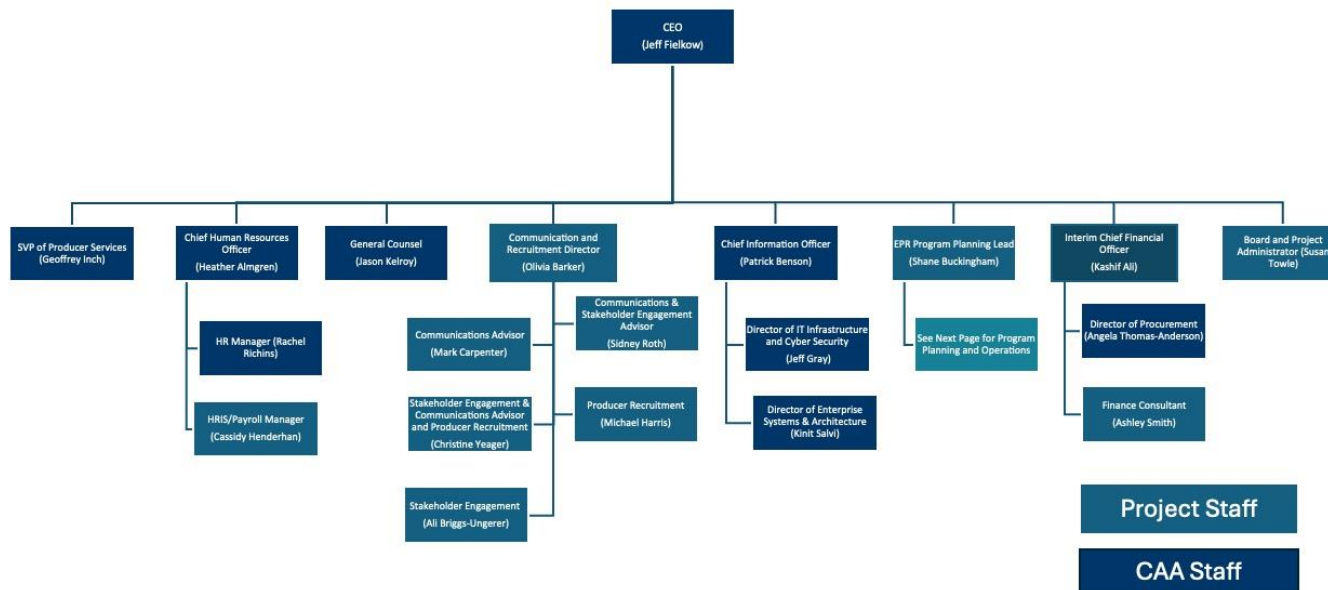


Appendix C:

