Circular Action Alliance Oregon

Paper and Packaging EPR Quarterly Report

Q2 (April – June, 2026)

August 14, 2026

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CAA Introduction

Circular Action Alliance (CAA) is a U.S. Producer Responsibility Organization (PRO) dedicated to implementing effective Extended Producer Responsibility (EPR) laws for paper and packaging. As a nonprofit, producer-led organization, CAA is committed to helping producers comply with EPR laws, delivering harmonized best-in-class compliance services and working with governments, businesses and communities to reduce waste and recycle more. CAA was founded in 2022 and is governed by producers representing the food, beverage, consumer goods, restaurant and retail sectors.

CAA Oregon is the only approved paper and packaging PRO in Oregon, and its first two-and-a-half-year Oregon program plan became effective on July 1, 2025. CAA has also been selected as the PRO in California, Colorado, Maryland, Minnesota, and Washington, and it is engaging with additional states that are developing EPR systems.

CAA has built a robust, nationwide services organization led by experts in packaging and recycling, consumer goods, circular economy policy, and more. CAA's fast-growing team of passionate, mission-driven experts are dedicated to ensuring that U.S. EPR laws reach their full potential.

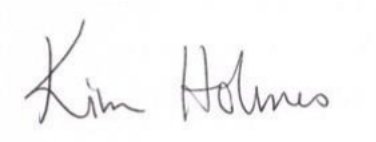
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Message from the Oregon Executive Director

As detailed in the program plan, CAA will submit a report each quarter during the course of the first program plan period to demonstrate CAA Oregon's progress toward meeting the convenience standard requirements for the collection of the materials on the PRO Recycling Acceptance List per Oregon Administrative Rules (OAR 340-090-0630 (3)) and fulfilling the Expansion of Service Funding (per OAR 340-090-0800).

This report reflects the progress made in the second quarter from April 1 to June 30, 2026. The report demonstrates the range of engagement the CAA team has had with interested parties around the state to build the foundation of the program.

The CAA Oregon team looks forward to our continued work with producers, the Department of Environmental Quality (DEQ), local governments, service providers, and all other interested parties across the state as we successfully implement the *Plastics Pollution and Recycling Modernization Act* (RMA) together.



Kim Holmes
Oregon Executive Director
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System Expansion Funding Administrative Process

As CAA Oregon detailed in its program plan, providing financial and other assistance to local governments and service providers for purposes of expanding recycling collection services is a critical step in the RMA implementation.

The system expansion process began in January 2025, building on the initial outreach through the Oregon Recycling System Optimization Project (ORSOP), and technical assistance from the CAA team. This outreach aimed to confirm information initially gathered in previous needs assessments, including communities' requests for infrastructure such as containers, trucks, and depots accepting materials on the Uniform Statewide Collection List (USCL). All Oregon jurisdictions were assigned a priority status based on each community's need for improvements, with A as the highest priority and F as the lowest. Budgeted system expansion costs are being disbursed to communities according to their priority status.

In 2026, the focus has been on completing initial outreach to all priority groups and advancing negotiations with Priority D-F communities. Initial outreach was successfully completed for identified priority groups, establishing a strong foundation for future expansion efforts.

System Expansion equipment was placed on order or delivered for all Priority A-C groups, ensuring these communities had the necessary resources to move forward with program implementation and operational readiness.

Negotiations and engagement activities progressed with Priority D-F groups to assess opportunities, address community needs, and support implementation planning.

Initial consultation and system expansion negotiations for Priority group G are scheduled to proceed during Q3 2026.

