

Annual Report 2025



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Letter from the Executive Director

The implementation of the Recycling Modernization Act (RMA) on July 1, 2025, marked not only a major milestone for Oregon in a long journey to improve the recycling system since major market disruptions in 2018, but it is also a historic moment for the nation, marking the beginning of Extended Producer Responsibility (EPR) for paper and packaging in the United States.

This report reflects the activities for the first six months of the program, spanning July 1 to Dec. 31, 2025. In this short period, Circular Action Alliance (CAA) laid the early groundwork for the long-term work of achieving compliance by the end of the first program plan period on Dec. 31, 2027.

CAA's primary focus during the first six months was working with interest holders across the state – from regulators to material producers, trade associations, local governments, recycling service providers and end markets – to build understanding about the program and support the contracting process so funding could begin flowing to eligible parties throughout the state.

Through the development and implementation of the program, our team has been hard at work meeting our commitments in the plan. We registered more than 2,600 participant producers that reported nearly 410,000 tons of covered materials. We ordered over 42,000 containers and 12 collection vehicles with some of the more than \$167 million in producer fees from participant producers. With that money, we launched 20 RecycleOn centers, registered over 90 waste haulers in our custom-built Service Provider Portal system, and reached nearly 90% of Oregon adults through our first statewide educational campaign. Our teams engaged across the value chain to create awareness, build internal systems, implement program requirements, and advance packaging EPR in its first U.S. market.

The team is deeply appreciative of the local governments, haulers, commingled recycling processor facilities, community organizations and the staff of the Department of Environmental Quality (DEQ) that helped bring the RMA to life in Oregon. Together we navigated unknowns and uncertainty, all while making significant strides in implementation. We look forward to continued collaboration with interested parties across the state as we build on this early progress and continue to optimize the program through shared learning and experience.

Sincerely,

Kim Holmes

CAA Oregon Executive Director

1 About Circular Action Alliance

1.1 Description of the Organization

CAA was founded in 2022 and is guided by producers representing the food, beverage, consumer goods, restaurant and retail sectors. CAA is recognized by the Internal Revenue Service as tax exempt under Internal Revenue Code Section 501(c)(3).

CAA operates wholly owned subsidiaries to serve as the representative stewardship organization for participant producers in each state that passes an EPR law wherein CAA is selected as the PRO. Circular Action Alliance Oregon LLC (CAA Oregon) was formed in 2024 and, like CAA, is exempt from taxation under Section 501(c)(3) of the Internal Revenue Code.

The organization's mission is to help participant producers comply with EPR laws, deliver harmonized best-in-class services and work with government, businesses and communities to reduce waste and recycle more.

CAA's National Board of Directors (the "National Board") is composed of 24 voting Directors representing Founding Member companies, reflecting a diversity of covered material supplied to the Oregon market. Each Founding Member has the right to appoint one representative to serve as a Director on the National Board.

The National Board has established the following standing committees and has the ability to create additional committees or dissolve committees in the future:

- **Governance Committee** – consisting of at least three members appointed by the National Board.
- **Finance, Audit and Investment Committee** – consisting of at least three members appointed by the National Board, at least two of whom must have accounting or related financial management expertise.
- **Human Resources Committee** – consisting of at least three members, appointed by the National Board.

The National Board has also established a designated governing body known as the Oregon Board to help oversee the implementation of CAA Oregon's producer responsibility plan.

1.2 CAA's Producer Membership

CAA membership exceeds the 10% market share threshold for covered materials in Oregon required for approved PROs, with **2,909** participating producers at the end of 2025.



1.2.1 Producer Outreach

CAA operates streamlined, multistate-aligned producer recruitment designed to enable all obligated producers to register and execute agreements consistent with the approved Oregon program. CAA leverages a national producer identification approach and ongoing outreach practices that emphasize structured engagement, escalation pathways and transparency.

Throughout 2026, CAA will conduct targeted outreach to recruit additional participant producers by outlining statutory registration obligations. This effort will include continued targeted outreach to Oregon producers, pairing state program education with clear guidance to support timely compliance.

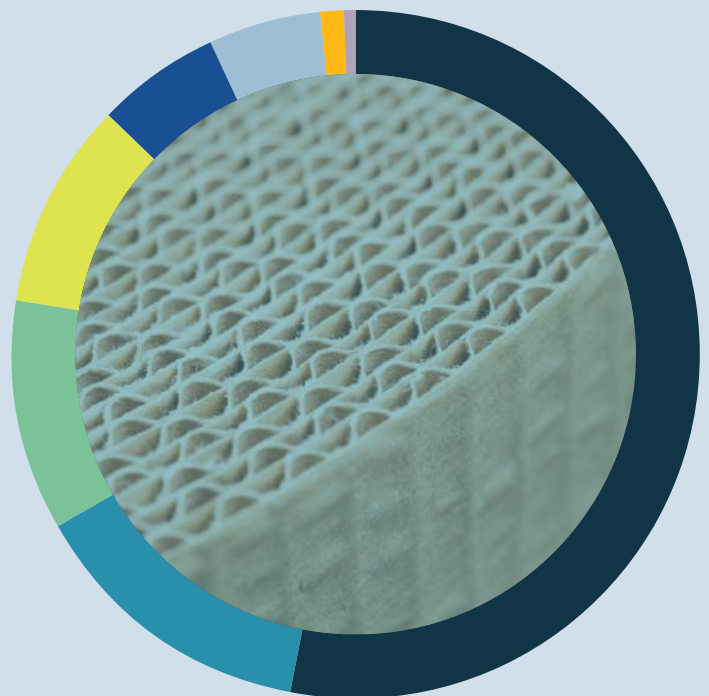
Producers that completed registration received the Oregon agreement, execution of which confirmed participation in the CAA Oregon program. All recruitment and reporting activities leverage CAA's single producer portal, and agreements use a similar, harmonized template structure adopted across other states to minimize administrative and execution burden for national producers.

1.3 Covered Products Sold in Oregon

In 2025, participating producers reported a total of 409,510 tons of covered products sold into Oregon. The volumes reported for 2025 fee-setting reflect the estimate of supply sold into the state during the 2024 calendar year.

Summary of Covered Products Sold in Oregon

MATERIAL	TONS	
Paper/Fiber	217,297	
Plastic — Rigid	56,743	
Plastic — Flexible	44,171	
Glass and Ceramics	39,232	
Printing and Writing Paper	24,003	
Metal	21,358	
Plastic — Other	4,641	
Wood and Other Organic Materials	2,063	



2025 Highlights

On July 1, 2025, CAA Oregon began implementation of its paper and packaging recycling program – the first of its kind in the United States. This report captures CAA Oregon’s accomplishments and progress during the program’s first six months. Although significant work lies ahead, the program has already delivered meaningful results across key implementation areas. The following metrics capture select program highlights at the close of 2025.

Producer Members



2,909

participant producers



409,510

tons of covered products reported by producers¹ sold into Oregon

RecycleOn Center Network



20

operational RecycleOn Centers

Collection



144,771²

tons of commingled material collected and processed



18,888

tons of glass collected and recycled



52

glass incentive contracts executed for curbside and existing depot collection



6.71

tons of PRO Recycling Acceptance List materials collected



12

trucks ordered



42,297

containers ordered

¹ Represents the full 2024 calendar year of participant producer reported covered material

² Represents 6 months of collection reported by CRPFs

Service Providers



93

service provider
accounts registered
in the portal



156

active users in Service
Provider Portal

Processing



\$19.2

million³ paid
to commingled
recycling processing
facilities (CRPFs)⁴



1st

PRO managed
Contamination Audit
Center in the
U.S. opened

End Markets



95.97%

of materials delivered
to self-attested
end markets



44

self-attested
end markets used
by CRPFs and
CAA Oregon, including:

- 24 recyclers
- 16 brokers
- 4 disposal sites

Education & Outreach (E&O)



34

types of educational materials
developed and distributed



1,772

downloads of materials in
12 languages



163

Oregon communities engaged
through the E&O portal



89%

of Oregon adults reached during first
statewide media campaign



20

community-based organizations engaged to provide
consultation on educational materials

³ CAA Oregon Schedule of Activities total of \$19.1 million for 2025. Slight difference driven by under accrual at fiscal year end

⁴ Includes \$16.2 million in Processor Commodity Risk Fees and \$3 million in Contamination Management Fees

2 Goals of the Program

A solid foundation begins with clear, actionable goals and objectives. CAA Oregon's program is built on four fundamental goals, each serving as a cornerstone for a system designed to be durable, adaptable and continuously refined over time.



GOAL #1

Reduce the negative environmental, social and health impacts from the production and end-of-life management of paper, food serviceware, as measured in the Life Cycle Evaluation (LCE) assessment.

GOAL #2

Increase the diversion of recyclable materials from disposal.

GOAL #3

Improve public participation, understanding and equity in the state's recycling system.

GOAL #4

Create a system that fulfills the needs and regulatory requirements of the PRO, its members and all other relevant interested parties.

Defined statutory objectives support each goal with corresponding success indicators and measurable metrics that provide transparency into program performance and progress for all interested parties.

Goal 1: Reduce the negative environmental, social and health impacts from the production and end-of-life management of paper, food serviceware, as measured in the Life Cycle Evaluation (LCE) assessment.

Goal 1 is focused on reducing the adverse impacts associated with the production and recovery/disposal of covered materials. Two core program features support this:

1. A network of Responsible End Markets (REMs) that are transparent, legally compliant, environmentally sound and that achieve adequate yield; and
2. A producer fee structure designed to fully fund program costs while incentivizing a transition to recyclable packaging and food serviceware.

These features are reflected in distinct objectives with associated metrics applied to REM performance and to producer fee structures (the second objective). Example metrics include the percentage of recycled material delivered to self-attested REMs, including specifically identified materials (SIMs); and base fees in the 60 Reporting and Fee Categories for covered materials aligned to material characteristics.

Goal 2: Increase the diversion of recyclable materials from disposal.

Goal 2 focuses on increasing the recovery of recyclable materials and reducing disposal. CAA Oregon will achieve this through improvements to the collection system and by modernizing the material processing infrastructure. Collection system improvements include expanding local government services and establishing a state-wide RecycleOn Center system to collect PRO Recycling Acceptance List (RAL) material and improve convenience and access for Oregonians looking to recycle certain materials not accepted in the curbside program. Key metrics include collection and recycling rates relative to targets, the number and types of local service expansions that are funded, and consumer awareness and utilization of depots.

Processing system improvements are designed to enhance material quality and reduce residue sent to disposal. Metrics include funding provided to CRPFs to manage contamination, capture rates (i.e., yield) and bale quality indicators.

Goal 3: Improve public participation, understanding and equity in the state's recycling system.

Goal 3 focuses on strengthening public participation and advancing equity across Oregon's recycling system in 2025. CAA Oregon launched several foundational initiatives such as expanded multilingual education and outreach materials, a public-facing website, social media engagement and statewide educational campaigns across different media. Metrics include impressions, reach, website traffic, social media engagement and presence of contaminants in collected materials.

Equity in the recycling system serves as a groundbreaking feature of the Oregon program. CAA Oregon's approach advances program goals while ensuring fair and inclusive access to recycling services and information. Key operational areas that embed equity considerations include:

RecycleOn Center Network Access: Development of a comprehensive RecycleOn Center network, including consideration for additional service models (e.g., at home collection, store drop off, community events, proximity

to public transportation infrastructure) to support recycling accessibility. RecycleOn Center locations include opportunities for participation on Tribal lands.

Responsible End Markets: Development of end markets that prioritize environmental protection, public health and worker safety both locally and globally.

Service Provider Engagement: Prioritization of opportunities for small businesses, Certification Office for Business Inclusion and Diversity (COBID) certified businesses, not-for-profit organizations, B Corps, and providers that demonstrate strong labor practices, including fair wages and inclusive hiring.

Education and Outreach: Delivery of culturally responsive educational materials and campaigns tailored to diverse communities across Oregon.

PRO Administration: Commitment to equitable procurement and workforce practices, including engagement with COBID certified vendors. In 2025, CAA partnered with four COBID certified organizations and continues to leverage the COBID directory to expand participation. CAA also continues to build its local workforce, beginning with the hiring of Oregon-based Executive Director in July 2024 and expanding in state CAA staffing thereafter.

Goal 4: Create a system that fulfills the needs and regulatory requirements of the PRO, its members and all other relevant interested parties.

Goal 4 focuses on establishing a program that meets regulatory requirements and supports all program participants, including producers and service providers.

This includes developing and maintaining the systems, processes and governance structures necessary to fulfill statutory obligations, including policies and procedures, communications, membership management, timelines and financial administration.

It also includes creating platforms that enable coordination and engagement across stakeholders, including local governments, processors, haulers and participant producers.

Key metrics include the development and operational status of core compliance systems and processes, the number and type of stakeholder engagement platforms, and levels of participation and utilization.

2.1 Program Metrics and Year 1 Baselines

The first six months of operations represent the early stages of program implementation, during which CAA focused on establishing priority baselines against which future performance will be measured. As a result, not all program metrics are available at this time.

CAA worked in close coordination with interest holders and service providers to build core program systems while simultaneously launching operations. For example, in 2025, CAA supported the identification and onboarding of a broad set of self attested end markets as an initial step toward establishing a REM system. Because formal REM verification had not yet been implemented in 2025, certain related metrics are unavailable for this initial reporting period, including such metrics as the percentage of chain of custody anomalies identified through the quarterly reporting review process and other REM dependent performance indicators. With the launch of the REM verification process in 2026, CAA expects these metrics to become available and more complete with subsequent annual reports.

For quick reference, a full set of program metrics linked to the associated report page is available in [Appendix O](#). A supplementary table setting out all Oregon statutory reporting requirements is available in [Appendix P](#).

3 Operations

The RMA requires producers of paper and packaging to share responsibility for building and sustaining a more resilient and responsible recycling system. Implementation of CAA Oregon's DEQ-approved program plan in July 2025 marked the start of operational changes across Oregon's recycling system.

Under the RMA, CAA funds and administers an EPR program, which is designed to strengthen recycling infrastructure, expand access to services and improve overall system performance statewide. The RMA defines two collection lists: the Uniform Statewide Collection List ("USCL") and the PRO Recycling Acceptance List ("RAL"). The USCL is the list of materials that communities over 4,000 in population are required to collect from residents and businesses, either through curbside or depot collection. These materials are commonly collected commingled. The RAL defines a separate list of materials that are typically not collected through curbside programs, and collection of these materials is the responsibility of the PRO. These materials are collected through CAA's expanding network of RecycleOn Centers. In parallel, CAA is working to advance responsible materials management through contamination management, auditing and end market verification.

CAA also leads coordinated education and outreach efforts to improve participation and reduce contamination across the system. Collectively, these operational activities are intended to build a more efficient, transparent and resilient recycling system for Oregon communities. During the program's first six months, CAA's efforts focused on establishing the core systems, processes and partnerships necessary to deliver these commitments at scale.

3.1 Collection and Recycling of USCL Materials

To support consistent, statewide collection and recycling of these materials, CAA provides financial and operational support to local governments and service providers. In 2025, key activities included initiating system expansion planning with local governments, executing funding agreements, coordinating with service providers and facilities eligible for transportation reimbursement, and establishing tracking mechanisms for collection-related investments.

The subsections below summarize progress on collection and recycling of USCL materials, including system expansions and improvements funded by CAA through producer-paid fees, outreach and contracting milestones and the status of key implementation activities underway as the program enters 2026.

3.1.1 System Expansions and Improvements

Local governments and service providers are eligible for reimbursement for a variety of new and expanded on-route collection services. These eligible costs include new trucks to support service expansion, containers and roll carts, on-board contamination monitoring equipment and software, program promotional literature, and costs associated with hiring, training and equipping staff, including safety equipment for managing USCL materials. Recycling reload facilities, (i.e., transfer stations and similar sites where recyclable materials



During the first six months of program implementation, CRPFs reported **146,737 tons** of commingled recyclables received from across the state's 36 counties.⁵

⁵ Based on data reported to CAA by CRPFs through the Service Provider Portal. County level data indexed against population is available in Appendix J

are consolidated and prepared for transport to processing facilities or end markets) may also be eligible for funding or reimbursement for equipment and infrastructure needed to manage increased volumes of USCL materials.

The system expansion consultation process began in Jan. 2025, six months prior to program launch, and built upon the initial outreach conducted through the Oregon Recycling System Optimization Project (ORSOP) and technical assistance provided by CAA. This early engagement was designed to validate and refine data collected through prior efforts, including alignment with community needs identified in the DEQ Needs Assessment. The initial state-managed Needs Assessment did not provide specific insights into the recycling system investment needs of each community. The wide estimates from the initial Needs Assessment caused initial program plan period cost estimates to range from \$356 million - \$463 million. The community-specific information generated through the ORSOP survey process helped bring total program estimated cost for the first program plan period down to \$123.2 million. These efforts informed funding estimates related to infrastructure needs such as containers, collection vehicles and depot equipment for handling USCL materials. Formal contracting began after program launch in July.

As required by the RMA, all Oregon local governments were assigned a priority tier based on the criteria need for improvements, with Group A representing the highest priority group and Group F the lowest. DEQ formally established these priority groupings through a public rulemaking process, which defined the applicable criteria for each group.⁶ Budgeted system expansion funds are disbursed to communities or their designated service providers in alignment with their priority status.

