

October 15, 2025

Electronic Submission

Leah Feldon, Director
Department of Environmental Quality,
State of Oregon
700 NE Multnomah Street, Suite 600
Portland, OR 97232

**In re: Public Comments, Plan Amendment 2 under current review:
Responsible end markets**

Director Feldon,

The American Chemistry Council (ACC) respectfully submits the following comments on the producer responsibility organization (PRO) proposed Plan Amendment 2 to the Oregon Producer Responsibility Program Plan.

ACC and our members are deeply committed to creating a more circular economy for plastics. Increasing plastic circularity will require industry, manufacturers, brands and retailers, recyclers, waste haulers, and federal, state, and local governments, to support policies and programs to increase the supply of and demand for recycled materials.

The amendment (Appendix A, page 7) specifies that non-mechanical recyclers are not included in the program plan because the PRO does not anticipate materials being sent to non-mechanical markets. While currently accurate, ACC is concerned that without clarification, this language could send the signal that non-mechanical recycling would not be considered in the future.

ACC suggests that the current language be replaced with the following:

Non-mechanical recycling. CAA does not anticipate sending materials to non-mechanical recyclers in the current plan. Non-mechanical recycling may be considered in future plan amendments if a viable pathway is presented that meets statutory requirements.

This language would acknowledge present conditions while signaling that Oregon's program retains flexibility to incorporate future end markets necessary to achieve long-term recycling objectives. First, as an industry sector, non-mechanical recycling is growing. According to AMI, North American advanced recycling capacity is on track to grow nearly five-fold by the end of 2025 compared to 2022,

with hundreds of thousands of tons of used plastics already recycled. Second, ACC is collaborating with a diverse group of value chain members, organizations, and trade associations to increase recycling for hard-to-recycle plastics.

For example, California law requires plastic packaging to achieve a 30% minimum recycling rate by 2028, and a 65% rate by 2032. The value chain formed the Film Recycling Peer Collaborative to meet these ambitious requirements. The collaboration is guided by an all-inclusive approach to evaluating recycling, technologies, and end markets in creating an approach to increase recycling and recycled content use. The current efforts are focused on identifying and filling data gaps. This critical work will help ensure that collaborative members make decisions in a data-rich environment. Like any emerging technology, advanced recycling will take time to scale and play an important role to increase recycling and recycled content use.

Again, thank you for this opportunity to provide these comments. If you have any questions, please contact Tim Shestek, Senior Director, State Affairs, at +1 (916) 448-2581 or Tim_Shestek@AmericanChemistry.com.

Sincerely,



Adam S. Peer, ALM
Senior Director, Plastics Sustainability
American Chemistry Council



Submitted via email to the Oregon Department of Environmental Quality

October 14, 2025

RE: Circular Action Alliance's Proposed Program Plan Amendments to the Responsible End Market Verification Process for Oregon's Recycling Modernization Act

On behalf of the American Forest & Paper Association (AF&PA), thank you for the opportunity to provide feedback concerning the proposed changes to Circular Action Alliance (CAA)'s approach to verify Responsible End Markets (REM) to meet Oregon's Recycling Modernization Act REM requirements.

The American Forest & Paper Association (AF&PA) serves to advance public policies that foster economic growth, job creation and global competitiveness for a vital sector that makes the essential paper and packaging products Americans use every day. The U.S. forest products industry employs more than 925,000 people, largely in rural America, and is among the top 10 manufacturing sector employers in 44 states. Our industry accounts for approximately 4.7% of the total U.S. manufacturing GDP, manufacturing more than \$435 billion in products annually. AF&PA member companies are committed to making sustainable products for a sustainable future through the industry's decades-long initiative — [*Better Practices, Better Planet 2030*](#).

Paper Recycling Works

Paper recycling is essential to our industry's efforts to achieve important sustainability goals and build a more circular value chain. Paper is one of the most widely recycled materials in America, turning used paper into new, essential products Americans rely on. In fact, more than 2/3 of all paper recycled in the U.S. is turned into new products at mills nationwide. In 2024, we recycled around 46 million tons, translating to an overall paper recycling rate of 60%-64%.

Paper recycling is also vital to our national supply chain. AF&PA members own and operate more than 100 materials recovery facilities across the country. About 80% of U.S. paper mills use some recycled paper to make new, sustainable products. Our industry is scaling up the use of recycled paper. U.S. mills used 1.29 million more tons of recycled paper to make new products in 2024 – that's 32.7 million tons compared to 31.3 million tons in 2023.

Our industry has prioritized recycling for over 30 years, and we are committed to continued progress. AF&PA members are not just participants in the recycling system, we are helping build and improve it through voluntary industry investments that use more recycled paper, create jobs, and innovate in our U.S. manufacturing processes. During 2019-2025, our industry invested in projects at paper mills that will use over 4.5 million additional tons of recycled paper. Companies built new mills, upgraded old ones, and modernized equipment.

We are invested in the continued development of a successful, effective recycling industry. Please find below comments focused on the areas of the REM requirements that the paper and fiber-based packaging industry would like to see improved.

Comments

CAA Initial Approach for REM Verification

The initial approach for REM verification is needlessly costly and excessively bureaucratic, and directly contradicts representations made by DEQ during the legislative consideration of the Recycling Modernization Act. DEQ needs to reconsider its position to more carefully consider costs weighed against benefits of its proposed regulatory requirements. Much of the information that DEQ is proposing to collect, such as yield derived specifically from Oregon-sourced recycled material, is not readily available or compatible with current manufacturing processes. It would require significant new data collection methods that neither meaningfully contribute to the stated goals of the legislation, nor conform with the statutory language or legislative intent.

Proceeding with the current framework risks a systemic failure, creating an incentive for end markets in the pulp and paper industry to find alternative sources of recovered paper to avoid unnecessary regulatory costs. In the current challenging economic environment, these regulations should not be developed without consideration of cost and other economic impacts. We believe that it is possible to create a system that complies with the letter of the law leveraging existing certification systems with a simplified self-attestation process.

Results from Consultations with the Recycling Industry

We appreciate CAA's diligence in engaging us and other end market entities to ensure that the REM requirements meet the legislative intent and are actionable for industry. We urge the Oregon Department of Environmental Quality (DEQ) to value this feedback and support the development of REM criteria that safeguard environmental soundness and human health & dignity, while being implementable and protective of sensitive business information.

Proposed REM Amendment

We support CAA's proposed phased-in REM process. To have industry compliance, a formal REM verification standard is needed. However, more clarity is needed on the initial phase of voluntary disclosures proposed and the current self-attestation process in place

The limited number of self-attested domestic mills significantly narrows compliant sales options. This situation may affect market access and operational flexibility because relying on a single or very few buyers could concentrate market activity in a way that warrants careful oversight.

The plan should be revised to explicitly acknowledge the importance of monitoring market concentration when only a few self-attested buyers are available. It should also establish a process for ongoing review and for requesting variances or alternative compliance pathways to maintain operational flexibility and ensure fair market participation.

Additionally, the plan should be revised to allow for alternative compliance or safe harbor provisions when overseas mills refuse to self-attest despite good-faith outreach. It should formalize the use of third-party certifications or existing regulatory permits from overseas mills as substitutes for Oregon-specific self-attestation, and provide a clear process for documenting and reporting unsuccessful outreach.

REM Disclosure Overall Approach

Initial Screening Steps

The roles of the end market and the Comingled Recycling Processing Facilities (CRPF) require further refinement in this section. It is unclear whether the End Market or the CRPF need to provide proof of compliance for the self-attestation form. The differences between how materials on the Uniform Statewide Collection List (USCL) and Producer Responsibility Organization Recycling List are treated make this process complicated and convoluted. We suggest that this information only be reported to CAA and that a mechanism is created for CRPFs to confirm that the end markets they utilize have self-attested. CRPFs should not be able to obtain proprietary permit and certification information from the end markets; that is anti-competitive and unnecessary. CAA needs to clarify who this obligation lies with. To increase clarity, we suggest refining the last sentence of the first paragraph in this section.

The plan should be revised to explicitly clarify the chain of responsibility for attestations, including who completes which form at each transaction point, what documentation is required when materials pass through multiple brokers, and what to do if a broker or end market refuses to provide information due to confidentiality. The plan should also allow for aggregated or anonymized reporting where direct disclosure is not feasible, provided that sufficient transparency is maintained for regulatory compliance.

Data Review Steps

More clarity is needed on what chain of custody information from the end markets will be available to the CRPFs in the Service Provider Portal. It is imperative that certain information, such as yield, remain confidential.

REM Disclosure Steps

We appreciate the voluntary nature of this section as the REM standard development process takes place. However, it is currently lacking a process for how the verification body will protect the disclosed information from the REMs. To increase participation in this voluntary process, there should be an incentive for end markets to disclose. The Containment of Waste impact area is unnecessary; it is covered by the guidelines for the Environmental Impact Measurement impact area.