The results of that outreach and the needs identified in each priority category are detailed below:

Priority / Outreach Groups	Total Funding Estimate per the Program Plan FY 2025-27	*Annual Operating and Education	Containers	Trucks	**USCL Depots	Recycling Reload Facilities
A	$16,679,168		$4,746,510	$10,352,300	$0	$1,500,000
B	$96,428				$103,571	
C	$1,052,321				$1,323,036	
D	$10,237,967		$1,402,467	$7,876,750	$300,000	$500,000
E	$12,834,790		$2,533,490	$5,851,300	$900,000	$3,700,000

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Priority / Outreach Groups	Total Funding Estimate per the Program Plan FY 2025-27	*Annual Operating and Education	Containers	Trucks	**USCL Depots	Recycling Reload Facilities
F	$40,624,829		$17,056,730	$19,579,350	0	$3,800,000
G	$6,909,825		$408,825	$4,501,000	$0	$2,000,000
Totals	**$88,435,328**	***$2,725,911**	**$26,148,022**	**$48,160,700**	**$2,626,607**	**$11,500,000**

Table 1. Summary of estimated investments in the approved program plan, by Priority Group. There are 241 Cities, 135 Census Designated Places, and 36 Counties. Some of the communities fall into multiple priority groups.

**Note: The E&O amount is allocated by wasteshed and is not included in the Program Plan FY2025-27 total as it is separate.*

***Note: Timing for USCL depot investments have been adjusted to reflect what is in the FY2025-27 Program Plan.*

The table below shows all system expansion investments made from the beginning of the program through the end of Q2 2026.

Region/ Wasteshed	Priority Group	Program Plan Initial Estimates FY 2025-27	Priority G FY 2025-27	Total Funding Estimate Signed Addendums throughQ2 2026	Trucks Ordered	Containers Ordered	USCL Depots (Existing & Potential)	Recycling Reload Facilities
Baker	A/B	$2,414,771		$1,123,061	2	5,187	2	
Benton	C	$542,100		$609	0	0	3	
Clatsop	C	$1,390,414		$757,403	1	4,000	2	
Columbia	C	$40,179		$295	0	0	2	
Coos	A/B/C	$2,739,200		$1,393,629	2	9,722	2	
Crook	C	$1,470,200		$677	0	0	2	
Curry	D/F	$0		$6,924	0	0	3	
Deschutes	B/C	$9,129,221		$1,343,356	2	8,300	6	
Douglas	A/G	$6,735,721	$2,314,775	$2,557,952	3	12,729	11	$74,978
Gilliam	C	$0		$0	0	0	2	
Grant	D	$0		$0	0	0	1	
Harney	C	$7,143		$711	0	0	1	
Hood River	C	$660,100		$1,102	0	0	2	
Jackson	C/G	$6,175,399	$1,000,000	$791	0	0	3	
Jefferson	C/G	$109,550	$41,250	$0	0	0	3	
Josephine	C/G	$1,103,410	$453,400	$1,570	0	0	4	
Klamath	D	$100,000		$295	0	0	11	
Lake	C	$48,214		$0	0	0	3	

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Region/ Wasteshed	Priority Group	Program Plan Initial Estimates FY 2025-27	Priority G FY 2025-27	Total Funding Estimate Signed Addendums throughQ2 2026	Trucks Ordered	Containers Ordered	USCL Depots (Existing & Potential)	Recycling Reload Facilities
Lane	A/G	$13,193,954	$1,125,200	$617,208	1	3,000	15	
Lincoln	C	$4,399,394		$1,494	0	0	5	
Linn	C	$1,247,316		$171	0	0	2	
Malheur	C/G	$611,100	$450,100	$0	0	0	1	
Marion	C	$3,002,006		$14,671	0	0	9	
Metro	B/C/G	$8,873,261	$75,000	$7,433	0	0	14	
Milton Freewater	A	$1,068,200		$0	0	0	0	
Morrow	A	$1,229,200		$627,650	1	1,227	3	
Polk	C	$1,025,200		$0	0	0	3	
Sherman	C	$0		$165	0	0	1	
Tillamook	C	$3,353,510		$2,900	0	0	4	
Umatilla	A/G	$7,151,050	$1,450,100	$4,052,373	6	15,401	6	$96,188
Union	F	$1,552,200		$0	0	0	1	
Wallowa	C	$1,786		$0	0	0	1	
Wasco	A	$1,437,590		$259,454	0	4,914	1	
Wheeler	D	$0		$0	0	0	3	
Yamhill	C	$714,114		$3,105	0	0	2	
Totals thru Q2 2026		**$81,525,503**	**$6,909,825**	**$12,774,205**	**18**	**64,480**	**134**	**$171,166**

Table 2. Summary of estimated payments to communities within each wasteshed based on signed addenda as of the latest quarter reporting timeframe. Negotiations within each wasteshed are not complete.