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
F	\$40,624,829		\$17,056,730	\$19,579,350	\$0	\$3,800,000
G ⁷	\$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 fraction is allocated by wasteshed and is not included in the program plan FY2025-FY2027.

⁶ OAR 340-090-0790(1)(b)

The highest priority (Priority A) was assigned to communities still needing to provide curbside recycling under the Opportunity to Recycle Act but that were unable to do so without system expansion funding. In 2025, CAA Oregon executed Primary Funding Agreements⁷ with all 16 Priority A communities and finalized service expansion addenda for 14. The remaining Priority A communities are in the process of confirming implementation timelines for their expansion plans in 2026. These agreements represent the most complex and resource-intensive set of investments across all priority groups because they require the development of curbside recycling programs, including extensive coordination between local governments and service providers to assess operational impacts, workforce needs and rate implications for customers.



Communities designated as Priority B and C include those using existing recycling depots to maintain recycling opportunities for materials previously collected curbside, as well as those intending to add new recycling options for materials not formerly collected through on route services. All Priority B communities (three counties and 21 depots) and Priority C communities (29 counties and 42 depots) also signed contracts for existing and potential USCL depots. As part of this outreach, CAA provided each depot with updated educational and instructional signage.



Priority groups D, E and F include smaller communities and local governments seeking to add or expand recycling services, with priority determined by population and the types of service changes and investments requested. Engagement with these groups remained in progress through Q2 2026.

For communities that did not respond to the original ORSOP survey, CAA provided an additional opportunity to participate via the ORSOP 2.0 survey. Of the 95 communities CAA reengaged through this outreach, 53 submitted responses, demonstrating renewed engagement. Analysis of these responses identified system expansion needs in 11 communities. CAA has since designated these communities as Priority G and will address needs identified in these communities in 2027.

The table below summarizes system expansion investments initiated from program launch through Q4 2025. These investments support new and expanded collection services, infrastructure upgrades, and jurisdiction-specific implementation needs, enabling local governments and service providers to meet program requirements and enhance access to recycling services across Oregon.

⁷ System expansion needs for Priority G were identified through the ORSOP 2.0 survey following the submission of the program plan.

Region/ Wasteshed	Priority Group	Program Plan Initial Estimates FY 2025-27	Priority G FY 2025-27	Total Funding Estimate Signed Addendums Q4 YTD	Trucks Ordered	Containers Ordered	USCL Depots (Existing & Potential)	Recycling Reload Facilities
Baker	A/B	\$2,414,771					2	
Benton	C	\$542,100		\$609	0	0	3	
Clatsop	C	\$1,390,414		\$2,372	0	0	2	
Columbia	C	\$40,179		\$295	0	0	2	
Coos	A/B/C	\$2,739,200		\$533,864	1	2000	2	
Crook	C	\$1,470,200		\$0	0	0	2	
Curry	D/F	\$0		\$6,924	0	0	3	
Deschutes	B/C	\$9,129,221		\$1,670	0	0	6	
Douglas	A /G	\$6,735,721	\$2,314,775	\$2,530,887	3	12729	11	\$74,978
Gilliam	C	\$0		\$0	0	0	2	
Grant	D	\$0					1	
Harney	C	\$7,143		\$711	0	0	1	
Hood River	C	\$660,100		\$0	0	0	2	
Jackson	C/G	\$6,175,399	\$1,000,000	\$0	0	0	3	
Jefferson	C/G	\$109,550	\$41,250	\$0	0	0	3	
Josephine	C/G	\$1,103,410	\$453,400	\$0	0	0	4	
Klamath	D	\$100,000		\$295	0	0	11	
Lake	C	\$48,214		\$0	0	0	3	
Lane	A/G	\$13,193,954	\$1,125,200	\$610,713	1	3000	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		\$5,668	0	0	9	
Metro	B/C/G	\$8,873,261	\$75,000	\$0	0	0	14	
Milton Freewater	A	\$1,068,200					0	
Morrow	A	\$1,229,200		\$630,365	1	3016	3	
Polk	C	\$1,025,200		\$0	0	0	3	
Sherman	C	\$0		\$165	0	0	1	
Tillamook	C	\$3,353,510		\$2,581	0	0	4	
Umatilla	A/G	\$7,151,050	\$1,450,100	\$3,904,922	6	19638	6	
Union	F	\$1,552,200					1	
Wallowa	C	\$1,786		\$0	0	0	1	
Wasco	A	\$1,437,590		\$259,454	0	4914	1	
Wheeler	D	\$0					3	
Yamhill	C	\$714,114		\$3,105	0	0	2	
Totals through Q4 2025		\$81,525,503	\$6,909,825	\$8,496,265	12	45,297	134	\$74,978

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.

3.1.2 Additional Reimbursement and Funding for Local Governments and Service Providers

In addition to system expansion funding, CAA provides a range of reimbursement programs to support local governments and service providers in operating the recycling system effectively and equitably. CAA designed these funding streams to sustain ongoing operations and drive performance improvements, including contamination reduction and transportation efficiency.

Reimbursement activity for the reporting period reflects scaling investment across multiple program areas, with most funding concentrated in core system operations.



3.1.2.1 Payments to CRPFs

CRPFs receive a mix of materials and sort them into distinct material streams for further processing. Under the RMA, CRPFs are eligible for funding that shifts processing costs away from ratepayers and toward participant producers, including both the cost of processing recyclable materials and managing contamination. In 2025, these funding streams represented the largest share of total reimbursements.

3.1.2.1.1 Processor Commodity Risk Fee (PCRF)

CAA pays the Processor Commodity Risk Fee (PCRF) to CRPFs to ensure that producers share in the cost of processing covered recyclable materials. The PCRF also supports investments in equipment and infrastructure necessary for facilities to effectively sort incoming materials and manage variability in commodity markets.

CAA pays the PCRF based on eligible processing costs, anticipated program costs and the average market value of recyclable commodities calculated by DEQ. In 2025, CAA distributed more than \$16 million in PCRF payments to eight CRPFs.

3.1.2.1.2 Contamination Management Fee (CMF)

The Contamination Management Fee (CMF) compensates CRPFs for the cost of removing and disposing of covered products that enter the recycling stream as contaminants. The CMF is calculated based on the per ton cost of managing contamination and set in regulation. In 2025, CAA paid over \$3 million in CMF payments to eight CRPFs.

2025 Payments to CRPFs ⁸		
PCRF	\$16,198,219	136,243 tons
CMF	\$3,013,759	8,436 tons

Table 3. PCRF and CMF payments made to CRPFs in 2025 and associated tonnage.

⁸ Amounts paid are based on amounts invoiced, with tonnage reported by CRPFs via the Service Provider Portal. There is a minor difference of 93 tons between the eligible tons and the reimbursed tons due to a difference in classification

3.1.2.2 Contamination Reduction Programing

Local governments are eligible for funding, up to \$3 per capita per fiscal year to support DEQ-approved activities aimed at reducing recycling contamination. Funding is allocated based on certified population data and may be distributed to designated service providers or community organizations. Access to funding requires completing an application and reporting on implementation. These funds support efforts to reduce contamination through education, outreach and operational improvements. While smaller in scale than CRPF funding, this program plays a critical role in improving material quality and reducing downstream processing costs.

3.1.2.3 Transportation Reimbursement

Local governments are eligible for transportation reimbursement when recyclable materials must be hauled long distances to reach processing facilities or responsible end markets. CAA bases reimbursement amounts on validating hauling costs and administers reimbursements through an application, approval and invoicing process that includes service provider reports to verify eligible transportation activities.

This funding ensures recyclable materials collection and delivery to appropriate facilities despite geographic constraints. In 2025, CAA engaged with 30 service providers and negotiated 35 transportation addenda with Priority Groups A-F. By year-end, 34 transportation addenda had been executed, with an estimated six additional agreements expected to be finalized in 2026.

3.1.2.4 USCL Depots

Local governments may request funding to support the addition or expansion of recycling depots to ensure convenient access to recycling services. In 2025, CAA did not receive any eligible reimbursement requests related to the operations of USCL depots.

3.1.2.5 Roll Carts

The RMA requires CAA to cover any cost differential when roll carts containing at least 10% post-consumer recycled (PCR) content cost more than comparable carts made from virgin material. To assess potential cost differences, CAA conducts quarterly market reviews by collecting pricing data from national suppliers for both virgin and PCR content roll carts. Pricing is analyzed by cart size to determine any material cost variance. Based on supplier pricing data for Q3 and Q4 2025, CAA found no material cost difference between virgin roll carts and those containing at least 10% PCR content.

3.1.2.6 Reimbursement Requests Denied or Reduced

During the reporting period, no reimbursement requests submitted by local governments or service providers were denied. All reimbursement requests met the statutory eligibility requirements.

In the limited cases where system expansion investments were adjusted, reductions were not due to ineligibility or non-compliance. Instead, adjustments reflected the identification of more efficient or cost-effective solutions than what was initially requested. In these instances, CAA worked collaboratively with applicants to refine project scope or identify alternative approaches that achieved the same outcome at a lower cost. For example, one jurisdiction requested a building to collect recyclables, but upon consultation with the CAA team, both parties agreed a compactor in a covered area would sufficiently meet their needs, while also reducing labor costs for the site

operator. These adjustments support responsible stewardship of program funds while continuing to meet the operational needs of local governments, service providers and the spirit of the RMA.

3.1.2.7 Dispute Resolution

CAA seeks to minimize the potential for disputes by clearly defining funding terms and conditions within its agreements. When disputes arise, the program plan establishes a structured, five-step dispute resolution process for all parties receiving funding under the program. No disputes were submitted or required resolution during the 2025 reporting period.

3.1.3 Contamination Management

In Sept. 2025, CAA began processing samples at its Contamination Audit Center to better understand the composition and quality of recycled materials collected across the Oregon recycling system. Based on data from 554 completed audits, the overall contamination rate of sampled materials was 24.73%. The majority of samples (544) were collected from the Portland metropolitan area, with an additional 10 audits conducted in other regions of the state. Jurisdiction-specific contamination data is shared regularly with participating communities, including route-level information for each sample, to support targeted contamination reduction efforts. In addition, CAA publishes annually aggregated contamination rates by geographic region, available in Appendix G.

Material	Percent of Total
Combined materials (non-separable)	6.70%
Fines (glass fragments, items smaller than 2 inches, etc.)	3.57%
Glass Bottles and Jars & Other Containers	2.75%
Polycoated Paperboard	2.09%
Bagged Garbage	1.52%

Table 4. Top contributors to contamination based on samples processed at the Contamination Audit Center in 2025

The audit program will continue to evolve to improve geographic representation and analytical rigor. Going forward, samples will be collected from locations across Oregon using a fully randomized audit sampling protocol developed in 2025. This approach will incorporate statewide sampling based on tonnage data to ensure proportional representation by region and collection sector, including residential, commercial and multifamily streams. This expanded methodology is expected to provide a more comprehensive view of contamination reduction efforts.

3.1.4 CRPF Capacity to Accept and Sort USCL Materials

The USCL identifies materials accepted for curbside collection statewide, recognizing that processing outcomes vary by CRPF. In 2025, CAA relied on system level analysis⁹ to assess CRPF capacity, including DEQ’s PCRf and CMF study



⁹ Crowe LLP, Final Report Study Results: Processor Commodity Risk Fee and Contamination Management Fee (prepared for Oregon DEQ, Mar. 7, 2024).

conducted by an independent professional services consulting firm. This analysis served as a baseline assessment of the system's ability to process USCL materials. Availability also expanded in Oregon during 2025 with additional facilities operational as CRPFs capable of processing the full range of USCL materials.

Individual CRPF capacity was sufficient to accept and effectively sort USCL materials. Facilities located more than 50 miles from a CRPF successfully transported materials to their designated CRPF without requiring secondary freight arrangements. No requests for secondary transportation support were submitted during the reporting year.

3.1.4.1 Capture rate and bale quality

CAA's program plan anticipated using DEQ-provided data to evaluate whether CRPFs meet established performance standards for capture rates and bale quality. While CRPF capacity to accept and sort USCL materials was sufficient in 2025, the data required to assess performance against these standards was not available during the reporting year.

3.1.5 USCL Diversion Rate Assessment and Alternative

Diversion rates, or recycling rates, are intended to measure the share of generated material that is diverted from disposal and managed through recycling or other recovery pathways.

Calculating a meaningful recycling rate for USCL materials for the 2025 reporting year proved challenging due to misaligned data and methodological limitations. The data needed to calculate a consistent recycling rate (i.e., the total amount of material collected and processed for recycling divided by the amount of the material that is generated¹⁰) were not available in a single, aligned dataset, and key assumptions (e.g., composition, contamination, and scope) vary by source and time period.

The most comprehensive data on material generation and composition is based on DEQ's 2023 waste composition study, while more detailed transactional data on outbound material flows from CRPFs is available for 2025. Combining these datasets results in a hybrid indicator that spans multiple time periods and may not accurately reflect year-specific performance. Additionally, translating DEQ disposal and waste characterization categories to USCL material categories is not always straightforward, and certain materials do not map cleanly between datasets.

Gathering and validating material generation data is further complicated by the fact that some materials, such as deposit containers, which are not part of the program, are also collected through routes outside the single stream commingled system, which can result in both under and double counting material quantities. As a result, a calculated USCL diversion rate drawn from currently available data, did not provide a stable, decision useful indicator of single stream system performance.

Given these limitations, CAA is evaluating alternative indicators to better reflect single stream collection system performance. One option is a normalized throughput metric, such as pounds collected per household (lbs/hh), using annualized 2025 data. However, this metric can be distorted in areas with



¹⁰ Generated material is the paper and packaging materials that are used and then discarded by a household, business or other entity to be managed as waste or as reusable, refillable or recyclable material.

significant commercial collection. In those cases, a population based measure (pounds per capita, lbs/capita) may provide a more appropriate high level indicator. While these alternatives do not represent true diversion rates, they offer a more consistent and transparent way to track system performance using year aligned data.

Due to data and methodological constraints, a defensible USCL diversion rate could not be calculated for 2025 and may require a multi year data lag (approximately two to three years). Accordingly, CAA is evaluating updates to this metric in a future program plan amendment to provide a more timely and decision useful measure of system performance.

3.2 The PRO Recycling Acceptance List

In 2025, CAA Oregon began laying the groundwork for collection of designated materials on the RAL as required under the RMA. The July 1, 2025, program start date means that the third and fourth quarters of 2025 represent the full initial implementation period for the PRO's acceptance list obligations and provides a partial baseline against which future program years will be evaluated.

Early implementation work emphasized operational readiness, coordination with local governments and service providers, and the strategic siting and activation of new PRO-funded collection infrastructure. Achievement of steady-state collection coverage and performance levels will come in future years.

In the program plan, CAA had set the goal of opening 10% of PRO RAL collection points by the end of 2025, 65% of collection points by the end of 2026, and the goal of meeting the convenience standard requirements by the end of the program plan period in 2027. CAA estimates it will require 144 collection point locations across the state to meet the convenience standard requirements. The goal for the end of 2025 was to have 15 collection points open by the end of 2025, and CAA exceeded that goal, launching the first 20 of its PRO depots, known as RecycleOn Centers, in Southern and Central Oregon. Simultaneously, CAA continued to support glass collection through existing curbside and drop-off systems, and targeted planning and investment for materials requiring specialized handling. These efforts were undertaken in close coordination with haulers, processors and host site partners to ensure that collection systems were operationally viable, compliant and capable of scaling over time as additional collection point sites come online.

The sections below describe CAA Oregon's progress in 2025 to operationalize the new RecycleOn Centers network. Designed to meet mandated accessibility convenience standards and CAA's collection targets, the network will include:

- A series of collection consolidation points across Oregon
- A comprehensive collection events program
- Partnerships with third-party organizations to collect specific materials such as expanded polystyrene (EPS)

Together, these activities reflect CAA Oregon's first-year focus on building a durable, scalable system to support expanded recycling access while laying the groundwork for measurable performance in subsequent years.

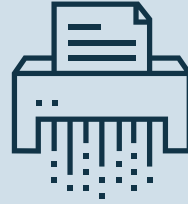
The goal for the end of 2025 was to have 15 collection points open, and CAA exceeded that goal, launching the first 20 of its PRO depots in Southern and Central Oregon.

3.2.1 Accepted Materials

The RAL identifies specific categories of packaging materials eligible for collection and recycling that CAA is required to manage on behalf of its participant producers. The list of materials was determined through a public rulemaking process and includes:



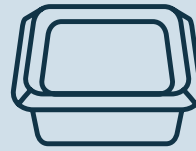
Glass bottles and jars are rigid glass containers used for packaging food, beverages, and other consumer products. These containers are designed to hold contents securely and are commonly distributed through retail channels before entering the recycling system after use.



Shredded paper refers to paper material that has been mechanically cut into small pieces. Although altered in form, shredded paper remains a paper-based material and is recognized as a distinct category within the acceptance list due to handling and processing considerations.



Aluminum foil and pressed aluminum materials consist of aluminum packaging formats that may be either flexible, such as foil, or rigidly formed through pressing or shaping. These materials are categorized based on their aluminum composition and ability to be processed through aluminum recycling systems.