More clarity is needed on CAA Oregon forgoing the right to randomly audit if an end market cannot demonstrate REM alignment. Does CAA forgo this right only if the REM voluntarily discloses information? Additionally, more information is needed on how CAA will determine how “an entity is known to process recovered materials from Oregon.” We recommend that this be cut from this section and that CAA Oregon not publicly disclose the names of end market entities used by CRPFs at all.

Requests for Temporary Variance in REM Disclosure

We support the variances requested by CAA. In Variance #3 it is critical that any document shown to the verification body to prove that minority components are efficiently processed remain confidential.

Other Components of REMs

Random Bale Auditing

We are pleased to hear that DEQ has granted CAA Oregon a 30-month delay on the obligation to conduct random bale tracking. It is essential when this obligation commences, that battery powered tracking devices

are not used to audit paper bales. Our full comments on this are included as an appendix at the end of this comment letter.

Responsible End Market Development Guiding Principles

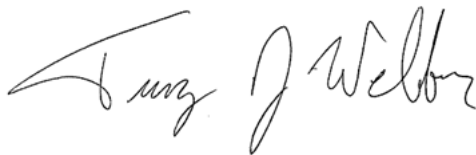
We support the “no cross-subsidization” key principle. The producer fees used to support REM development should come from the covered materials that flow through each end market. Paper fees should not support the development of other commodity end markets and vice versa.

CAA Oregon should include trade associations in its stakeholder process when considering what REM funding and infrastructure needs should be addressed. The use of these targeted funds would be more impactful with a wider industry perspective. Additionally, trade association involvement could help protect against antitrust concerns.

Conclusion

Thank you for your consideration of our comments. We appreciate the ongoing collaboration between AF&PA, OR DEQ, and CAA to advance a sustainable recycling system. We remain available to discuss the feedback herein in greater detail and look forward to your response. Please contact Shoshana Micon, Manager, Recycling and Packaging Sustainability, at shoshana_micon@afandpa.org if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry J. Webber". The signature is fluid and cursive, with the first name "Terry" and last name "Webber" clearly distinguishable.

Terry Webber

Vice President, Industry Affairs

American Forest & Paper Association



Appendix A: Random Bale Auditing Comments

August 30, 2024

Ms. Kim Holmes
Executive Director, Oregon
Circular Action Alliance
via email: kim.holmes@circularaction.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.

Safety is AF&PA's Top Priority

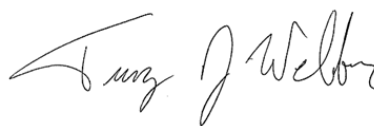
Companies that process large amounts of flammable material, such as paper facilities, need to be vigilant in managing fire safety risks and liability. Knowingly exposing those facilities, and their employees, to heightened fire risk by introducing mandated GPS trackers that would most likely use lithium 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.”ⁱ 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.”ⁱⁱ
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.”ⁱⁱⁱ
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.”^{iv}

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

ⁱ <https://www.nfpa.org/education-and-research/home-fire-safety/lithium-ion-batteries>

ⁱⁱ <https://www.portland.gov/bps/garbage-recycling/battery-recycling>

ⁱⁱⁱ <https://beavertonoregon.gov/1542/Batteries>

^{iv} <https://www.clackamas.us/recycling/batteries>

October 15, 2025

Oregon Department of Environmental Quality (DEQ)

Via email to RethinkRecycling@deq.oregon.gov

RE: CAA Oregon Program Plan, August 13, 2025 Amendment

Dear Oregon Department of Environmental Quality (DEQ) staff:

The Association of Plastic Recyclers (APR) is committed to improving plastics recycling in Oregon and supporting the effective implementation of the Plastic Pollution and Recycling Modernization Act (RMA). We appreciate the opportunity to provide written comments on the Circular Action Alliance (CAA) Oregon Program Plan Amendment submitted August 13, 2025.

[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. APR represents over 80% of the processing capacity for post-consumer plastic packaging in the US and Canada, including two Oregon-based processors (reclaimers) and 10 additional regional West Coast processors.

As the first state to implement packaging EPR in the U.S., Oregon is a leader in crafting regulations to improve recycling and materials management. The RMA is a paradigm shift in materials management that will reshape recycling for decades to come. We appreciate the extensive work of DEQ and CAA on all aspects of the RMA, and we look forward to continuing to have collaborative, constructive conversations as RMA implementation unfolds and evolves. Specific to the REM process, we want to recognize the extensive work and stakeholder engagement undertaken by CAA. The proposed amendment to the REM process is based on extensive discussions, field testing, and collaboration. It is a genuine response to significant operational challenges (financial, confidentiality, legal, etc.) with the implementation of the REM requirements, and we strongly support DEQ's adoption for the amendment in recognition of the need for more time and more discussion

to develop this first of its kind program. We provide the comments below in a collaborative spirit to modernize Oregon's recycling system, and look forward to continuing discussions with DEQ, CAA, and other stakeholders in support of this new era for Oregon.

SUPPORT FOR PROPOSED REM AMENDMENT

APR recommends DEQ approve the CAA Amendment and the proposed approach for verification of Responsible End Markets (REMs). The amendment supports the principles of REM verification established under the law while allowing the necessary time for CAA to develop and implement the REM requirements. This is a groundbreaking new program. CAA and OR DEQ have acknowledged there is no parallel program or comparable certification scheme that matches all Oregon's requirements. It is further complicated by trying to find a comprehensive solution to oversee the different types of operations of paper mills, glass plants, aluminum smelters, plastics reclaimers, and more. While this creates tremendous opportunity for Oregon to lead, it also requires time to ensure program development is done effectively. As such, it requires a phased approach with continuous stakeholder engagement, feedback, and iteration. We believe the CAA Amendment exemplifies this phased approach, and encourage DEQ to recognize the need for more time and engagement to develop a fully effective REM program.

As of October 3, 2025, seven plastics recyclers have [completed the self-attestation process](#). This is an adequate number of facilities across resin types to process Oregon's recyclable plastics at current capacities. The small size of the state, combined with its West Coast location, are significant limiting factors in why other responsible plastics recyclers across the U.S. have not pursued self-attestation. In addition, there are many responsible recyclers that object to the current REM process because it places more costs on recyclers without any similar requirements on virgin/new plastic production. Recyclers are struggling to stay cost-competitive with new/virgin plastic, and any new costs on recyclers just further push manufacturers to use cheaper virgin plastic.

While seven REMs for recyclable plastics is a strong foundation, we want to convey that there remains significant concerns around the additional auditing and verification

requirements even among the current REMs. Much work remains to be done with CAA, DEQ, and all stakeholders to refine a practical REM audit process that can be effectively implemented by plastic reclaimers and that attracts more reclaimers to pursue REM verification in Oregon. More access to responsible recycling markets will help Oregon reach higher recycling rates and provide greater resiliency for CRPFs to have more viable end markets.

KEY CONCERNS TO ADDRESS WITH REM VERIFICATION PROCESS

APR provided comments to OR DEQ that express specific concerns on the REM regulations in our letter dated January 31, 2025. There are substantial issues that remain unresolved, which are essential reasons to approve the CAA Amendment and the phased-in approach, including:

1. **The cost burden to REMs will be a disadvantage to manufacturers using more recycled plastics.** Plastics recyclers compete to sell their recycled content plastic against new virgin plastic. Under the RMA, there is no incentive or mandate for producers or manufacturers to buy recycled plastic or to buy more recycled plastic. Recycled plastic can cost more than new plastic because of the overproduction of virgin plastic and the costs to collect, sort, and process recyclables from communities. The REM process will add more costs to plastics recycling facilities without putting any cost burden on virgin plastic production facilities or landfills. This means plastic recyclers are at a further cost disadvantage compared to new plastic, and manufacturers will be further encouraged to keep buying cheaper new plastic rather than recycled plastics. DEQ's attribution study found using more recycled content has proven environmental benefits. Since the RMA is focused on improving environmental outcomes, the RMA should instead be providing incentives and other market signals that promote more recycled content and mitigate any disadvantages to recyclers that add more cost to recycled content and its ability to replace virgin plastic.