10% PCR Content Roll Cart Pricing

CAA's procurement team conducts quarterly market reviews of roll cart pricing by collecting current pricing from national manufacturers for roll carts constructed from virgin plastic resin as well as those containing a minimum of 10% post-consumer recycled (PCR) content. Pricing is logged and averaged by cart size to assess any material cost difference between virgin and PCR options. Based on Q2 2026 supplier pricing, CAA found no material difference in the cost of virgin roll carts compared to roll carts containing a minimum of 10% PCR content.

Note: During the Q2 2026 cost comparison process, CAA was informed by some of the suppliers that overall market pricing for carts has increased, reflecting broader cost

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pressures across the market. CAA will continue to monitor trends in overall cost of goods, watching for trends in price increases to gauge program impacts.

Implementing Education and Outreach (E&O) Initiatives

During Q2 2026, Oregon E&O efforts focused on supporting the implementation of paper and packaging EPR under the Recycling Modernization Act through interest holder engagement, public education, communications for new program launches and annual reporting. Major activities included the release and promotion of Oregon's 2025 Annual Report, communications support for new RecycleOn Centers, development of statewide Education & Outreach campaign strategies, public awareness campaigns, media relations and engagement with local governments, service providers and DEQ.



Updated USCL depot signage at Knott Landfill

CAA's E&O team delivered three new communication tools via the E&O Portal - the portal set up to support local jurisdictions with customizing and downloading Recycle On communications materials - including a larger recycling decal, two sizes of cardboard decals and newsletter content for nursery pot recycling.

CAA partnered with communities to design custom USCL depot signage, a complex effort requiring close coordination with individual USCL depot operators. Each site's signage package is tailored to reflect its unique layout/size, traffic flow and operational considerations. The following communities updated their USCL depot signage:

- Grants Pass Hauling
- Deschutes County
- Crook County
- Klamath County

Communities continued to actively use the E&O Portal, downloading 214 collateral items and ordering more than 59,000 pieces of educational materials during the quarter. The most frequently customized downloaded items included Oops Tags (28% of all downloads during

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Q2 2026), Recycling Guides (27%), Bill Inserts (14%), and Large Signs (12%). Materials were primarily downloaded in English (43.93%) and Spanish (9.35%), with all other languages making up 4.67% each. The most downloaded non-customizable materials included the updated Cart Label (15%), Decals (14%) and Material Images (10%).

Contamination Reduction Programming E&O Materials

In January 2026, CAA and DEQ began conversations to align on Contamination Reduction Funding (CRF) E&O roles and responsibilities. DEQ's current CRF guidance, issued after the development and approval of CAA's most recent batch of E&O materials, requires local recycling programs that wish to use the CAA-developed E&O materials, to modify and pay for the printing of materials before using those them for contamination reduction-funded activities.



Approved CRP E&O Material



CAA-developed CRP E&O Material

This misalignment between the CAA materials and DEQ guidance led to confusion that raised questions among local governments and service providers. CAA proposed that, because the materials had already been developed, reviewed and approved for use in Oregon's recycling system, communities be allowed to use them without modification for contamination reduction activities during the first program plan period. However, DEQ maintained its position that changes were required. As a result, communities may need to use contamination reduction funding for design, customization and material redevelopment activities rather than directing those funds primarily toward outreach implementation, distribution and community engagement. This may also result in a less consistent mix of messages and design styles across the state. This requirement also creates additional challenges for smaller communities that may not have in-house communications staff or access to graphic design resources, while reducing consistency in recycling education and messaging across the state. During the next update of E&O materials in 2028, CAA will work to align messaging with DEQ guidance.

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Material Trials for E&O Development

During Q2 2026, CAA launched two educational campaigns supporting the trial collection of aluminum foil and foil-pressed products, and empty aerosol cans. The two campaigns ran from May 2026 to July 2026. Each campaign included a dedicated landing page on RecycleOn.org/Oregon to provide more information to community members. Due to these campaigns extending beyond the close of Q2, campaign outcomes will be reported in the Q3 report.