Block white expanded polystyrene (EPS) is a rigid, lightweight foam packaging material made from expanded polystyrene resin. This material is typically used for protective packaging and insulation and is identified separately from other polystyrene formats due to its density and handling characteristics.



High-density polyethylene (HDPE) package handles and plastic buckets and pails made of HDPE (#2) or polypropylene (PP #5) are rigid plastic packaging components and containers manufactured from specified resin types. Handles are packaging components affixed to containers, while buckets and pails are rigid containers intended to hold and transport products. Only those made from HDPE or PP resins are included.



Polyethylene (PE) and polypropylene (PP) lids and caps are rigid plastic closures used on containers and tubs. Caps are defined as threaded closures, while lids use fastening mechanisms other than threads. These items are identified by their resin type and function as packaging components designed to seal containers.

3.2.2 Convenience Standards

The RAL materials are collected through Oregon's new network of RecycleOn Centers. Oregon's convenience standards ensure that recycling services provided by the PRO are reasonably accessible to people across the state. CAA is developing a statewide network of participant producer-funded recycling locations that reflect both population distribution and service demand. Initiated in Oct. 2025, when the first depot opened in Ashland, CAA Oregon's growing network of RecycleOn Centers are publicly accessible recycling locations at no charge designed to meet Oregon's convenience standards.

This report reflects the first six months of implementation under CAA Oregon's initial 2.5-year program plan. As a result, the assessment of convenience standards for calendar year 2025 is primarily focused on system build-out and early activation, rather than on demonstrating full alignment with population-based collection targets or mature annual collection volumes. The emphasis during this initial phase has been on establishing a foundational network capable of scaling toward achieving the targets in upcoming years. As described in its program plan, CAA Oregon's approach to meeting the convenience standards is intentionally phased. Early program years are focused on siting, contracting and activating collection locations, while later years are intended to demonstrate sustained operation, increased utilization by Oregonians, and ultimately, fulfillment of the convenience standard requirements.

Looking Ahead.

The 2026 reporting year will provide a more robust baseline and reflect locations that have been operating for approximately nine to 12 months, allowing for more meaningful evaluation of system utilization and early progress toward convenience standards. By the 2027 annual report, CAA Oregon anticipates being able to present a more complete assessment of annual collection volumes and network performance relative to the population-based requirements established in rule.

3.2.3 RecycleOn Center Network

By Dec. 2025, CAA Oregon had successfully launched 20 RecycleOn Centers, exceeding the program goal of 10% of total planned collection points opened by the end of the year.¹¹ These initial sites were opened across Jackson, Josephine, Klamath, Crook and Deschutes counties, with locations selected based on convenience standards, operational feasibility and regional service needs. The launch of these locations was met with great enthusiasm and support from the hosting communities.

CAA Oregon is actively building the infrastructure and establishing the relationships and operational protocols to meet the goal of 144 RecycleOn collection points for RAL materials by the end of 2027. CAA Oregon will establish additional sites for a single material, including glass depots for glass bottles and jars and drop-off points, many of which are already established, and new sites for expanded polystyrene collection.

To support the development and operation of this network, CAA Oregon contracts with the Oregon Beverage Recycling Cooperative (OBRC) to provide core operational services. OBRC brings an established fleet, trained drivers and logistics systems that support efficient collection, transportation and servicing of RecycleOn Centers. OBRC also prepares and operates consolidation facilities that receive, bale and aggregate collected PRO materials, enabling efficient movement to responsible end markets.

RecycleOn Centers are also implemented in close coordination with Oregon's waste haulers, local governments and host site operators, ensuring that new collection locations align with existing solid waste

¹¹ 13.9% of total planned collection points were opened by end of the year.

infrastructure and community needs. CAA works with regional and local haulers—including private companies and jurisdictional service providers—to integrate RecycleOn Centers into established collection routes and service systems.

In addition to partnerships with haulers, CAA collaborates with community-based organizations that provide trusted, convenient access points for residents. A key partner in this effort is Southern Oregon Goodwill Industries, which hosts multiple RecycleOn Centers at its retail locations. These sites allow residents to recycle RAL materials while visiting familiar community destinations, helping normalize participation and increase accessibility.

Through the coordinated efforts of OBRC, waste haulers, local governments and community partners, RecycleOn Centers provide a consistent, dependable framework for collecting RAL materials and represent a central component of Oregon’s modernized recycling system.

3.2.3.1 Community Awareness Surveys

While 20 RecycleOn Centers began operation in 2025, their Q4 opening dates allowed limited time for the centers to be fully operational and available for public use during the reporting period. Given this shortened time frame, no surveying was conducted to assess consumer awareness or use. Now that the initial 20 RecycleOn Centers have been open for a longer period, and additional centers have opened with more underway, CAA is beginning to conduct surveys to capture consumer awareness and use insights, which will be available in future reports.

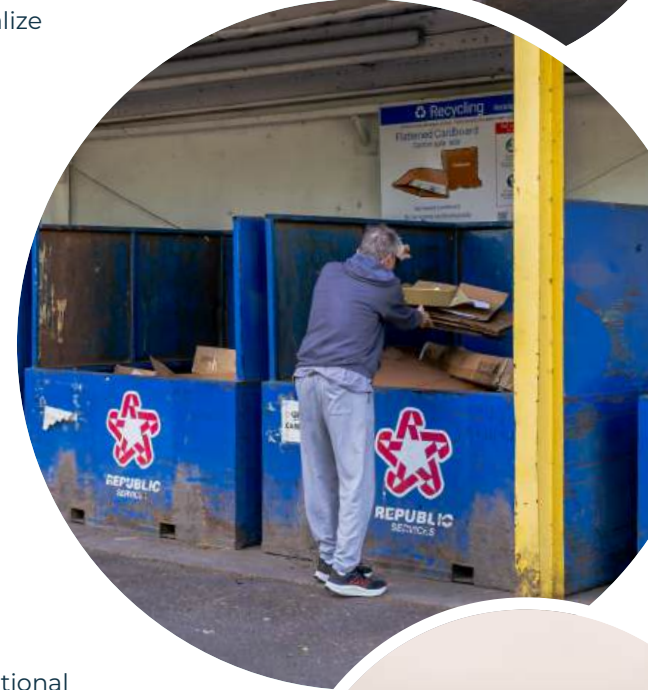
3.2.4 Collection Events

During the initial months of implementation, the CAA Oregon team began developing a strategy for hosting RecycleOn Collection events in areas currently lacking a permanent depot, prioritizing underserved communities to ensure convenient access to recycling services. The team collaborated with local jurisdictions, service providers and nonprofits to evaluate whether RecycleOn materials could be incorporated into existing community collection events. To inform this approach, the team attended and observed several events, documenting early lessons learned.

Building on this foundational work and experience gained in the third quarter, the CAA team expanded outreach efforts in Q4 2025 to collection event organizers and potential collaborators across Oregon to better understand operational models, site constraints and partnership opportunities.

3.2.5 Tribal Engagement

During 2025, CAA Oregon continued early-stage engagement with Oregon’s Tribal communities to better understand existing solid waste and recycling infrastructure, community priorities and opportunities for future collaboration under the RMA. Prior to CAA’s engagement, Tribes had largely not been consulted in



the development of the RMA or in the first DEQ Needs Assessment. As a result, CAA's work has focused on relationship-building, information sharing and exploratory discussions rather than immediate implementation of new collection services.

CAA engaged with Tribal Solid Waste Advisory Network (TSWAN) leadership, the EPA Region 10 Tribal Liaison and the Oregon DEQ Headquarters Tribal Liaison to better understand the Tribal governance landscape and existing service levels. Tribes with existing solid waste infrastructure—specifically Grand Ronde, Warm Springs and Umatilla—participated in discussions regarding potential RecycleOn Center opportunities at current facilities. Tribes emphasized that collection of PRO acceptance list materials was a secondary priority relative to other identified needs, including household hazardous waste management, solid waste collection assets and expansion of services for materials such as cardboard, commingled recyclables and glass.

In response, CAA is exploring alternative forms of program support that align with Tribal priorities while remaining within the scope of participant producer-funded activities. Tribes are reviewing the Primary Funding Agreement as an initial step toward enabling future funding arrangements.

CAA Oregon also initiated outreach to Tribes without existing depot infrastructure, including the Coquille, Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI), Cow Creek and Siletz. Engagement with these communities focused on understanding service gaps and exploring potential collaboration pathways, including coordination with local haulers to assess options for providing USCL recycling services in certain Tribal jurisdictions.

Overall, Tribal engagement activities during 2025 were foundational, prioritizing trust-building, learning from Tribal partners and aligning future recycling system development with Tribal-defined needs and timelines.

3.2.6 Performance Standards

CAA is required to ensure that operation of the RecycleOn Center network meets designated performance standards. These include requirements related to free and equitable public access; accessibility and safety; promotion and public education; contamination prevention and management; material quality and marketability; litter prevention; regular site monitoring and reporting; incident self reporting; and advance notice and approval before accepting additional materials beyond those on the recycling acceptance list. These criteria are reinforced through an audit protocol that includes a mix of on-site evaluation and desktop audits.

3.2.6.1 RecycleOn Center Audits

In 2025, CAA Oregon conducted 13 site audits of PRO RecycleOn Centers to evaluate operational effectiveness and ongoing compliance with program standards. Audits were conducted during the first 90 days of a site's go-live date and focused on verifying site accessibility and public access; the condition of collection equipment; signage and availability of program information; protection of collected material from weather; contamination



prevention practices; cleanliness and general site conditions; staff awareness of RecycleOn collection standards; and basic site security measures. Audits also reviewed hours of operation, material handling practices and alignment with requirements outlined in the RecycleOn Collectors Handbook. These audits support consistent service delivery across RecycleOn Centers and help identify follow-up actions or corrective measures where needed.

Audits confirmed that sites were generally operating in alignment with required standards while also identifying common, correctable issues typical of early stage implementation. At several transfer stations and existing depot locations, auditors observed instances of non USCL plastics placed in lids, buckets or totes, as well as ferrous metals such as tin cans appearing in aluminum collection containers. Because USCL collection infrastructure was already present at these sites, CAA staff worked directly with site operators to implement immediate corrective actions, including redirecting materials to appropriate USCL bins and reinforcing staff practices for managing misplaced materials. These adjustments were straightforward to implement and helped reduce contamination risk early in operations.

At hosted retail locations, such as Goodwill sites, audits focused on evaluating how newly deployed collection bins were functioning within existing customer interaction workflows. CAA staff coordinated with site personnel to assess bag usage, clarify contamination expectations and confirm staff understanding of accepted materials. Because Goodwill staff engage directly with customers at the point of drop off, these sites demonstrated strong capacity to prevent non USCL or non PRO materials from entering the collection system.

Beyond compliance verification, the initial 90 day audits supported relationship building between host sites and the CAA operations team. These early engagements established clear communication channels, reinforced shared expectations and created a foundation for ongoing collaboration and continuous improvement as the RecycleOn Center network expands.

3.2.7 Collection Targets

Given that 2025 RecycleOn data represents early results from a limited number of operating sites, the data gathered by year end cannot be averaged to calculate a meaningful collection rate for 2025.

3.2.7.1 Collection Results

In Q4 2025, the total volume of PRO acceptance list materials collected through the network was 6.71 tons, with volumes concentrated in a subset of material categories.

The largest material stream reported was PE film (4.83 tons), followed by plastic buckets and HDPE or PP with lids (0.74 tons), shredded paper (0.63 tons), PE and PP lids and caps (0.44 tons), and



aluminum/pressed foil (0.07 tons). Other listed categories reported zero volume during this initial quarter of operations.¹²

Glass was not collected through the operational RecycleOn Centers in 2025. In communities where RecycleOn Centers were sited at facilities with existing glass depots, glass continued to be collected through those depots and its volume is therefore calculated separately.

CAA Oregon expects that annualized collection results will become more meaningful as site operation matures. The 2026 reporting year will serve as a baseline year and will reflect locations operating for substantially longer periods (approximately 9–12 months for the earliest sites), allowing for a clearer view of system utilization and early progress toward collection targets. By the 2027 annual report, the program will be positioned to report more complete annual collection totals and evaluate performance relative to the stated targets with substantially more operational history and a more fully developed network.

PRO Recycling Acceptance List Material	Collected Tons	Tons per Depot Week (Actual)	Tons per Depot Week (Plan Target)	Relative to Year 1 Target
Plastic Film	4.8	0.62	0.22	286%
Aluminum foil and pressed products	0.1	0.01	0.04	20%
Block white EPS	—	—	0.05	0%
PE, PP, HDPE package handles	0.4	0.06	0.03	176%
Plastic buckets, pails, storage containers	0.7	0.09	0.11	87%
Depot — Collected Materials with Targets	6.1	0.78	0.46	172%

Table 5. Tons of PRO RAL materials with targets, collected at approved RecycleOn Centers and DEQ-permitted receiving centers that were operational in the program year 2025. To allow for easier comparability and better reflect program performance, the collection results and targets were normalized to a per depot week basis.¹³

3.2.7.2 Glass Collection

Oregon's rules establish a collection target of 45% for glass. This collection target covers both glass collected at RecycleOn Centers and glass collected curbside or through other channels. Since July 2025, the curbside incentive program collected and transported 18,888 tons of glass to end markets.¹⁴ When annualized, this amounts to close to 38,000 tons of glass collected, which is aligned with the baseline of 38,000 tons and over 90% of the target presented in the program plan. The target of 41,000 tons of glass anticipated additional glass collected based on an enhanced consumer education campaign and increased collection points and on-route collections under a fully developed PRO depot network. Using the modeled generation of 77,000 tons of glass in

¹² Based on OBRC month-end inventory reports measuring the number of totes of each material collected and their individual weights. OBRC operators provide assurance that submitted data is reasonably accurate and complete, consistent with program requirements. This assurance may be supported by internal controls or other reasonable measures appropriate to the operator's data systems.

¹³ The depot weeks are derived based on determining the average number of weeks that each of the depots were operational in 2025. The average weeks in operation per depot was 7.8 weeks.

¹⁴ Based on disposition reports from two glass end markets in 2025; the reported glass disposition excludes non-covered glass material. CAA intends to rely on glass collector and transporter claims as the basis of glass reporting in future years when the claims reporting and processing activities stabilize. As part of REM qualification, the glass end markets have confirmed via self-attestations that their reports are reasonably accurate and complete, consistent with program requirements.

the program plan, the current results suggest an implied collection rate for glass of 49% which is higher than the regulatory-mandated target of 45%.

	Collected Tons (since July 2025)	Collected Tons – Full Year (estimated)	Relative to Year 1 Target
Glass Collection	18,888	37,776	92

Table 6. Tons of glass collected through the curbside incentive program from July – Dec. 2025

3.2.8 Disability Access Requests

In 2025, CAA established a publicly available Disability Access Request Form, through RecycleOn.org/ Oregon, to support individuals who may face barriers to using RecycleOn Centers. The form allows people living with mobility-limiting disabilities to request assistance or accommodations for recycling at RecycleOn Centers.

During the 2025 reporting period, CAA did not receive any disability access requests from individuals in communities where centers were operating. As RecycleOn Centers expand and public awareness continues to grow, CAA will use requests received through this process, along with any feedback, to evaluate whether additional or expanded recycling services are needed to support populations with access challenges. Any such services will be developed and reported in future program years as data and demonstrated need become available.

3.3 Materials Management

CAA recognizes that certain materials may require targeted actions to support the goals of the RMA, for example expanding recycling opportunities, responding to specifically identified material SIM designations, reducing packaging impacts, advancing plastics recycling and ensuring materials are managed through responsible end markets. During the first program year, CAA focused on establishing the foundation needed to address these material specific priorities in a coordinated and effective manner.

3.3.1 Materials On-Ramping

In addition to expanding collection of RAL materials through RecycleOn Centers and supporting consistent implementation of the existing USCL collection through system expansion, CAA is evaluating pathways for certain materials to be added to the USCL in future program years. Determining whether a material is suitable for inclusion in a commingled recycling program involves evaluating multiple statutory criteria, including potential contamination impacts, compatibility with existing recycling infrastructure, the stability and maturity of responsible end markets, and the quantity of material available in the waste stream. Materials currently under evaluation include PET thermoforms; PP and PE lids; HDPE package handles; aluminum foil and pressed foil products; and empty, non-hazardous aerosol containers.

Efforts in 2025 focused on targeted research and engagement to determine the technical feasibility and potential system impact of expanding the USCL. These efforts included establishing an initial USCL on-ramping strategy with input from DEQ and the Oregon Refuse & Recycling Association; conducting practicability studies for aerosol containers and pressurized cylinders; and completing a PET bale study to assess material quality considerations. Additional activities included aerosol residual testing in collaboration with the Household & Commercial Products Association (HCPA) and aluminum foil testing to better understand processing impacts and system readiness.

Based on these learnings, formal recommendations for additions to the USCL are expected to be made in the next program plan.

3.3.2 Specifically Identified Materials

A SIM has been designated by DEQ for special attention under the RMA because it may present challenges related to processing, management costs or access to responsible end markets. When a SIM is collected for recycling, whether within the Opportunity to Recycle Act or through private recycling efforts, CAA must take practical steps to direct material to a responsible end market. In 2025, CAA focused on SIMs with approved collection pathways such as aluminum foil, HDPE package handles, shredded paper and plastic lids. CAA Oregon began accepting these items at the RecycleOn Centers and published new education and outreach materials to educate the public on the full list of materials collected at these locations.