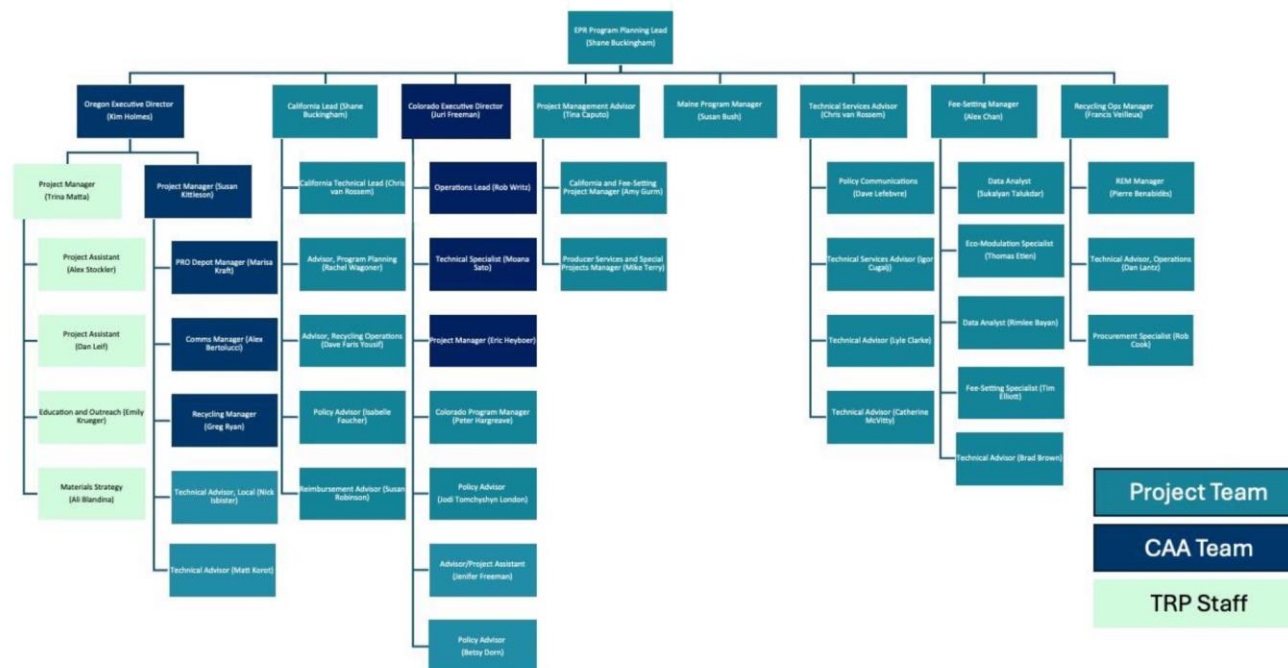
CAA Organizational Structure

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 | → Dahl Disposal Service |
| → City of Salem and service providers | → North Lincoln Sanitary Service |
| → City of Roses Disposal | → Thompson’s Sanitary Service |
| → Columbia County Government | → Southern Oregon Sanitation |
| → Deschutes County Government with Cities and service providers | → Brandt’s Sanitary Service |
| → Lane County Government with Cities and service providers | → Royal Refuse |
| → Marion County Government with Cities and service providers | → Loren’s Sanitation Services |
| → Lincoln County Government with Cities and service providers | → Valley Recycling and Disposal |
| → Milton-Freewater and DEQ regional rep | → Nestucca Valley Recycling |
| → City of Corvallis | → Sutherlin Sanitary |
| → Rogue Disposal, Thompson’s Sanitary Service, Dahl Disposal Service, Pendleton Sanitary Service | → Humbert Refuse |
| → Tillamook County Government with Cities and service providers | → Roseburg Disposal Company |
| → Washington County and all cities in the IGA | → Pacific Sanitation |
| → Waste Management | → Suburban Garbage Service |
| → Recology | → Pride Disposal and Recycling Company |
| → Waste Connections | → Apex Recycling and Disposal |
| → Republic Services | → D&O Garbage Service, Inc |
| | → City Sanitary Service |
| | → Cascade Disposal Co. |
| | → South Umpqua Disposal Company |
| | → Valley Recycling and Disposal |
| | → Safety Kleen |



circularactionalliance.org

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 Eycles- 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)



circularactionalliance.org

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 (PCRFR) 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, legal and ecomodulation 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	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

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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

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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%	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

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%	N/A	N/A	N/A	N/A	N/A	N/A

Table vii

Appendix G:

Detailed Fee-Setting Methodology

(confidential)

Appendix G is confidential and has been shared with DEQ separately.

Appendix H:

CAA Articles of Incorporation



Appendix
CAA - Articles of Incorporation

VENABLE LLP

800 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,

A handwritten signature in black ink, appearing to read "Andrew L. Steinberg".

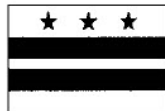
Andrew L. Steinberg

Enclosures



Initial File #: N00007528311

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF LICENSING AND CONSUMER PROTECTION
CORPORATIONS DIVISION



CERTIFICATE

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



ULCP Corp. DM.1

MAR 28 2023

McHymowitz

**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 2 9 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);



ELCOP CORP. INC.

MAR 26 2023

FILE COPY

- (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]



CLERK CORP. CH.

MAR 29 2023

File Copy

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 Schwarz, Chair

Date: 3-24-23

Attest:

John Breedlove, Secretary

Date: _____



District of Columbia Government
DEPARTMENT OF LICENSING AND
CONSUMER PROTECTION
Corporation Division
1100 4th Street, SW
Washington, DC 20024

Billing Voucher

Charge To: Circularity Alliance - Initial File Number:
N00007528311

OFFICE OF FINANCE AND TREASURY
Date: 3/28/2023 1:23 PM
Office: DCP-ONE 1000
Batch: 70575 Batch date: 3/28/2023
Batch ref: 00775
Trans: 34.2
OFFICE OF LICENSING & REGULATION
Corporation Division - Circularity Alliance
Percent: 7.50% 25.50
Percent Distribution:
2115 CPO (5270) 100000000 100.00
2115 CPO (5270) 100000000 100.00
GR Total: 212.00

Office Use Only

Fund:		Source Code	
Charge For	QTY	Price	
1 Day Expedite Services	1	\$100.00	Fund 1060283 Acc 6211071
Restated Articles NonProfit Dom. Backoffice	1	\$80.00	Fund 1010001 Acc 6211039
Date: 3/28/2023 <i>mch</i>	PAY THIS AMOUNT PAYABLE TO THE D.C. TREASURER		\$180.00 Total

Government of the District of Columbia - Office of the Chief Financial Officer

Returned Check Fee - \$65.00 - DCMR § 1-108

All checks returned are subject to electronic representment along with a \$65.00 fee.



Appendix I:

501(c)3 Letter of Determination



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-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 black ink that reads "Stephen A. Martin".

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

Appendix J:

**Proof of Registration as a
Charitable Organization**



ELLEN F. ROSENBLUM
Attorney General

LISA M. UDLAND
Deputy Attorney General



DEPARTMENT OF JUSTICE
PORTLAND OFFICE

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

Appendix:
CAA – Proof of Charitable
Organization in Oregon

November 29, 2023

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:

Proof of Registration – 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) 986-2200

REGISTRY NUMBER: 220134594

For office use only



CIRCULAR ACTION ALLIANCE

NEWAUT

In accordance with Oregon Revised Statute 192.410-192.490, the information on this application is public. 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: ND0007528311

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(26)

(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.