The aerosol can campaign ran on digital audio and social media with the message "Press it. Shake it. Recycle it." The foil campaign, with the message "Ball it up" partnered with the Portland Pickles baseball team for two in-person activations at games and billboards around the Metro Area. The outcomes of these campaigns will be shared in the Q3 report.

Media Support for Local Recycling Programs



Example of social media content



Foil campaign billboard

CAA Oregon supported local recycling programs with media outreach and promotion as new recycling programs launched and RecycleOn Centers opened. Below is a list of all media coverage and outreach work that CAA supported in Q2.

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Date	Source	Title/Link
4/1/2026	RecycleOn Oregon Blog	The Dalles Becomes the First Oregon Community to Expand Curbside Recycling Service with Producer-Funded Investment
4/8/2026	Waste Dive	Oregon packaging EPR funds its first recycling improvements with cart program
4/10/2026	KEIZ	New recycling carts coming to Roseburg homes starting in April
4/13/2026	RecycleOn Oregon Blog	Recycling Just Got Easier in Roseburg
4/15/2026	KQEN News	Morning Conversation
5/7/2026	RecycleOn Oregon Blog	Good News for Baker City: Curbside Recycling Has Arrived
5/27/2026	The Cottage Grove Sentinel	Cottage Grove Garbage Service outlines recycling changes
5/27/2026	Hermiston Herald	Hermiston, Boardman to begin curbside recycling in July
6/18/2026	Hermiston Herald	$1M investment expands recycling access for 10,000 E. Oregon households
6/23/2026	Elkhorn Media Group	Recycling cart delivery begins in Boardman, Hermiston, Umatilla
6/30/2026	CCC News	New RecycleOn centers open in Hood River & The Dalles, expanding free recycling options
6/30/2026	Gorge County Media	New RecycleOn Centers open in Hood River and The Dalles

Table 3: Summary of media coverage and outreach work that CAA supported in Q2

Social Media Follower Growth Campaign

During Q2 2026, CAA conducted a statewide social media follower growth campaign to increase awareness of RecycleOn Oregon and expand the audience for future organic social media-based recycling education efforts. The campaign ran from April 20 through June 15, 2026, and generated 6,321 new followers across Facebook, Instagram and TikTok, exceeding the projected range of 2,850–4,475 followers. The campaign also delivered an estimated 1 million impressions and 12,186 clicks, helping increase public exposure to recycling education and outreach materials. Facebook generated the most new followers, while Instagram produced the highest engagement rates.

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2026 Statewide Campaign Kick Off

CAA Oregon began engagement with interest holders for the 2026 statewide education and outreach campaign during Q2. On June 26, 2026, CAA hosted a webinar to introduce the campaign strategy, share proposed campaign concepts, review statewide messaging priorities and provide an opportunity for local governments, service providers, community-based organizations and other interest holders to ask questions and provide feedback. Fifty-six people attended the webinar. Following the event, CAA distributed the recording to 566 contacts, resulting in 424 email opens, 153 link clicks, and 77 views of the webinar recording.

Feedback received through a follow-up survey was all positive and aligned with the proposed campaign direction. Respondents strongly supported the campaign's focus on transparency and trust-building and consistently identified a desire to share more information about what happens to recyclable materials after collection, where materials are processed and what new products they become. Interested parties also emphasized the importance of promoting RecycleOn Centers, using trusted local messengers to deliver information, providing multilingual outreach and equipping communities with campaign materials to amplify statewide messaging through local channels.

On June 29, 2026, CAA presented the campaign strategy to the Recycling Council Equity & Outreach Subcommittee. No feedback or requested changes were provided by the committee. The campaign concepts and messaging framework will be further informed after a presentation to the full Recycling Council at the end of July.

Meeting the PRO Recycling Acceptance List Convenience Standard Requirements

Q2 2026 marked another period of growth for Oregon's RecycleOn Center network as CAA continued expanding access to collection opportunities for materials on the PRO Recycling Acceptance List. Building on the site deployments of previous quarters, CAA opened 8 additional RecycleOn Centers, further increasing the availability of recycling services for residents and businesses across the state.