2. **REMs are also at a cost disadvantage compared to non-REMs.** In addition to competing against virgin plastic production, REMs are also competing to sell their recycled content against that produced by other recyclers. Producers commonly buy recycled plastic based on price, seeking out the lowest costs. This means non-REMs will have a market advantage in selling their recycled plastics compared to REMs because they do not have the added costs of REM certification, auditing, and compliance. This is exactly counter to the goal of the RMA to promote more responsible recycling.
3. **The REM program must build upon existing certification programs for efficiency and reduced costs.** APR is deeply concerned about the added costs to REMs of an Oregon-specific certification program. The CAA plan identifies eight certification programs that meet some or most of the REM criteria. It is imperative for DEQ to approve Variance #2 (p. 155) which recognizes the REMs that have already complied with industry-leading certification programs and allows for those REMs to submit additional documentation as needed. This is critically important to ensure REMs do not have to bear the costs of an additional full audit and certification program. Certification bodies are in the business of selling their auditing services, which may mean they push recyclers to get two full audits and two separate certification programs even though there are significant overlapping criteria. We have already seen instances where certifying bodies will charge nearly double the fees for very similar standard programs. Much more work is needed in the proposed CAA certification process to ensure the program builds upon existing industry standards and only requires REMs to document additional Oregon-specific data when appropriate.
4. **We object to the definition of the REM for food packaging and children's toys** and support CAA's Variance #4 to require verification at the reclaimer. See previous comments.
5. **REM emissions should be compared against the alternative of landfilling materials and producing new plastic.** There is a critical gap in both the CAA

verification process and the DEQ guidelines in that neither one accounts for the environmental benefits of increased recycling of more tons of plastics and other material types. Focusing only on the potential emissions from recycling facilities does not account for the reduction in energy use and emissions compared to virgin resource production. All data on environmental impacts from recycling must be compared to alternatives because those materials must be managed, and having no impact is simply not an option.

RESPONSE TO STAKEHOLDER CRITICISM TO AMENDMENT

APR is aware that some stakeholders are criticizing this amendment for “rolling back” the REM requirements. We strongly object to this criticism based on these counterarguments:

- **The self-attestation form itself is a major milestone in transparency for recycling.** REMs have not provided this level of information to any state prior to the introduction of this form. It is imperative for DEQ and all stakeholders to acknowledge self-attestation as a groundbreaking accomplishment and a critical starting point for providing transparency to local governments on how recycling is working and where plastics are being recycled.
- **REMs have stepped up and will continue to do so.** Our member REMs—plastics reclaimers that have completed the self-attestation forms—have all incurred time and expense to collect data and report in order to affirm as REMs. In particular, Denton Plastics, one of APR’s members, deserves special recognition as the only market of any type willing to undergo the REM field testing (and congratulations for passing the full audit). This shows the willingness of recyclers to engage with DEQ and CAA in this process. To be clear, we are not asking to cease all regulations—APR members support responsible processing and have been committed partners to Oregon programs for decades. We support a phased approach that incorporates stakeholder input to refine and iterate this first of its kind program.

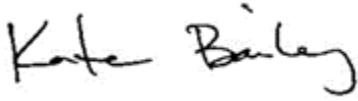
- **Concerns are shared by all materials markets and CRPFs, demonstrating fundamental challenges.** All material types—paper, metal, glass, and plastics—have expressed significant concerns about REM audits and the verification process. CRPFs have also expressed concerns about the impacts to their operations from the REM requirements. The extent of the concerns across all recycling markets and CRPFs speaks to the complexity of the REM verification regulations and the need to approve the amendment to provide more time for CAA, materials markets, and DEQ to refine the REM program.
- **There has been a substantial decline in plastic exports.** Exports of plastic bales have [declined from ~30% to less than 7% today](#). US and Canadian recyclers added more processing capacity in response to China's National Sword policy. Cleaner bales are more sought after by US and Canadian plastics reclaimers and less likely to be exported. The RMA includes groundbreaking new CRPF performance standards that will improve sorting capacity, improve bale quality, and reduce contamination. But it will take time for CRPFs to invest in new sorting equipment and for new education programs to reduce contamination from residents. A phased approach reflects the need for RMA funding and programs to take full effect to ensure CRPF bales meet the quality specifications of US and Canadian recyclers.

MOVING FORWARD

APR remains committed to work with DEQ, CAA, and stakeholders to refine a practical, effective verification program for REMs. We will also continue to advocate for more investments, incentives, mandates, and other commitments to encourage and buy postconsumer recycled plastics from REMs. Successful implementation of the RMA depends on greater use of recycled plastics in manufacturing new products.

Our staff and members are available at your convenience to discuss these comments, share further information, and collaboratively craft solutions for the effective implementation of the RMA. Please contact Kate Bailey, Chief Policy Officer, at katebailey@plasticsrecycling.org.

Sincerely,



Kate Bailey, Chief Policy Officer, Association of Plastic Recyclers (APR)

October 15th, 2025

To: Oregon Department of Environmental Quality

Re: Comments on Circular Action Alliance (CAA) Responsible End Market Program Plan Amendment

Dear DEQ Staff and Recycling Council Members,

Thank you for the opportunity to provide feedback on the latest amendment from Circular Action Alliance (CAA) on the implementation of Oregon's Plastic Pollution and Recycling Modernization Act (PPRMA). We appreciate the extensive outreach to Responsible End Markets (REMs) and recognize the significant time and effort DEQ staff and CAA have invested in developing this plan.

While we understand that Oregon is a relatively small player in the global recycling system, we also recognize that Oregon has long been a leader in environmental innovation. Other states are watching our progress closely as they shape their own extended producer responsibility (EPR) programs. We believe this amendment, as currently proposed, gives away too much too soon and risks weakening the very standards that positioned Oregon as a national model.

Upholding Oregon's Leadership

Oregon's *Responsible End Market* (REM) requirement is a trailblazing component of the legislation and also one of the most important provisions of the PPRMA. This standard has helped uphold public trust by ensuring that recycling collected here does not contribute to global plastic pollution. Weakening these standards, especially through voluntary compliance and reduced criteria, could jeopardize that trust and diminish Oregon's ability to lead by example.

As we look to Europe and other jurisdictions implementing EPR, it's important to recognize that their systems are more rigorous in some areas and less in others. Their evolving frameworks will go before ours, offering valuable lessons. When entering negotiations, one never begins at the bottom line—one starts higher to leave room for compromise. By scaling back key provisions prematurely, we are surrendering our leverage and reducing Oregon's influence in shaping national consistency and accountability.

Areas of Concern and Recommendations

1. Criteria Reduction

The amendment proposes reducing the number of criteria from 21 to 11. While streamlining can sometimes be beneficial, this particular reduction eliminates essential environmental performance measures and yield metrics that are vital to ensuring transparency and accountability. Without measurable outcomes, we cannot determine whether the system is meeting the intent of the Act.

We respectfully request that DEQ and CAA reinstate the six final requirements that were removed. We are willing to concede the first three dropped items, as they are less closely tied to statutory intent, but believe the remaining six are fundamental to achieving Oregon's goals.

2. Voluntary Reporting and Compliance

The shift from required to "voluntary" reporting and disclosure throughout the plan is deeply concerning. Accountability must be a requirement, not an option. Voluntary participation risks undermining progress, delaying adoption, and eroding the integrity of the system. We ask that DEQ clearly define in rule when and how voluntary provisions will transition to mandatory compliance and that this timeline be aligned with both California's and Europe's implementation schedules.

3. Verification and Transparency

The initial plan identified the Responsible Materials Standard (RMS) and GreenBlue as third-party verification partners—systems already vetted and aligned with international best practices. The amendment now proposes developing a new verification framework based on ANSI accreditation. While ANSI offers structure, it does not guarantee transparency, independence, or performance.

We recommend retaining RMS as the foundation for third-party verification and urge DEQ to require random, unannounced site visits and bale tracking by a DEQ-monitored contractor. This level of verification is essential to maintaining confidence in Oregon's system and preventing the recurrence of issues similar to those experienced during the 2017 China National Sword crisis. Once there are several states with similar verification requirements, it would stand that the review requirements could be aligned so that the states are not reinventing the wheel and are not overly burdening processors. Until that time, we need to have assurances that the materials are being managed as reported.

4. Harmonization and Market Alignment

We recognize and appreciate CAA's efforts to build relationships with end markets and improve reporting practices. However, harmonization with national and international best practices is essential. Aligning Oregon's standards and rollout timeline with California and Europe will ease future transitions, create continuity, and allow Oregon to remain competitive and relevant in the global recycling market.

Oregon's Role and the Path Forward

The purpose of the PPRMA is clear—to make recycling easier, more consistent, and more effective while holding producers accountable for their packaging and paper waste. Oregon's leadership helped spark a national movement toward extended producer responsibility. Weakening our standards now risks undermining years of progress.

We encourage DEQ and CAA to take a measured approach:

- Reinstatement of the last six dropped requirements essential to system integrity.
- Define a clear timeline to transition from voluntary to mandatory reporting.
- Retain the RMS framework for verification.
- Align Oregon's rollout with emerging standards in California and Europe.
- Strengthen local economic benefits through investment in domestic end markets.

These actions will ensure that Oregon continues to set the standard for responsible recycling, maintain public trust, and build a resilient circular economy that supports both environmental and economic development goals.

Closing

We are grateful for DEQ's leadership and the collaboration that has characterized this process. We share the common goal of a transparent, effective, and equitable recycling system that benefits Oregon residents and businesses alike. However, we urge caution in moving too quickly to relax standards that are central to the success of this Act.

