

Circular Action Alliance Oregon

Paper and Packaging EPR Quarterly Report

Q3 (July – September 2025)

Nov. 15, 2025



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CAA Introduction

<u>Circular Action Alliance (CAA)</u> 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 industries.

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 July 1, 2025. CAA has also been selected as the PRO in California, Colorado, Maryland and Minnesota, and it is engaging with additional states that are developing EPR systems.

CAA has built out 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.





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 <u>Oregon Administrative Rules (OAR) 340–090–0630 (3)</u> and fulfilling the Expansion of Service funding (per <u>OAR 340–090–0800</u>).

This report reflects the progress made during the first three months of implementation from July 1 to Sept. 30, 2025. The report demonstrates the range of engagement the CAA Oregon team has had with interested parties around the state to build the foundation of the program.

The CAA Oregon team looks forward to working with the producers, 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 Circular Action Alliance





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 included initial outreach with the Oregon Recycling System Optimization Project (ORSOP), and technical assistance the CAA team began providing in January 2025. 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

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

Priority /	Total Funding Estimate	*Annual	Containers	Trucks	USCL	Reload
Outreach Groups	per the Program Plan FY	Operating and			Depots	
	2025-27	Education				
A	\$16,679,168		\$4,746,510	\$10,352,300	\$80,358	\$1,500,000
В	\$96,428				\$96,428	
С	\$1,052,321				\$1,052,322	
D	\$10,237,967		\$1,402,467	\$7,876,750	\$458,750	\$500,000
E	\$12,834,790		\$2,533,490	\$5,851,300	\$750,000	\$3,700,000
F	\$40,624,829		\$17,056,730	\$19,579,350	\$188,749	\$3,800,000
Wasteshed Totals	\$81,525,503	*\$2,725,911	\$25,739,197	\$43,659,700	\$2,626,607	\$9,500,000

Table 1. Summary of estimated investments in the approved program plan, by Priority Group. There are 241 Cities, 135 CPD's 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 FY2O25-27 total as it is separate.

CAA Oregon has entered into Primary Funding Agreements with all 16 Priority A communities and has executed service expansion addenda for four communities. The remaining communities are in the process of finalizing their expansion plan implementation dates. The table below shows the system expansion investments ordered during Q3 2025.

Region / Wasteshed	Priority Group	Program Plan Initial Estimates FY 2025-27	Total Funding Estimate Signed Addendums Q3 YTD	Trucks Ordered	Containers	USCL Depots	Recycling Reload Facilities
Baker	Α	\$2,414,771	\$1,122,749	2	5,187		
Douglas	Α	\$6,735,721	\$1,991,708	2	10,729		
Lane	Α	\$13,193,954	\$439,319	1	200		
Q3 Totals		\$22,344,446	\$3,553,776	5	16,116	7 Signs	None

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.





Implementing Education and Outreach Initiatives

Between July and September 2025, CAA Oregon worked to support communities as they transitioned to the USCL and expanded its statewide education and outreach (E&O) efforts to prepare Oregonians for the rollout of the RMA.

Messaging focused on helping residents recycle with confidence, reduce contamination, and understand new recycling options coming to their communities. As communities across the state transition to collecting the full range of USCL materials, CAA considers initial orders of E&O materials from communities adding items to their recycling list to be system expansion support. When communities place subsequent orders, these will be considered ongoing support for E&O under Oregon Revised Statutes (ORS) 459A.893.

During Q3 2025, CAA supported communities accessing and ordering materials via the E&O Portal, which enables communities to find, customize, and download 22 different E&O materials in 12 languages. Additional tools and resources will be added over time.

Statewide, 117 communities accessed the portal to update their recycling acceptance lists and customize and download educational materials. Communities ordered more than 166,000 pieces of customized collateral via the portal.

Communities printed additional collateral through vendors that provide mailing and billing services, with CAA Oregon providing reimbursement.

CAA's E&O team worked closely with USCL depots to update and customize signage to meet the needs of expanding programs. CAA Oregon funded the development and printing of USCL depot signage for seven communities and continues to work with others on one-off signage needs.

CAA Oregon also launched a large statewide recycling-focused marketing campaign in August 2025. The first phase of the campaign introduced Oregonians to the new RecycleOn Oregon brand and website, and built awareness that changes are coming to improve recycling in Oregon.