Additional activities to inform SIM management, establishing the scope for a RFID flow study for SIM materials (excluding aerosols) and conducting end market research for plastic film to support continued market access and avoid SIM designation.

Activities to address specific SIM concerns, included:

- Developing education materials for local government to educate consumers about new recycling opportunities for glass if it was dropped from curbside recycling in a specific jurisdiction.
- Developing education materials for shredded paper to educate consumers that had previously recycled that material in the curbside system to instead direct them to drop-off opportunities.
- Building behavior change campaigns to evaluate readiness for on-ramping to curbside recycling.
- Exploration of potential nursery pot reuse.

Interested parties consulted for SIM designation work included: Aerosol Recycling Initiative, Aluminum Association, Association of Plastics Recyclers, Carton Council, Despray, Food Service Packaging Institute, Glass Packaging Institute, Household and Commercial Products Association, National Association for PET Container Resources, NextGEN Consortium, Oregon Association of Nurseries, Oregon Recycling System Advisory Council, Oregon Refuse and Recycling Association, Polycoated Paper Alliance, The Recycling Partnership, and Resource Recycling Systems.

3.3.3 Ensuring Responsible End Markets

The RMA defines a REM as a market where recycling, material recovery or contaminant disposal is conducted in a manner that benefits the environment and minimizes risks to public health and worker safety. To qualify as a REM, facilities must be verified as complying with applicable laws, being transparent about where materials go, operating in an environmentally sound manner, and meeting a minimum recycling yield of 60%. In Oregon, the PRO has a shared responsibility with CRPFs to ensure that covered products collected for recycling are delivered to REMs, and address issues, such as cases when end markets cannot be verified as a REM.



Through coordinated outreach, processor engagement, education and systematic tracking, CAA materially increased the number of self-attested end markets in 2025. A self-attested end market is one that signs a form attesting they adhere to the REM principles and serves as the first step in becoming a REM. At the outset of implementation there were 32 self-attested markets and brokers and by year's end there were 88 self-attested markets, brokers and disposal sites. This was achieved through comprehensive outreach and technical assistance to processors and end markets, structured coordination with DEQ and measurable improvements in downstream compliance awareness. During the first six months of program operations, 95.97% of materials sent from CRPFs and RecycleOn Centers went to 44 self-attested end markets, brokers and disposal sites.¹⁵

While expanding self-attested markets is the short-term goal, CAA is also working toward the longer-term goal of finalizing a REM verification program. An end market can only be considered a REM once it has been verified by an independent, third-party. In support of this goal, CAA Oregon submitted a program plan amendment to DEQ on Aug. 13, 2025. The amendment was developed in response to end market concerns about the complexity of the initial verification process. In response, CAA convened a REM Working Group consisting of end markets, NGOs and industry associations to identify practical methods to verify REM requirements. Additional direct outreach with end markets and technical experts yielded necessary feedback to propose the alternatives in the amendment, including the need for a consensus-based third-party certification standard. CAA launched the REM standard development process in collaboration with SCS Standards and Assurance Systems on Oct. 17, 2025. The REM amendment was approved on May 4, 2026, and CAA will launch the verification effort.



88
self-attested
markets, brokers,
and disposal sites
at end of 2025

3.3.3.1 Targeted End Market and Broker Outreach

CAA conducted sustained outreach to end markets and brokers receiving Oregon material but lacking self-attestation. Activities included direct communications, one-on-one meetings, repeated follow-ups and technical assistance to clarify self-attestation and documentation requirements. In the absence of self-attestation, DEQ granted a temporary acknowledgment process by which CRPFs could continue to send materials to non-self-attested markets through Dec. 31, 2025. Consistent engagement moved acknowledged markets to fully self-attested REMs, thereby reducing reliance on DEQ variance process known as the acknowledgment process, for allowing materials to go to non-self-attested markets for a period of time and expanding compliance capacity for processors.

3.3.3.2 Collaboration with Processors

CAA worked closely with CRPFs to reinforce downstream accountability. Processors received regular, updated lists of self-attested end markets and individualized notifications identifying downstream markets requiring action.

In collaboration with CRPFs, CAA established a foundational reporting process for CRPFs to support regulatory oversight, REM verification and long-term program accountability.

¹⁵ Based on data reported to CAA by CRPFs.

Standardized reporting expectations were initiated to capture material flows and disposition information necessary to assess compliance with REM requirement, recognizing variability in facility operations and data readiness during the initial implementation year. Outreach with CRPF operators supported initial data submissions and identified data gaps related to end market identification and willingness to self-attest. Through this process, many additional end markets downstream of brokers were identified and agreed to complete self-attestation forms with support of processors and brokers. This collaborative approach was continued through the end of the year to transition end markets off the DEQ-managed “Acknowledged (not self-attested) list,” either to self-attested or withdrawn status from the Oregon program.

3.3.3.3 Industry Engagement and Technical Consultation

During the 2025 reporting year, CAA coordinated with relevant industry associations to inform the program plan amendment development, REM implementation and system planning. This coordination included structured engagement through three webinars, six meetings with the End Market Working Group comprised of recycling trade associations and recyclers, and over 200 hours of targeted consultations with end markets and associations representing paper, glass, metals, plastics and recycling system stakeholders to gather input on end market practices, operational constraints and verification considerations. Through this engagement, CAA developed five key takeaways:

1

Progress Made in a Shared Understanding

The RMA advanced a meaningful discussion with the global recycling industry about REMs. Progress has been made to ensure recycling supply chain entities understand their obligation to demonstrate that their operations align with the REM principles.

2

Change Management Takes Time

We need to consistently engage with end markets to build trust and acceptance for the new REM requirements. End markets believe a more realistic goal is to have all entities receiving Oregon material achieve REM verification by 2030. In the meantime, CAA will focus on gathering initial information and offering technical help to prepare them for more thorough auditing under a third-party standard once it is developed.

3

Confidentiality Concerns Remain

Outstanding uncertainty and concerns remain with the confidential treatment and use of information that will be gathered during the REM process. These concerns extend to how some performance areas, such as yield, can be meaningfully demonstrated.

4

Uncertainty and Perceived Risk May Affect Participation

Given the risks associated with the uncertainty of participating in the Oregon market, several recycling supply chain entities and end markets may opt to purchase materials from jurisdictions with fewer requirements and perceived risk.

5

Desire for a Reformed Verification Approach

End markets wanted a reformed approach — different from the one in the original program plan. Entities wanted a harmonized REM verification system across all states. Developing an independent verification standard and scaling the REM verification program will take time but will be optimal in the end.

These takeaways led to the improved REM disclosure and verification process defined in the program plan amendment.

3.3.3.4 Expansion and Risk Mitigation of End Market Self-Attested Capacity

Recognizing Oregon's limited reach with smaller volumes and regionally concentrated end market base, CAA engaged both existing and alternative end markets to assess capacity and identify backup options if acknowledged markets fail to self-attest by regulatory deadlines.

CAA concentrated outreach efforts for self-attestation with all known major end markets, encouraging self-attestation, attesting total volume capacity to move more tons to self-attested markets and exploring new markets that could absorb Oregon volumes. By end of 2025, CAA significantly expanded the range of market options to CRPFs through outreach efforts.

3.3.3.5 Investment Consideration and Planning Framework

The first six months of implementation focused on laying the groundwork for meeting full compliance in all program areas by the end of the program plan period. In 2025, what this meant for REMs was scaling the number of self-attested markets available to Oregon CRPFs, understanding the end market landscape and refining the initial REM verification approach as presented in the program plan amendment.

Once REM verification audits begin in 2026, CAA will have a much clearer picture of investments needed, not only to responsibly manage materials from Oregon, but from other EPR states where CAA is operating as the PRO. Based on this information, CAA will be developing a National Materials Strategy that will consider the interventions and investments that may be necessary to ensure strong responsible end markets for materials from all EPR states.

3.3.3.6 REM Verification

In Apr. 2025, CAA conducted a trial audit of its initial REM verification methodology at Denton Plastics. The result was that Denton was verified as compliant with REM requirements by the third-party certification body, Verico. Denton was the sole REM to be verified against the criteria presented in the program plan approved in Feb. 2025. The on-site audit was observed by representatives from CAA and GreenBlue, which also supported development of the methodology.¹⁶

During the trial verification period, CAA conducted example documentation reviews with select end markets. Participating end markets identified concerns regarding audit complexity, duplication with existing audit and permit requirements, and the level of disclosure requested. As a result, these end markets requested to review the REM verification approach prior to broader implementation. Verico provided CAA with feedback on the audit methodology and recommended opportunities for improvement. Based on this feedback, CAA proposed development of a consensus-based certification standard



¹⁶ The verification methodology and criteria have since changed with the approval of the REM plan amendment in May of 2026. Denton's audit will be compared against the new process to determine, if re-evaluation is needed to maintain Denton's verification status.

through the American National Standards Institute (ANSI) Accredited Standards Development Process and submitted this approach via a program plan amendment in August 2025. The updated approach led to the commencement of further REM verification in 2026. Future annual reports will summarize the challenges identified by end markets and actions taken by CAA to address them.

3.3.3.7 REM Non-Conformance

In 2025, two end markets were identified by DEQ as potentially operating out of compliance with the REM standard defined in OAR 340-090-0670(2). In each case, CAA worked with the end markets to understand the alleged non-conformance issue, with one issue resolved and one outstanding at the end of the year.

3.3.3.8 Data Availability

Given the complexity of the end market disposition reporting and the need for a ramp up phase of reporting, DEQ has deferred the disposition reporting requirements for CAA under ORS 459A.887(6) until more complete disposition reporting is performed by end markets. Once DEQ determines an adequate level of disposition reporting data is available, CAA will be able to identify chain of custody anomalies, quantify materials with meaningful disposition pathway differences, map out potential to shift materials to higher benefit markets and assess disposition compliance with the hierarchy requirement. Once DEQ determines the data is sufficient to perform this analysis, CAA will produce that report on a quarterly basis.

3.3.4 Upholding Oregon's Materials Management Hierarchy

CAA committed to conducting life cycle analysis (LCA) research during the first program plan period to understand the various impacts of disposition pathways for different materials. For this program plan period, cartons, glass and EPS are to be evaluated using comparative LCA studies.

In 2025, CAA contracted with an experienced LCA consultancy to perform this work. According to ISO 14044 standards, any LCA that yields results that support comparative assertions that are disclosed to the public requires a critical review under Section 6.3 of the standard. The LCAs were initiated in Sept. 2025, and the critical review is expected to be completed by Sept. 2026, with findings incorporated into future reporting and program plan submissions as appropriate.

Early learnings from the initial screenings include:

LCAs do not capture all key impact areas. For example, LCAs cannot account for the benefits of ecosystem or species preservation, both of which are key priorities in Oregon state policy.

LCAs also do not account for the full impacts of plastic pollution in the environment, which is why DEQ has added additional lifecycle evaluation (LCE) requirements in OAR 340-090-0930(2)(h).

LCAs cannot account for highest and best use for materials that are scarce or in limited supply. There may be societal benefits for using raw materials in one application over the other, where recycled materials could displace demand for material in one instance, alleviating overall demand and allowing virgin materials to flow to applications that have a greater societal benefit.

Use of different data sets and software for running modeling can yield different results.

Given these limitations CAA believes a discussion is merited about the future use of LCAs in policy setting and program plan implementation. CAA is encouraging DEQ and other interested parties to use LCAs/LCEs to inform rather than use them to drive policy decisions without sufficient consideration of the externalities not captured in LCAs.

3.3.5 Statewide Plastics Recycling Rate

The RMA establishes a statewide recycling rate goal for plastic packaging, recognizing that achieving this goal requires coordinated investments across collection, education, processing capacity and end-market access. The statewide rate goal is set at 25% by 2028, aligning with the end of the first program plan. During the first six months of program implementation, CAA focused on building the foundational systems necessary to support increased plastic recycling over time.

3.3.5.1 Building Access to Plastic Recycling Collection

A primary driver of improved plastic recycling rates is providing Oregonians with convenient, reliable opportunities to recycle covered plastic materials. In 2025, CAA prioritized investments to expand and strengthen access to collection through a combination of curbside program support, drop-off infrastructure and new PRO-funded RecycleOn Centers. These investments are designed to increase the volume of plastic material captured statewide, particularly in communities that previously lacked adequate service.

During the reporting period, CAA executed funding agreements and service expansion addenda with local governments and service providers to lay the groundwork for acquiring new trucks, recycling carts, and containers as well as depot capacity, needed to collect plastics on the USCL. In parallel, CAA launched the first RecycleOn Centers described above.

3.3.5.2 Supporting System Performance and Material Flow

In addition to collection access, CAA has worked to ensure that collected plastics move efficiently through the recycling system and reach self-attested markets, and eventually REMs. This includes coordination with haulers, processors and logistics partners to support consolidation, transport and processing of plastics collected through curbside and USCL depot programs and RecycleOn Centers. Investments in equipment, facility readiness and operational systems were prioritized to support increasing material volumes as collection expands.

3.3.5.3 Education and Outreach to Increase Participation in Plastics Recycling

Public understanding and correct recycling behavior are critical to achieving higher plastic recycling rates. Throughout 2025, CAA advanced statewide and local education and outreach efforts to help Oregonians recycle plastics correctly and with confidence. These efforts included the launch of the RecycleOn Oregon branding and website, a multiphase statewide advertising campaign and expanded availability of customizable education materials through the Education and Outreach (E&O) Portal.



Messaging emphasized clear guidance on what plastics are accepted, how to prepare materials and why proper recycling matters. In addition to statewide outreach, CAA provided direct support to communities transitioning to the full USCL by funding and coordinating locally tailored educational materials, signage and campaigns. These efforts are expected to reduce contamination, improve material quality and increase the share of collected plastics that can be successfully recycled.



3.3.5.4 Statewide Plastic Packaging and Food Serveware Recycling Rate

CAA is working toward meeting the statewide plastics recycling rate goal of 25% by the end of the first program plan period in 2028. The statewide plastics recycling rate measures the portion of plastic packaging and food serveware generated in the state that is recycled. Based on the most recent available data, the current statewide plastics recycling rate is 17.05%.¹⁷ This rate calculation is based on data collected by DEQ for the 2022 calendar year, predating the launch of the CAA Oregon program.

Recycled tons are drawn from DEQ's annual Material Recovery Survey (MRS), which compiles reported recycling tonnage from collectors, processors, exporters, end users and some large generators across Oregon.¹⁸ Disposal is estimated using DEQ's disposed waste composition study, which identifies the portion of the disposed waste stream comprised of plastic packaging and food serveware. These composition percentages were adjusted to reflect "clean, dry" plastic (i.e., net of moisture and attached contamination)¹⁹ and then multiplied by total disposed waste tons reported for 2022. Given the DEQ data sets lag by a few years, the plastics recycling rate that uses 2025 program year data will not likely be reported until 2028.

Going forward, CAA will work with DEQ to streamline the overall data collection process across data sources, including data from service providers reporting to CAA to minimize additional data collection needs through the MRS.

3.3.5.5 Ongoing Evaluation and Planned Next Steps

The program launched in mid-2025, meaning statewide plastic recycling rate data reflecting these investments is not yet complete. However, the efforts undertaken during this initial implementation period are intentionally designed to create the conditions necessary to meet and maintain the statewide plastic recycling goal over time.

Looking ahead, CAA will continue to expand collection access, increase the number of RecycleOn Centers and support curbside program improvements statewide. E&O efforts will shift increasingly toward contamination reduction and sustained behavior change. CAA will also continue working with processors and end-market partners to ensure that collected plastics are responsibly recycled and that system capacity grows in step with collection volumes.

CAA will continue to evaluate program performance using verified data as it becomes available and will adjust investments and strategies as needed to support achievement of the statewide plastic recycling goal in future reporting periods.

¹⁷ Based on 2022 MRS survey and 2022 Waste Characterization Survey from DEQ. More recent disposal tonnage data is available but to maintain consistency in the rate calculation the 2022 disposal data was used.

¹⁸ Recycling tonnage from other recyclers not included in the MRS were not included due to inconsistent availability and low volumes.

¹⁹ The disposal-side contamination correction uses factors developed in DEQ's 2016–2017 Oregon Disposed Waste Composition Study (based on cleaning and re-weighing sorted plastics to estimate the "clean, dry" plastic weight). No contamination correction is applied to the recycling ton.