Thank you for your time, your dedication, and your ongoing commitment to making Oregon a model for circular systems nationwide.

Sincerely,

Sonya Carlson, Executive Director, BRING

Taylor Cass Talbott, Co-Director, Ground Score Association

Celeste Meiffren-Swango, State Director, Environment Oregon



October 15, 2025

Leah Feldon
Director
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232
Delivered via email: rethink.recycling@deq.oregon.gov

RE: Circular Action Alliance Proposed Program Plan Amendment #2: Responsible End Markets

Dear Director Feldon,

Consumer Brands Association (“Consumer Brands”) is appreciative of the opportunity to submit comments regarding Circular Action Alliance’s (CAA) proposal to amend the program plan, specifically regarding the “Ensuring Responsible End Markets” subsection of the plan. We are committed to supporting a comprehensive process for responsible end market (REM) verification that ensures all recycling technologies are available for consideration in the responsible end market verification process. Consumer Brands welcomes and appreciates Oregon DEQ’s continued stakeholder engagement throughout the program plan review process.

Consumer Brands champions the industry whose products Americans depend on every day, representing more than 2,000 iconic brands. From household and personal care products to food and beverage products, the consumer-packaged goods (“CPG”) industry plays a vital role in powering Oregon’s economy, contributing \$31.7 billion to Oregon’s GDP and supporting more than 324 thousand Oregon jobs. The CPG industry also plays a crucial role in creating a more sustainable future through its products and has prioritized packaging and recycling innovation. All of the 25 largest CPG companies in the United States have made commitments to increasing recyclable content, source reduction, or reuse of material. Eighty percent of those companies are working toward introducing fully recyclable packaging for all of their products by 2030 at the latest.

Consumer Brands appreciates CAA’s efforts to develop a process for REM verification that involves substantial industry involvement, reduces or eliminates overburdensome and often duplicative practices in the verification process, and is aligned with existing recycling and manufacturing processes. However, we have significant concerns regarding the proposed amendments to the REM verification subsection of CAA’s program plan, specifically regarding how the REM verification process handles non-mechanical recycling technologies.

In the amended program plan, a newly added section - Appendix A - outlines how each element of the Oregon rulemaking pertaining to REMs is addressed in CAA’s proposed approach to REM verification. In Appendix A, CAA states, “all entities are accounted for in CAA program plan amendment with the exception of: [...] Non-mechanical recyclers, as CAA doesn’t anticipate materials will be sent to non-mechanical recyclers.” Consumer Brands find this language

particularly concerning, as Oregon's law requires covered materials to be recycled or processed at REMs to count as recycling. Therefore, by not including non-mechanical recyclers in CAA's proposed REMs verification process, CAA is, in essence, putting a de facto ban on these innovative recycling technologies in Oregon. Furthermore, in Appendix B of the proposed amendments to the program plan, CAA indicates their expectation of using the REM verification process developed in Oregon, in California, Colorado, and any future states with REM requirements in their packaging EPR law. Therefore, not only does CAA indicate that non-mechanical recycling facilities won't qualify as REMs under the verification process in Oregon, but it also means that non-mechanical recyclers won't qualify as REMs in Colorado, California, and future states with packaging EPR.

Non-mechanical or molecular recycling is a critical component of plastic packaging circularity, recovering it as a raw material at scale, which can be utilized in high-quality plastic packaging that adheres to strict quality regulations for direct food contact and medical applications. Further, mechanical recycling can effectively sort some plastic polymers, such as HDPE and PET, but is less suited to address other categories of plastic waste. Non-mechanical or molecular recycling technologies should complement mechanical recycling processes by providing a sustainable end of life for a variety of difficult-to-recycle plastic materials, including low-density plastics such as films and flexibles. These technologies will be critical to meeting Oregon's recovery and recycling goals, particularly for hard-to-recycle materials.

Consumer Brands recommends that CAA take a technology-neutral approach to REMs and include considerations for non-mechanical recycling facilities in their REM verification process. This is critical to ensure the overall success of Oregon and other states' packaging EPR programs in achieving circularity, supporting innovation, and developing new recycling systems to reduce plastic pollution.

Thank you for the opportunity to comment on CAA's proposed second amendment to the program plan, specifically regarding the "Ensuring Responsible End Markets" subsection of the plan. Please do not hesitate to contact me if you have any questions regarding this request. I can be reached at eraden@consumerbrandsassociation.org.

Sincerely,

A handwritten signature in blue ink that reads "Erin Raden".

Erin Raden
Senior Director of State Affairs
Consumer Brands Association

October 13, 2025

Oregon Department of Environmental Quality (DEQ)

Via email to RethinkRecycling@deq.oregon.gov

RE: Proposed Producer Responsibility Organization Plan (Amended)

Dear Oregon DEQ staff:

My name is Nicole Janssen and I am President of Denton Plastics in Portland, OR. We are a family-owned recycling business that has spent more than 40 years pioneering plastics recycling into custom blends that are pelletized or pulverized for reuse by local companies. Denton is a self-attested Responsible End Market (REM) and a member of the Oregon Recycling System Advisory Council (ORSAC). I have a long history of engaging with Metro and DEQ on working group calls, as well as serving on the Governor's Advisory 2023 "Truth in Labeling" committee.

Denton Plastics added a wash line to our operations two years ago to expand into residential post-consumer plastics that we formulate into post-consumer recycled (PCR) resin. We are currently under the State's water permit management system for our wash line. In addition, we are PCR-certified for our post-consumer resins. We have a Quality Management system, material traceability procedures and we currently report annually to DEQ on our post-consumer recycling numbers.

In short, we are a responsible, local market for Oregon's discarded plastics packaging, the same type of market these regulations should be prioritizing. In these capacities and in consideration of Denton's commitment to the successful implementation of the Recycling Modernization Act (RMA), we support the CAA Proposed Amendment submitted August 13, 2025.

REMs like Denton are stepping up and incurring costs, but we need more time and flexibility to build out this new system

Denton was the only recycling facility across all materials—paper, metal, glass, and plastic—to participate in the pilot audit and field testing for the REM process. It was pretty intense and required a lot of effort, time, and money. The pilot audit uncovered many challenges. This is why we took the time to participate in the audit—so we could figure out what does or does not work. We are proud to have passed the audit, but we still have many concerns about the process.

The pilot showed that even though we're really trying to make this work, there are still tons of details and questions just for our facility. REMs are ready to step up, but we need to nail down the specifics of what REMs need to do, where we can find reasonable efficiencies, and how we keep costs in check. That's why I'm asking you to accept the CAA amendment that focuses first on getting rid of the "bad actors" and then building out the appropriate REM process.

It is critical to work with other certification programs.

We are deeply concerned that the REM program will impose multiple, overlapping certification programs on recyclers, significantly increasing costs. Denton already holds APR PCR certification, which verifies that our materials originate from postconsumer plastics. Many of the Oregon REM requirements are already covered by this existing certification.

We strongly advocate against undergoing another full audit or paying a complete certification fee to a new agency. If there are additional REM requirements specific to Oregon, we believe we should only be required to certify for those incremental criteria. These audits represent a substantial financial burden and demand considerable staff time, posing a significant challenge for local recyclers.

We need more time to work through all these details with CAA, ORSAC, DEQ, and all stakeholders.

The best way to support responsible recycling is to drive manufacturers to buy more recycled content from REMs

The Oregon law requires CRPFs to only send their recyclables to REMs for processing. This affects the materials coming into Denton's facility. But then we sell the recycled content made at our facility to producers and manufacturers to make new products with recycled plastic instead of using new/virgin plastic. These companies have no requirements or even incentives to buy recycled content from REMs. This is a key missing piece from the Oregon law. We are doing the hard work to be a REM but it is adding burden and cost without any gains. This makes it harder, not easier, for us to compete against other sources of recycled plastics. There seems to be no incentive in creating greater demand with the proposed regulation, meaning there is nothing that helps us to better sell our product and outcompete non-REMs.

What we need to help local recyclers become successful with this new legislation coming into effect next year is greater demand for buying PCR content, remove the requirement to disclose our confidential buyer information, and a simplified, more streamlined process to

support and prioritize local responsible recyclers rather than lumping us in with the bad actors. That is how we will also help complete the circle of sustainable materials to be attainable long into the future of Oregon's recycling programs.

I hope to continue the dialogue as your responsible local partner.

Sincerely,

Nicole Janssen

Nicole Janssen, President
Denton Plastics

Oregon Department of Environmental Quality

Materials Management Program

700 NE Multnomah Street, Suite 600

Portland, OR 97232

Support for the Circular Action Alliance (CAA) Amendment on Responsible End Markets

Dear DEQ Team,

At EFS-plastics we express strong support for the Circular Action Alliance (CAA) amendment related to the implementation of Oregon's *Responsible End Market (REM)* requirements under the Recycling Modernization Act.

