Rulemaking Advisory Committee Meeting #2
Plastic Pollution and Recycling Modernization Act

Sept. 28, 2022
Zoom Webinar
# Agenda

<table>
<thead>
<tr>
<th>Time</th>
<th>Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>9 a.m.</td>
<td>Welcome, overview of today’s meeting</td>
</tr>
<tr>
<td>9:10 a.m.</td>
<td>Introductions</td>
</tr>
<tr>
<td>9:15 a.m.</td>
<td>Local Government Compensation and Engagement</td>
</tr>
<tr>
<td>10:20 a.m.</td>
<td>Additional information (Annual Administration Fees)</td>
</tr>
<tr>
<td>10:30 a.m.</td>
<td>BREAK</td>
</tr>
<tr>
<td>10:40 a.m.</td>
<td>Revised Rule Concepts (Responsible End Markets, Market Share and Modified Market Share)</td>
</tr>
<tr>
<td>12 a.m.</td>
<td>LUNCH BREAK</td>
</tr>
<tr>
<td>12:30 a.m.</td>
<td>Public Input Period*</td>
</tr>
<tr>
<td>1 a.m.</td>
<td>New rule concept: PRO Program Plan Timelines*</td>
</tr>
<tr>
<td>1:20 a.m.</td>
<td>Introduction to Materials Acceptance Lists*</td>
</tr>
<tr>
<td>2 a.m.</td>
<td>Review meeting schedule, next steps, and adjourn*</td>
</tr>
</tbody>
</table>

* Note: Times subject to change and topics may begin earlier than listed
Webinar Tips

Join audio either by phone or computer, not both.

For panelist discussion and comments, use the raise hand button to get in the queue; if by phone press *9.

This meeting is being recorded.

For Zoom technical issues text 503-869-2884 or email alex.bertolucci@deq.oregon.gov.
Meeting ground rules

• Listen and treat everyone with respect
• Allow one person to speak at a time – raise hand
• Be prepared and set time aside for the meetings
• Provide a balance of speaking time
• Bring concerns and ideas up for discussion early in the process
• Comment constructively and avoid personal attacks
• Move around and take care of yourself as needed
Introductions - DEQ Staff

**Cheryl Grabham**, Program Manager, Materials Management Product Stewardship Team

**David Allaway**, Senior Policy Analyst

**Michael Lee**, Policy Analyst

**Roxann Nayar**, Recycling Program Analyst

**Alex Bertolucci**, Natural Resource Specialist
Input and Engagement

• RAC input is welcome throughout the process
• Comments received within 10 days of RAC meetings will help staff prepare in advance of following meeting
• Formal comment period will be in May-June 2023
• DEQ will clarify and provide information when possible
• Comments and questions received will be considered during rule development
We are here
DEQ will be engaging with local governments and service providers across the state to create awareness about the new opportunities and requirements.

- **October 2022**: DEQ will be mailing a brochure to local governments.
- **Oct-Nov 2022**: DEQ will be giving presentations about the Act.
- **Winter 2023**: A DEQ contractor will be surveying LGs and services providers about service expansion needs.
- **July 1, 2023**: Needs Assessment will be analyzed and shared with the PROs.
Local Government Compensation

ELIGIBLE EXPENSES

- Service Expansion
- Transportation Reimbursement
- Contamination Reduction
- Contamination Assessment
Local Government Compensation

Rulemaking 1 Topics:

1. Contamination Reduction Programming
2. Expansion of Recycling Services
3. Transportation Reimbursement (RAC meeting #3)
Compensation for Contamination Reduction

State of Oregon Department of Environmental Quality
Rule Concepts: PRO Compensation of Local Governments for Contamination Reduction Programming

Plastic Pollution and Recycling Modernization Act (SB 582, 2021)
Remaking Advisory Committee Meeting 2 of 3, Remaking 1

Contact: Rebecca Neyar
760 NE Marquam St, Suite 600, Portland, OR 97232
rneyar@deq.oregon.gov

Sept. 14, 2022

Background

This memo provides background information for the Remaking Advisory Committee on the topic of Producer Responsibility Organization (PRO) compensation to local governments and their service providers for contamination reduction programming, and introduces DEQ’s proposed rule concepts on the topic. The topics include:

- Method(s) for determining population-based limits on funding or reimbursement associated with generator-facing contamination reduction efforts; and
- Standards for local governments and/or their service providers to document costs and procedures for them to request reimbursement from a PRO.

