Recycling Council Materials Committee feedback on key topics in the program plan amendment submitted Sept. 1, 2026.

Diversion Rate

The Materials Committee discussed CAA's proposal to replace diversion rate with pounds of USCL commingled material collected per household. CAA's diversion rate calculation relies on DEQ generation data that is not readily available on an annual basis. DEQ has asked CAA to consider a methodology for calculating a USCL recycling rate metric that uses an estimate of generation based on projection of trends. DEQ identified a few downsides of CAA's proposed metric:

1. Using households to standardize the amount of material collected downplays the contribution of the commercial sector to Oregon's recycling success. In some states, packaging EPR programs involve only residential recycling, but in Oregon the law includes the commercial sector, as well.
2. Focusing only on material collected without comparison to total generation provides less informative results. Increases in amount collected could be the result of changes in the amount or type of material generated, not necessarily improvements in recycling performance.

Committee members expressed a range of opinions on this topic and did not reach a conclusive recommendation. Some agreed that removing generation could give rise to potentially misleading results. Some noted that in the short term, the amount of material collected is likely a good indicator of increased recycling access.

Responsiveness to anticipated rule changes for the PRO management of glass

CAA is proposing to add the following language to the glass section on p. 114 of the program plan: "If regulations change related to the PRO's responsibility in the collection of glass in Oregon, CAA will adjust its operational and funding plans accordingly to meet the obligation through the duration of this program plan."

In response to public comments received, the Materials Committee recommends that CAA update the language in the following ways: 1. Clarify that CAA may adjust its operational and funding plans only for changes to glass collection obligations proposed in the Recycling Modernization Act Updates 2026 rulemaking process that is currently underway and 2. Clarify that CAA will notify DEQ and producers in advance of operational and funding plan adjustments.

Draft Guiding Principles for Covered Material Categories

Background

In the draft program plan that DEQ and the Recycling Council will review next year, CAA intends to propose on-ramping some materials, such as clamshells and cups, to start in 2028. The on-ramping proposal is one of the strategies CAA is employing to meet the statutory plastics recycling goal, which is 25% for calendar year 2028. CAA has represented that in order to on-ramp materials in 2028, CAA must update the Covered Material Categories for producer reporting by the end of 2026 so producers can begin reporting into the new categories in the Spring of 2027, which will provide needed data to help CAA properly set producer fees for 2028. The Covered Material Categories, or CMCs, are the 60 or so categories of covered materials for which producers are required to report supply and CAA sets fees. The CMCs are not related to the USCL or PRO Recycling Acceptance Lists.

In the program plan amendment submitted Sept. 1, 2026, CAA has proposed updates to the CMCs to support a future on-ramping proposal. At the Nov. 2, 2026 Recycling Council Materials Committee meeting to review the program plan amendment, DEQ flagged a concern that updating the CMCs before evaluating CAA's on-ramping proposal is the opposite of the expected process order and could result in additional CMC adjustments and more administrative burden on reporting producers if the suite of materials approved for on-ramping differs in any way from CAA's proposal. CAA maintains that waiting to approve CMC adjustments after a discussion of on-ramping options will not allow enough time to add materials to the USCL and meet the plastics recycling goal in 2028.

Draft Guiding Principles for Covered Material Categories

On Nov. 2, 2026, members of the Recycling Council Materials Committee expressed a desire to follow a process that maintains the ability to on-ramp materials in 2028 and make significant progress toward meeting the plastics recycling goal. To that end, the Recycling Council recommends DEQ work with CAA to identify updates to the Covered Material Categories using the following guiding principles:

DEQ should aim for a level of granularity in the CMCs that balances two objectives:

1. Allow DEQ flexibility to make on-ramping decisions that are responsive to the analysis of statutory criteria as well as the outcome of the public and Recycling Council review process.

2. Minimize administrative burden for producers by only adding CMCs for materials that have a reasonable likelihood of getting on-ramped based on the statutory criteria.

In addition, if possible, DEQ and CAA should consider harmonizing CMCs with other states.