The proposed amendment represents a balanced and pragmatic approach to achieving Oregon's goals of transparency, accountability, and environmental integrity within the recycling system. It appropriately acknowledges both the intent of the law and the operational realities of recycling markets.

The introduction of the self-attestation form marks a major milestone in transparency for recycling. This form goes far beyond what has been provided to any other state to date, offering unprecedented visibility into material flows and downstream market destinations. It is critical that DEQ recognizes the form itself as a strong and sufficient starting point for verifying responsible end markets.

By requiring facilities to document specific downstream markets, the form directly supports DEQ's objective of giving local governments and stakeholders confidence that recyclable materials are being handled responsibly. This framework lays the groundwork for continuous improvement, data integrity, and shared accountability between processors, PROs, and regulators.

While the intent of the REM framework is commendable, the implementation requirements create several practical challenges that the CAA amendment wisely seeks to address. These include:

- **Administrative and cost burden:** Developing, maintaining, and submitting detailed end-market documentation requires significant staff time and financial resources. Smaller facilities or those managing diverse outbound streams face particularly steep costs associated with tracking, verification, and compliance documentation.
- **Reporting complexity:** Many downstream markets are located outside Oregon, and in some cases outside the U.S., where verification standards differ or are not yet established. Requiring multiple layers of attestations or audits could make compliance infeasible and discourage participation in Oregon's recycling system.

The CAA amendment strikes a necessary balance by setting a clear initial expectations, through the self-attestation form, while providing flexibility to refine verification methods over time as consistent national frameworks emerge.

The CAA amendment ensures that Oregon remains a leader in responsible recycling policy while maintaining a workable and scalable system for the organizations responsible for implementation. Approving this amendment would reinforce the shared commitment to transparency and continuous improvement without imposing disproportionate costs and administrative burden on the very facilities enabling recycling in Oregon.

EFS-plastics Inc. respectfully urge DEQ to approve the CAA amendment and to recognize the self-attestation process as a strong, credible, and meaningful first step in advancing Oregon's Responsible End Market objectives.

Thank you for your consideration and for the Department's continued leadership in sustainable materials management.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hendrik Dullinger', is positioned above the printed name.

Hendrik Dullinger
Vice President Business Development
EFS-plastics Inc.

October 14, 2025

Electronic Submission

Leah Feldon, Director
Department of Environmental Quality

State of Oregon
700 NE Multnomah Street, Suite 600
Portland, OR 97232

In re: Public Comments, Plan Amendment 2

Freepoint Eco-Systems Holdings LLC (“Eco-Systems”) appreciates the opportunity to comment on Circular Action Alliance Oregon, LLC’s (“CAA”) August 13, 2025 Producer Responsibility Organization Program Plan Amendment #2 (“Amended Plan”). Eco-Systems’ mission is to address the global waste plastic problem through advanced technology that will help create a more waste-free, circular economy. Eco-Systems supports the goals of Oregon’s Plastic Pollution and Recycling Modernization Act (the “Act”) and appreciates the Oregon Department of Environmental Quality’s (“DEQ”) engagement regarding CAA’s Amended Plan.

Eco-Systems develops, constructs, owns and operates facilities in the United States and Europe that use “best-in-class” proven pyrolysis recycling technology to recycle a wide variety of types of plastic—many of which are not currently recycled through standard mechanical recycling methods—into liquid hydrocarbons that can be used to make new plastic and other products. Pyrolysis not only enables higher recycling rates through processing of hard-to-recycle plastic, such as flexible films, but it also produces a hydrocarbon feedstock that has a significantly lower carbon intensity than feedstocks created from fossil resources, while diverting waste from landfills and dramatically reducing the emissions created by incineration. Consistent with Eco-Systems’ mission,

our technology complements mechanical recycling and greatly expands the types of plastic waste that can be responsibly recycled.

While Eco-Systems does not yet operate a facility in Oregon, it is actively working to deploy its technology across the United States. Moreover, as the leading state in implementing comprehensive extended producer responsibility law, Oregon has a unique opportunity to set the precedent that new technologies should be deployed to increase waste plastic recovery across a broader range of covered materials. That leadership role makes it all the more important that the Amended Plan include non-mechanical recycling.

I. The Amended Plan Should Include Non-Mechanical Recycling Technologies

Eco-Systems supports CAA's objectives and its general approach to implementation of the Act. Eco-Systems, however, is concerned that the Amended Plan may hinder the deployment of new recycling technologies. Specifically, in the Appendix A table to the Amended Plan, CAA states that "Non-mechanical recyclers" are not included in the Amended Plan "as CAA doesn't anticipate materials will be sent to non-mechanical recyclers." Amended Plan p. 7. Eco-Systems respectfully disagrees with CAA's proposal to exclude non-mechanical recyclers based on assumptions about current material pathways. Advanced recycling is being deployed at an increasing rate in many different states across the United States. Currently, waste plastic could be collected in Oregon and exported to states with advanced recycling facilities. Regardless of the presence or lack thereof of advanced recycling facilities within Oregon, it is still important to include these technologies in the Amended Plan for several key reasons.

First, the Act and DEQ's implementing regulations both expressly establish pathways for incorporating non-mechanical recycling for plastics, making clear that the rule is technology-neutral. *See, e.g.*, ORS § 459A.875(2)(a)(I); Or. Admin. Code § 340-090-0670(1)(d), (2)(a)(E). Retaining non-mechanical recycling in the Amended Plan will ensure it remains technology neutral and aligns with the Act's intent to create a pathway for new technologies.

Second, even if non-mechanical recycling is not yet being used to process Oregon materials, it is far more practical to include these technologies in the Amended Plan now than to leave them out and later require companies to initiate a separate advocacy effort to revise the program to include them. Delaying inclusion could also discourage early engagement from recyclers evaluating the Oregon market. An inclusive approach now, on the other hand, will streamline administration and signal that CAA welcomes a range of recycling solutions as the program evolves.

Third, recycling facilities (mechanical or non-mechanical) are capital-intensive, multi-year undertakings whose financing relies on predictable policies. Investors are less likely to commit the substantial capital needed to develop modern recycling facilities if it is unclear whether the technology will be accepted by CAA. Removing non-mechanical recycling from the Amended Plan thereby creates uncertainty that could hinder the deployment of new recycling technologies. By explicitly keeping the non-mechanical pathway open within the Amended Plan today, even if near-term use is limited, CAA can help provide developers and investors with confidence to explore projects in the Oregon region.

II. Eco-Systems Supports the Plan's Inclusion of Mass Balance

While not addressed in the current Amendments, Eco-Systems wishes to express its support for the Amended Plan's inclusion of ISO 22095 chain-of-custody models, including the mass balance (rolling-average percentage) model, due to its relevance to non-mechanical recycling. These models are appropriate and widely accepted tools for ensuring credible allocation of recycled content. The inclusion of mass balance is important for continuous recycling processes, including those used in non-mechanical recycling where direct material tracing is not always feasible. By providing program participants with a choice to use these accounting models, the Amended Plan supports a more technology-neutral framework.

III. Conclusion

Eco-Systems supports the goals of Oregon's extended producer responsibility framework and appreciates the thoughtful work of both CAA and DEQ in developing a program that increases recycling rates and improves the environment. We encourage CAA to revise the Amended Plan to state clearly that non-mechanical recycling technologies are included within its scope. Doing so would better align with the Act and ensure the Amended Plan remains forward looking and provides confidence to developers of advanced recycling technology. Moreover, Eco-Systems commends the Amended Plan's incorporation of ISO 22095 chain-of-custody models, including mass balance, which will help ensure participation across a diverse range of recycling technologies. Eco-Systems welcomes the opportunity to contribute to Oregon's efforts to expand recycling infrastructure and stands ready to work with stakeholders to support a more circular economy.

Sincerely,

Mark Worden

Mark Worden
General Counsel
Freepoint Eco-Systems Holdings LLC



KW Plastics Recycling Division

279 Pike County Lake Road, Troy, AL 36079 • P.O. Drawer 707, Troy, AL 36081

October 7, 2025

Nicloe Portley

Pro Program Plan Lead

Department of Environmental Quality Portland Administration Office

700 NE Multnomah Street, Suite 600

Portland, Oregon 97232-4100

Dear Ms. Portley,

I am writing to you today to express my strong support for CAA's proposed amendments to your Responsible End Market requirements. As the largest recycler of HDPE and PP in North America, we find Oregon's requirements to disclose end markets will force KW to violate many of our long-term existing supply contracts that are covered by NDA's. Since Oregon generated material is only a small amount of the total volume we purchase, KW would forgo participating in Oregon's material if forced to reveal sensitive confidential customer information. We also find Oregon's reporting requirements to be onerous, costly and not practical as we process a blend of materials from many states and locations.