3.4 Education and Outreach

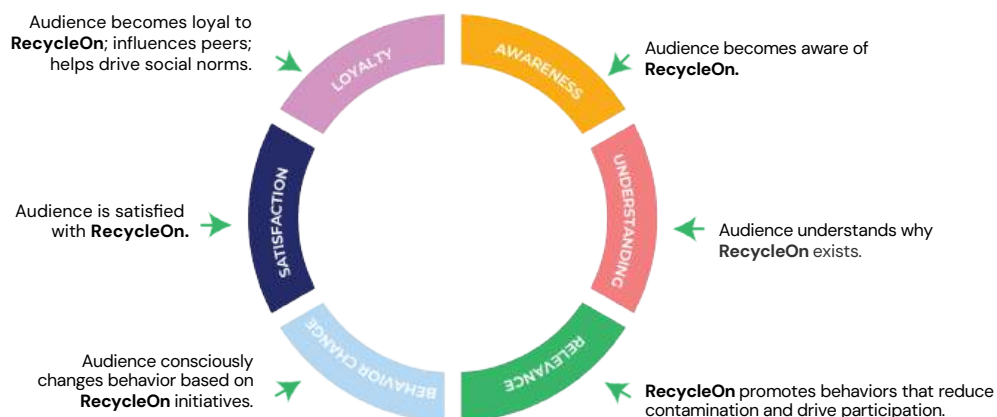
In its first year of implementing paper and packaging EPR under the RMA, CAA approached E&O as a foundation-building effort rather than a one-time communications push. The program was designed to clearly introduce change, build confidence among those responsible for delivering recycling services and prepare Oregonians for a system that would evolve over time. From the outset, CAA prioritized trust, consistency and readiness, recognizing that behavior change depends on credible messengers, understandable information and alignment across a highly fragmented statewide system. This approach reflects the statutory intent of ORS 459A.893, including developing educational resources that support participation, reducing contamination and improving outcomes while acknowledging the RMA requires implementation in phases and at different speeds across communities.

To support this work, CAA worked with The Recycling Partnership, a national nonprofit organization that works across the United States to strengthen recycling systems through research, policy engagement and on the ground program support. The Recycling Partnership brings a data-driven perspective by leveraging research, pilot programs and real world implementation to develop best practices that can be adapted to local conditions. By working with The Recycling Partnership, CAA ensured that Oregon's E&O materials were informed by proven, scalable approaches used nationwide while remaining flexible enough to reflect Oregon specific infrastructure, policy and community needs. This partnership supported consistency, credibility and effectiveness statewide.



3.4.1 CAA's E&O Methodology: Behavior Change and Continuous Improvement

CAA's E&O program is grounded in well-established behavior-change principles and a commitment to continuous improvement. Recycling behaviors are shaped by local context—housing type, service availability, language and past experiences—and confusion or mistrust can undermine even well-designed systems. For this reason, CAA framed education as a progression. Early efforts focused on building awareness and understanding about what is changing, why the system is evolving and where residents can find accurate information. Only after that foundation is established do motivation and action become realistic goals.



Throughout 2025, this methodology guided decisions about content, tone and timing. It also informed a deliberate choice to sequence public messaging carefully, ensuring that local governments and service providers—the most trusted educators—were prepared before statewide outreach accelerated.

3.4.2 Overview Of E&O Material Batches, Timelines and Deliverables

E&O materials were developed in four structured batches, making E&O one of CAA's earliest implementation activities under the RMA, requiring up-front spends prior to implementation (reflected in the 2025 Financial Report for Fiscal Year 2023-2024). This phased approach was intentional. Batching allowed CAA to manage risk during a complex rollout, avoid premature or confusing messaging and incorporate feedback iteratively while preserving statewide consistency.

Each batch underwent review by local governments, service providers, community-based organizations (CBOs), Oregon Recycling Council members (ORSAC) and Oregon DEQ prior to release. This structure ensured materials were both compliant and practical for real-world use.



Figure 1. E&O Material Batches

3.4.2.1 Developing Educational Resources

To meet the requirements of ORS 459A.893, CAA developed a comprehensive suite of educational resources and promotional materials to support the rollout of the USCL. These materials explain what paper and packaging items are accepted in the recycling system, how they should be prepared and why contamination creates challenges for the system. Just as importantly, the materials establish a consistent statewide visual identity, terminology and accessibility standard, while allowing for appropriate local customization. Prior to implementation each jurisdiction and hauler was responsible for developing, designing and printing education materials, a cost that rate payers and local governments no longer incur.

Prior to development, CAA conducted a qualitative baseline study in late 2024 to identify knowledge gaps, anticipated points of confusion and opportunities to increase participation. Findings from this research directly shaped material content, language strategy and the design of statewide campaigns in 2025, ensuring that education addressed real barriers rather than assumptions.

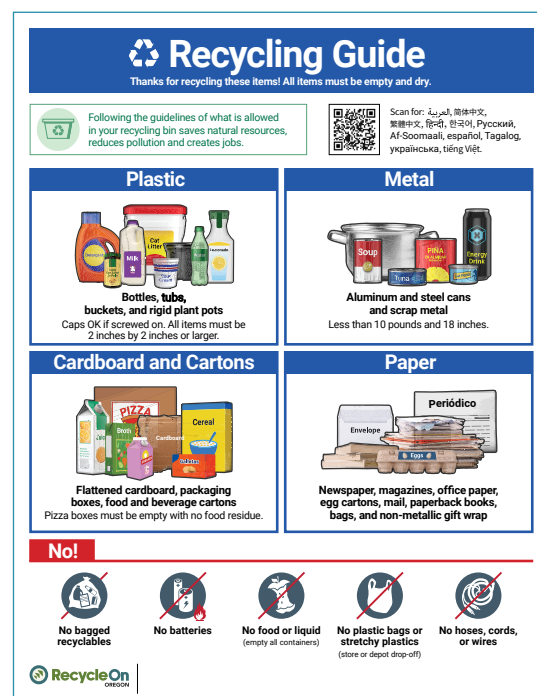
Following the release, feedback continued. For example, Spanish translations were refined and terminology was adjusted when programs identified clearer alternatives (e.g., “round containers” to “tubs”). CAA continues to collect and incorporate feedback as part of an iterative improvement process.

CAA extends its sincere appreciation to the local governments, service providers, community based organizations, ORSAC members and DEQ staff who engaged deeply and constructively throughout this process. Their sustained participation, technical insight and local perspective were essential to developing E&O materials that are clear, accessible, credible and responsive to the needs of communities statewide, and to building a shared foundation for successful implementation of paper and packaging EPR.

Where we started



Where we ended



Type of Feedback and Action Taken by CAA

Batch	Action	Positive	Clarifying	More info needed	No action taken	Total overarching comments
1a	77	11	36	4	25	153
1b	16	4	17	1	12	50
2	35	13	37	1	13	99
3	4	3	17	0	4	28
4	6	7	12	1	6	32
Total	138	38	119	7	60	362

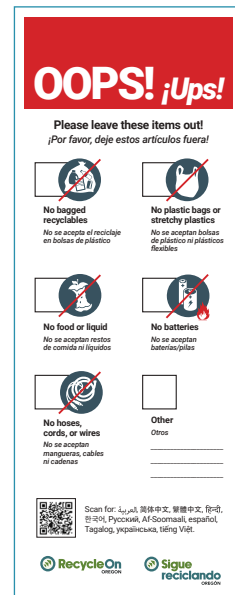
Table 7. Type of feedback and action taken by CAA by E&O material batch.

3.4.4 Equity, Language Access, and Community-Based Organizations

In parallel with local government engagement, CAA worked with The Recycling Partnership and community-based facilitators to conduct structured listening sessions with urban, rural, Spanish-speaking and Tribal-serving organizations. These conversations reinforced the importance of pairing a unified statewide recycling system with locally adaptable education that reflects cultural, linguistic, geographic and infrastructure differences.

CBOs highlighted their role as trusted messengers—particularly in multifamily housing, rural communities and households with limited access to recycling information or services. Spanish language engagement emphasized the value of informal, conversational Spanish, culturally familiar terminology and outreach channels such as signage, cart labels, mailers and social media. This feedback directly informed refinements to CAA's recycling guides, signage, mailers, toolkits and the Community Education Playbook, strengthening CAA's commitment to co-creation and equitable outreach.

Some CBOs serving non-English-speaking residents expressed hesitation to engage with CAA during 2025, citing concerns about trust, visibility and potential risks associated with the broader political climate, which influenced how and when they were willing to participate in program-related outreach and conversations.



CAA invited 11 CBOs to participate in the batch 1a, 1b and 2 listening sessions. The following organizations attended.

- The Arc
- Habitat for Humanity
- BRING Recycling
- Trash for Peace
- Sustainable Corvallis

CAA invited 9 Spanish-language CBOs to participate in a listening session reviewing batch 1a, 1b and 2 Spanish educational materials. The following organization attended.

- Centro Cultural

Looking ahead, CAA recognizes that meaningful, equitable engagement is an ongoing process that requires time, consistency and trust building. CAA remains committed to continuing dialogue with CBOs across Oregon, including those that were unable or hesitant to participate in 2025, and to creating multiple pathways for engagement as relationships strengthen and conditions evolve. Feedback from these groups will continue to inform refinements to E&O materials over time, ensuring they remain culturally responsive, accessible and aligned with the needs of the communities they are intended to serve.

3.4.5 Channels and Scale of Outreach Activities Undertaken Related to Educational Resources and Promotional Campaigns

Throughout 2025, CAA employed an integrated, multi-channel approach to meet Oregonians where they seek information. Earned media supported major milestones, including the July 2025 launch of the RMA and RecycleOn Oregon and the Oct. opening of the first RecycleOn Center in Ashland. Coverage across statewide, regional and national outlets helped establish CAA and RecycleOn Oregon as trusted sources during a period of change and reinforced the phased nature of implementation.

RecycleOn.org/Oregon served as the central public information hub, offering an address-based recycling lookup tool, plain-language explanations of system changes, ongoing blog content, a RecycleOn Center locator and direct connections to local recycling programs, allowing community members to learn more about their local programs. Organic social media channels on Instagram, Facebook and TikTok complemented this work by reinforcing key messages, responding to common questions and directing users to authoritative resources using approachable, non-shaming language.



CAA also used direct communication channels to maintain continuity and transparency. A monthly RecycleOn Oregon newsletter provided timely updates to interest holders throughout 2025, while webinars offered opportunities for deeper discussion of roles, responsibilities and upcoming milestones. Recordings were posted publicly to ensure ongoing access.

3.4.5.1 Number and Kinds of Audiences Reached

CAA intentionally sequenced outreach to support early implementation while laying the groundwork for long-term behavior change. Initial efforts focused on local governments and service providers, whose readiness and alignment are essential to effective public education. Once this foundation was in place, outreach expanded statewide to the general public. Across audiences, messaging emphasized awareness and guidance toward reliable information rather than immediate enforcement or behavioral correction.

Statewide outreach focused on the following audience groups:

English-speaking
adults
(18+)

Reached through a combination of paid advertising, the RecycleOn Oregon website, organic social media and printed E&O materials distributed by communities and service providers.

Spanish-speaking
adults
(18+)

Reached through Spanish-language advertising placements, Spanish content on the RecycleOn Oregon website, bilingual social media posts and translated E&O materials made available to communities

Speakers
of languages
other than
English or
Spanish

Supported through multilingual website content, translated educational materials available via the E&O Portal and organic social media distribution. During this phase of implementation, materials were available in multiple languages to enable communities to engage residents who speak languages commonly used in their service areas.

3.4.6 Statewide Educational and Promotional Campaigns

As part of its statutory obligation to develop educational resources, CAA Oregon implemented statewide educational and promotional campaigns beginning in August 2025. Across all phases, 8–12% of campaign spending was allocated to Spanish-language media to promote inclusive access.

The initial phase introduced the RecycleOn Oregon brand and built baseline awareness that recycling in Oregon is changing. Subsequent phases focused on contamination reduction and encouraging participation in newly opened RecycleOn Centers through geographically targeted



outreach. Together, these campaigns directed residents to educational tools, reinforced consistent statewide guidance and prepared communities for new services. CAA views this work as foundational, with future efforts increasingly focused on localized, action-oriented education as implementation progresses and the system matures.

July 2025: Recycling Modernization Act and RecycleOn Oregon Launch

In advance of and immediately following the July 1, 2025, effective date of program implementation, CAA engaged in proactive media outreach to support accurate, accessible coverage of what was changing statewide. Coverage appeared across statewide, regional and national outlets, including public radio and television, daily newspapers, community news sites and trade publications.

Early reporting focused on:

- Standardization of recycling acceptance statewide.
- Expanded access to recycling services, particularly in rural areas.
- The role of participant producer funding in supporting system improvements.
- Where residents could find reliable, up-to-date information about recycling changes.

This coverage helped establish RecycleOn Oregon and CAA as trusted sources of information during a period of significant system transition. CAA created a customizable press release template that allowed recycling programs to localize the broader program changes by explaining what residents in specific communities could expect, helping reinforce that changes would roll out over time rather than all at once.



3.4.7 Statewide Campaign Phases and Activities

3.4.7.1 Phase 1: Brand Introduction and System Awareness

Phase 1 introduced Oregonians to the RecycleOn Oregon brand and website and focused on building a baseline understanding that statewide recycling changes are underway. Messaging emphasized consistency and clarity about what can and cannot be recycled, that recycling improvements would roll out over time, and pointed residents to reliable, up-to-date information sources.

Phase 1 employed a multi channel media strategy, including Google Search, billboards and transit advertising, digital audio and podcasts, digital video (pre roll and YouTube), broadcast and cable television, radio and paid social media placements.

Over its full duration, Phase 1 is estimated to have reached approximately 89% of Oregon adults (18+), delivering an average of 71 impressions per person. These activities established statewide baseline awareness for the RecycleOn Oregon system and upcoming recycling changes.

Now that Phase 1 has concluded, CAA has begun research to better understand its impact on public awareness and message comprehension, to inform future refinements to educational strategies and campaigns.



3.4.7.2 Phase 2: Contamination Reduction Messaging

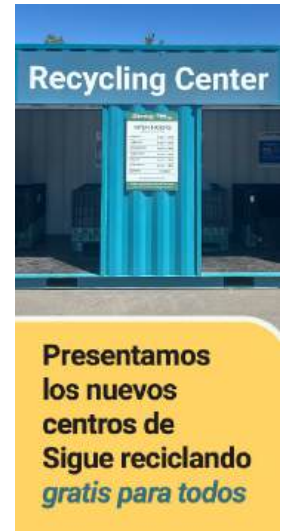
Phase 2 launched in Oct. 2025 and ran through late Nov. 2025, pausing during the holiday media season. The reporting period for Phase 2 aligns with the 2025 calendar year, although the campaign restarted in early 2026.

This phase focused on encouraging the placement of recyclables loose in the recycling bin, reducing the negative behavior of bagging recycling, a known contributor to contamination and processing challenges. Messaging reinforced proper recycling behaviors consistent with statewide acceptance standards.

Over the campaign period, Phase 2 delivered 87.8 million impressions, reaching an estimated 75% of Oregon adults, with an average frequency of 28 impressions. These impressions came from approximately 28.4 million audio listens and 17,362 social media engagements, resulting in 158,000 website clicks.

Phase 2 continued into early 2026 to reinforce contamination reduction behaviors as recycling services continued to expand.

To understand how well early outreach is working, CAA evaluated Phase 2 advertising through a brand lift study comparing people who saw a RecycleOn Oregon ad with those who did not. The purpose of this research is not just to measure awareness, but to understand whether people recognize and trust the new recycling system enough to use it correctly. The study found modest but positive increases in awareness and understanding among those who saw the ads, along with stronger agreement that the program helps them recycle better and find recycling locations. These shifts are early signs that outreach is building familiarity and confidence in the system—an important step toward reducing confusion and contamination. Stronger results among key audiences, including rural and lower-income households, also suggest the program is reaching communities that have traditionally had less access to clear recycling information. While these are early findings, they indicate that consistent, statewide messaging is helping residents recognize the program, understand how it works and feel more confident participating as the system continues to grow.



3.4.7.3 Phase 3: RecycleOn Center Awareness and Participation

Phase 3 promoted public participation in newly opened RecycleOn Centers using geographically targeted campaigns. This phase was deployed in two regional segments as centers became operational.

Phase 3a – Southwest Oregon

Initiated in mid Oct. 2025 and ran through mid Dec. 2025, pausing for holidays. Phase 3a reached an estimated 85% of adults in the Southwest Oregon region and delivered an average frequency of 36 impressions.

Phase 3a generated approximately:



958,000

audio listens



4,058

social media
engagements



13,165

website clicks

Phase 3b – Central Oregon

Launched in early Dec. 2025 and continued into mid-Jan. 2026, with full campaign reporting extending beyond the 2025 calendar year. During the reported period, Phase 3b reached an estimated 85% of adults in the Deschutes and Jefferson County region and delivered an average frequency of 26 impressions.

Phase 3b generated approximately:



2,937,815

audio listens



5,203

social media
engagements



12,336

website clicks

3.4.7.4 Oct. 2025: Ashland RecycleOn Center Launch

Earned media outreach supported the opening of the first RecycleOn Center in Ashland, marking an important shift from program launch to visible, on-the-ground implementation of a new collection center. Coverage of the Ashland opening appeared across Southern Oregon outlets and was picked up by national industry and recycling publications.

Media stories highlighted:

- The Ashland site as the first participant producer-funded RecycleOn Center in Oregon and the nation.
- New opportunities to recycle materials not accepted in curbside programs.
- The role of local partners and host sites in expanding access.
- How RecycleOn Centers fit within the broader RMA framework.

This localized coverage emphasized accessibility, convenience and community benefit, while reinforcing that additional RecycleOn Centers would be deployed over time in other parts of the state. National trade coverage positioned Oregon's approach as a model for other states considering or implementing EPR systems.