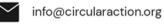
The campaign included advertisements on various media including Google, billboards and transit, digital audio, podcasts, digital video (pre-roll/YouTube), broadcast and cable TV, radio, and social media. As of Sept. 14, 2025, an estimated 86% of people in Oregon aged 18 and older were reached an average of 36 times with over 105 million impressions. To reach Oregon's Spanish-speaking community, 11.5% of the ad budget was spent on Spanish-language media.

Across all channels, the campaign emphasized clear, consistent messaging that builds trust in Oregon's evolving recycling system.

The first phase has had more than:

- 30 million completed video views, with a cost per view below the national average
- 21 million audio listens, with a cost per listen also below the national average
- 69,000 social media engagements

Additional phases of the ad campaign will launch in Q4 2025 focusing on the launch of free, PRO-funded RecycleOn Centers and contamination reduction messaging.







Meeting the PRO Recycling Acceptance List Convenience Standard Requirements

CAA Oregon contracted with Oregon Beverage Recycling Cooperative (OBRC) to support the operational needs of a statewide network of recycling collection points. OBRC offers a well-established fleet of trucks and drivers and an established logistics system that can optimize routes and collection coordination across the state.

On Sept. 8, 2025, CAA accepted delivery of the first RecycleOn Center shipping container at the Grants Pass Depot host site operated by Republic Services. Additional RecycleOn Center shipping containers were delivered later in the month to other sites in CAA's first PRO depot region in Southern Oregon, inclusive of Jackson, Josephine, Klamath, and Lake Counties.

On Sept. 25, 2025, CAA Oregon conducted initial operator training for the management and staff at Southern Oregon Goodwill Industries (SOGI). Twelve assistant store managers for Goodwill stores in the region attended the training. SOGI will host several RecycleOn locations, serving as collection points for many of the PRO Recycling Acceptance List (RAL) materials. The SOGI locations are accepting source–separated items directly from residents alongside the goods they are donating to Goodwill. Working with SOGI provides CAA an opportunity to partner with an organization that has prominence in many communities in the region and offers Oregonians an efficient and convenient way to recycle materials while donating household goods.

CAA is working toward activating more RecycleOn Centers in both Jackson and Josephine counties in Q4 2025, to be operated by Republic Services, Southern Oregon Sanitation, Recology, and SOGI. Similarly, the CAA Recycling Center team is working on establishing the first RecycleOn Centers in Deschutes, Crook, Jefferson, and Harney counties. CAA Oregon is in contract with Crook County and Madras Sanitation in Jefferson County and is in active negotiations with Deschutes County and Republic Services.

By Sept. 30, 2025, CAA Oregon executed 24 funding addenda with communities and haulers to facilitate continued glass collection through existing collection systems. CAA Oregon began accepting invoices for glass collected and delivered to a Responsible End Market (currently Glass to Glass, LLC) beginning July 1, 2025. Communities and haulers have begun submitting documentation of delivered quantities, including weight tickets and route data. Invoices for glass incentives, at the 2025 rate of \$77 per U.S. ton, are being paid. CAA Oregon also had 16 fully executed glass transportation addenda by the end of Q3 2025.

Alternative Compliance and Meeting Convenience Standards for Block White Expanded Polystyrene

CAA Oregon continues to make strategic progress toward achieving Phase One operational goals for the collection and densification of expanded polystyrene (EPS) across Portland Metro, Tillamook County, and Lane County. During Q3 2025, CAA Oregon actively engaged in contract







negotiations with potential operating partners to establish the necessary infrastructure and logistics for EPS recovery. CAA Oregon has developed and presented comprehensive contracts addressing both EPS densification equipment and EPS collection and transportation services. These proposals have been shared with Green Century Electronics Recycling and the St. Vincent de Paul Society of Lane County. In parallel with contract development, CAA Oregon has made significant capital investments to support Phase One infrastructure. This includes the procurement of two custom–designed EPS thermal melt densification systems that have been engineered to accommodate the anticipated material volumes and spatial configurations of our future processing facilities. These systems are currently under construction by Intco, with delivery to Oregon scheduled for Q4 2025.

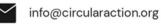
CAA Oregon has also invested in a mobile EPS processing unit equipped with onboard shredding and storage capabilities. This innovative mobile solution is designed to service remote collection points, specifically Tillamook County, by enabling on-site EPS volume reduction through shredding. The shredded material will then be transported to a contracted facility for final densification.

