



October 17, 2025

VIA EMAIL ONLY

Oregon Department of Environmental Quality (“DEQ”)
700 NE Multnomah St., Ste 600
Portland, OR 97232
rethink.recycling@deq.oregon.gov

Re: Comments on 2025 Financial Report submitted by Circular Action Alliance
Oregon LLC (“CAA Oregon”)

Dear Sirs/Madams:

By this letter, North Pacific Paper Company, LLC (“NORPAC”) submits its comments regarding the 2025 Financial Report prepared by CAA Oregon and its parent organization, Circular Action Alliance (“CAA”) (collectively referred to herein as “CAA”) and submitted to DEQ on July 1, 2025. CAA serves as the sole producer responsibility organization (“PRO”) in Oregon under Oregon’s Plastic Pollution and Recycling Modernization Act (“RMA”), ORS 459A.860 *et seq.* Because the RMA requires participation in a PRO by certain businesses deemed to be “producers” under the law, NORPAC has registered as a member of CAA’s Oregon producer responsibility program. As such, NORPAC has an interest in ensuring that CAA is operating in compliance with the RMA and maintains financial transparency. Accordingly, NORPAC submits the following comments.

1. ***CAA’s redactions of 2024 data make it impossible for both the agency and the public to conduct a meaningful review of CAA’s revenue and expenses.*** Put simply, these financial reports tell us absolutely nothing about how CAA managed its money in 2024. All of the 2024 financial data has been redacted. These redactions completely defeat the purpose of the required annual report and the opportunity for comment that DEQ is mandated to extend to the public under the statute.

This opportunity to review CAA’s financial statements is of critical importance to producers, who fund the activities of the PRO through the fees established and charged by the PRO. That fee-setting process is not transparent, and therefore the only public insight into the basis for CAA’s fees comes through this annual report. Without any actual data, producers are left with no mechanism of oversight to understand how CAA developed its fees, who is paying the fees, and how those fees correlate to CAA’s expenses. Producers—and the public at large—must have a legitimate

opportunity to review and comment on that data. A heavily redacted annual report only contributes to the growing industry-wide perception that CAA is not operating with sufficient transparency.

Moreover, redactions in other aspects of the report render the information meaningless or indecipherable. For example, the redacted text in Note 4 on page 16 of the report makes it impossible to understand the full scope of CAA's strategic plan for 2025 and beyond.

DEQ should reject this report and require CAA to provide an unredacted report for purposes of public comment.

2. ***This report is not a voluntary submission.*** CAA's Financial Report indicates on its cover page that it is a "Voluntary Submission." This is not accurate. The RMA, at ORS 459A.887(1), requires CAA to submit to DEQ, no later than July 1 of each year, "an annual report on the development, implementation and operation of the producer responsibility program" that covers the prior calendar year. The annual report must include, among other information, "[a] summary of the financial status of the producer responsibility organization, including annual expenditures, revenues and assets[.]" ORS 459A.887(2)(j). The PRO's required annual report must be made available for public comment by DEQ pursuant to ORS 459A.887(4). Although CAA's report is not titled as an "annual report," this appears to be the function served by the 2025 Financial Report; to our knowledge, no other report from CAA covering fiscal years 2023 and 2024 was submitted to DEQ on or before July 1, 2025 and released for public review and comment. Accordingly, DEQ should not accept CAA's financial report with any indication that it is a "voluntary submission," but instead as the required "annual report" submission pursuant to the RMA.
3. ***This report does not include all of the required components of an annual report per the RMA.*** ORS 459A.887(2)(a)-(y) lists 25 categories of information that must be included in the PRO's annual report. Although many of the 25 categories of information are not applicable to the start-up years of 2023 and 2024, CAA should at least include acknowledgement of all 25 requirements by enumerating each required category, providing information as available, and noting those components for which no information exists for the 2023 and 2024 fiscal years. On this basis, CAA's report does not comply with the statutory requirement and should be rejected.
4. ***This report does not comply with the regulatory requirements for an annual report.*** Under OAR 340-090-0850, "[a] producer responsibility organization must include in its **annual report for 2025** an addendum that

provides a complete accounting of costs incurred in 2024 relating to activities described in ORS 459A.887(2)(e) to (i). The addendum should contribute to demonstrating that fees are adequate to cover the costs of the program, including start-up costs incurred prior to the start date.” These requirements were not satisfied in CAA’s 2025 Financial Report.