The Plastic Pollution and Recycling Modernization Act (“Act”) requires local governments to deliver generator-facing programming to reduce contamination in set-out recyclables, requires PROs to compensate local governments (both regulated and non-regulated) for such efforts, and includes a requirement that the Environmental Quality Commission establish a method for determining funding or reimbursement associated with generator-facing contamination reduction efforts.

GORS 459A.890(3)(b) states that “Rules adopted under this subsection may not require producer responsibility organizations to provide funding or reimbursement of more than $1 per carton per year.”
Contamination Reduction: population estimates

Funding or reimbursement for contamination reduction programming is limited to up to $3 per capita, per year based on population.

DEQ proposes determining population-based limits on funding or reimbursement using:

- Most recent Population Estimate Reports published by Portland State University’s Population Research Center to determine populations for each local government (city or county).
  - updated on an annual basis
  - preliminary estimates typically released around November 15 annually, and estimates are certified (i.e., finalized) by December 15 annually.
Contamination Reduction: population estimates

Allow reimbursement using the most current published population estimate at the time requested, provided that an estimate for a subsequent year is not used.

For example, for reimbursements requested:

For 2027 expenses prior to publication of 2027 population estimates would have expenses capped using 2026 estimates.

For 2027 expenses following publication of 2027 population estimates would have expenses capped using 2027 estimates.

For 2027 expenses in 2029 would have expenses capped using 2027 estimates.
Contamination Reduction: documenting costs

Standards for documenting costs and reimbursement procedures

- DEQ proposes local governments or service providers:
  - Must provide PRO with itemized invoice detailing the contamination reduction effort undertaken, such as resources, administrative costs, etc.
  - May submit reimbursement invoices as necessary (e.g., monthly, quarterly, end-of-project, etc.) but no more frequently than once per month.
Contamination Reduction: reimbursement

Standards for documenting costs and reimbursement procedures

• PRO shall remit payment expenses to a Local Government (LG) or the LG’s service provider(s), or other person authorized by the LG, within 60 days of receiving a request for payment.

• Multiple LGs may submit joint funding requests in order to pool populations and reduce the number of reimbursements. All such LGs must sign/endorse the funding request.
Discussion
Expansion of Recycling Collection Services

State of Oregon Department of Environmental Quality

Rule Concepts: Expansion of Recycling Collection Services

A Memo on eligible expenses for recycling service expansion

Plastic Pollution and Recycling Modernization Act (SB 582, 2021)

Rulemaking Advisory Committee Meeting 2 of 3, Rulemaking 1

Contact: Rosanna Navar
700 NE Multnomah St, Suite 600, Portland, OR 97232
rony.navar@deq.oregon.gov

Sept. 14, 2022

Background

This memo provides background information about expansion and provision of residential and commercial (single-family, multifamily and businesses) recycling collection services for covered products, and introduces DEQ’s proposed rule concepts on these topics.

The Plastic Pollution and Recycling Modernization Act (Act) requires that the Producer Responsibility Organization (PRO) fund or reimburse local governments or their service providers for eligible expenses associated with expanding and providing residential and commercial recycling services. The Department of Environmental Quality will conduct a Local Government Needs Assessment and survey local governments and their service providers about their interests in expanding collection services. The first report will be due to the PRO by July 1, 2023, prior to the PRO submitting their first program plan for review. Additional Local Government Needs Assessments will be conducted periodically thereafter. The PRO must fulfill all the eligible needs submitted as part of this assessment.