Appendix L:
CAA Revised Bylaws



Appendix: CAA Bylaws

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

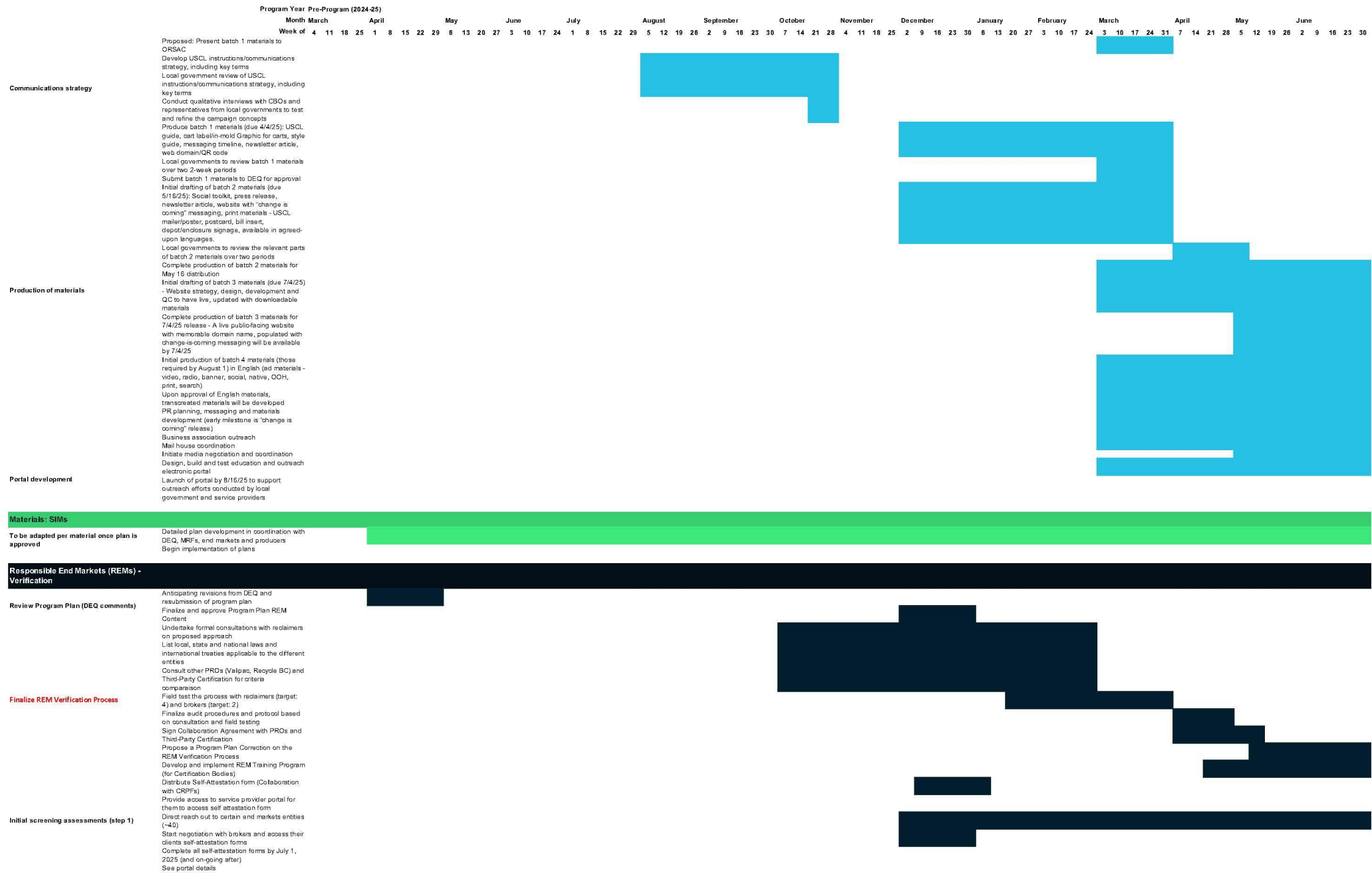
Section 10.01 By the Board. At any meeting these Bylaws may be altered, amended or repealed in whole or in part upon approval of a majority of the Directors then in office.