First, per the requirements of the regulation, CAA did not submit to DEQ a full “annual report” that includes an addendum with an accounting of costs incurred in 2024. Instead, CAA submitted to DEQ a document it calls “2025 Financial Report” that is *only* an accounting of the costs from 2023 and 2024. CAA has not followed the regulatory directive in OAR 340-090-0850.

Second, CAA’s submission does not address the activities described in ORS 459A.887(2)(e) to (i) as required by the rule. These five activities are a subset of the 25 categories of information articulated in the statute, as described above. Subsections (e) to (i) of the statute are as follows:

“(e) A complete accounting and summary of payments requested by local governments and local governments' service providers and paid by the producer responsibility organization under ORS 459A.890;

“(f) A description of all expansions and improvements to recycling collection systems that have been paid for by the producer responsibility organization, whether those expansions or improvements have been implemented, the funds provided for such expansions and improvements, and what collection programs are still scheduled for expansions or improvements in the remaining duration of the producer responsibility program plan;

“(g) A summary of payments paid by the producer responsibility organization under ORS 459A.920 [regarding contamination management fee] and 459A.923 [regarding processor commodity risk fee];

“(h) A summary of payments requested by local governments or local governments' service providers that were denied or reduced by the producer responsibility organization;

“(i) A summary of all other payments made to satisfy the producer responsibility organization's obligations under ORS 459A.860 to 459A.975, including but not limited to payments

made to support responsible recycling of specifically identified materials, as described in ORS 459A.917[.]”

None of the above information is addressed or even mentioned in CAA’s report. DEQ should reject the report as submitted and require CAA to prepare a revised report.

5. ***CAA should be required to identify the recipients of large expenditures.*** In Note 5 on page 16 regarding “Concentrations,” the report explains that 48 percent of CAA’s total expenses in 2023, or \$4,210,871, was paid to a single company for the purpose of setup. Large expenditures to one recipient should be scrutinized closely. DEQ should require CAA to identify any entity that receives a large percentage of total expenditures from CAA. The basis for such a requirement could come through DEQ’s discretion for additional information in ORS 459A.887(2)(y).

Thank you for the opportunity to submit these comments on CAA’s 2025 Financial Report.

Respectfully submitted,



Craig Anneberg
CEO
North Pacific Paper Company LLC

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October 15, 2025

TO: Leah Feldon, Director of the Oregon Department of Environmental Quality

FR: Derek Sangston, Oregon Business & Industry

RE: Comments Urging the Rejection of Financial Documents Provided by CAA

Oregon Business & Industry (OBI) is a statewide association representing businesses from a wide variety of industries and from each of Oregon's 36 counties. In addition to being the statewide chamber of commerce, OBI is the state affiliate for the National Association of Manufacturers and the National Retail Federation. Our 1,500 member companies, more than 75% of which are small businesses, employ more than 250,000 Oregonians. Oregon's private sector businesses help drive a healthy, prosperous economy for the benefit of everyone.

Thank you for the opportunity to express serious concerns regarding the financial statement submitted by Circular Action Alliance (CAA) at the recent September 17, 2025, meeting of the Oregon Recycling System Advisory Council. Both the substantial lack of transparency provided by CAA's submitted financial document and several issues relating to a meeting during which the Recycling Council Finance subcommittee reviewed that document, OBI urges DEQ to reject CAA's financial statement. Each continues the unacceptable and untransparent nature with which DEQ and CAA have begun administering Oregon's Plastic Pollution and Recycling Modernization Act (RMA).

Foremost, the level of redaction within the submitted financial materials is simply unacceptable—particularly the complete redaction of all financial data for 2024. While it has been indicated that CAA will eventually provide full financial information after submitting the relevant IRS forms, this promise of future transparency does not meet the standards of accountability that should be required now, during the active implementation and oversight of RMA.