Concepts for discussion at the Sept. 28, 2022 RAC meeting
Expansion of Collection Services

1. Fund in advance or reimburse for eligible expenses

2. Expansion of residential/commercial collection of covered products at depots and on-route

3. All local governments, regardless of size

4. Indicate interest during the Local Government Needs Assessment (Winter 2023)
Expansion of Recycling Collection Services

The concept clarifies ‘service expansion’ and eligible expenses:

- “Covered products” only
- Must be on the recycling acceptance lists
- New services
- Expansion of existing, inadequate services
Eligible Expenses: On-Route

Expansion expenses include:

- Collection trucks
- Containers or roll carts
- Monitoring equipment
- Promotional literature
- A recycling reload facility for reloading recyclables
Eligible Expenses: Depots

Expansion expenses include:

• Containers
• Signage
• On-site monitoring equipment
• Equipment to move, compact, bale and load recyclables for shipment
• Site preparation or other start-up costs
• Ongoing operational costs
Expansion Prioritization

Program Plan Requirements:

1. Existing depots contracting with PRO:
   a. Where materials formerly collected on-route or where on-route collection ceases due to material not being on the uniform statewide collection list
   b. Where materials not currently or formerly collected on-route
Expansion Prioritization

Program Plan Requirements:

2. Communities with populations less than 4,000

3. Communities of any size that lack any service (on-route or a depot) looking to start up service

4. All other communities with some services and looking to expand existing on-route collection, recycling depots or both, by ascending population
Discussion
Timing of Needs Assessments

1. Initial needs assessment is the only one implemented during the first 3-year program plan.

2. Each five-year program plan will address up to two needs assessments, at the beginning and near the mid-point.

3. PRO must submit program plan amendment for assessment received within four years of expiration.
Compensation & Expansion in Program Plan

PRO must describe in their program plan:

- Schedule for implementing expansion within the upcoming program plan timeframe
- Method for determining how to fully fund or reimburse reasonable eligible expenses
- Method for paying local governments or their designated service provider(s)
- Total estimated amount of funds made available to each local government per year
Unused funding must be returned within 60 days
State of Oregon Department of Environmental Quality

Rule Concepts: Annual Administration Fee: Additional Details

Plastic Pollution and Recycling Modernization Act (SB 582, 2021)
Rulemaking Advisory Committee Meeting 2 of 5, Rulemaking 1

Contact: Roxana Nayar
700 NE Maltanorah St, Suite 600, Portland, OR 97232
roxan.nayar@deq.oregon.gov

Sept. 14, 2022

Background

This memo provides additional information to the Rulemaking Advisory Committee on budgeting for the annual administration fee. This fee, paid to DEQ by the producer responsibility organization(s), covers DEQ’s expenses associated with the ongoing costs of administering, implementing, and enforcing provisions ORS 459A.860 to 459A.975. In our current rule concept, it is $4,000,000 per year for the first four years of implementation (2025-2028), and then $3,000,000 in subsequent years. These amounts represent the maximum projected expenditure and DEQ may adjust the fee downward in any given year to reflect actual operating costs. The first four annual fees are higher than the later annual fees, as they encompass reimbursement of DEQ’s start-up costs incurred in 2021-2025.

Applicable statute regarding DEQ fees: ORS 459A.938.

Additional Detail

DEQ’s budget for the annual administration fee consists of start-up costs including all costs for implementing the Act incurred prior to July 1, 2025, the date on which the PRO program plans begin to operate and operation costs incurred from July 1, 2025, onward. PER ORS 459A.938, DEQ can only begin charging the annual administration fee for 2025, the first year of program plan implementation. Start-up costs incurred prior to 2025 must be recouped in future years’ fees, while annual operation costs are recovered in the fee for the year in which they are incurred.
Annual Administration Fee

Questions from RAC members:
1. How was the annual administration fee calculated?
2. Does the fee fund existing staff and work, or only new work?
3. Are the fees reduced in the case of one rather than multiple PROs?
Annual Administration Fee

Recap:
• One-time fee for plan review
  – Proposed fee amount: $150,000

• Annual fee for administration
  – Proposed fee amount:
    • $4 million per year in 2025-2028
    • $3 million per year thereafter
Annual Administration Fee

1. How was the annual administration fee calculated?
A: Project start-up and operation costs for DEQ staff and contractor services