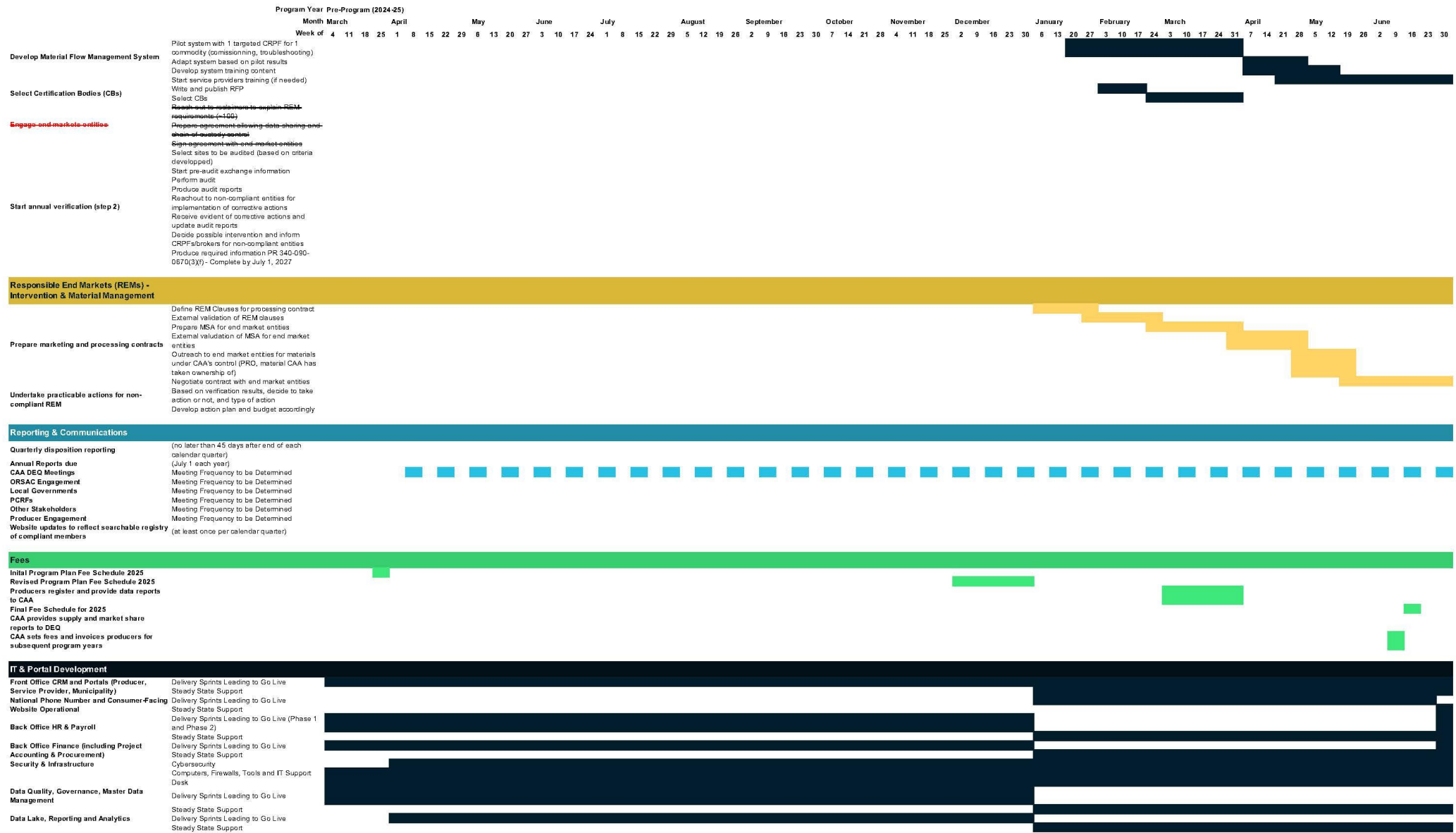
Adopted by the Board of Directors on March 1, 2023, as amended by the Board of Directors on March 15, 2023.

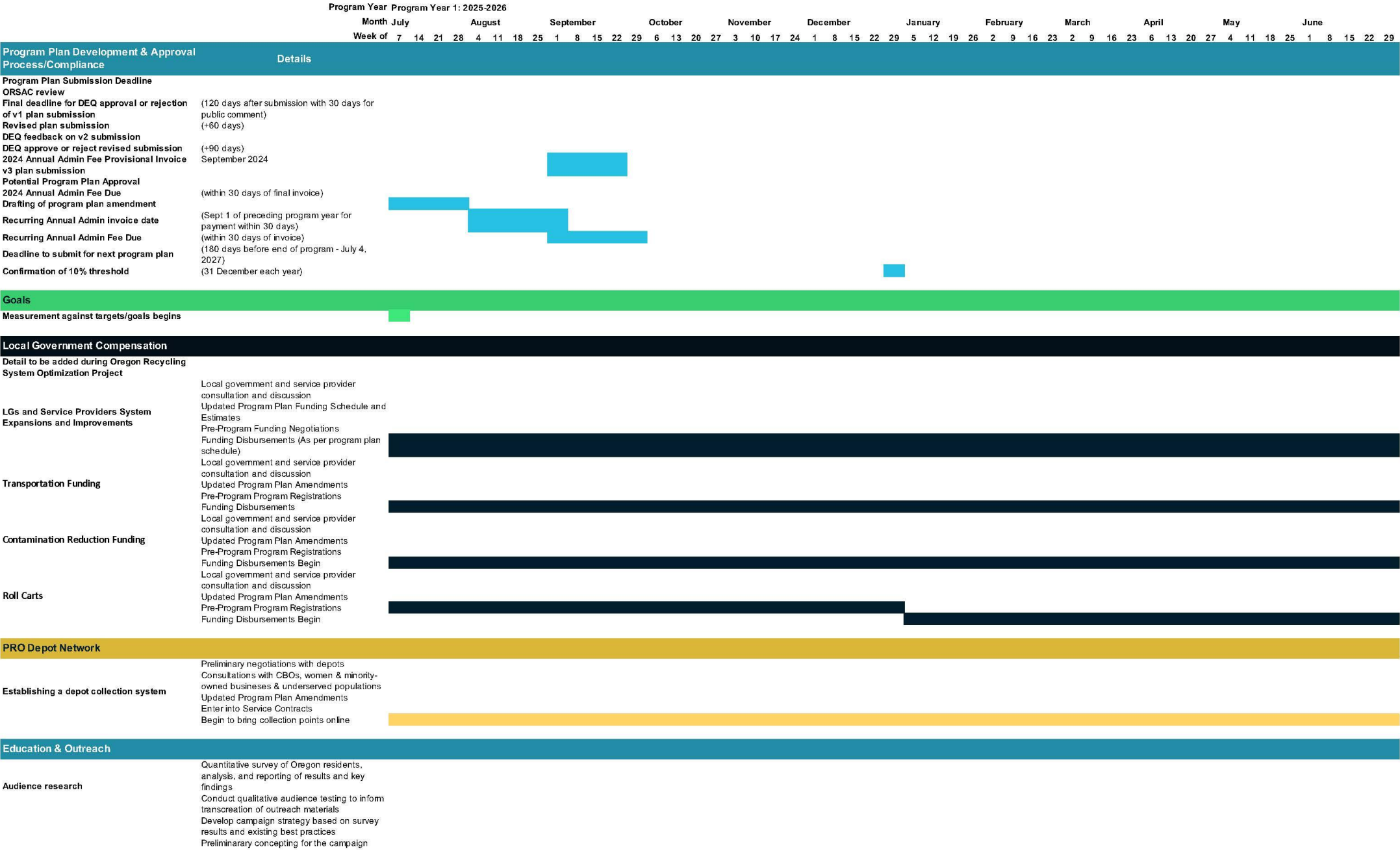
Appendix M:

