



## REVERSE LOGISTICS GROUP

190 Middlesex Turnpike, Suite 206  
Iselin, NJ 08830  
[www.rev-log.com/us](http://www.rev-log.com/us)

August 28, 2023

Dear Ms. Portley,

This letter serves as confirmation of Reverse Logistics Group's intent to serve as a producer responsibility organization (PRO) on behalf of producers affected by Oregon's Plastic Pollution and Recycling Modernization Act.

### **About RLG**

Reverse Logistics Group (RLG) is a leading global service provider and enabler for Circular Economy, EPR and DRS solutions currently providing services to 5,000+ customers, including major organizations and governments, in the areas of end-of life electronics, packaging, batteries, beverage containers, and more in 80+ countries around the world. We have been providing such services in the US for more than a decade.

RLG is part of the Reconomy Group, an innovative, tech-led provider of circular economy-focused services. Supporting businesses around the world to improve their ESG outcomes, the Reconomy Group delivers services through three main verticals - Recycle, Comply and Re-use. RLG is part of the Reconomy's Comply Division along with Valpak, the largest packaging PRO in the UK, and Noventiz, a packaging, battery and electronics PRO in Germany.

Globally, RLG manages 35 PROs for packaging, batteries and/or electronics. With regards to the management of packaging PROs, in addition to the activities of our sister companies, Valpak and Noventiz, we currently manage PROs in Poland, Hungary and India.

In North America, we are supporting Circular Materials, the largest packaging PRO in Ontario, with the province's transition to a new fully producer funded Blue Box program. As the Common Collection System Operator in Ontario, RLG is managing municipal and receiving facility contract negotiations and administration, materials stream auditing and the development and management of IT systems tracking materials movement, composition, contamination and related contractual and financial transactions.

In the U.S. we have been providing EPR compliance services, building collection and recycling infrastructures and working with local governments, recyclers and communities on behalf of electronics manufacturers in 25 states plus the District of Columbia since 2008.

We have a highly knowledgeable team of EPR policy and program implementation experts in the US and globally and believe our experience, knowledge, IT solutions, and implementation/management capabilities make us well suited to advance innovation, increase



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collection and recycling performance, and deliver improved environmental outcomes in Oregon.

### **Progress Towards Forming a Not-For-Profit PRO**

Earlier this month, RLG contracted with a legal firm to develop and submit the necessary legal paperwork to form a 501 (c) 3 compliant non-profit organization. At the same time RLG secured a consulting firm with expertise in the establishment and operations of PROs to work with us on the development of our Oregon-based packaging PRO. This work will involve development of the necessary governance, bylaws, financial and administrative structures to ensure effective management of the new PRO. Part of this work will also include developing our short and mid-term budgets, financing strategy and plans for securing start-up capital. We anticipate meeting the goal of having a non-profit entity in place prior to March 31, 2024.

### **Progress Towards Securing Required Market Share**

RLG has also been actively engaging with current and prospective new US customers to test their initial interest in becoming members of RLG's proposed PRO. Many of our current customers are interested in such but we do not have binding commitments from them as of yet. There is hesitancy on the part of most producers to commit to joining a PRO at this time as there is a lack of clarity as to what final PRO program requirements and costs may be (due to rule making not being final for 2023 and a 2<sup>nd</sup> round of rulemaking not to be completed for over a year from now). The RMA deadline for producers to join a PRO by July 1, 2025 is also playing into this hesitancy. With that said, RLG is confident we can secure commitments from enough producers to equate to 10% market share or more prior to July, 1 2025.

### **Progress Towards Start-Up**

RLG's US team is actively working with a team of consultants with local, national and global expertise in the collection, processing and marketing of printed paper and packaging and in the operation and management of Extended Producer Responsibility systems. This work will inform RLG's development of a compliant program plan for submission to the Department of Environmental Quality (DEQ) in March of 2024. It will also serve as the basis for developing our market share calculations, budgetary requirements and start-up revenue projections for our proposed PRO.

RLG is currently financing the cost to form our proposed non-profit PRO and conduct the research to develop a compliant program plan. As noted above, we are currently in the process of developing our principles and plans for the operation of our proposed PRO. We would be



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happy to share additional information on our marketing and financial strategies with the DEQ as these strategies are finalized.

We welcome the opportunity to discuss our background, experience, and capabilities further and any questions you may have.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Wiedemann", is written over a light blue circular watermark or background.

Patrick Wiedemann, CEO