2. Does the fee fund existing staff and work, or only new work?
A: Personnel costs cover all staff time spent implementing the Act, including proportional costs for existing staff

3. Are the fees reduced in the case of one rather than multiple PROs?
A: The annual administration fee will be split between multiple PROs rather than charging this fee to only one prospective PRO
Discussion
Break
Revised Rule Concepts

State of Oregon Department of Environmental Quality
Revised Rule Concepts: Responsible End Markets

Plastic Pollution and Recycling Modernization Act (SB 382,2021)
Rulemaking Advisory Committee Meeting 2 of 5; Rulemaking 1

Contact: Rosang Nayar
700 NE Maltomah St, Suite 600, Portland, OR 97232
ronayar@deoq.oregon.gov

Sept. 14, 2022

Summary

The Plastic Pollution and Recycling Modernization Act (“Act”) requires that certain covered products collected for recycling are delivered to “responsible end markets” and managed in an environmentally-protective way according to Oregon’s hierarchy of materials management options.

At the July 20, 2022 Rulemaking Advisory Committee meeting, DEQ presented four rule concept areas for consideration:

1. Specify which persons in the recycling supply chain are considered the “end market;”
2. Clarify standards for what would constitute a “responsible” end market under ORS 459A.863;
3. Establish implementation, reporting, auditing and enforcement requirements and protocols for “responsible end markets;” and
4. Clarify actions that may be considered “practicable” for 459A.869(7) and ORS 459A.896(2), which require a Producer Responsibility Organization, “to the extent practicable,” to ensure product delivery to responsible end markets with materials managed in an environmentally-protective manner and according to Oregon’s hierarchy.

This document presents proposed updates to rule concepts in areas (2), (3), and (4) in response to feedback received from the committee during the July 20 meeting.
Responsible End Markets

Proposed updates:

1. Proposed Standard for “Responsible”
2. Implementation, Reporting, Auditing, and Enforcement
3. Definition of “Practicable” (and calculation of social benefits)
Responsible End Markets

1. Proposed Standard for “Responsible” - Update the language for the definition of “Compliant”

   – Explicit inclusion of labor and public health law in compliance element of “responsible”
Responsible End Markets

2. Implementation Pathways, Reporting, Auditing, and Enforcement

- The concept proposes to include language in rule that provides examples of implementation approaches PROs could use to fulfill their responsibilities
Example Implementation Pathways

Two tracks for fulfillment of “responsible end market” obligation

Internal verification
Two-step process:
1. Initial screening (attestations)
2. Detailed assessment

3rd Party Certification
using a certification program approved by the EQC
About Enforcement

The goals of enforcement are to:

• **Protect** public health and the environment;
• Obtain and maintain **compliance** with applicable environmental statutes and the department’s permits, rules and orders;
• **Deter** future violators and violations; and
• Ensure an **appropriate** and **consistent** statewide enforcement program.
Discussion
3. Practicability

PRO obligations are “to the extent practicable” (ORS 459A.896(2)):

- How to evaluate “cost” and “benefit”?
- DEQ proposes allowing the PRO to choose from two options, both subject to DEQ review and approval

- **Default analysis**
  Compare per-ton costs (from PRO) to per-ton benefits (benchmark in rule, adjusted for inflation)

- **Customized analysis**
  Subject to consultation with State Recycling Council
Recycling acceptance lists (ORS 459A.914)

• When naming materials to a recycling acceptance list, the Commission is required to consider ~15 different criteria
  – Including “economic factors” and “environmental factors from a life cycle perspective”

• DEQ analysis (with Cascadia Consulting Group) is evaluating multiple “whole system” scenarios
  – Material flows
  – Transactional (financial) costs
  – Environmental impacts
  – Social costs (externalities)
Cost/Benefit Comparison
A theoretical example (figures not to scale)
Cost/Benefit Comparison
A theoretical example (figures not to scale)

Cost/(Benefit)

future

Transactional Cost (T)

Externalized Cost (E)

$0

Tons Recycled

44 44
Cost/Benefit Comparison
A theoretical example (figures not to scale)