In addition to the operational sites already operating in Josephine, Jackson, Deschutes, Crook, Baker, Harney, Klamath, Malheur, and Umatilla Counties, CAA deployed new RecycleOn Centers in Gilliam, Morrow, Polk, Wasco and Hood River Counties during Q2. These additions broadened the statewide network and continued progress toward meeting

Oregon's convenience standard requirements by expanding service coverage in both urban and rural communities.

CAA continued to expand the RecycleOn Center network through its partnership with the Oregon Beverage Recycling Cooperative (OBRC), utilizing established logistics and consolidation infrastructure to support efficient collection and transportation of materials. As the network grows, CAA has leveraged multiple operational hubs throughout Oregon to improve service coverage, reduce transportation costs, and streamline material movement from collection sites to downstream processors and responsible end markets. By the end of the second quarter, OBRC was servicing sites in four of five zones.

In the second quarter CAA also signed an agreement with EcoSort in Eugene to be CAA's consolidation point for PRO acceptance list materials collected at RecycleOn Centers through OBRC's Zone 4. While OBRC will service the RecycleOn Center sites, providing pick up and transportation services, EcoSort will consolidate and bale materials to prepare them for end market.

By the end of Q2 2026, Oregon's RecycleOn Center network included 34 operational locations statewide, in addition to single-material collection sites for glass and expanded polystyrene. CAA anticipates additional site deployments throughout the remainder of 2026 as contracting, equipment installations, and site readiness activities continue. Current planning remains focused on achieving a network of approximately 93 RecycleOn Centers by year-end, subject to ongoing negotiations and implementation timelines.

CAA Oregon also continued supporting glass collection through a combination of curbside glass programs and contracted glass depot locations. These depots remain an important component of Oregon's collection network and are included in convenience standard reporting for glass, which is identified on the PRO Recycling Acceptance List.

During Q2 2026, CAA provided a glass incentive rate of $79.08 per ton, reflecting the incentive structure established in the approved program plan and adjusted for CPI-U increases. In addition to incentive payments, CAA continued reimbursing eligible transportation costs for glass hauled more than 50 miles to the nearest reload facility or Responsible End Market, consistent with program requirements.

By the end of Q2 2026, CAA Oregon had executed 59 glass incentive funding agreements and 35 glass transportation reimbursement agreements. Participating communities and service providers continue to submit tonnage documentation, route records, and supporting materials necessary for reimbursement and incentive payments

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Percentage of Oregon Population Within 15 Miles of an Operational RecycleOn Center