This lack of financial transparency contributes to an already growing perception that the RMA is functioning without sufficient public visibility. Stakeholders—including producers, local governments, and members of the public—deserve to clearly understand the financials of this program. Currently, we have no access to:

- The methodology and data used to establish the program fees producers are required to pay;
- The number of producers who are actively paying these fees and participating in the system; and
- How collected fees are being allocated, spent, or reserved by CAA.

Withholding this information raises significant concerns about fairness, compliance, and effective program oversight. Transparency is not a future obligation; it is a current

necessity—especially for CAA, which is tasked with collecting **nearly \$750 million from producers over the next three years** to implement and administer the RMA.

Additionally, several concerning issues arose during a seemingly impromptu meeting of the Recycling Council Finance subcommittee on October 14, 2025. Of primary concern is DEQ failed to publicly notice the meeting until the day after it occurred. Leading the subcommittee to note that it could not consider any official action because the meeting was not noticed. Due to the lack of notice for the meeting, many stakeholders—seemingly including CAA—could not attend.

The lack of proper notice also extends to when stakeholder comments on CAA's financial statement are due. Originally, DEQ had posted the due date for comments on CAA's financial statement for 5:00pm on October 17, 2025. On October 14, 2025, stakeholders received an email alerting them comments were now due the next day on October 15, 2025. While the timeline was corrected the morning of October 15, 2025, to reset the deadline for the original deadline of October 17, 2025, stakeholders had no choice but to believe they had a little over a day to produce comments because of the ostensibly constrained timeline; and, regardless of when comments were due apparently the Recycling Council Finance subcommittee would not review them because it met prior to either deadline DEQ provided for stakeholders to submit comments.

Considering the submission of almost completely redacted financial documents and the flagrantly untransparent process for which stakeholders have had the opportunity to comment on them, OBI respectfully requests that DEQ reject the financial documents CAA submitted until unredacted, complete financial information is provided. In addition, OBI respectfully requests a real and transparent process that allows stakeholders to have a discussion of the costs the RMA promises to impose on businesses and consumers in Oregon. Placeholder or incomplete financial information and symbolic process should not take the place of true transparency.

Thank you for your consideration. Please do not hesitate to email dereksangston@oregonbusinessindustry.com with questions.



Date: October 17, 2025

To: Leah Feldon, Director of the Oregon Department of Environmental Quality

RE: Comments on CAA Financial Documents

Director Feldon,

The Oregon Wine Council (OWC) is a statewide advocacy association representing over 50 percent of the Oregon wine grapes, grown, produced, and sold. The OWC, alongside other statewide business associations, has voiced our concern with the implementation of the Plastic Pollution and Recycling Modernization Act (RMA) since the concept first arose in the legislature.

While we have ongoing concerns about the implementation of the RMA, we want to express to you today our serious concerns about the lack of transparency in the financial statement submitted by Circular Action Alliance (CAA) at the September 17, 2025, meeting of the Oregon Recycling System Advisory Council.

The CAA is tasked with collecting nearly \$800 million from producers over the next three years to implement and administer the RMA. The level of redaction—and lack of transparency—in the submitted financial statement is simply unacceptable. Further, it contributes to the growing perception that the RMA lacks public visibility.

It is simply not acceptable for the administrators of this program to refuse to share the methodology and data used to establish producer program fees, the number of producers participating in the system, and how collected fees are being allocated, spent or reserved by the CAA.

We urge the DEQ to reject the submitted financial statements until they are unredacted and complete financial information is provided. Our wine producer members who are being brought under this system deserve true transparency about where their fees are going.

Sincerely,

A handwritten signature in black ink that reads 'Fawn Barrie'. The signature is written in a cursive, flowing style.

Fawn Barrie
Executive Director
Oregon Wine Council

October 15, 2025

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700 NE Multnomah St., Ste 600
Portland, OR 97232
rethink.recycling@deq.oregon.gov

Re: Comments on 2025 Financial Report submitted by Circular Action Alliance Oregon LLC (“CAA Oregon”)

Dear Sirs/Madams:

By this letter, R.J. Schinner Co., Inc. (“Schinner”) submits its comments regarding the 2025 Financial Report prepared by CAA Oregon and its parent organization, Circular Action Alliance (“CAA”) (collectively referred to herein as “CAA”), and submitted to DEQ on July 1, 2025. CAA serves as the sole producer responsibility organization (“PRO”) in Oregon under Oregon’s Plastic Pollution and Recycling Modernization Act (“RMA”), ORS 459A.860 *et seq.* Because the RMA requires participation in a PRO by certain businesses deemed to be “producers” under the law, Schinner has registered as a member of CAA’s Oregon producer responsibility program. As such, Schinner has an interest in ensuring that CAA is operating in compliance with the RMA and maintains financial transparency. Accordingly, Schinner submits the following comments.