Cost/(Benefit)

Net Social Cost (N)
\( N = T + E \)

Transactional Cost (T)

Externalized Cost (E)

future

Cost/(Benefit)

$0

Tons

Recycled

45
Cost/Benefit Comparison
A theoretical example (figures not to scale)

Net Social Cost (N)
\( N = T + E \)

Transactional Cost (T)

Externalized Cost (E)

$0

Tons
Recycled

future

Cost/(Benefit)
Cost/Benefit Comparison
A theoretical example (figures not to scale)

Cost/(Benefit)

Net Social Cost (N)
(N = T + E)

Transactional Cost (T)

Externalized Cost (E)

$0

future

∆T

∆N

∆E

Tons

Recycled

47
Cost/Benefit Comparison
A theoretical example (figures not to scale)

Net Social Cost (N)
\[ N = T + E \]

How much should an “economically rational” society be willing to pay (in transactional costs) to recycle at the “future” scenario?

\[ \Delta E \]

How much do we actually expect society to pay?

\[ \Delta T \]

How much additional should society be willing to pay?

\[ \Delta N \]

Or, on a per-ton basis, \( \Delta N / \Delta \text{Tons} \)
Discussion
5 Minute Review Break

Up next:
Market Share and Modified Market Share
Market Share and Modified Market Share

Revised Rule Concepts: Market Share and Modified Market Share

Plastic Pollution and Recycling Modernization Act (SB 582, 2021)
Rulemaking Advisory Committee Meeting 2 of 5, Rulemaking 1

Contact: Roxann Nayar
700 NE Multnomah St, Suite 600, Portland, OR 97232
roxy.nayar@deq.oregon.gov

Sept. 14, 2022

Summary

Statute directs the Environmental Quality Commission to establish a method for calculating “market share” in rule. Market share can be defined in many different ways. DEQ seeks additional feedback on proposed methods to calculate market share during the Sept. 28, 2022 Rulemaking Advisory Committee meeting.

DEQ proposes that a weight-based approach (either weight alone or weight multiplied by financial burden) is most feasible and a best match for “market share” as used in global Extended Producer Responsibility programs. After considering feedback from RAC members on July 20, DEQ proposes the following additional options for consideration:

- Establish a weight-based approach to calculate “market share” in rule. This would be used to identify the largest 25 producers and to establish the 10% Producer Responsibility Organization (PRO) market share threshold; and
- Establish in rule the term “modified market share,” to be calculated using a financial burden approach. This would be used to allocate financial obligations among multiple PROs.
Market Share and Modified Market Share

• ORS 459A.869(9) requires the Environmental Quality Commission to establish by rule “methods for calculating market share.”

• ORS 459A.863(13) defines “market share” to mean “a producer’s percentage of all covered products sold in or into this state during a specified time period, as calculated in accordance with methods established by the commission by rule.”

• Uses of “market share”:
  – ORS 459A.863(8): definition of “large producer”
  – ORS 459A.869(12): minimum size for PROs
Market Share: Updated Proposal

1. Apply the weight method in rule for calculating market share. Use market share to determine
   • Whether PROs meet the 10% threshold for operating in Oregon
   • The identity of the largest 25 producers
Market Share: Updated Proposal

1. Apply the weight method in rule for calculating market share. Use market share to determine
   - Whether PROs meet the 10% threshold for operating in Oregon
   - The identity of the largest 25 producers

2. Define “modified market share” in rule and apply the financial burden method for calculating it.
   - Use modified market share to divide financial obligations among PROs
Calculating Modified Market Share

Options for financial burden unit factor:

1. Oregon PROs’ own annual base rates
2. Recycle BC fee schedule
3. Factors fixed in rule
4. Independent consultant index

Possible hybrid approach:

• **Year 2 and future years**: Use Oregon PROs’ own annual base rates from the preceding year.