County	*FCC Staff Block Estimate 2024*			Percent of Population within 15 Miles	*Portland State PRC Certified Estimates 2025*		
	Total Population	Population within 15 Miles	Population Beyond 15 Miles		Total Population	Population within 15 Miles	Population Beyond 15 Miles
State of Oregon	**4,272,371**	**1,165,312**	**3,107,059**	**27.3%**	**4,301,164**	**1,168,507**	**3,132,657**
Baker County	16,750	13,222	3,528	78.9%	16,765	13,234	3,531
Benton County	98,899	15,259	83,640	15.4%	98,291	15,165	83,126
Clackamas County	425,857	0	425,857	0.0%	432,473	0	432,473
Clatsop County	41,043	0	41,043	0.0%	41,807	0	41,807
Columbia County	54,063	0	54,063	0.0%	53,785	0	53,785
Coos County	64,326	0	64,326	0.0%	65,124	0	65,124
Crook County	27,336	25,203	2,133	92.2%	28,094	25,902	2,192
Curry County	22,774	0	22,774	0.0%	23,375	0	23,375
Deschutes County	211,535	209,345	2,190	99.0%	213,886	211,672	2,214
Douglas County	112,255	77,366	34,889	68.9%	110,355	76,057	34,298
Gilliam County	1,971	0	1,971	0.0%	2,122	0	2,122
Grant County	7,093	0	7,093	0.0%	7,221	0	7,221
Harney County	7,402	5,921	1,481	80.0%	7,401	5,920	1,481
Hood River County	23,764	22,324	1,440	93.9%	24,361	22,885	1,476
Jackson County	221,331	219,010	2,321	99.0%	221,471	219,149	2,322
Jefferson County	25,536	24,711	825	96.8%	25,768	24,936	832
Josephine County	88,276	78,124	10,152	88.5%	89,686	79,372	10,314
Klamath County	70,438	57,287	13,151	81.3%	69,135	56,227	12,908
Lake County	8,194	0	8,194	0.0%	8,297	0	8,297
Lane County	382,396	0	382,396	0.0%	385,201	0	385,201
Lincoln County	51,212	0	51,212	0.0%	50,428	0	50,428
Linn County	132,474	3,980	128,494	3.0%	130,322	3,915	126,407
Malheur County	32,315	27,124	5,191	83.9%	31,453	26,400	5,053
Marion County	352,867	204,932	147,935	58.1%	352,162	204,523	147,639
Morrow County	12,360	8,728	3,632	70.6%	14,604	10,313	4,291
Multnomah County	795,897	0	795,897	0.0%	805,583	0	805,583
Polk County	90,549	85,302	5,247	94.2%	89,616	84,423	5,193
Sherman County	2,002	0	2,002	0.0%	2,001	0	2,001
Tillamook County	27,264	0	27,264	0.0%	27,389	0	27,389
Umatilla County	80,491	64,185	16,306	79.7%	81,784	65,216	16,568

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County	FCC Staff Block Estimate 2024			Percent of Population within 15 Miles	Portland State PRC Certified Estimates 2025		
	Total Population	Population within 15 Miles	Population Beyond 15 Miles		Total Population	Population within 15 Miles	Population Beyond 15 Miles
Union County	26,058	0	26,058	0.0%	26,239	0	26,239
Wallowa County	7,522	0	7,522	0.0%	7,592	0	7,592
Wasco County	26,507	23,289	3,218	87.9%	26,403	23,198	3,205
Washington County	611,272	0	611,272	0.0%	618,737	0	618,737
Wheeler County	1,456	0	1,456	0.0%	1,456	0	1,456
Yamhill County	110,886	0	110,886	0.0%	110,777	0	110,777

Table 4: The above analysis was performed utilizing the Federal Communications Commission Census Block Data 2024 figures to generate the percent of coverage in each county. The percentages were then applied to the certified 2025 estimates form Portland State PRC.

Meeting Alternative Convenience Standards for Block White Expanded Polystyrene

During Q2 2026, CAA made significant progress toward implementing its planned expanded polystyrene (EPS) collection and processing network in the Metro area, Lane County, and surrounding regions. Building on negotiations completed in prior quarters, CAA executed agreements with Green Century Electronics Recycling and Saint Vincent de Paul Society of Lane County (SVdP) to support EPS collection, transportation, densification, and marketing of densified material to end markets. As part of these agreements, CAA is funding the installation and operation of EPS thermal-melt densification equipment and has established performance-based compensation for processing and sale of densified EPS. Additionally, CAA executed an agreement with SVdP to establish 11 SVdP retail locations as official EPS collection points, substantially expanding future public access to EPS recycling opportunities in Lane County.

CAA also achieved an important program milestone by completing the sale of the first load of CAA-funded densified EPS material to INTCO. This transaction represents an initial demonstration of the collection-to-end-market pathway for EPS collected through CAA-supported program infrastructure.

During the quarter, CAA continued working closely with Green Century Electronics Recycling to advance long-term EPS processing capacity in the Metro area. Through collaborative site evaluation efforts, Green Century identified a new location from which to base its EPS processing operations. Work to secure the necessary permits and approvals for the site is

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currently underway and represents an important step toward establishing permanent processing infrastructure to support future program growth.

CAA also executed an agreement with City of Roses Disposal & Recycling to support ownership and operation of an innovative mobile EPS collection and shredding truck. Under the agreement, CAA is funding the truck and associated processing equipment, including the onboard EPS shredding system. During Q2, project efforts focused on equipment integration and vehicle build-out activities. Once completed, the truck will enable collection and onboard shredding of EPS material at remote aggregation points and is expected to begin operations in Q3 2026, beginning with service to Tillamook County.