1. ***CAA’s redactions of 2024 data make it impossible for both the agency and the public to conduct a meaningful review of CAA’s revenue and expenses.*** Put simply, these financial reports tell us absolutely nothing about how CAA managed its money in 2024. All of the 2024 financial data has been redacted. These redactions completely defeat the purpose of the required annual report and the opportunity for comment that DEQ is mandated to extend to the public under the statute.

This opportunity to review CAA’s financial statements is of critical importance to producers, who fund the activities of the PRO through the fees established and charged by the PRO. That fee-setting process is not transparent, and therefore the only public insight into the basis for CAA’s fees comes through this annual report. Without any actual data, producers are left with no mechanism of oversight to understand how CAA developed its fees, who is paying the fees, and how those fees correlate to CAA’s expenses. Producers—and the public at large—must have a legitimate opportunity to review and comment on that data. A heavily redacted

annual report only contributes to the growing industry-wide perception that CAA is not operating with sufficient transparency.

Moreover, redactions in other aspects of the report render the information meaningless or indecipherable. For example, the redacted text in Note 4 on page 16 of the report makes it impossible to understand the full scope of CAA's strategic plan for 2025 and beyond.

DEQ should reject this report and require CAA to provide an unredacted report for purposes of public comment.

- 2. *This report is not a voluntary submission.*** CAA's Financial Report indicates on its cover page that it is a "Voluntary Submission." This is not accurate. The RMA, at ORS 459A.887(1), requires CAA to submit to DEQ, no later than July 1 of each year, "an annual report on the development, implementation and operation of the producer responsibility program" that covers the prior calendar year. The annual report must include, among other information, "[a] summary of the financial status of the producer responsibility organization, including annual expenditures, revenues and assets[.]" ORS 459A.887(2)(j). The PRO's required annual report must be made available for public comment by DEQ pursuant to ORS 459A.887(4). Although CAA's report is not titled as an "annual report," this appears to be the function served by the 2025 Financial Report; to our knowledge, no other report from CAA covering fiscal years 2023 and 2024 was submitted to DEQ on or before July 1, 2025 and released for public review and comment. Accordingly, DEQ should not accept CAA's financial report with any indication that it is a "voluntary submission," but instead as the required "annual report" submission pursuant to the RMA.
- 3. *This report does not include all of the required components of an annual report per the RMA.*** ORS 459A.887(2)(a)-(y) lists 25 categories of information that must be included in the PRO's annual report. Although many of the 25 categories of information are not applicable to the start-up years of 2023 and 2024, CAA should at least include acknowledgement of all 25 requirements by enumerating each required category, providing information as available, and noting those components for which no information exists for the 2023 and 2024 fiscal years. On this basis, CAA's report does not comply with the statutory requirement and should be rejected.
- 4. *This report does not comply with the regulatory requirements for an annual report.*** Under OAR 340-090-0850, "[a] producer responsibility organization must include in its **annual report for 2025** an addendum that provides a complete accounting of costs incurred in 2024 relating to activities described in ORS 459A.887(2)(e) to (i). The addendum should contribute to demonstrating that fees are adequate to cover the costs of the program, including start-up costs incurred

prior to the start date.” These requirements were not satisfied in CAA’s 2025 Financial Report.

First, per the requirements of the regulation, CAA did not submit to DEQ a full “annual report” that includes an addendum with an accounting of costs incurred in 2024. Instead, CAA submitted to DEQ a document it calls “2025 Financial Report” that is *only* an accounting of the costs from 2023 and 2024. CAA has not followed the regulatory directive in OAR 340-090-0850.