Updated Program Implementation Timelines



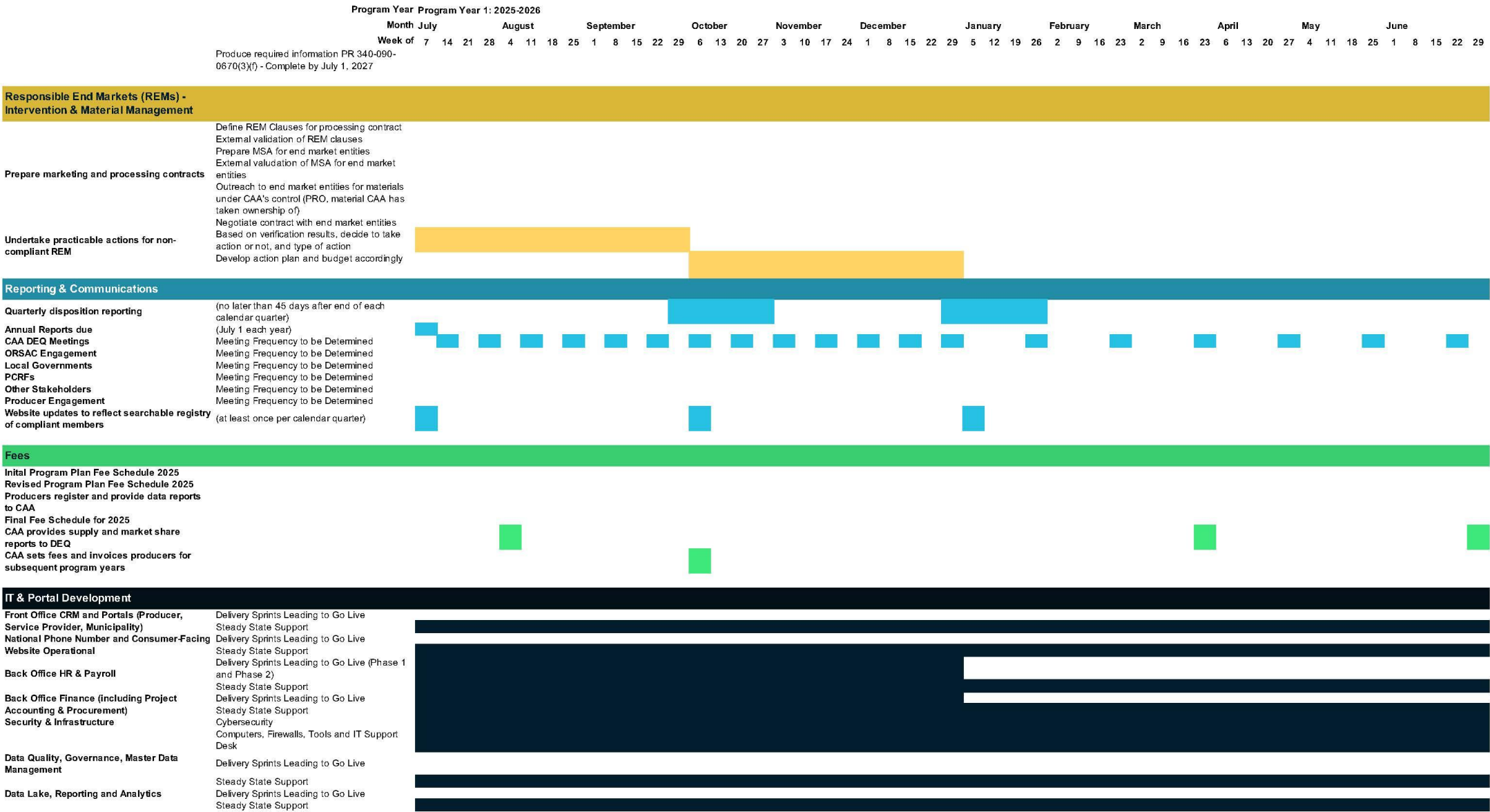






coming release)
Business association outreach

		Program Year 1: 2025-2026																																																			
		Month July			August			September			October			November			December			January			February			March			April			May			June																		
		Week of	7	14	21	28	4	11	18	25	1	8	15	22	29	6	13	20	27	3	10	17	24	1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	6	13	20	27	4	11	18	25	1	8	15	22	29
		Mail house coordination Initiate media negotiation and coordination Design, build and test education and outreach electronic portal Launch of portal by 8/16/25 to support outreach efforts conducted by local government and service providers																																																			
Portal development																																																					
Materials: SIMs																																																					
To be adapted per material once plan is approved		Detailed plan development in coordination with DEQ, MRFs, end markets and producers Begin implementation of plans																																																			
Responsible End Markets (REMs) - Verification																																																					
Review Program Plan (DEQ comments)		Anticipating revisions from DEQ and resubmission of program plan Finalize and approve Program Plan REM Content Undertake formal consultations with reclaimers on proposed approach List local, state and national laws and international treaties applicable to the different entities Consult other PROs (Valpac, Recycle BC) and Third-Party Certification for criteria comparison Field test the process with reclaimers (target: 4) and brokers (target: 2) Finalize audit procedures and protocol based on consultation and field testing Sign Collaboration Agreement with PROs and Third-Party Certification Propose a Program Plan Correction on the REM Verification Process Develop and implement REM Training Program (for Certification Bodies) Distribute Self-Attestation form (Collaboration with CRPFs) Provide access to service provider portal for them to access self attestation form Direct reach out to certain end markets entities (~40) Start negotiation with brokers and access their clients self-attestation forms Complete all self-attestation forms by July 1, 2025 (and on-going after) See portal details																																																			
Finalize REM Verification Process																																																					
Initial screening assessments (step 1)																																																					
Develop Material Flow Management System		Pilot system with 1 targeted CRPF for 1 commodity (commissioning, troubleshooting) Adapt system based on pilot results Develop system training content Start service providers training (if needed) Write and publish RFP Select CBs Reach out to reclaimers to explain REM requirements (~400) Prepare agreement allowing data sharing and chain of custody control Sign agreement with end market entities Select sites to be audited (based on criteria developed) Start pre-audit exchange information Perform audit Produce audit reports Reachout to non-compliant entities for implementation of corrective actions Receive evident of corrective actions and update audit reports Decide possible intervention and inform CRPFs/brokers for non-compliant entities																																																			
Select Certification Bodies (CBs)																																																					
Engage end markets entities																																																					
Start annual verification (step 2)																																																					



		Program Year 2: 2026-2027																																																				
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Program Plan Development & Approval Process/Compliance		Details																																																				
Program Plan Submission Deadline ORSAC review																																																						
Final deadline for DEQ approval or rejection of v1 plan submission		(120 days after submission with 30 days for public comment)																																																				
Revised plan submission		(+60 days)																																																				