North American plastic recyclers are regulated by local and state laws that adequately protect the natural environment. Adding additional reporting requirements will greatly disadvantage recyclers as our competitors in the virgin resin space face no such requirement.

KW looks forward to working with Oregon DEQ to achieve its goals of increasing the recycling rate and reducing plastic litter.

Many Regards,

J. Scott Saunders, GM
KW Plastics



October 15, 2025

Nicole Portley

Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

RE: CAA Responsible End Market Amendment

Dear Nicole,

On behalf of Lane County and the City of Eugene, thank you for the opportunity to comment on the Circular Action Alliance (CAA) Producer Responsibility Organization (PRO) Responsible End Market (REM) program plan amendment under the Recycling Modernization Act (RMA). We appreciate the leadership of DEQ staff in advancing this legislation and recognize the effort CAA has invested in developing its program plan.

As local governments, we hear from residents who are unsure whether recycling is making a difference. Public trust has been eroded by reports of plastics dumped, burned, or mismanaged overseas. The RMA was built on the promise of rebuilding trust by ensuring materials are being sent to facilities that are transparent and environmentally sound. The timing of REM implementation aligns with global and regional legislation with similar requirements on markets. To preserve public trust and maintain Oregon's leadership, we must enforce strong standards for transparency, environmental and human health, and recycling yield. This is the only way to ensure our recycling system no longer contributes to plastic pollution.

To maintain public trust and uphold the statutory integrity of REM standards, we encourage DEQ to establish a regulatory framework with CAA that relies on direct audits and verification rather than voluntary self-attestations. We support unannounced onsite audits and GPS tracking to ensure transparency, accountability, and environmental soundness.

We respectfully offer the following recommendations:

Harmonization

- Align REM standards and timelines with California and Washington and coordinate with states (CO, ME, MN, MD) passing EPR laws. Harmonization is needed, and Oregon, and soon to be California's REM standard can be used as a template for assuring materials are in fact recycled.

- Align Oregon REM's standards with global best practices, including the European Waste Shipment Regulations. Large producers are preparing for impending European Union requirements on materials exported for recycling.

Verification and Compliance

- Ensure verification system that tracks facilities and reports noncompliance.
- Develop a robust third-party verification system (e.g., GreenBlue) that aligns with DEQ's REM criteria: legal compliance, transparent, environmentally sound, with yield rate documentation.
- Create a certification and verification standard that guarantees transparency and performance of the system.

REM Criteria

- Ensure REM criteria include environmental and yield rate metrics, necessary for evaluating the new system.

Timeline

- Delay REM requirements to allow for end markets and brokers to adjust to new standards and obligations.
- Establish a clear roadmap for REM third-party verification by 2030, with end market participation in establishing a certification body.

Clarification on Voluntary Disclosure

- Define "voluntary reporting and disclosure," including timelines and a transition to mandatory reporting. Temporarily allow voluntary reporting only for material categories with a clear chain of custody.
- Require mandatory reporting—and reject voluntary disclosure or desktop audits as substitutes for direct audits and verification—for material categories with identified risks or unclear export markets.

Thank you again for your leadership and for the opportunity to provide input on this critical component of Oregon's recycling modernization efforts. We look forward to continued collaboration to ensure the success and integrity of this program.

Sincerely,

Angie Marzano, Waste Reduction Program Manager, Lane County

Donny Addison, AIC Waste Prevention Program Manager, City of Eugene

October 14, 2025

Oregon DEQ, Nicole Portley
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232-4100

Re: CAA program plan amendment: responsible end markets (REM)

Dear Nicole,

Thank you for the opportunity to submit comment on the Circular Action Alliance (CAA) Producer Responsibility Organization (PRO) responsible end market program plan amendment related to the implementation of the Plastic Pollution and Recycling Modernization Act (PPRMA). We are grateful to DEQ staff and Recycling Council members for their tireless work in moving the PPRMA through its implementation phases, upholding our commitment to legislators. We also recognize the significant effort that CAA has committed to designing and refining its extensive program plan.

We are often asked by the public if recycling is worth the effort, as they see headlines about materials ending up in landfills, oceans and waterways. Their concerns are valid. We face a real plastic pollution problem, here in Oregon and worldwide. Extended producer responsibility for packaging and paper is expanding across the U.S. and Asia, while Europe and Canada are moving toward increasingly rigorous standards for responsible end markets. Oregon was the first state in the nation to adopt a responsible end market requirement, and other states are watching closely. To maintain public trust and ensure Oregon continues to lead, it is essential that our system upholds meaningful standards of transparency, environmental soundness, health and safety, and recycling yield. Only then can we have confidence that our recycling is no longer contributing to plastic pollution.

System integrity

The purpose of the PPRMA is to make recycling easier and more consistent, expand access to recycling services, upgrade recycling infrastructure, and reduce plastic pollution and waste by holding producers accountable for the packaging and paper they introduce into the market.

Of these purposes, preventing plastic leakage from the waste system is central. All other elements of PPRMA are designed to support a recycling system that manages materials responsibly and prevents pollution throughout the process. The voluntary nature of the

proposed amendment is concerning, as accountability must be a requirement—not an option—to ensure the system functions as intended for the long-term. After all, the goal is to encourage manufacturers to redesign their packaging, not redesign the rules to fit their current packaging into the bin.

The PRO program plan includes a \$731.5 million investment, yet only \$2.5 million is allocated towards REM Development and Verification, compared to \$22 million for education and marketing. Given that REM verification underpins the integrity of the entire system, we urge CAA to re-examine these cost allocations and direct additional resources toward REM development and verification.

Harmonization

We recognize Oregon's relatively small footprint in national and global recycling industry. We also appreciate CAA's efforts to build trust with end markets and brokers to improve reporting and disclosure practices.

As EPR expands, this is a critical moment to align with international best practices, such as the European Waste Shipment Regulation. Harmonizing standards now will ease adoption and create continuity here in Oregon, California, Washington and other states adopting packaging and paper EPR. Large end markets are preparing to meet European standards, and they can help us lead the way to streamline this across the U.S. We respectfully request DEQ and CAA to align the rollout timeline with California and Europe's.

Local economic development

The PRO is investing in Oregon's recycling processing facilities to produce clean, marketable materials. Meanwhile countries such as Thailand, Malaysia and Vietnam are restricting plastic imports. This is an opportunity to strengthen local and domestic end markets. As the only producer responsibility organization for packaging in the U.S., CAA is uniquely positioned to catalyze domestic economic development, support good jobs and promote public health and safety.

We request that CAA outline where it will invest in end markets—both domestic and global—and how those investments will support economic development in Oregon.

Criteria

CAA's program plan amendment would reduce the number of responsible end market criteria from 21 to 11, eliminating key environmental standards and recycling yield metrics. This undermines the intent of the Act. Without performance metrics, we cannot demonstrate whether the system is achieving its purpose.

We are concerned that this change would allow new materials to be added to the state-wide acceptance list without ensuring that vetted, responsible end markets are available. This could risk repeating the challenges of the 2017 China National Sword crisis, when unmarketable materials destabilized recycling programs nationwide. While developing end markets takes time and effort, the PRO is making significant investments in recycling infrastructure and contamination reduction programs precisely to ensure that collected materials remain marketable and sustainable over the long term.

We ask DEQ, CAA and the Responsible End Market sub-committee to explore a pathway to onboard markets to the original set of criteria and yield.

Verification

To ensure that Oregon recycling has responsible end markets as specified in statute, we advocate for random, unannounced onsite verification and random bale tracking through a DEQ monitored third-party contractor to inspect our downstream recycling imports or exports final disposition for independent confirmation. The verification process should document where materials are sent, how they are managed, and confirm that their stated destinations and uses are accurate.

The approved program plan identified GreenBlue as the third-party certification partner. The amendment now proposes developing a new verification organization using ANSI-accredited standards. While ANSI provides a framework, it does not guarantee transparency or performance.

The Responsible Materials Standard (RMS), which was included in the approved plan, remains the best aligned and most credible third-party verification system. It has already been vetted, covers key certification criteria, and is gaining adoption in Europe. We strongly recommend retaining RMS for verification and request DEQ to evaluate REM verification options and outline best practices for CAA to follow.

Clarification of voluntary disclosure

The amendment changes from required reporting to “voluntary” disclosure and reporting throughout. This shift risks delaying progress and undermining accountability. We request CAA define how “voluntary” reporting and disclosure would be applied, the expected timelines for adoption, and when reporting will transition to a requirement. Since this may be beyond the two-year program plan, we request DEQ define in rule this transition as well.

We understand the strategy to introduce the markets to the REM standards and align with California and Europe timelines. If this is a shift, we ask that DEQ define in rule when it will transition from voluntary to requirement.