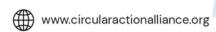
In addition to the established collection networks of our proposed EPS densification facilities, testing is underway for a small-footprint collection box for EPS that can be placed in urban settings. This approach will be ideal for adding collection points by laying the groundwork for significant volumes of EPS to be collected and densified in accordance with the phased-in strategy laid out in CAA's program plan.

Collection Events for PRO Recycling Acceptance List Materials

During the first few months of implementation, the CAA Oregon team began developing a strategy for hosting PRO Recycling Acceptance List (RAL) material collection events. The team is partnering with local jurisdictions, service providers, and non-profits to learn if PRO RAL materials can be incorporated into existing material collection events. The team has attended and observed a number of events and will continue learning and observing best practices through Q4 2025. Notes from the initial events are included below.

- 1. Environmental Management Advisory Committee (EMAC) City of Florence 8/16:
 - Items collected: Appliances, tires, propane tanks, EPS, mattresses, paint, construction supplies, hearing aids, glasses.
 - Collected 18 mattresses, 17 refrigerators, 1 washing machine, 45 pairs of glasses, 88 gallons of paint, 66 tires with rims, 76 tires with no rims, 14 propane tanks.
 - Public attendance: 89 vehicles entered, all with one minute or less wait time.
 - No walk-up residents.
- Tillamook County EPS Collection 8/9:
 - Items collected: Household Hazardous Waste (HHW) & EPS. This event is hosted every other month.
 - Collected 15 super sacks of EPS.







- Drive-through event. Long wait times due to HHW unload times. Tough for EPS-only customers.
- Considering there is a free year-round EPS drop off in Manzanita and Pacific City, it was a surprising amount of EPS collected.
- Not an ideal method for collecting other PRO RAL materials.
- 3. James Recycling/New Seasons Plastic Collection Event in the City of Portland on 9/13:
 - Items collected: Plastics #1, #2, #4, #5, #6, plastic straws and utensils, plastic screw-on caps, bread clips.
 - Collected 294 pounds of plastic film; 1,872 pounds of plastics #2, #5, #6; 600 pounds of EPS; 2,789 pounds of e-waste.
 - This event is not free to the public, and therefore not ideal for collecting PRO RAL materials.

In addition to events attended in August and September, several others are planned for Q4 2025, including events organized through Republic Services, Deschutes County, and Zero Waste McMinnville.

Tribal Engagement for System Expansion and RecycleOn Centers

In addition to engaging with the local jurisdictions, the CAA Oregon team is committed to collaborating with the Confederated Tribes of Oregon to ensure these communities receive equal access to recycling. In 2024, team members began meeting with Tribal Solid Waste Advisory Network (TSWAN) leadership, as well as the EPA Region 10 Tribal Liaison and the DEQ Headquarters Tribal Liaison, to learn the initial landscape of Tribal structure and current levels of service to Tribal members.

TSWAN members Grand Ronde, Warm Springs, and Umatilla have what DEQ defines as an existing depot or solid waste infrastructure. CAA held several phone meetings with these Tribes' environmental staffers to discuss RecycleOn Center opportunities at existing locations. CAA also made site visits to these locations, including a landfill tour. Though RecycleOn Centers remain a possibility at these Tribal locations, the Tribes highlighted higher priorities. These included HHW management, solid waste collection assets, and collection of other material streams such as cardboard, commingled recyclables, and glass. CAA is now exploring these other possibilities that fall under the capabilities and scope of producer funds.

Tribes are actively reviewing the Primary Funding Agreement, which is the first step for enabling funding to flow to these communities. As collecting PRO RAL materials is a secondary priority for tribes, CAA Oregon is beginning to work with local haulers to explore the provision of USCL recycling services in certain Tribal jurisdictions.

CAA Oregon continues to meet with Tribes that do not have existing depot infrastructure, including the Coquille, CTCLUSI, Cow Creek, and Siletz. These meetings have focused on developing relationships and trust building, while informing the Tribes of the coming changes to the state and how CAA can support Tribal goals within the parameters of the RMA.





CAA has made several attempts to connect with Burns Paiute and Klamath Tribes and will continue to do so quarterly.

Outside of individual Tribal outreach, CAA began attending TSWAN meetings, worked closely with TSWAN and its Oregon members at the Association of Oregon Recyclers (AOR) conference, and attended and presented at TSWAN's Tribal Green Summit in September 2025.

Changes in Program Plan for Which an Amendment is Not Required None to report at this time.





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