DEQ feedback on v2 submission																																																						
DEQ approve or reject revised submission		(+90 days)																																																				
2024 Annual Admin Fee Provisional Invoice v3 plan submission		September 2024																																																				
Potential Program Plan Approval																																																						
2024 Annual Admin Fee Due																																																						
Drafting of program plan amendment																																																						
Recurring Annual Admin invoice date		(Sept 1 of preceding program year for payment within 30 days)																																																				
Recurring Annual Admin Fee Due		(within 30 days of invoice)																																																				
Deadline to submit for next program plan		(180 days before end of program - July 4, 2027)																																																				
Confirmation of 10% threshold		(31 December each year)																																																				
Goals																																																						
Measurement against targets/goals begins																																																						
Local Government Compensation																																																						
Detail to be added during Oregon Recycling System Optimization Project		Local government and service provider consultation and discussion																																																				
LGs and Service Providers System Expansions and Improvements		Updated Program Plan Funding Schedule and Estimates																																																				
		Pre-Program Funding Negotiations																																																				
		Funding Disbursements (As per program plan schedule)																																																				
Transportation Funding		Local government and service provider consultation and discussion																																																				
		Updated Program Plan Amendments																																																				
		Pre-Program Program Registrations																																																				
		Funding Disbursements																																																				
Contamination Reduction Funding		Local government and service provider consultation and discussion																																																				
		Updated Program Plan Amendments																																																				
		Pre-Program Program Registrations																																																				
		Funding Disbursements Begin																																																				
Roll Carts		Local government and service provider consultation and discussion																																																				
		Updated Program Plan Amendments																																																				
		Pre-Program Program Registrations																																																				
		Funding Disbursements Begin																																																				
PRO Depot Network																																																						
Establishing a depot collection system		Preliminary negotiations with depots																																																				
		Consultations with CBOs, women & minority-owned businesses & underserved populations																																																				
		Updated Program Plan Amendments																																																				
		Enter into Service Contracts																																																				
		Begin to bring collection points online																																																				
Education & Outreach																																																						
Audience research		Quantitative survey of Oregon residents, analysis, and reporting of results and key findings																																																				
		Conduct qualitative audience testing to inform transcreation of outreach materials																																																				
		Develop campaign strategy based on survey results and existing best practices																																																				
		Preliminary conceptualizing for the campaign																																																				