Across both the July program launch and the Ashland RecycleOn Center opening, earned media complemented paid and owned channels by extending reach through trusted third-party voices and reinforcing consistent messaging.

3.4.7.5 Digital Information Assets: RecycleOn.org/Oregon

CAA's primary digital information platform, RecycleOn.org/Oregon, functioned as a centralized, publicly accessible hub for recycling information. The website supported multiple audience needs by providing:

- A recycling lookup tool to help residents understand what can and cannot be recycled during a time of transition.
- Plain-language explanations of recycling changes under the RMA.
- A RecycleOn Center locator to guide residents to appropriate drop-off locations.
- Ongoing blog content covering recycling topics, program updates and educational guidance.
- A contact form allowing members of the public to submit questions and receive responses.
- Packaging Lifecycle Assessments

The website was referenced consistently across earned media coverage, advertising, community outreach materials and social media, allowing CAA to direct residents to a single source of accurate and up-to-date information as changes rolled out. To provide community members with as much information as possible, RecycleOn.org/Oregon includes “off-ramps” that connect users to their local recycling and solid waste program so they can learn more about their specific system.

3.4.7.6 Organic Social Media

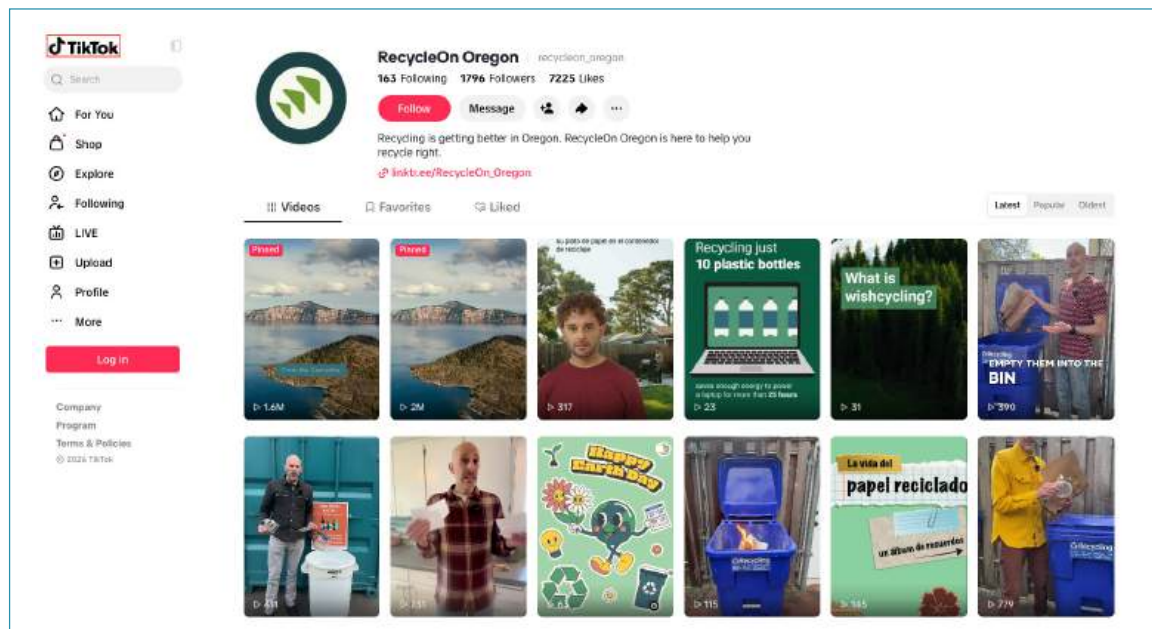
CAA used organic social media channels under the @RecycleOn_Oregon handle on Instagram, Facebook



and TikTok to reinforce key messages and support public understanding. Organic social content focused on:

- Explaining what can and cannot be recycled using simple visuals and short-form videos.
- Reinforcing contamination-reduction behaviors.
- Directing audiences to RecycleOn.org/Oregon for more detailed information.
- Highlighting new services, including RecycleOn Centers, as they came online.

Organic social media complemented paid advertising by allowing for ongoing engagement, timely updates and message reinforcement using approachable, non-shaming language. These platforms also allowed CAA to test messaging, respond to common questions and observe areas where additional clarification or education was needed.



3.4.7.7 Monthly RecycleOn Oregon Newsletter

CAA created a monthly RecycleOn Oregon email newsletter throughout 2025 to provide consistent, direct communication with interest holders and partners as the RMA rolled out. The newsletter served as a recurring touchpoint for sharing program updates, explaining upcoming changes and directing readers to additional tools and resources.

The newsletter audience included local governments, service providers, nonprofit partners, participant producers, educators and other interested parties seeking timely, practical information about recycling changes in Oregon.

From Jan. through Dec. 2025, the RecycleOn Oregon newsletter demonstrated steady engagement:

- Monthly sends reached approximately 1,773 subscribers over the course of the year.
- Open rates generally ranged from roughly 31% to 55%, with several spring and summer editions exceeding 50%.
- Click-through activity was consistent across the year, indicating ongoing engagement with linked resources such as program webpages and educational content.

3.4.7.8 Number and Kinds of New Educational Materials Created and Distributed

Material Name	Customizable?	Number of Languages
USCL Recycling Guide	Yes	12
Bill Insert	Yes	12
Brochure Mailer	Yes	12
Cart Label	Yes	12
Cart Tag — Materials	Yes	12
Cart Tag — Oops	Yes	12
Community Education and Outreach Playbook	No	1
Decal — Glass	No	5
Decal — Recycling	No	5
Door Hanger	Yes	12
Infocard Mailer	Yes	12
Large Sign	Yes	12
Materials Set (High Resolution)	No	Transcreated for 12 languages
Materials Set (Low Resolution)	No	Transcreated for 12 languages
Messaging Timeline Guide	No	1
Newsletter Article	Yes	11
No Icons	No	12
Poster	Yes	12
Press Release	Yes	9
QR Codes for RecycleOn Oregon Website	No	0
RecycleOn Oregon Logos	No	2
Social Media Toolkit	No	12
Terminology Spreadsheet	No	12

Table 8. Number and kinds of new educational materials created and distributed.

3.4.7.9 2025 E&O Printing Numbers

CAA covered or reimbursed the printing costs for approximately 330,000+ E&O materials. Reimbursement to communities for printing done outside the E&O Portal accounts for approximately 96,800 pieces of collateral.

Communities that ordered E&O collateral for printing include:

- Amity
- Bend
- Benton County
- Cascade Locks
- Carlton
- Corvallis
- Clatsop County
- Columbia County
- Dayton
- Deschutes County
- Eugene
- Florence
- Hood River
- Keizer
- Klamath County
- La Pine/Redmond
- Lafayette
- Lane County
- Lincoln County
- Marion County
- Maupin
- McMinnville
- Newport
- Polk County
- Portland
- Salem
- Sheridan
- Sherman County
- Sisters
- Sweet Home

- The Dalles
- Tillamook County
- Umatilla
- Union County
- Washington County
- Willamina
- Yamhill
- Yamhill County

Service Providers

- Apex Disposal
- BRING
- Curry Transfer and Recycling
- D&O Garbage
- Dahl Disposal
- Loren's Sanitation
- MVHA
- North Lincoln Sanitary Service
- Pacific Sanitation
- Pride Disposal
- Recology
- Republic Services
- Royal Refuse
- Sanipac
- Sanitary Disposal
- Thompson Sanitary Services
- Valley Disposal
- Waste Connections of the Gorge
- Waste Management
- Waste Pro

3.4.8 USCL Depot Signage Support

CAA partnered with communities to design custom USCL depot signage, a complex effort requiring close coordination with individual depot operators. Each site's signage package is being tailored to reflect its unique layout, traffic flow and operational considerations. Although time-intensive, this collaborative work in 2025 established a strong foundation for the successful rollout of USCL depot signage in early 2026. Specifically, CAA worked with Lane County and Pendleton Sanitary to support the design and cover printing costs of signage. Additionally, many communities used the "Large Signs" available in the E&O Portal for their USCL depot.



3.4.9 Waste Generator Awareness

Degree of waste generator awareness, knowledge and confidence in recycling are not available for 2025 due to the program's mid-year launch. Following program launch, many communities needed additional time to update contracts, operational systems and education materials before fully rolling out the Uniform Statewide Collection List (USCL). As a result, community recycling instructions and services were not consistent statewide during the latter half of 2025.

In addition, collecting survey-based awareness or confidence data only a few months into a phased rollout would not have produced meaningful or representative insights.

To ensure future reporting is grounded in sound, comparable baseline data, CAA will rely on baseline statewide audience research conducted in 2024, prior to program launch. This research established baseline measures of recycling awareness, self-reported behaviors, confidence and information gaps among Oregon residents and now serves as a pre-implementation benchmark against which future change will be measured. Building on that baseline, CAA initiated research in 2026 to track consumer awareness, self-reported behaviors, campaign performance, brand lift, digital engagement and what impact, if any, statewide campaigns had on RecycleOn Center usage over time. This data, and additional insights, will be reported in future annual reports once the program and education rollouts have been more fully established statewide.



4 CAA Management and Compliance

The following sections describe how CAA complied with requirements set forth in several regulatory instruments, including: Oregon statute and rules; DEQ's Internal Management Directive (IMD) for the RMA, and CAA's DEQ-approved [program plan](#). Section 4.1 addresses CAA's engagement with interested parties to implement the program's goals and objectives, and Section 4.2 summarizes specific compliance obligations and exceptions.

4.1 Collaboration is Key

4.1.1 Communications

Effective communication is a foundational element of achieving the goals of the RMA. During 2025, CAA used a combination of statewide public education, targeted local outreach and structured interest holder engagement to support improved recycling performance and to inform ongoing program implementation.

Statewide E&O efforts focused on building public awareness of recycling system changes, promoting correct recycling behaviors and reducing contamination—key factors that directly affect material quality, system efficiency and recycling outcomes. Through the launch of the RecycleOn Oregon brand, a multi-phase statewide advertising campaign and expanded community-level education resources, CAA provided consistent, accessible messaging to help Oregonians recycle with confidence as services expanded.

At the same time, CAA worked closely with local governments, service providers, tribes and other partners to tailor communications to local conditions. The E&O Portal enabled communities to customize materials, update local program information and deploy outreach aligned with the USCL. Feedback from portal users, service providers and community partners highlighted both strengths and areas for improvement, informing refinements to onboarding support, material design and process clarity.

Interest holder feedback also played a central role in shaping the implementation of the plan beyond education. Input from local governments, haulers, end-market operators and Tribal partners informed decisions on collection access, RecycleOn Center siting, signage design and phased rollout strategies. CAA incorporated this feedback through ongoing meetings, site visits, technical assistance, pilot efforts and revisions to outreach approaches, ensuring the program remained responsive to on the ground realities during early implementation.

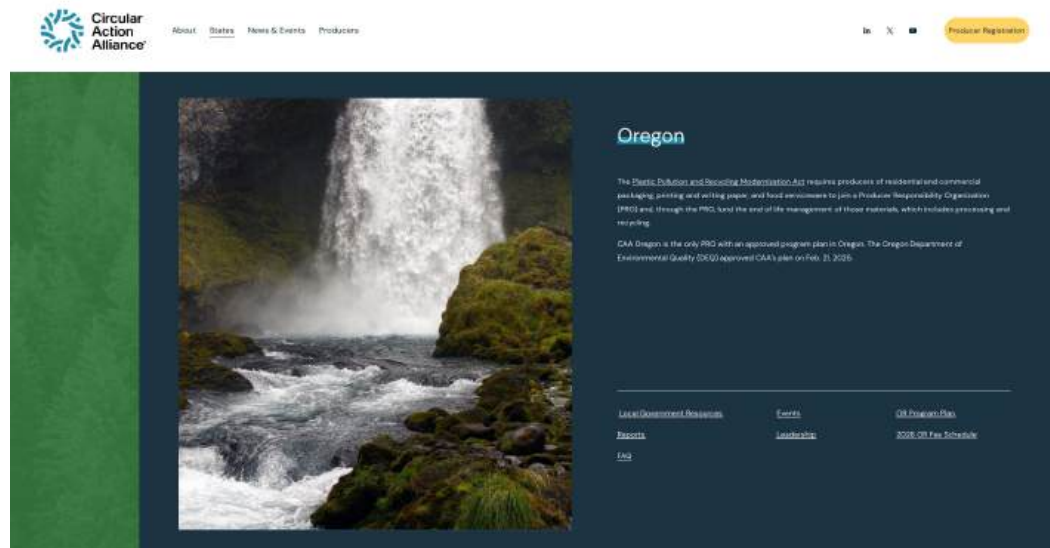
Together, these communication and engagement efforts supported system readiness, increased opportunities for participation and continuous program improvement. As implementation continues, CAA will further integrate interest holder feedback and performance data into communications planning to reinforce correct behaviors, support expanding services and advance progress toward the program's long-term recycling goals.

4.1.2 CAA Website

CAA's website, circularactionalliance.org, serves as a central resource for information on program implementation, compliance and organizational transparency. The site includes information on CAA's role as Oregon's approved PRO, explains how the RMA is being implemented and offers regular updates on program development and performance.

To support accountability, the website includes access to CAA's Ethics and Compliance Program, including an independent whistleblower hotline, as well as publicly available funding information, reports and producer registration and state addenda forms. Webinar recordings, technical resources and

implementation updates are also hosted on the site to support participant producers, local governments, service providers and other interested parties.



Consistent with statutory requirements, CAA publishes a [quarterly participant producer list](#) and a [public list of non-compliant producers](#), including the basis for non-compliance, as required under ORS 459A.896(8)(a–b). Together, these website resources support transparency, regulatory oversight and informed participation as Oregon’s recycling system continues to evolve.

4.1.3 E&O Portal

To translate planning and partnership into action, CAA launched the E&O Portal in May 2025. The portal serves as an implementation infrastructure, enabling local governments and service providers to deliver consistent, compliant education while tailoring materials to local services, languages, branding and rollout timing. The E&O Portal was built utilizing The Recycling Partnership’s Recycling Program Solution Hub.

Between May 19 and Dec. 31, 2025, 163 Oregon communities—representing rural, suburban and urban jurisdictions—actively used the portal to customize and download materials. These materials were produced in 11 languages in addition to English, with Spanish representing a substantial share of multilingual use. Additional languages include: Vietnamese, Russian, Chinese (Simplified and Traditional), Korean, Somali, Tagalog, Ukrainian, Arabic and Hindi. The E&O Portal also allows communities to update verified local recycling acceptance information, which powers the address-based lookup tool on RecycleOn.org/Oregon and ensures residents receive accurate, community-specific guidance during phased implementation.

CAA supported adoption through onboarding webinars, training resources, direct technical assistance and covered the cost of portal-based print materials. This approach reinforced local governments and service providers as primary educators while maintaining statewide coherence.



4.1.3.1 E&O Portal Usage (May 19 – Dec. 31, 2025)

163 Oregon communities interacted with collateral in the E&O Portal in 2025.²⁰ The tables below show how communities used the E&O Portal between May 19 and Dec. 31, 2025.

Custom Collateral Downloaded from the E&O Portal May 19 – Dec. 31, 2025	
Collateral Type	Count
Bill Insert	93
Brochure Mailer	65
Cart Tag — Materials	24
Cart Tag — Oops	71
Door Hanger	24
Infocard Mailer	53
Large Sign	120
Poster	29
USCL Recycling Guide	425
Total	904

Table 9. Custom collateral downloaded from the E&O portal from May 19 – Dec. 31, 2025.

Custom Collateral Downloaded from the E&O Portal by Language May 19 – Dec. 31, 2025		
Language	Count	%
Arabic	31	3.43%
Chinese — Simplified	44	4.87%
Chinese — Traditional	44	4.87%
English	378	41.81%
Hindi	31	3.43%
Korean	44	4.87%
Russian	45	4.98%
Somali	43	4.76%
Spanish	115	12.72%
Tagalog	43	4.76%
Ukrainian	43	4.76%
Vietnamese	43	4.76%
Total	43	100.00%

Table 10. Custom collateral downloaded from the E&O portal by language from May 19 – Dec. 31, 2025.

²⁰This number is lower than the one reported in quarterly reports because a few test users were identified during the data review and have since been removed from the total count.

Static Collateral Downloaded from the E&O Portal (Non-customized)

May 19 – Dec. 31, 2025

Collateral Type	Count
Bill Insert	27
Brochure Mailer	41
Cart Label	57
Cart Tag — Materials	29
Cart Tag — Oops	35
Community Education and Outreach Playbook	34
Decal	62
Door Hanger	23
Infocard Mailer	43
Large Sign	29
Materials Set (High Resolution)	63
Materials Set (Low Resolution)	39
Messaging Timeline Guide	35
Newsletter Article	44
No Icons	13
Poster	19
Poster and Sign	13
Press Release	37
QR Codes for RecycleOn Oregon Website	18
RecycleOn Oregon Logos	29
Social Media Toolkit	66
Social Media Toolkit #2	10
Social Media Toolkit #3	10
Terminology Spreadsheet	25
USCL Recycling Guide	67
Total	868

Table 11. Static collateral downloaded from the E&O portal (Non-customized) from May 19 – Dec. 31, 2025.