Thank you for the opportunity to provide input on the responsible end market program plan amendment. Local governments remain committed to working with CAA and DEQ to ensure that the Act achieves its intended outcomes: reducing plastic pollution, strengthening public trust in recycling and building resilient recycling markets.

Sincerely,

Local governments

- Thomas Egleston, Policy and Program Development Manager, Metro
- Scott Keller, Senior Program Manager, Sustainability & Recycling, City of Beaverton
- Shannon Martin, Solid Waste & Sustainability Manager, City of Gresham
- Andrew Bartlett, Program & Support Manager, City of Hillsboro
- Amanda Watson, Sustainability Program Manager, City of Lake Oswego
- Eben Polk, Solid Waste & Recycling Manager, City of Portland
- Pete Chism-Winfield, Sustainable Materials and Waste Policy Manager, City of Portland
- Ryan Largura, Environmental Specialist, City of Troutdale
- Rick Winterhalter, Solid Waste & Recycling Manager, Clackamas County
- Susan Baker, Diversion & Franchise Services Manager, Deschutes County
- Heidi Konopnicki, Solid Waste & Recycling Program Specialist, Multnomah County
- Rusty Davis, Solid Waste & Recycling Manager, Washington County



October 15, 2025

Oregon Department of Environmental Quality

RE: Circular Action Alliance's Responsible end Market Plan Amendment Submission

The National Association of Electrical Distributors (NAED) is a nationwide trade association for the \$150+ billion electrical distribution industry which represents more than 600 distributors and manufacturers of electrical products with more than 5,000 locations in all 50 states. Our members are companies of all sizes - from small and mid-sized independents to large regional and national firms.

NAED warehouse and distribution members are a critical piece of the electrical equipment supply chain, linking manufacturers to electrical contractors, who are the end users of the equipment we supply.

NAED and our members are increasingly concerned about the proliferation of Extended Producer Responsibility (EPR) laws in various states. EPR laws are meant to encourage a "circular economy" to reduce environmental impact of packaging and paper for various consumer goods. The underlying framework for these EPRs is to hold the producer responsible for the lifecycle impact of these packaging materials.

While these efforts are laudable, implementation is being rushed, leaving many of our members with more questions than answers.

Oregon's effort requires the creation of a Producer Responsibility Organization (PRO)—a non-governmental entity charged with administering the program. This PRO-led model raises several concerns for our members:

First, electrical warehouse and distribution companies are misclassified as "producers". Distributors typically operate warehouses, manage inventory, and consolidate shipments, often across state lines. Legal experts caution that these activities are construed as "production," even though distributors do not manufacture goods.

Second, in Oregon, and other states, questions remain about the power of PROs to administer state-mandated programs without direct state oversight. For example, Oregon's designation of the Circular Action Alliance (CAA)—a private nonprofit—as its PRO requires registration, and the imposition of reporting obligations.

As the Department is aware, the Oregon model grants CAA with broad authority to impose mandatory fees using a confidential methodology with no transparency, public oversight, or judicial review. There is no formal process for producers to appeal or challenge fee assessments, adjustments or categorizations, and are limited to binding arbitration as the only recourse after CAA's internal remedies have been exhausted, raising significant due process concerns.

Third, the complexity around compliance, even the most sophisticated businesses, creates confusion. For our smaller businesses, compliance and the threat of fees may be so burdensome that companies may have to decide whether to continue operating in the state, or recoup costs by raising prices.





NATIONAL ASSOCIATION OF ELECTRICAL DISTRIBUTORS (NAED)

Finally, we note the existence of a pending lawsuit in Oregon, challenging state and federal constitutional issues. Therefore, the Department of Environmental Quality should postpone implementation until the court has ruled on the case.

Thank you for considering our comments.

Bud DeFlaviis
Director of Government Relations
National Association of Electrical Distributors
Bud@naed.org





October 15, 2025

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

FR: Derek Sangston, Oregon Business & Industry

RE: Comments Regarding Second Plan Amendment to Circular Action Alliance's Program Plan

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 comment on Circular Action Alliance's (CAA) second plan amendment to its approved program plan to implement the Plastic Pollution and Recycling Modernization Act (RMA). While OBI appreciates the acknowledgment from CAA and the Department of Environmental Quality (DEQ) that portions of the RMA need substantive improvements, we must emphasize that the law in its current form is unworkable. The provisions subject to the amendment under consideration – those regarding responsible end markets (REM) – are only one part of an overly complex scheme that has already proven to present significant operational, compliance, and enforcement challenges for Oregon producers and businesses.

Unworkable Complexity of the Program

The structure and scope of the RMA are overly complex and difficult for even the most well-intentioned producers to navigate. Businesses that sell packaging into Oregon—large and small—are struggling to understand their obligations and how to comply. The interplay between material types, responsible end markets, performance standards, and inconsistent information provided from both CAA and DEQ has created a web of requirements that is both burdensome and ambiguous.

Lack of Enforcement and Compliance Mechanisms

At present, there is also no effective mechanism in place to ensure that all obligated parties are complying with the law. This lack of enforcement has created a system where voluntary compliance is penalized, and businesses that attempt to meet their responsibilities are placed at a competitive disadvantage relative to those who delay or avoid compliance altogether.

The uneven application of rules not only undermines the intent of the program but also breeds frustration among stakeholders who are investing significant time and resources to comply in good faith.

Request for Changes Acknowledging Feedback from Other Stakeholders

OBI acknowledges and appreciates CAA and DEQ's work to incorporate substantial stakeholder feedback into the updated REM provisions. The most recent amendment provides additional clarity on verification timelines, streamlines reporting obligations where feasible, and recognizes implementation challenges of the responsible end markets provisions through the inclusion of variances and phased compliance pathways. These updates represent a step in the right direction and demonstrate that a collaborative rulemaking process can improve outcomes for both the environment and the regulated community.

Despite the changes to the REM provisions, OBI maintains its concern that the RMA's regulation of REMs could pose significant problems in the future. OBI still has significant concerns that Oregon's extreme provisions will prohibit much of the packaging waste sold into Oregon from being processed in a recycling facility.

Need for a Phased-In Implementation Timeline

OBI has long pushed CAA, DEQ, and the Oregon Legislature to provide all stakeholders—including haulers, producers, and local governments—more time with which to comply with the RMA. Given the scale and ambition of the RMA, OBI renews its request of DEQ and the Oregon Legislature to consider a phased-in approach over the course of several years. A staggered implementation timeline would allow:

- DEQ to refine program elements through feedback and real-world testing
- Local governments, CAA, and haulers to build out infrastructure and compliance mechanisms
- Consumers to better understand and participate in the new recycling system and help ensure the extreme investment for which they are ultimately paying improves recycling in Oregon
- The state to avoid unintended economic consequences and disruption to business operations.

A rushed rollout of the program is reducing its effectiveness and could ultimately harm the very environmental and economic outcomes it seeks to improve.

Unfortunately, the responsiveness extended to stakeholders pushing for common-sense but likely inadequate changes to the REM provisions, has not been extended to other critical aspects of the RMA program—particularly producer fees, transparency in program operations, and enforcement equity. Despite extensive feedback from industry stakeholders, producers continue to face a fee structure that is unclear, lacks adequate justification, and disproportionately burdens those attempting to comply in good faith. The confidential nature of key financial elements, including the recently amended producer fee schedules, prevents producers from understanding how their contributions are calculated, how funds are allocated, and whether those funds are being used efficiently or fairly.

Moreover, there is still no effective mechanism to ensure consistent enforcement of the law across all producers. Those who are working diligently to meet their obligations are placed at a clear competitive disadvantage compared to those who are non-compliant or operating outside of DEQ's oversight. This imbalance undermines the integrity of the program and discourages voluntary compliance—exactly the opposite of what a modern, circular economy-based recycling law should strive to achieve.

In short, while the REM amendment shows what is possible when DEQ and program administrators take industry feedback seriously, other areas of the program continue to suffer from top-down decision-making and limited transparency, further compounding the program's unworkability. Without consistent application of stakeholder-informed adjustments across the full scope of the RMA, Oregon risks developing a system that is inequitable, inefficient, and ultimately ineffective in achieving its goals.

Thank you for your continued consideration. Please contact dereksangston@oregonbusinessindustry.com with any questions.

September 15, 2025

Via email only: RethinkRecycling@deq.oregon.gov

Ms. Nicole Portley
Program Plan Lead, Paper and Packaging EPR
Materials Management – Product Stewardship Team
Oregon Department of Environmental Quality
700 NE Multnomah ST #600
Portland, OR 97232

RE: Comments on Amendments to Approved CAA Producer Responsibility Organization Plan

Dear Ms. Portley:

The following comments are respectfully submitted for DEQ's consideration regarding the Circular Action Alliance (CAA) Oregon Program Plan Amendment (August 2025). ORRA has always been—and continues to be—a strong proponent of establishing responsible end markets for USCL materials under the RMA.