[illegible]

		Program Year 2: 2026-2027																																																				
		Month July			August			September			October			November			December			January			February			March			April			May			June																			
		Week of	6	13	20	27	3	10	17	24	31	7	14	21	28	5	12	19	26	2	9	16	23	30	7	14	21	28	4	11	18	25	1	8	15	22	1	8	15	22	29	5	12	19	26	3	10	17	24	31	7	14	21	28
		Mail house coordination. Initiate media negotiation and coordination. Design, build and test education and outreach electronic portal Launch of portal by 8/16/25 to support outreach efforts conducted by local government and service providers.																																																				
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		Produce required information PR 340-090-0670(3)(f) - Complete by July 1, 2027																																																				
Responsible End Markets (REMs) - Intervention & Material Management																																																						
		Define REM Clauses for processing contract																																																				
		External validation of REM clauses																																																				
		Prepare MSA for end market entities																																																				
		External validation of MSA for end market entities																																																				
Prepare marketing and processing contracts		Outreach to end market entities for materials under CAA's control (PRO, material CAA has taken ownership of)																																																				
		Negotiate contract with end market entities																																																				
Undertake practicable actions for non-compliant REM		Based on verification results, decide to take action or not, and type of action																																																				
		Develop action plan and budget accordingly																																																				
Reporting & Communications																																																						
Quarterly disposition reporting		(no later than 45 days after end of each calendar quarter)																																																				
Annual Reports due		(July 1 each year)																																																				
CAA DEQ Meetings		Meeting Frequency to be Determined																																																				
ORSAC Engagement		Meeting Frequency to be Determined																																																				
Local Governments		Meeting Frequency to be Determined																																																				
PCRFs		Meeting Frequency to be Determined																																																				
Other Stakeholders		Meeting Frequency to be Determined																																																				
Producer Engagement		Meeting Frequency to be Determined																																																				
Website updates to reflect searchable registry of compliant members		(at least once per calendar quarter)																																																				
Fees																																																						
Initial Program Plan Fee Schedule 2025																																																						
Revised Program Plan Fee Schedule 2025																																																						
Producers register and provide data reports to CAA																																																						
Final Fee Schedule for 2025																																																						
CAA provides supply and market share reports to DEQ																																																						
CAA sets fees and invoices producers for subsequent program years																																																						
IT & Portal Development																																																						
Front Office CRM and Portals (Producer, Service Provider, Municipality)		Delivery Sprints Leading to Go Live																																																				
		Steady State Support																																																				
National Phone Number and Consumer-Facing Website Operational		Delivery Sprints Leading to Go Live																																																				
		Steady State Support																																																				
Back Office HR & Payroll		Delivery Sprints Leading to Go Live (Phase 1 and Phase 2)																																																				
		Steady State Support																																																				
Back Office Finance (including Project Accounting & Procurement)		Delivery Sprints Leading to Go Live																																																				
Security & Infrastructure		Cybersecurity																																																				
		Computers, Firewalls, Tools and IT Support Desk																																																				
Data Quality, Governance, Master Data Management		Delivery Sprints Leading to Go Live																																																				
		Steady State Support																																																				
Data Lake, Reporting and Analytics		Delivery Sprints Leading to Go Live																																																				
		Steady State Support																																																				

		Program Year Program Year 3: 2027-2028																											
		Month July				August				September				October				November				December							
		Week of	5	12	19	26	2	9	16	23	30	6	13	20	27	4	11	18	25	1	8	15	22	29	6	13	20	27	
Program Plan Development & Approval Process/Compliance																													
Details																													
Program Plan Submission Deadline																													
ORSAC review		(120 days after submission with 30 days for public comment)																											
Final deadline for DEQ approval or rejection of v1 plan submission		(+60 days)																											
Revised plan submission																													
DEQ feedback on v2 submission																													
DEQ approve or reject revised submission		(+90 days)																											
2024 Annual Admin Fee Provisional Invoice v3 plan submission		September 2024																											
Potential Program Plan Approval																													
2024 Annual Admin Fee Due		(within 30 days of final invoice)																											
Drafting of program plan amendment																													
Recurring Annual Admin invoice date		(Sept 1 of preceding program year for payment within 30 days)																											
Recurring Annual Admin Fee Due		(within 30 days of invoice)																											
Deadline to submit for next program plan		(180 days before end of program - July 4, 2027)																											
Confirmation of 10% threshold		(31 December each year)																											
Goals																													
Measurement against targets/goals begins																													
Local Government Compensation																													
Detail to be added during Oregon Recycling System Optimization Project																													
		Local government and service provider consultation and discussion																											
		Updated Program Plan Funding Schedule and Estimates																											
LGs and Service Providers System Expansions and Improvements		Pre-Program Funding Negotiations																											
		Funding Disbursements (As per program plan schedule)																											
		Local government and service provider consultation and discussion																											
Transportation Funding		Updated Program Plan Amendments																											
		Pre-Program Program Registrations																											
		Funding Disbursements																											
		Local government and service provider consultation and discussion																											
Contamination Reduction Funding		Updated Program Plan Amendments																											
		Pre-Program Program Registrations																											
		Funding Disbursements Begin																											
		Local government and service provider consultation and discussion																											
Roll Carts		Updated Program Plan Amendments																											
		Pre-Program Program Registrations																											
		Funding Disbursements Begin																											
PRO Depot Network																													
		Preliminary negotiations with depots																											
		Consultations with CBOs, women & minority-owned businesses & underserved populations																											
Establishing a depot collection system		Updated Program Plan Amendments																											
		Enter into Service Contracts																											
		Begin to bring collection points online																											
Education & Outreach																													
		Quantitative survey of Oregon residents, analysis, and reporting of results and key findings																											
Audience research		Conduct qualitative audience testing to inform transcreation of outreach materials																											
		Develop campaign strategy based on survey results and existing best practices																											
		Preliminary conceiving for the campaign																											

