

# Discussion: Changes to Oregon's glass packaging collection requirements

Prepared for the Oregon Recycling System Advisory Council - May 20, 2026, meeting

## Purpose

The purpose of this document is to inform the Council about recent conversations at technical workgroup and subcommittee meetings related to glass recycling, and engage the Council on related policy discussion.

Some of the policy considerations presented here are not intended to be included as part of any proposed rule concepts for the current rulemaking; however, they are longer-term questions and general program questions that may help inform DEQ and the PRO on general program and operational matters. The Council is not being asked to provide formal guidance to DEQ or the PRO as part of this consultation, and Council members may choose to schedule future agenda items related to any of these topics.

## Background

ORS 459A.914 requires the Environmental Quality Commission to adopt [administrative rules](#) that identify materials that are suitable for recycling collection. Existing rules, adopted in 2023, require the Producer Responsibility Organization to provide for collection of glass, primarily through a network of depots or drop-off sites. A PRO may provide for an alternative system, which might involve an incentive payment to local governments that choose to provide on-route collection of glass instead, and that is how CAA has responded in many Oregon communities.

In response to concerns raised by the glass manufacturing industry and users of glass packaging, such as wine producers, DEQ is considering changes to the 2023 rules that might reduce costs to glass producers, primarily through changes to collection requirements for glass.

DEQ convened a [technical workgroup](#) and held two meetings in April 2026 to discuss a number of different ways that the state could achieve a goal of lower costs to producers without jeopardizing ongoing success of glass packaging collection for recycling. The outcomes of those discussions were presented at two meetings of the ORSAC Materials Subcommittee in early May, at which Council members discussed their preferences for potential changes and raised several related questions presented for full Council discussion in this paper.

On May 27, 2026, DEQ will present a rule concept document to the [RMA Rulemaking 3 Rulemaking Advisory Committee](#) to solicit feedback on two potential options for rule amendments. Those two options were drawn from the feedback of the ORSAC Materials Subcommittee, as noted above. The RAC is asked to focus on the specific details of regulatory obligations and related convenience standards for the purposes of rulemaking. DEQ will incorporate feedback from the RAC members into any potential development of rule amendments to be drafted and issued for public comment in fall 2026.

## Potential system improvements: Hub-and-spoke expansion, transportation cost reimbursement amendments

Through the Technical Workgroup and Recycling Council subcommittee meeting conversations, the Glass Packaging Institute has shared its interest in working with CAA to build out its current system of hub-and-spoke consolidation points for collected glass. Such consolidation points serve as places where both on-route and drop-off collection programs can deliver smaller loads of glass for consolidation into larger containers for more

cost-effective transport to a responsible end market. An expansion of that network has potential to reduce CAA's transportation reimbursements to service providers and local governments, in part by reducing the overall costs of transporting glass.

To help enable a transition to such a system, DEQ intends to propose amendments to OAR 340-090-0770 that would clarify that local governments and their service providers could receive transportation cost reimbursement for materials, including glass, that must be moved more than 50 miles from a recycling depot or recycling reload facility to a commingled recycling processing facility (CRPF) or a responsible end market (REM) **or a consolidation point that delivers material to a CRPF or REM at no charge to the entity delivering the material.** Emphasis added by DEQ as underline and bold for new language.

The addition of "consolidation point" would support the voluntary expansion of CAA's hub-and-spoke model of glass packaging collection. DEQ plans to bring this proposal as a rule concept to the RAC at its July meeting. The inclusion of the qualifier "at no charge to the entity delivering the material" is intended to address two discrete, but related, issues:

- The statute is designed to compensate local governments or their service providers for the transport of glass all the way to a responsible end market. If OAR 340-090-0770 is changed to limit transportation reimbursement to the nearest consolidation point, that consolidation point should provide onward transportation of the material to a REM without the generating collector incurring additional fees for downstream transport. In the absence of the proposed qualifying language, a consolidation point could charge a tip fee to pay for the next leg of transportation, thereby circumventing the design of the RMA.
- Historically, end markets for materials collected in Oregon either pay for the material or at least accept it at no charge. While commingled recycling processing facilities often charged a tip fee to accept materials, the RMA is designed to attempt to eliminate those charges through payments by the PRO to CRPFs (and competition between CRPFs). DEQ's proposed language (above) would protect communities that use consolidation points if glass (or other) end markets begin charging a tip fee to accept materials. In such a scenario, a PRO would need to cover any downstream tip fees if it wants to provide a consolidation point and limit its financial obligations for transportation by limiting compensation to the nearest consolidation point.

## **Rulemaking Advisory Committee considerations: Collection scenarios, implementation questions**

On May 27, DEQ will present a rule concept paper to the Rulemaking Advisory Committee to gather input on two collection scenarios, distilled through the conversations outlined above. The scope of that Committee is to offer DEQ input and feedback on elements of proposed rulemaking, so the discussion on May 27 is expected to be more limited and narrow than the Council discussion on May 20.