• **Year 1**: Independent consultant index or other source.
Discussion
LUNCH BREAK
Public Input Period
PRO Program Plan Timelines

State of Oregon Department of Environmental Quality

Rule Concepts 6: PRO Program Plan Timelines
Plastic Pollution and Recycling Modernization Act (SB 582, 2001) Rulemaking Advisory Committee Meeting 2 of 5, Rulemaking 1

Background

Statute directs the date for beginning implementation of the first set of approved Producer Responsibility Organization program plans. It also defines the duration of the first PRO program plan and subsequent, updated PRO program plans. The relevant citations and language are as follows:

- (Program start deadline) c. 681 §59 Oregon Laws 2021 (temporary statutory provision): “A producer responsibility organization shall first implement an approved producer responsibility program plan no later than July 1, 2025.”
- (Duration of first PRO program plan) ORS 459A.878(3): “A plan approved by the department under this section is valid for three years.”
- (Duration of updated PRO program plans) ORS 459A.878(3), amended version which takes effect on April 1, 2027: “A plan approved by the department under this section is valid for five years.”
- (Deadline for submission of updated PRO program plans) ORS 459A.878(4): “No less than 180 days before a plan approved under this section expires, a producer responsibility organization shall submit a plan to be approved under this section for an additional four years. A plan submitted for approval under this subsection must satisfy the requirements of ORS 459A.875 and describe any substantive changes from the previously approved plan. Until a plan submitted under this subsection is approved, the previously approved plan remains in effect.”
PRO Program Plan Timelines

Rule Concept to clarify:
• Initial plan valid until Dec. 31, 2027
• Updated plans due Jul. 4th of last program year

Why:
• More predictable plan timelines
• Better align plans if multiple PROs
PRO Program Plan Timelines

Act states:

- Initial plans are “valid for three years”
- Initial plans must be implemented by Jul. 1, 2025
- After Apr. 1, 2027, plans are “valid for five years”
- Must submit updated plan 180 days before approval expires
PRO Program Plan Timelines

Potential timelines based on Act:

1. Program plans are valid for three or five years from date of plan approval
2. Program plans are valid for three or five program years
PRO Program Plan Timelines

Rule Concept: Plans are valid for program years

<table>
<thead>
<tr>
<th>Initial Program Plan</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2025</td>
<td>Jan. 1, 2026-Dec. 31, 2026</td>
<td>Jan. 1, 2027- Dec. 31, 2027</td>
</tr>
</tbody>
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<tr>
<th>Second Program Plan (due Jul. 4, 2027)</th>
<th>Year 4</th>
<th>Year 5</th>
<th>Year 6</th>
<th>Year 7</th>
<th>Year 8</th>
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Program Plan Timelines

Benefits:

• Initial plan implemented through end of 2027
• More predictable timeline for submitting updated plan
• Better align plans if multiple PROs
• Fixed calendar for needs assessment
Discussion
Recycling Acceptance Lists
Topics

• Key terms and concepts
• Covered products vs. acceptance lists
• “Specifically identified materials”
• PRO obligations for different materials
• Local government obligations
• PRO depots
• Evaluation criteria and research program
• Next steps
Key terms and concepts

• **On-route** collection vs. **depot** collection
• **Commingled** (mixed) materials vs. **source segregated** materials
• **Source separation**
• Types of materials:
  – **Covered products**
  – **Materials acceptance lists**
Covered products vs. material acceptance lists

Covered products

Covered products not on a material acceptance list, e.g., potato chip bags (potential contamination)

PRO collection obligations (ORS 459A.896(1)), e.g., film plastic at depots

Local government “Opportunity to Recycle” obligations (ORS 459A.005)*

Opportunity to Recycle material but not a covered product, e.g., scrap metal

Opportunity to Recycle material and a covered product, e.g., newsprint

*Includes drop-off and on-route collection; includes but not necessarily limited to the uniform statewide collection list
Specifically identified materials

- Covered products
- Local government "Opportunity to Recycle" obligations (ORS 459A.005)
- Opportunity to Recycle material but not a covered product, e.g., scrap metal
- Opportunity to Recycle material and a covered product, e.g., newsprint

- PRO collection obligations (ORS 459A.896(1)), e.g., film plastic at depots
- "Specifically identified materials" (ORS 459A.917)
PRO obligations: responsible disposition (ORS 459A.896(2) and ORS 459A.869(7))