ORRA's comments are founded on the belief that the Responsible End Markets (REM) provisions of the Recycling Modernization Act (RMA) must be administered in a way that encourages, rather than discourages, end market participation. Therefore, ORRA's comments focus on encouraging the participation of organizations that qualify as responsible end markets, by clarifying regulatory intent, improving data practicality, narrowing data gathering to within statutory authorizations, reducing the administrative burden on markets that are otherwise not required to participate in Oregon's recyclable material markets, and ensuring that the REM provisions of the RMA are implemented successfully.

1. Clarification of Residual and Yield Reporting

Clarification is needed regarding whether end-market entities are being asked to report on total residual disposal or only on the residuals associated with Oregon-sourced materials. This distinction is essential because Oregon-originating recyclables typically represent a very small portion of overall feedstock at most facilities. Additionally, yield calculations may be distorted by moisture variation, especially in coastal or wet climates where loads can gain significant weight through precipitation or humidity exposure. Accounting for these variables would improve accuracy and prevent misinterpretation of reported performance.

2. Protection of Commercial and Proprietary Information

Industry stakeholders have raised legitimate concerns about the confidentiality of operational data, particularly related to yield calculations, customer lists, and chain-of-custody details. Disclosure of such information could reveal competitive business practices and violate existing

non-disclosure agreements. A sound solution would be to manage such data through an independent third-party auditor, ensuring transparency with regulators without compromising proprietary business relationships.

3. Data Management and Trackability

The proposed requirements for tracing material in many instances falls upon commingled recycling processing facilities (CRPFs). Information for tracking materials through to end disposition is not controlled by such facilities and therefore should not be required from them. The plan should clarify expectations for traceability at each level of the recycling supply chain, who is responsible for gathering and providing such information, and to whom the information must be provided, and at what frequency. Furthermore, the plan should recognize the limits of precision when multiple states contribute to mixed material streams.

4. Application to Out-of-State and Export Markets

Many of the regulatory and reporting challenges appear to arise when seeking information from end markets located outside Oregon, particularly international destinations. Such entities are under no compulsion to take Oregon recyclable materials. DEQ should consider the feasibility of verifying compliance within foreign jurisdictions and the risk that overly prescriptive requirements could discourage these markets, including those who have already self-attested, from purchasing Oregon recyclables altogether.

5. Redundancy with Existing Federal and Industry Standards

The REM verification requirements proposed for plastics—particularly those extending beyond recyclers to converters producing food-contact packaging and children’s products—appear to duplicate existing oversight under U.S. Food and Drug Administration (FDA) and international regulatory frameworks. These systems already require rigorous testing for contamination and toxicity, including mandatory decontamination, challenge testing, and letters of non-objection. Requiring additional verification at the state level would likely create unnecessary redundancy without improving environmental outcomes.

6. Coordination with Other States

As other states—most notably California—develop Extended Producer Responsibility (EPR) programs incorporating REM-style verification, Oregon should seek alignment in data and audit requirements. Multi-state harmonization would reduce administrative burden, encourage consistency across markets, and improve participation among end markets operating nationally or internationally.

7. Support for a Phased and Collaborative Approach

ORRA supports the program amendment’s proposal for a phased implementation, supported by independent, accredited verification. The development of a national or multi-state standardized

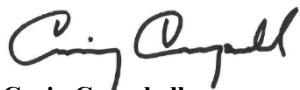
REM verification framework—such as through the Recycled Materials Standard (RMS)—would provide consistency, credibility, and scalability. A phased rollout will also allow end markets time to adapt while ensuring that DEQ’s oversight remains transparent and effective.

8. Evaluation of CAA’s Disclosure Policy

The disclosure policy presented in Appendix C of the amendment provides a balanced approach to transparency and confidentiality. The policy clearly delineates between information that must be shared under law and information that should remain proprietary. This structure appropriately supports both DEQ’s need for oversight and the industry’s need for protection of confidential business data.

The CAA program plan amendment demonstrates meaningful progress toward implementing Oregon’s REM requirements; however, the above clarifications and adjustments would enhance its feasibility and effectiveness. It is our hope that these recommendations will assist in implementation of a REM framework that strengthens responsible recycling systems without disrupting existing markets or creating unnecessarily administrative burdens on the very private sector businesses that we must rely on for the success of the responsible end market elements of the RMA.

Sincerely,



Craig Campbell
Governmental Affairs Director
Oregon Refuse and Recycling Association
727 Center Street NE, Suite 350
PO Box 2186
Salem, OR 97308-2186
800-527-7624 or 503-588-1837
craigc@orra.net



October 15, 2025

Dear Oregon Department of Environmental Quality,

Thank you for your continued work to strengthen Oregon's recycling system through the implementation of the Plastic Pollution and Recycling Modernization Act. The Recycled Materials Association (ReMA) is the trade association representing over 1,600 companies who process, sort, broker, and consume recycled materials including metals, paper, plastic and glass. Our member companies are located in the U.S. and around the globe and play a critical part in providing recycled materials to America's manufacturing industries.

ReMA was previously called ISRI until April of last year and we are the organization that manages the ISRI specifications which define the quality standards or composition of recycled materials traded across the country and around the world.

ReMA encourages approval of Circular Action Alliance's August program plan amendment on Responsible End Markets. The amended approach to REM verification is responsive to stakeholder feedback around confidential business information, administrative burden, and the need for harmonization, while also bolstering public trust in recycling through increased transparency and a strong verification system.

We appreciate CAA's efforts to refine and improve the REM verification framework, and in particular, we are supportive of the following elements:

Phased in Approach

ReMA supports the phased-in approach that allows for voluntary disclosure and feedback in the short term. This will provide time for practical testing, stakeholder engagement, and continuous improvement of the REM verification process.

Development of an Independent Third-Party Standard

ReMA supports the development of an independent third-party standard for REM verification, utilizing an accredited standard development organization. The use of a transparent, collaborative process that includes public engagement and field testing will ensure the standard is credible and widely supported by recyclers.

Variance #2 – Recognition of Existing Certifications



ReMA supports Variance #2, which allows end markets already certified through recognized programs aligned with REM requirements to be listed without additional verification.

Variance #3 – Exemption of Yield Disclosure

ReMA also supports Variance #3, which exempts REMs from disclosing yield data. Yield information is commercially sensitive and often connected to proprietary business operations. The proposed variance would protect confidential business information while still ensuring effective verification measures.

Variance #4 – End Market Entity Definition

ReMA would like to suggest one important change to CAA and Oregon DEQ's approach to the definition of an end market entity under Variance #4. ReMA represents recyclers across all packaging commodities: glass, plastic, metals, paper, etc. The current material-specific approach, which defines a different processing step as the "end market" for each commodity, has created inconsistencies that make compliance and interpretation difficult.

ReMA recommends defining the end market entity as:

"The first entity beyond the MRF, depot or drop-off which processes a recyclable material into a recycled feedstock which can be used for manufacturing as a virgin feedstock substitute or in a substantially similar manner as a virgin or primary feedstock would be used."

This approach establishes a consistent standard that will remain applicable as processing technology and market dynamics evolve over time. It is also more reflective of how metals are processed at MRFs. For example, materials that are sometimes smelted directly by a mill may also be processed into feedstock by a metal shredder, who would then be the appropriate end market entity.

Clarification on Non-Covered Materials' REM Requirements

ReMA is additionally seeking clarification, either through this program plan or other documentation, on the status of non-covered materials, such as scrap metal and plastic storage containers which are sorted by CPRFs. On the September 25, 2025 Responsible End Markets webinar, Oregon DEQ indicated that MRFs, not the PRO, would need to verify that these materials go to Responsible End Markets. This requirement extends beyond the scope of the PRO and the Recycling Modernization Act, since it applies to non-covered materials. Since PRO verification is currently the only pathway for REM verification, there is



no entity in place to appropriately verify these non-covered material markets. ReMA recommends that DEQ clarify that REM verification applies only to covered materials within the RMA's scope. Non-covered materials should not be subject to REM verification, as they fall outside the jurisdiction of the PRO and lack an established verification pathway.

ReMA appreciates Oregon DEQ's flexibility and responsiveness in refining the Responsible End Markets approach and finding workable solutions as the REM verification system is developed. We look forward to continuing our dialogue with DEQ, CAA, and ORSAC and working together to ensure the REM verification process is clear, fair, and effective.

Thank you for your consideration of these comments and for your ongoing efforts to build a more transparent and sustainable recycling system.

Thank you,

Robin K Wiener

Robin K. Wiener, President

Recycled Materials Association

Signature: *Robin K. Wiener*

Robin K. Wiener (Oct 15, 2025 09:41:47 EDT)

Email: rwiener@recycledmaterials.org






ReMA Oregon REM Program Plan Amendment Comments Oct 2025

Final Audit Report

2025-10-15

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