Second, CAA’s submission does not address the activities described in ORS 459A.887(2)(e) to (i) as required by the rule. These five activities are a subset of the 25 categories of information articulated in the statute, as described above. Subsections (e) to (i) of the statute are as follows:

“(e) A complete accounting and summary of payments requested by local governments and local governments' service providers and paid by the producer responsibility organization under ORS 459A.890;

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None of the above information is addressed or even mentioned in CAA’s report.



DEQ should reject the report as submitted and require CAA to prepare a revised report.

- 5. CAA should be required to identify the recipients of large expenditures.** In Note 5 on page 16 regarding “Concentrations,” the report explains that 48 percent of CAA’s total expenses in 2023, or \$4,210,871, was paid to a single company for the purpose of setup. Large expenditures to one recipient should be scrutinized closely. DEQ should require CAA to identify any entity that receives a large percentage of total expenditures from CAA. The basis for such a requirement could come through DEQ’s discretion for additional information in ORS 459A.887(2)(y).

Thank you for the opportunity to submit these comments on CAA’s 2025 Financial Report.

Respectfully submitted,

Tim Scott

Tim Scott
Senior VP Purchasing & Corporate Strategy



October 17, 2025

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Oregon Department of Environmental Quality ("DEQ")
700 NE Multnomah St., Ste 600
Portland, OR 97232
rethink.recycling@deq.oregon.gov

Re: Comments on 2025 Financial Report submitted by Circular Action Alliance Oregon LLC ("CAA Oregon")

Dear Sirs/Madams:

By this letter, United States Bakery ("USB") submits its comments regarding the 2025 Financial Report prepared by CAA Oregon and its parent organization, Circular Action Alliance ("CAA") (collectively referred to herein as "CAA") and submitted to DEQ on July 1, 2025. CAA serves as the sole producer responsibility organization ("PRO") in Oregon under Oregon's Plastic Pollution and Recycling Modernization Act ("RMA"), ORS 459A.860 *et seq.* Because the RMA requires participation in a PRO by certain businesses deemed to be "producers" under the law, USB has registered as a member of CAA's Oregon producer responsibility program. As such, USB has an interest in ensuring that CAA is operating in compliance with the RMA and maintains financial transparency. Accordingly, USB submits the following comments.

1. ***CAA's redactions of 2024 data make it impossible for both the agency and the public to conduct a meaningful review of CAA's revenue and expenses.*** Put simply, these financial reports tell us absolutely nothing about how CAA managed its money in 2024. All of the 2024 financial data has been redacted. These redactions completely defeat the purpose of the required annual report and the opportunity for comment that DEQ is mandated to extend to the public under the statute.



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Moreover, redactions in other aspects of the report render the information meaningless or indecipherable. For example, the redacted text in Note 4 on page 16 of the report makes it impossible to understand the full scope of CAA’s strategic plan for 2025 and beyond.

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2. ***This report is not a voluntary submission.*** CAA’s Financial Report indicates on its cover page that it is a “Voluntary Submission.” This is not accurate. The RMA, at ORS 459A.887(1), requires CAA to submit to DEQ, no later than July 1 of each year, “an annual report on the development, implementation and operation of the producer responsibility program” that covers the prior calendar year. The annual report must include, among other information, “[a] summary of the financial status of the producer responsibility organization, including annual expenditures, revenues and assets[.]” ORS 459A.887(2)(j). The PRO’s required annual report must be made available for public comment by DEQ pursuant to ORS 459A.887(4). Although CAA’s report is not titled as an “annual report,” this appears to be the function served by the 2025 Financial Report; to our knowledge, no other report from CAA covering fiscal years 2023 and 2024 was submitted to DEQ on or before July 1, 2025 and released for public review and comment. Accordingly, DEQ should not accept CAA’s financial report with any indication that it is a “voluntary submission,” but instead as the required “annual report” submission pursuant to the RMA.
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years. On this basis, CAA's report does not comply with the statutory requirement and should be rejected.

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Thank you for the opportunity to submit these comments on CAA's 2025 Financial Report.

Respectfully submitted,

Randi Wells

Randi Wells
Director Cost Accounting & Purchasing
United States Bakery
randi.wells@usbakery.com