Operational readiness activities continued throughout the quarter. The EPS thermal-melt densifiers and mobile shredding equipment received in Q1 remain available for deployment and are now supported by executed service agreements with implementation partners.

Alternative Compliance Request for Bucket and Pail Collection Where Current Collection Exists

1. Alternative Compliance to collecting Buckets and Pails in certain urban settings.

CAA is seeking alternative compliance for the Convenience Standards for the collection of buckets and pails in the Metro area. Space constraints and permitting barriers create a difficult landscape for placing the standard shipping container RecycleOn Center configuration in urban areas. Ideal locations for ROCs in more rural areas, and transfer stations tend to have ample space to situate the standard ROC container configuration. However, the Metro region has a limited number of transfer stations and needs a much higher concentration of ROC collection points. This creates the need for CAA to partner with a broader range of existing business and collection models throughout the Metro area. Many of the businesses CAA is in negotiations with have small footprints and are aiming to make the addition of PRO material collection as minimally impactful as possible, while still collecting the widest range of materials. Eliminating the need to collect bulky items, like buckets will greatly expand the options for conveniently citing RecycleOn collection points where lids, carrier handles, aluminum foil products, and shredded paper can be collected.

Metro area residents and businesses currently have established opportunities to recycle buckets and pails through existing collection systems. Metro area communities have long accepted buckets and pails in curbside recycling programs. Residents are provided recycling capacity through either a 95-gallon roll cart serviced twice per month or a 65-gallon roll cart serviced weekly. CAA's primary

request is for all Metro communities to be exempt from requiring bucket and pail collection at new RecycleOn locations. At a minimum, CAA requests alternative compliance for the following cities

1. Portland
2. Gresham
3. Beaverton
4. Tualatin
5. Forest Grove
6. Lake Oswego
7. Gladstone
8. Oregon City
9. Wilsonville
10. Milwaukie
11. Happy Valley

CAA believes the operational flexibility that a variance request could afford will enable CAA to site collection points for all other PRO Acceptance Materials without current curbside service in a way that is more convenient for residents of the Metro region and provide more equitable access. Requiring CAA to maintain bulky rigid collection in communities that already offer bulky rigids via USCL collection will significantly impact the PRO's ability to offer permanent convenient collection and force use of more events to meet convenience standard requirements.

2. Alternative Compliance to collecting source separated Buckets and Pails at ROC centers that are co-located at specifically identified USCL Depots.

As CAA works to meet the convenience standard requirements for the collection of PRO Acceptance List materials through ROCs, CAA is finding some ROCs will be co-located with USCL depots that also collect bulky rigids such as pails and buckets. In these instances, and where there is insufficient space for the shipping container model, some co-located facilities would benefit from a smaller, more modular set up. In those situations, CAA will request alternative compliance for buckets and pails in instances where USCL Depots have 20-yard or 30-yard dumpsters for their USCL bins, in which buckets and pails are currently accepted. Therefore, container size is not a barrier to collection of buckets and pails.

CAA is currently collecting source-separated buckets and pails at all existing ROC/USCL sites. Those operators will continue to do so. Most new ROC sites coming online in the next 1.5 years will also collect buckets source separated. This Alternative Compliance request is for ROC locations that suffer from space constraints.

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Alternative Compliance Request for the Transport of Non-densified Block White EPS

Current administrative rules set a 75-mile limit on the distance that undensified EPS may be transported within the state (OAR 340-090-0650(3)(a)(A)). DEQ's approval of the program plan granted CAA an alternative compliance scenario that allows for transport of undensified EPS for distances greater than 75 miles if the EPS was filling "void space" in trailers primarily being used for transport of other goods.

CAA is seeking an additional alternative compliance for the transportation restrictions in OAR 340-090-0650(3)(a)(A), allowing shredded EPS to be transported up to 195 miles before densification. CAA conducted a lifecycle analysis (LCA) comparing the transportation of unshredded EPS at the 75-mile limit to the environmental impacts of shredding and transporting size-reduced EPS. The LCA suggests the size-reduced EPS can be transported a distance of 195 miles with the same environmental impacts as the transportation limitation limits of unshredded EPS in the current rule.