[illegible]

[illegible]



		Program Year 3: 2027-2028																											
		Month July				August				September				October				November				December							
		Week of	5	12	19	26	2	9	16	23	30	6	13	20	27	4	11	18	25	1	8	15	22	29	6	13	20	27	
Produce required information PR 340-090-0670(3)(f) - Complete by July 1, 2027																													
Responsible End Markets (REMs) - Intervention & Material Management																													
Prepare marketing and processing contracts	Define REM Clauses for processing contract																												
	External validation of REM clauses																												
	Prepare MSA for end market entities																												
	External validation of MSA for end market entities																												
Undertake practicable actions for non-compliant REM	Outreach to end market entities for materials under CAA's control (PRO, material CAA has taken ownership of)																												
	Negotiate contract with end market entities																												
	Based on verification results, decide to take action or not, and type of action																												
	Develop action plan and budget accordingly																												
Reporting & Communications																													
Quarterly disposition reporting	(no later than 45 days after end of each calendar quarter)																												
Annual Reports due	(July 1 each year)																												
CAA DEQ Meetings	Meeting Frequency to be Determined																												
ORSAC Engagement	Meeting Frequency to be Determined																												
Local Governments	Meeting Frequency to be Determined																												
PCRFs	Meeting Frequency to be Determined																												
Other Stakeholders	Meeting Frequency to be Determined																												
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National Phone Number and Consumer-Facing Website Operational	Delivery Sprints Leading to Go Live (Phase 1 and Phase 2)																												
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Data Quality, Governance, Master Data Management	Delivery Sprints Leading to Go Live																												
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Data Lake, Reporting and Analytics	Delivery Sprints Leading to Go Live																												
	Steady State Support																												

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.

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.

SYSTEM EXPANSION	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
<p>A. Prioritization of system expansion requests</p> <p>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?</p> <p>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.</p> <p>c. More details needed on the intent and plan for maximizing use of existing infrastructure, and availability of efficiencies across wastesheds (page 24).</p>	<p>To be considered in December submission of program plan.</p>
<p>B. Approach to dispute resolution</p> <p>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.</p> <p>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.</p>	<p>To be considered in December submission of program plan.</p>
<p>C. Transportation reimbursement</p> <p>a. More info is needed about how the pre-approval process will work and assurance that it will not result in delays.</p> <p>b. More detail is needed around calculation of the standard fee</p> <p>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.</p> <p>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)</p>	<p>To be considered in December submission of program plan.</p>
<p>D. Potential additional funding for protection of ratepayers</p>	<p>To be considered in December submission of program plan.</p>

<p>(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.</p>	
<p>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.</p> <p>a. Consideration: In communities where color choice of recycling containers is less specific or less established, consider recommending a standard color for future purchases.</p>	<p>To be considered in December submission of program plan.</p>
<p>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.</p>	<p>To be considered in December submission of program plan.</p>

UNIFORM STATEWIDE COLLECTION LIST ON-RAMP	
<u>Recycling Council Comment</u>	<u>How was comment addressed?</u>
<p>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:</p> <ul style="list-style-type: none"> 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. 	<p>At the request of DEQ the specifics of on-ramping certain materials will be detailed in future program plan amendments.</p>
<p>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</p>	<p>Accepted.</p>
<p>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)</p>	<p>Outside of scope of compliance.</p>
<p>D. More detail needed for the preliminary plastic recycling rate projections (pages 68-72)</p>	<p>Accepted.</p>
<p>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.</p>	<p>Accepted.</p>
<p>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)</p>	<p>Accepted.</p>
<p>G. More detail needed on polycoated gable-top cartons and aseptic cartons (pages 62-63)</p>	<p>Accepted.</p>

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.
<p>O. Add specific shared definitions of equity for Program Plan in Appendix A: Definitions, page 30. Below are a few examples.</p> <p>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.</p> <p>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.</p> <p>a. Historically marginalized (Metro): Groups who have been denied access and/or suffered past institutional discrimination in the United States.</p>	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@circulardaction.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.

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⁵ Letter provided by the American Forest & Paper Association (AF&PA)



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August 29, 2024
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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/bps/garbage-recycling/batteries-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](mailto: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.

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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 katebailey@plasticsrecycling.org.

Thank you,

A handwritten signature in black ink that reads "Kate Bailey".

Kate Bailey
Chief Policy Officer