In addition to providing feedback on the two collection scenarios, DEQ is asking the RAC members to consider the effective dates for any collection requirement changes and the benefits of extending a mandate for on-route commercial glass collection beyond that currently in place for the Portland Metro region.

More information about the scenarios, including the additional questions about implementation, is available through the RAC website. DEQ welcomes feedback from the Council on the scenarios and additional questions identified for RAC discussion.

## **Local government considerations**

Local government representatives have participated in the Technical Workgroup meetings and Council subcommittee discussions. Through these conversations, a few key themes have emerged that may warrant conversation at the Recycling Council:

- Two of the larger local government entities, Metro and Lane County, have expressed interest in diversifying the responsible end markets available to accept glass packaging from Oregon.
  - Currently, one entity located in Portland serves as the REM for the vast majority of glass collected for recycling in Oregon. Small amounts of material collected from the southern part of the state go to a REM in California and a very small amount of material collected from the northeastern parts of the state travel to a REM in Idaho.
- Representatives from Metro and Lane County also expressed interest in re-evaluating environmental impacts of glass recycling, including opportunities to optimize on-route collection in some communities with changes in collection frequency (from weekly to every-other-week, or other adjustments).
- A representative from Lincoln County voiced strong concerns that higher costs borne by the local government would result in higher rates for residents, and a very likely outcome of more dumping of garbage in forest lands.

## **Additional considerations**

Several additional themes emerged from conversations in the Technical Workgroup meetings and Council subcommittee discussions:

- A representative of the Oregon Wine Growers stated that producer members are paying high fees to CAA and that in some cases, those fees exceed their Corporate Activity Tax payments. Members support efforts to maintain high levels of glass recycling while reducing costs to producers.
- The Glass Packaging Institute noted Oregon had an unusually-effective glass recycling system prior to the RMA, and that it would be happy to revert to that state, without imposing new obligations on local governments.
- Representative McLain emphasized the need to maintain convenient access to glass recycling, including on-route service.
- Metro mentioned its own Regional Service Standard, which requires that local governments provide at least bi-weekly collection of glass from households and “as needed” collection of glass from businesses. Metro expressed a desire to maintain flexibility with its Standard, and expressed concerns about the possibility of a state mandate that might lock-in on-route service requirements.
- Several parties representing waste collection and processing businesses expressed concern that if Oregon’s collection system for source segregated glass is diminished, then glass will likely increase in the commingled stream. That will increase costs and decrease revenue and market access for commingled processing facilities, and eventually drive up costs for the PRO. In an effort to reduce short-term costs to producers, DEQ needs to be careful to avoid a “backfire” situation where costs boomerang back to producers in the form of more expensive processing.
- A representative from Revino encouraged the state to build a system that supports glass recycling and the economic viability of glass as a packaging material, while also laying a framework that will facilitate a future transition to greater reuse of glass packaging.

## **Council considerations**

The Council could provide advice to DEQ and the PRO on a variety of topics related to glass including but not limited to the following:

1. Possible hub-and-spoke expansion and rule changes related to transportation compensation.
2. Issues raised in DEQ’s discussion paper for the RAC May 27 meeting, including:
  - a. Collection options;
  - b. Effective date for potential rule amendments; and

- c. Extension of on-route mandate for commercial glass collection outside of the Metro region.
3. Benefits, design, and timing of a more refined assessment of environmental impacts of different glass collection options, methods. (Note that CAA is currently undertaking a more detailed life cycle assessment comparing different possible end markets for glass.)
4. How the PRO and DEQ can actively monitor glass recycling going forward, to quickly identify if glass is moving into the commingled mix, and what kinds of changes might be considered in response.
5. How does the Council, in its advisory capacity, help ensure that near-term changes to the glass collection and recycling system don't result in long-term underinvestment or jeopardization of reuse systems.
  - a. DEQ's MIRROR program, scheduled to begin initial disbursement of funds in the start of 2027, is a complement to the recycling-based elements of RMA and incentivizes reuse as a way to reduce the environmental, human health and social impacts of the materials sold and used in Oregon.
  - b. Glass is a material with a lot of potential for reuse, and the physical act of recycling glass through crushing/reforming is in conflict with reuse of the material in a current form, so it is important for DEQ to consider this balance in its 2027 rulemaking decisions.
6. End markets for glass, and how Oregon might diversify end market options while ensuring best environmental outcomes are realized.
7. How much future time and effort the Council wants to devote to these topics, given that the environmental benefits of recycling glass are disproportionately small relative to its tonnage. For example, in its report on the state's Material Recovery Survey for calendar year 2010, DEQ found that container glass contributed 7.9 percent of the tonnage of material recycled (across all material categories), while the recycling of that glass contributed only 1.0 percent of the energy savings from all recycling.

## Contact

Oregon DEQ: Materials Management Program  
Stephanie Caldera, Rulemaking Project Manager  
[RMARulemaking3@deq.oregon.gov](mailto:RMARulemaking3@deq.oregon.gov)

## Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age, sex, religion, sexual orientation, gender identity, or marital status in the administration of its programs and activities. Visit DEQ's [Civil Rights and Environmental Justice page](#).