CAA is building and piloting a mobile, fully contained shredding and material storage system that will allow safe and efficient on-site shredding of block EPS at collection sites located greater than 75 miles from densification locations.

Collection Events for PRO Recycling Acceptance List Materials

During Q2 2026, Circular Action Alliance (CAA) partnered with local governments, community organizations, and service providers to host five RecycleOn collection events in Silverton, Stayton, Wilsonville, Lake Oswego, and Troutdale. These events provided residents with convenient opportunities to recycle materials accepted through the RecycleOn program, including plastic film, plastic lids and package handles, plastic buckets and pails, shredded paper, and foil products. Host sites developed and distributed event-specific media and outreach materials tailored to the needs and demographics of their local communities to maximize awareness and participation up to 6 weeks in advance of the event. To further support promotion of the collection events, CAA Oregon supplemented these efforts with targeted social media posts that helped expand public awareness and encourage community engagement. As more communities receive RecycleOn Centers, knowledge of the accepted items will expand customer participation.

Many events were incorporated into existing community cleanup or bulky waste collection programs, allowing residents to access multiple recycling and disposal services in a single visit.

The events served as an important outreach and access strategy in advance of continued RecycleOn Center expansion. By bringing collection opportunities directly into communities, CAA increased awareness of accepted materials, introduced residents to the RecycleOn program, and encouraged proper recycling practices for materials not typically accepted through curbside programs. The events also provided an opportunity to test operational approaches, strengthen local partnerships, and gather feedback to inform future collection and education efforts.

Several events were paired with established community bulky waste programs hosted by Republic Services. In Silverton, Stayton, Wilsonville, and Lake Oswego, residents were able to recycle RecycleOn materials while also participating in local bulky waste collection efforts that accepted large household items, scrap metal, mattresses, and other difficult-to-manage materials. This partnership approach helped maximize resident participation and expanded the visibility of Oregon's new recycling opportunities.

The Troutdale collection event, hosted in partnership with the City of Troutdale and local waste management partners, extended participation opportunities to residents of Troutdale and Wood Village. The event highlighted regional collaboration and demonstrated how temporary collection events can provide service in areas while permanent recycling infrastructure continues to expand.

Collectively, these Q2 events supported CAA's ongoing efforts to expand recycling access throughout Oregon, increase public awareness of accepted materials, and provide convenient recycling opportunities for residents. The events complemented the broader rollout of RecycleOn Centers statewide and contributed to Oregon's long-term goal of creating a more accessible, modern, and consistent recycling system.

Q2 Event Schedule

Silverton – May 9, 2026

- Distance to public transit:0.6 miles
- 2 bags of plastic film received
- 8 buckets received

Wilsonville – May 16, 2026

- Distance to public transit: 0.6 miles
- 0 items received

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Stayton – May 30, 2026

- Distance to public transit: 0.2 miles
- 3 bags of shredded paper received
- 1 bag of plastic film received

Lake Oswego – June 6, 2026

- Distance to public transit: 0.4 miles
- 2 bags of shredded paper received
- 1 bag of plastic film received

Troutdale – June 13, 2026

- Distance to public transit: 0.3 miles
- 5 bags of plastic film received
- 1 bag of plastic lids received
- 1 bag of foil products received

Tribal Engagement for System Expansion and RecycleOn Centers

TSWAN's bi-annual meeting was held in conjunction with the Association of Oregon Recyclers conference from June 22 to 24, 2026. CAA team members attended and had the opportunity to engage with TSWAN staff and participating Tribes. CAA continues to participate in TSWAN meetings and events, where appropriate, to support engagement related to recycling system expansion in Oregon and Washington.

Building on the Primary Funding Agreement signed with the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) last quarter, CAA and CTUIR signed a PRO Depot addendum during Q2 2026 to support implementation of a RecycleOn Center at a location to be determined on the reservation. Delivery and launch activities are scheduled to occur early in Q3 2026.

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