- Covered products
- Other materials counting towards plastics recycling goals (ORS 459A.926)
- Materials not on the uniform statewide collection list
- Local government “opportunity to recycle” obligations (ORS 459A.005)
- Uniform statewide collection list materials only
- “Specifically identified materials” (ORS 459A.917)
- PRO collection obligations (ORS 459A.896(1)), e.g., film plastic
- “specifically identified materials” (ORS 459A.917)
Summary of additional PRO obligations

Covered products:
- COMMUNICATE WHAT/WHERE/HOW TO RECYCLE
- PAY FOR PRO OVERHEAD, DEQ ADMIN. COSTS AND WASTE PREVENTION/REUSE FUND
- ACHIEVE PLASTICS RECYCLING GOALS

Covered products not on a material acceptance list, e.g., potato chip bags (potential contamination):
- COMPENSATE LOCAL GOVERNMENTS FOR CONTAMINATION-REDUCTION PROGRAMMING
- PAY CONTAMINATION MANAGEMENT FEE TO MRFs
- MAY CONTRIBUTE TO OTHER PRO COSTS

PRO collection obligations (ORS 459A.896(1)), e.g., film plastic:
- MEET CONVENIENCE STANDARDS, COLLECTION TARGETS AND PERFORMANCE STANDARDS

Local government “Opportunity to Recycle” obligations (ORS 459A.005)
- COMPENSATE LOCAL GOVERNMENTS FOR SERVICE EXPANSION, TRANSPORTATION.
- PAY PROCESSOR COMMODITY RISK FEE TO MRFs (UNIFORM STATEWIDE COLLECTION LIST ONLY)
Local government obligations

• “Standard” and “alternative” methods
• Standard program:
  – General requirements
    • Depot at disposal site or more convenient location and recycling information
    • For cities over 4,000:
      – At least monthly collection of source separated recyclable material from garbage collection service customers
      – Additional services chosen from a menu of elements
• Definition of “recyclable material”
PRO Depots

- Primarily intended to supplement local government collections – for materials not readily commingled
- 4 types:
  - Existing Multi-Material Depots (expanded)
  - Return-to-Retail
  - Single-Material Drop-Box
  - New Multi-Material Depot (PRO)
PRO Depots

- Materials collected source segregated, not commingled
- Convenient placement can encourage participation
- Convenience standards, collection targets and performance standards – to be developed
Evaluation criteria (ORS 459A.914(3))

(a) The stability, maturity, accessibility and viability of responsible end markets;
(b) Environmental health and safety considerations;
(c) The anticipated yield loss for the material during the recycling process;
(d) The material’s compatibility with existing recycling infrastructure;
(e) The amount of the material available;
(f) The practicalities of sorting and storing the material;
(g) Contamination;
(h) The ability for waste generators to easily identify and properly prepare the material;
(i) Economic factors;
(j) Environmental factors from a life cycle perspective; and
(k) The policy expressed in ORS 459.015 (2)(a) to (c).
Research approach

1. Request for Information
2. Conversations with producers, suppliers, processors, end markets, others
3. Evaluation matrix
4. Screening-level life cycle assessments
5. Surveys of depot users
6. Quantitative modeling of scenarios
7. Consultation with a Technical Workgroup
Next steps (materials acceptance lists)

RAC Meeting 3 (November 9)
Rule concepts: placement of most materials

RAC Meeting 4 (January 11)
Rule concepts:
• Placement of outstanding materials
• Convenience standards, collection targets and performance standards for PRO collections

Recycling Council (October 20th and later)
Next Steps - Meeting Schedule

Nov. 9, 2022
Topics: Transportation Reimbursement and Materials Acceptance Lists (part I)

Jan. 11, 2023
Topic: Materials Acceptance Lists (part II)

March 2023
Topics: Equity & Fiscal Impact Statements
More information

Rulemaking webpage
oregon.gov/deq/rulemaking/Pages/Recycling2023.aspx

Email input to recycling.2023@deq.oregon.gov