4.1.3.2 Participant feedback on the E&O Portal

To inform ongoing improvements to the E&O Portal, CAA collected user feedback from a range of users. Overall, responses indicate that once users can access the portal, it is viewed as a valuable and relevant resource for E&O efforts across the state. Users most frequently highlighted the benefit of having centralized, customizable materials that are easy to download, print and share with the public.

Feedback also identified several areas for improvement, particularly related to getting started. Some respondents reported challenges with account setup, logging in or adding communities, which, in some cases, prevented them from fully using the portal. Others noted that the process for reviewing and verifying local program information could be difficult to navigate and would benefit from clearer explanations about where information comes from and how updates are managed. Users who customized materials appreciated the flexibility but suggested refinements such as more consistent formatting controls, clearer display of material specifications and additional filtering options as the library of resources grows.

Taken together, the feedback shows strong interest in and demand for the E&O Portal, alongside clear opportunities to improve onboarding, technical support and transparency around key processes. CAA used this input to expand one-on-one technical assistance provided to communities and made recommendations to the portal operator for backend changes that have removed barriers. CAA will continue to work with communities to guide enhancements to ensure the portal remains an accessible, effective tool for supporting consistent, locally relevant recycling education statewide.

4.1.4 Service Provider Portal

The Service Provider Portal went live in June 2025, enabling users to:

- Submit data required to track materials from communities to end markets
- Submit requests for transportation reimbursement
- Submit invoices along with required documentation for reimbursement
- Check the status of invoices
- Submit questions and requests to CAA staff

By the end of the year, 93 accounts were registered with the Service Provider Portal, representing 156 active users. With each passing month, an increasing number of users interacted with the portal.

4.1.4.1 Participant Feedback on the Service Provider Portal

In 2025, CAA received feedback from several service providers regarding portal functionality and data submission. Feedback received included challenges with data mapping across systems, difficulties aligning scale ticket and activity data with CAA data standards, concerns about data validation and error messaging, limitations with the monthly summary reports available through the portal and access issues related to organizational firewalls. In each case, CAA engaged directly with the affected service providers to understand the reported concerns and provide hands on support.

To improve the Service Provider Portal experience going forward, CAA is working to identify longer-term system solutions for the concerns raised by service providers. This includes validation checks, mapping provided directly to the portal and possible API delivery. In addition, a long-term automated reporting solution is in development that will deliver expanded monthly summaries directly through the portal, with the ability to refresh reports as new data is received. Together, these improvements reflect ongoing efforts to enhance data accuracy, usability and service provider experience as the program continues to mature.

4.1.5 Internal Management Tools

CAA uses a suite of internal management tools to support program administration. In 2025, this included a customer relationship management and project management tool, and a financial management system for invoice processing and payment. As the program continues to mature, CAA will continue to assess and refine its internal tools and systems to streamline workflows, improve coordination and remain well positioned to effectively serve all interested parties while maintaining compliance with statutory and program plan requirements.

4.2 Managing Compliance

CAA's program plan was formally approved by DEQ on Feb. 21, 2025. It outlines CAA's approach to administering its obligations under ORS 459A.860 to 459A.975 as the designated PRO in Oregon. The program plan was developed in accordance with DEQ's IMD, with any deviations from statute identified and approved as alternative compliance requests.

4.2.1 Alternative Compliance Requests

Under OAR 340-090-0640(6)(a), a PRO may propose an alternate approach to meeting collection requirements to DEQ. In 2025, CAA submitted two alternative compliance requests to DEQ for approval.

4.2.1.1 Glass Alternative Compliance Request

In the fourth quarter of 2025, CAA Oregon submitted to DEQ an alternative compliance request related to glass packaging collection to account for the widespread availability of curbside glass recycling services across much of the state. The request sought to reduce the number of RecycleOn Centers required to offer glass collection based on the proportion of households already served by existing curbside glass recycling programs. In 2025, CAA provided a per-ton glass incentive of \$77 per ton and reimbursed transportation costs for glass hauling to a REM or the nearest reload facility when hauling distances exceeded 50 miles one way.

Under the proposed approach outlined in the alternative compliance request, communities with high levels of curbside glass access would rely primarily on existing curbside services, while a proportionately smaller share of RecycleOn Centers would be required to accept glass in addition to other PRO acceptance list materials. For example, if 95% of a jurisdiction's single-family and multifamily households are served by curbside glass collection, the number of RecycleOn Centers within that jurisdiction required to accept glass would be reduced by a corresponding amount. This request was documented in the Q4 2025 quarterly report to support DEQ's review of how glass collection requirements can be appropriately calibrated within the broader PRO system during early program implementation.

CAA is awaiting formal feedback on this alternative compliance request and the final granted variance may be modified from the initial proposal submitted in Q4 2025.

4.2.1.2 RecycleOn Center Alternative Compliance Requests

During the fourth quarter of 2025, CAA Oregon submitted three site-specific alternative compliance requests to address circumstances where strict application of jurisdictional or distance requirements did not fully align with how communities access recycling services in practice. These requests were developed to account for real-world service patterns observed during early implementation and were supported by considerations such as local government recommendations, demonstrated self-hauling behavior and overall access to recycling infrastructure. Each request was intended to ensure that the intent of the convenience standard

could be met while the PRO collection network continues to expand and mature. All site-specific alternative compliance requests were documented in the Q4 2025 quarterly report for transparency and DEQ review.

In Q2 of 2026, DEQ requested additional information related to these alternative compliance requests, therefore, no requests have been formally approved to date.

4.2.2 Program Plan Amendment

CAA submitted two amendments to the approved program plan in 2025. Both amendments went through the formal review process, including public comment, review by the ORSAC full council and appropriate sub-committees.

- On May 16, 2025, an amendment was submitted that introduced the use of Bonus C to grant bonuses to participant producers that achieve environmental impact reductions through transitioning from single-use packaging to reusable or refillable packaging,
- On Sept. 12, 2025, an amendment was submitted to DEQ to request changes to the REM verification approach, including variances to the timing and the subset of performance criteria that are applied in the verification audits.²¹

Bonus C Amendment: A response was issued from DEQ on Sept. 11, 2025 with conditional approval for Bonus C.

REMs Amendment: A response was issued from DEQ on Dec. 11, 2025, and included a list of requested changes. CAA submitted a second draft of the REM amendment on Feb. 6, 2026 and has actively engaged in the review process to resolve open issues including benchmarking of other PRO verification models. CAA received conditional approval of the REM amendment, with ordered changes on May 4, 2026.

As stated in the submitted amendment proposals, CAA is developing a national REM standard that meets the needs of EPR states where CAA is operating as the PRO for paper and packaging EPR. Standards have a proven track record of advancing broad, meaningful change, something that no single state can achieve alone. CAA contracted with SCS Standards, an American National Standards Institute (ANSI) accredited body, and kicked off development in Dec. 2025 with the selection of the board members. OR DEQ accepted a seat on the standard development board, along with other participating state regulators, trade associations and third-party organizations, to ensure collaboration and shared responsibility. The standards body held their first meeting in 2026. Two versions of the standard will be made available for public comment, with the first between May 5 and July 7, 2026, and the second planned for Feb. 2027. CAA and SCS anticipate completion of the REM standard by Mar. 2027 and intend to use the final standard to inform development of the next CAA Oregon program plan submission for 2028 to 2032.



²¹ The program plan amendment includes requested variances to OAR 340-090-0670(3)(i), OAR 340-090-0670(3)(h), OAR340-090-0670(2)(a), and OAR 340-090-0670(3)(ii).

4.2.3 Reporting

CAA submits regular reports to DEQ to document program implementation, producer participation and materials management activities under the RMA. In 2025, these submissions included participant producer supply and material category data, quarterly program and disposition update reports, REM outreach reports, and the publication and maintenance of CAA's participant producers in good standing list.

DEQ has deferred the full disposition reporting requirements for CAA under ORS 459A.887(6) until more complete disposition reporting is performed by end markets. In the interim, CAA submits an abbreviated report on a quarterly basis covering disposition for PRO-managed materials.

4.2.4 Producer Obligation Monitoring & Resolution

CAA implemented a structured producer notification and resolution process in coordination with DEQ, beginning in Aug. 2025. CAA's role as the PRO is to monitor fulfillment of producer obligations it administers, notify producers when obligations are not met, provide a defined opportunity for resolution and escalate unresolved matters in accordance with applicable requirements. Determinations of non compliance and enforcement actions are the responsibility of DEQ. Under this process, producers with unfulfilled obligations are notified directly in writing of their specific delinquency, the actions required to resolve it and the applicable resolution timeline. This notification and resolution framework is designed to be consistent with ORS 459A.869(10) and to provide producers with a clear, documented opportunity to resolve potential delinquencies prior to escalation to DEQ. The standard resolution period of three months is supported by direct follow-up, ongoing cross-checks of producer status and validation of resolution outcomes. Producers that resolve their delinquency within the resolution period, formally exit the program or have claimed to qualify under alternative classifications prior to escalation are excluded from escalations provided to DEQ. For delinquencies that remain unresolved after the resolution period expires, CAA established a standardized monthly escalation cadence to DEQ. This cadence ensures timely regulatory notification requirements while maintaining a focus on accuracy and consistency in all submitted information. Given the length of initial resolution periods, the monthly escalation process commenced in 2026.



5 Financing

Oregon law requires CAA to set fees that adequately fund the program operations, ensuring the fulfillment of the RMA requirements and enabling program implementation. These fees must cover the expected management costs of materials, including collection service expansion, depot network setup and CRPF compensation as well as REM and other strategic development costs. The fees must also cover reimbursement of DEQ costs related to administering the program, a waste prevention and reuse fee, administrative fees, PRO operations and program reserves.

Producer fee-setting begins with seven basic principles designed to ensure fairness and transparency. (Figure 1.) The CAA fee-setting methodology ensures fairness for producers by differentiating material fees based on each material's supply, cost and revenue profiles. Materials with the highest supply quantities and management costs pay the highest share of costs. Materials generating the most commodity revenues from having been sold to REMs receive the largest reduction in costs. Materials recycled at high rates pay less costs relative to low-performing materials. This approach ensures that the core fee principles of Fairness, Material-Specific Costs and Commodity Revenues are upheld. For covered materials that are neither collected nor recycled, participant producers of those materials still incur fees to cover the cost of the recycling system in accordance with the Fairness principle and Oregon law.

Seven Principles. One Fair Fee System.



Figure 1. Seven principles of producer fee setting.

The fee-setting process consists of six steps as illustrated in Figure 2. The same basic method is used in all EPR states to promote harmonization while also including state-specific requirements. Base fee-setting accounts for actual system costs that include collection, sorting, processing and delivery of the materials to responsible end markets. Folded into the process are additional steps designed to motivate participant producers to choose more recyclable packaging designs, known as eco-modulation (see more below).



Figure 2. The fee-setting process.

5.1 Producer Fee Structure

Oregon participant producers were required to report their 2024 supply data (12 months) by Mar. 2025. The CAA team verified supply reports and incorporated any individual and pooled 869(13) exemptions before calculating total participant producer supply to use as the final denominator for calculating the 2025 fee rates. The final fee schedule was published in May 2025. The fee schedule (see below) includes a fee rate for each of the 60 covered material categories. Beginning in 2026, Oregon participant producers will report their supply data by May 31 each year, and the fee schedule will be published in Oct. giving them time to budget for the upcoming year.

Fee invoices to CAA Oregon participant producers were issued starting in June 2025 in advance of the program launch on July 1, 2025. Total participant producer fee revenue in FY'25 amounted to \$167.9M.²² This amount covered all anticipated direct program costs, start-up costs and indirect allocated costs including establishing program reserves.

²² Producer Fee revenue for the year follows US GAAP accounting principles and includes late fees (\$0.4 million) and allowance for future producer adjustments (\$5.7 million). Total producer fee invoices net of adjustments totaled \$185.6 million in FY'25. A detailed reconciliation is provided in Appendix N.

2025 Oregon Producer Fee Schedule

Fees for Program Year July 1 – Dec. 31, 2025

Materials labeled N/A in the following table are not accepted on either the USCL or PRO Recycling Acceptance List.

Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Fee Rate
Printing and Writing Paper	Newspapers	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Newsprint (inserts and circulars)	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Magazines, Catalogs and Directories	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Paper for General Use	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Other Printed Materials	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
Glass and Ceramics	Glass Bottles and Jars & Other Containers	PRO	9.9 ¢/lb	1.1 ¢/lb	11.0 ¢/lb
	Ceramic — All Forms	N/A	122.0 ¢/lb	0.0 ¢/lb	122.0 ¢/lb
Metal	Aluminum Containers	USCL	2.0 ¢/lb	0.0 ¢/lb	2.0 ¢/lb
	Aluminum Foil and Molded Containers	PRO	21.2 ¢/lb	1.8 ¢/lb	23.0 ¢/lb
	Aluminum Aerosol Containers	PRO	28.8 ¢/lb	4.2 ¢/lb	33.0 ¢/lb
	Aluminum — Other Forms	N/A	64.0 ¢/lb	0.0 ¢/lb	64.0 ¢/lb
	Steel Containers	USCL	6.0 ¢/lb	0.0 ¢/lb	6.0 ¢/lb
	Steel Aerosol Containers	PRO	28.8 ¢/lb	4.2 ¢/lb	33.0 ¢/lb
	Steel — Other Forms	N/A	54.0 ¢/lb	0.0 ¢/lb	54.0 ¢/lb
	Metal — Small Format	PRO	19.0 ¢/lb	0.0 ¢/lb	19.0 ¢/lb
	Pressurized Cylinders	PRO	28.0 ¢/lb	0.0 ¢/lb	28.0 ¢/lb
Paper/Fiber	Aseptic and Gable — top Cartons	USCL	10.2 ¢/lb	6.8 ¢/lb	17.0 ¢/lb
	Kraft Paper	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Corrugated Cardboard	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Corrugated Cardboard (Tertiary/transport)	USCL	0.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb
	Paperboard	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Polycoated Paperboard	N/A	43.7 ¢/lb	1.3 ¢/lb	45.0 ¢/lb
	Other Paper Laminates	N/A	46.0 ¢/lb	0.0 ¢/lb	46.0 ¢/lb
	Other Paper Packaging	USCL	4.0 ¢/lb	0.0 ¢/lb	4.0 ¢/lb
	Paper — Small Format	USCL	31.0 ¢/lb	0.0 ¢/lb	31.0 ¢/lb
Plastic — Rigid	PET (#1) - Bottles, Jugs, and Jars	USCL	12.0 ¢/lb	0.0 ¢/lb	12.0 ¢/lb
	PET (#1) — Bottles, Jugs, and Jars	N/A	52.0 ¢/lb	0.0 ¢/lb	52.0 ¢/lb
	PET (#1) — Tubs	USCL	32.3 ¢/lb	5.7 ¢/lb	38.0 ¢/lb
	PET (#1) — Thermoformed Containers, Cups	N/A	64.3 ¢/lb	5.7 ¢/lb	70.0 ¢/lb
	PET (#1) — Lids	N/A	69.0 ¢/lb	0.0 ¢/lb	69.0 ¢/lb
	PET (#1) — Other Rigid Items	N/A	52.0 ¢/lb	0.0 ¢/lb	52.0 ¢/lb
	HDPE (#2) — Bottles, Jugs and Jars	USCL	6.0 ¢/lb	0.0 ¢/lb	6.0 ¢/lb
	HDPE (#2) — Bottles, Jugs and Jars	USCL	14.0 ¢/lb	0.0 ¢/lb	14.0 ¢/lb
	HDPE (#2) — Pails & Buckets	USCL/PRO	14.0 ¢/lb	0.0 ¢/lb	14.0 ¢/lb
	HDPE (#2) — Tubs, Nursery (plant) pots	USCL	35.0 ¢/lb	0.0 ¢/lb	35.0 ¢/lb
	HDPE (#2) — Package Handles, Lids	PRO	27.2 ¢/lb	0.8 ¢/lb	28.0 ¢/lb
	HDPE (#2) — Other Rigid Items	N/A	71.0 ¢/lb	0.0 ¢/lb	71.0 ¢/lb
	PVC (#3) — Rigid Items	N/A	82.0 ¢/lb	0.0 ¢/lb	82.0 ¢/lb
	LDPE (#4) — Bottles, Jugs and Jars	N/A	71.0 ¢/lb	0.0 ¢/lb	71.0 ¢/lb
	LDPE (#4) — Lids	PRO	27.2 ¢/lb	0.8 ¢/lb	28.0 ¢/lb

2025 Oregon Producer Fee Schedule (cont.)

Fees for Program Year July 1 – Dec. 31, 2025

Materials labeled N/A in the following table are not accepted on either the USCL or PRO Recycling Acceptance List.

Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Fee Rate
Plastic — Rigid (cont.)	LDPE (#4) — Other Rigid Items	N/A	71.0 ¢/lb	0.0 ¢/lb	71.0 ¢/lb
	PP (#5) — Bottles, Jugs and Jars	USCL	18.0 ¢/	0.0 ¢/lb	18.0 ¢/lb
	PP (#5) — Tubs, Pails and Buckets, Nursery (plant) pots & trays	USCL/PRO	14.0 ¢/lb	0.0 ¢/lb	14.0 ¢/lb
	PP (#5) — Lids	PRO	27.2 ¢/lb	0.8 ¢/lb	28.0 ¢/lb
	PP (#5) — Other Rigid Containers, Cups, Plates, Trays (non-nursery (plant))	N/A	68.6 ¢/lb	1.4 ¢/lb	70.0 ¢/lb
	PP (#5) — Other Rigid Items	N/A	71.0 ¢/lb	0.0 ¢/lb	71.0 ¢/lb
	PS (#6) Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays	N/A	140.0 ¢/lb	0.0 ¢/lb	140.0 ¢/lb
	PS (#6) White Expanded/Foamed	PRO	103.0 ¢/lb	0.0 ¢/lb	103.0 ¢/lb
	PS (#6) Colored Expanded/Foamed	N/A	140.0 ¢/lb	0.0 ¢/lb	140.0 ¢/lb
	PS (#6) Rigid Non-Expanded	N/A	82.0 ¢/lb	0.0 ¢/lb	82.0 ¢/lb
	PLA, PHA, PHB — Rigid Items	N/A	82.0 ¢/lb	0.0 ¢/lb	82.0 ¢/lb
	Other/Mixed Rigid Plastic	N/A	82.0 ¢/lb	0.0 ¢/lb	82.0 ¢/lb
Plastic — Flexible	HDPE (#2)/LDPE (#4) Flexible and Film	PRO	55.0 ¢/lb	0.0 ¢/lb	55.0 ¢/lb
	HDPE (#2)/LDPE (#4) (Pallet Wrap) non-consumer	PRO	36.0 ¢/lb	0.0 ¢/lb	36.0 ¢/lb
	PP (#5) Flexible and Film Items	N/A	114.0 ¢/lb	0.0 ¢/lb	114.0 ¢/lb
	PLA, PHA, PHB — Flexible and Film Items	N/A	114.0 ¢/lb	0.0 ¢/lb	114.0 ¢/lb
	Plastic Laminates and Other Flexible Plastic	N/A	114.0 ¢/lb	0.0 ¢/lb	114.0 ¢/lb
Plastic — Other	Plastic — Small Format	PRO	43.0 ¢/lb	0.0 ¢/lb	43.0 ¢/lb
	Plastic containers for motor oil, antifreeze, or other automotive fluids, pesticides or herbicides, or other hazardous materials	N/A	60.0 ¢/lb	0.0 ¢/lb	60.0 ¢/lb
Wood and Other Organic Materials	Wood and Other Organic Materials	N/A	106.0 ¢/lb	0.0 ¢/lb	106.0 ¢/lb

Table 12. 2025 Oregon Producer Fee Schedule. Fees for Program Year July 1 – Dec. 31, 2025.

Tiered Flat Fee Structure

In accordance with ORS 459A.884(6), participant producers with gross revenues of less than \$10 million but supplying covered materials sold for use in Oregon greater than five metric tons, or vice-versa, may also choose to pay a flat fee according to the following schedule:

Annual Supply Tons (Metric)	Fee
1 to 2.5 tons*	\$900
Over 2.5 tons to 5 tons*	\$1,900
Over 5.0 to 7.5 tons	\$3,200
>7.5 tons	\$4,500

Table 13. Tiered Flat Fee Structure.

*These flat fee tiers are also available to participant producers with over \$10 million in gross revenues.

5.1.1 Meeting the Statutory Requirement

CAA Oregon's 2025 producer fees were calculated in accordance with Oregon law that requires CAA to set fees that adequately fund program operations in a manner that is fair by differentiating material fees based on each material's supply, cost and revenue profiles and by ensuring that materials with the highest supply quantities and management costs pay the highest share of costs. This approach reflects fee-setting principles provided in Figure 1 and was used to determine the base fees as they appear in the 2025 Oregon Producer Fee Schedule.

In the Oregon program, there are three separate groups of covered materials: USCL, PRO recycling acceptance list (RAL) and materials not accepted for recycling. The first two groups have distinct management systems and funding obligations. First, CAA Oregon is obligated to fund the expansion of on-route collection of USCL materials but not the actual operating collection costs of USCL materials. Second, for the RAL, CAA Oregon must develop a depot network to receive these materials and then transfer them to a CRPF or end market. To avoid cross-subsidization of the fees, the allocation of materials management costs is done within cost boundaries set between these two groups.

As required under the RMA, the average base fees for not accepted materials are always higher than the average base fee for accepted materials. This requirement has been met in the 2025 Oregon Producer Fee Schedule, as illustrated in the following table:

Material Group	Low Fee Rate	High Fee Rate
Uniform Statewide Collection List (USCL)	2.0 ¢/lb	35.0 ¢/lb
PRO Recycling Acceptance List	9.9 ¢/lb	103.0 ¢/lb
Not Accepted (N/A)	46.0 ¢/lb	140.0 ¢/lb

Table 14. Low and high fee rates by material group.

CAA developed a discretionary state adjustment factor (SAF) that would be activated in the event that the average fees of not accepted materials is lower than the average fees of accepted materials to generate a positive delta between the average base fees of not accepted and accepted materials. It was not necessary to apply the SAF to CAA Oregon's 2025 fees.

5.1.2 Publisher In-Kind in Lieu of Paying Fees (Print and Online Advertising)

Oregon law allows eligible newspaper and magazine publishers to satisfy all or part of their PRO membership fees by providing print or online advertising, in lieu of cash payment, under ORS 459A.884(7). This option is intended to support E&O efforts under the RMA while recognizing publishers' role as participant producers of covered products.

During the 2025 program year, no newspaper or magazine publishers elected to participate in this advertising in lieu of fees option. As a result, no participant producers received membership fee reductions under this provision, and no advertising value determinations or fee adjustment calculations were required for the reporting period. In early 2026, publishers have inquired about the in-kind program, and CAA is actively working with these publisher producers on developing relevant criteria and suitable advertising programs that will meet CAA Oregon's resident engagement and outreach needs.

CAA Oregon will continue to make this option available to eligible publishers in future reporting years, consistent with statutory requirements, should any producers choose to participate.

5.2 Producer Fee Incentives

Participant producers that make changes to how they produce, use and market their packaging in ways that lessen impacts on the environment and human health may be rewarded with fee reductions in the form of three different bonuses (A, B, and C). Also known as eco-modulation of fees, Bonus A applies to participant producers that evaluate and disclose the impacts of their packaging by conducting an LCA, in accordance with DEQ's life cycle evaluation rules. Bonus B will apply to participant producers that apply changes to their packaging that demonstrate substantial impact reductions. Bonus C will be granted to participant producers that switch from single-use to reusable and refillable formats that demonstrate significant impact reductions.

With only six months of operation in 2025, data are not yet available for several metrics related to eco modulation. Participant producers have had limited opportunity to make and report changes to packaging materials or formats in response to the bonus incentives. Likewise, evaluating reductions in specific environmental impacts requires multiple years of data to establish baselines and assess trends over time. For similar reasons, it is too early to determine whether adjustments to eco modulated fees are needed to achieve stronger outcomes. These measures will be evaluated in future reporting years as additional data becomes available.

5.2.1 Producer Fee Adjustments

In 2025, one participant producer qualified for Bonus A, submitting two reports. The associated fee adjustment will be granted on the following year's invoice.

5.3 Financial Performance

For FY'25, the estimated budget was \$188.9²³ million, of which \$145.5 million was program expenses and \$43.4 million was allocated to operating reserves, as set out in Appendix E of the approved program plan. Actual expenditures for this period totaled \$56.5 million,²⁴ driving accumulated reserves of \$111.4 million (see Table 14.)



²³ Note that the published program plan forecasted revenue number of \$188 million differs (-\$0.9 million) from the actual budget of \$188.9 million due to the rounding of numbers in the program plan. Producer fees were set against the actual \$188.9 million.

²⁴ \$56.5 million includes 2022, 2023 and 2024 start-up costs of \$9.7 million, which are not included in the \$46.8 million figure in the 2025 Schedule of Activities.

2025 Oregon \$	Program Plan	Actuals	Comments
Local Government Collection Services Expansion	\$12,100,000	\$233,077	- No capital down payment needed vs. 20% assumption - No costs incurred for current depot site operations - Investment delays; Less contingency needed than anticipated
Contamination Reduction Programming	\$20,200,000	\$6,323,146	Expenses reallocated to the period of corresponding activity over 2.5 year program plan; Less contingency needed than anticipated
Transportation Reimbursement	\$5,500,000	\$1,393,809	Minimal requests for source separated material transportation reimbursement; Less contingency needed than anticipated
Others (audit center)	\$2,000,000	\$522,148	6 months of audit activity vs. 12 months
Payments to CRPFs	\$32,900,000	\$19,087,812	Higher average commodity value vs. initial estimate of \$53 / ton; Less contingency needed than anticipated
PRO Materials Management	\$20,700,000	\$2,685,770	- Delay in investment / activity - Lower cost ongoing due to more efficient design; Less contingency needed than anticipated
REM Development and Verification	\$700,000	\$56,486	Global standard being developed in 2025/2026, with REM development and verification to be completed in 2027
Special Materials Investments	\$3,300,000	\$2,143	Execution of material investment will be in 2027
Education and Outreach	\$10,000,000	\$3,816,809	Underutilization of printing funds by service providers in 2025 (shifting into 2026)
Regulatory	\$4,000,000	\$4,000,000	
Other Direct Program Costs ²⁵	\$2,900,000	\$1,757,629	People costs lower behind reduction in benefit costs
Other Shared Service Costs	\$12,200,000	\$3,055,144	- Delayed national hiring resulted in reduced national shared service allocation - Jan-Jun 2025 shared service costs shifted into "start-up" line item
Allowance for Bad Debt	\$9,500,000	\$584,461	Assumption of 5% of forecasted revenue not aligned with accounting standards and not reflective of risk of government mandated fees
Start-Up Costs ²⁶	\$9,500,000	\$12,978,072	Jan-Jun 2025 shared service costs shifted into "start-up" line item from management and administration. Includes \$9.7 million of start up costs incurred prior to FY2025
Total Spend	\$145,500,000	\$56,496,506	
Reserves	\$43,400,000	\$111,371,380	
Operating Reserves	\$43,400,000	\$60,209,325	
Earmarked Reserves	\$0	\$51,162,055	
Revenue	\$188,900,000	\$167,867,886	Participant producer adjustments + \$6M reserve for future supply adjustments

Table 15. 2025 estimated program plan budget compared to actual expenditures by budget item.

²⁵ In the original program plan, the budget for "Other Direct Costs" and "Other Shared Service Costs," was combined and labeled as "PRO Management and Administration". This change was made to provide transparency and align with CAA's internal accounting practices.

²⁶ This includes \$9.7M of 2022-2024 costs and \$3.3M of Jan. – June 2025 pre-program costs.

The operational underspend occurred due to a variety of factors beginning with significant uncertainty during the development of the program plan. CAA's priority was to ensure that it would cover all its incurred costs, assuming full program roll-out. However, getting the program up and running has been slower than anticipated.

For example, CAA's estimate for local government collection services expansion covered the anticipated costs of funding local government recycling service expansions and improvements, including capital requirements for on-route service, depot and reload facility upgrades and expansions, as well as eligible operating costs relating to existing local government depot operations and reload facilities. The complexities of the internal local government and service provider approval process and other preparedness issues meant that many local governments had not yet completed the funding application process by the end of 2025. Similarly, CAA did not receive any eligible funding reimbursement requests for existing operations of USCL depots in 2025. Other factors included, minimal requests for source separated transportation reimbursements and only 20 of the planned 144 RecycleOn Centers in the first six months of operation. Consequently, many of the investments budgeted for Year 1 (e.g., 20% down payments on 23 collection trucks and 55,874 containers to be delivered in 2026) were not required in 2025, and a 15% contingency built into operations start-up was not needed. More details are provided in the subsections below. The underspend of funds resulted in accelerated Oregon specific operating reserve accumulation and surplus funds for certain program activities, which could reduce Oregon 2026 and 2027 producer fees behind both reduced incremental reserve and program activity funding needs.

5.3.1 2025 Program Actuals Reconciliation

CAA's 2025 program plan budget used a forecasting approach, capturing higher end cost estimates in the face of significant uncertainty, to protect against a scenario in which CAA would be unable to fulfill its PRO financial obligations to vendors, local governments and service providers. In addition, a contingency, that was not ultimately required in 2025, was built into the budget to address the many unknowns during program plan development. Learnings gained through this first year of implementing an EPR state program budget will be applied to future year cost estimates to continually improve CAA's forecasting accuracy.

5.3.1.1 Local Government Collection Services Expansion

The ingoing estimate, captured in the program plan, assumed a 20% down payment on 23 trucks and 55,874 containers scheduled for delivery in 2026. However, no upfront funding was required, and the 20% capital investment for these committed capital units shifted into 2026, with no impact to total capital funding estimate over the 2.5-year program plan.

As the program continues to mature, CAA will evaluate any emerging contamination-related labor needs at USCL depots on a case-by-case basis to ensure that support is provided where it is operationally justified and aligned with statutory intent. Once the RecycleOn Centers are fully deployed, many facilities will have partial CAA-funded labor resources on site, which will help address operations, including contamination, without requiring additional reimbursement depots.

CAA will continue to monitor USCL depot operations closely to identify ongoing cost savings, ensure appropriate use of funds and support facilities as system needs evolve.

5.3.1.2 Contamination Reduction Programing

The program plan used cash flow modeling for contamination reduction programing (CRP) funds. These funds were profiled across the 2.5 year program plan, and reflected the potential in 2025 for: 1) all communities to request reimbursement / pre-payment for FY 2025 – 2026 activities equivalent to the maximum liability (i.e., \$3/capita cap), and 2) all communities eligible for two years of upfront funding to also request funds for FY 2026 – 2027. However, the annual profiling was amended to reflect expense recognition principles that allocate anticipated expenses to the period

of corresponding activity. As a result, 6 months of the total 2.5-year program potential liability, less actuals for the July 2025 through Dec. 2025 period, have been accrued for in 2025. The shift from cash to expense for the CRP liability in the budget does not impact total estimated spend across program plan duration. In 2026, if trends suggest a material number of reimbursements for funding equal to less than \$3/capita, CAA may choose to decrease 2027 CRP cost forecasts to reflect this.

5.3.1.3 Transportation Reimbursement

Monthly transportation reimbursement run rates continued to actualize below forecast due to a lower-than-expected volume of reimbursement requests for source separated transportation. In most cases, local governments and service providers did not need to request reimbursement because transportation costs for corrugated cardboard were already embedded in the material bid price from the end market. As a result, the service provider did not incur a separate transportation cost that would require reimbursement. CAA will continue to monitor ACV trends and adjust our modeling and budget estimates accordingly to best reflect market realities.

5.3.1.4 Others (Audit Center)

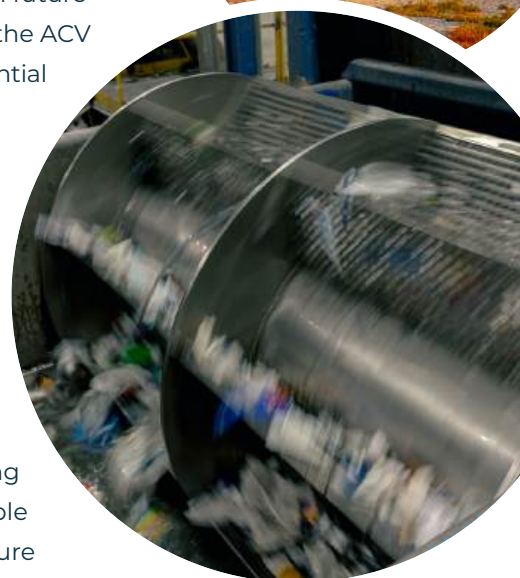
Ingoing budget accounted for potential 12 months of audit center operations (i.e. the full 2025 calendar year); however, the audit center was only operational for six months of the 2025 program plan, due to the timing and effort required to setup the audit center. Spending in 2025 for the Audit Center totaled \$0.8M, however, FYE under-accrual combined with capital depreciation drove \$0.5M in booked 2025 audit center expenses. Audit center funding supports contamination measurement, data collection and quality assurance activities that inform program performance and system planning. The concentration of spending in 2025 also included new equipment and infrastructure to stand up the audit center. Some of the costs incurred in 2025 will not reoccur in 2026 but will see a full year of operating costs compared to the startup cost and partial year of operation in 2025.

5.3.1.5 Payments to CRPFs

CRPF payments came in below forecast, driven by strong average commodity values during the period, increasing CRPF commodity revenues and subsequently decreasing CAA's net reimbursements. Given the volatility of the commodities market, there is potential for this budget item to continue to swing significantly versus forecast in future years. CAA has adopted a conservative approach to forecasting the ACV \$ / ton value leveraged in its financial assumptions, favoring potential for overly sufficient vs. insufficient funding. CAA will continue to monitor ACV trends and adjust our modeling and budget estimates accordingly to best reflect market realities.

5.3.1.6 PRO Material Management

CAA estimates a minimum of 144 operational RecycleOn Centers will be necessary in total. At program start, CAA was uncertain how much of the collection and logistics infrastructure would need to be built from the ground up. Estimated program costs reflect a scenario where CAA is building and managing all aspects of collection and logistics. CAA was able to realize significant cost savings leveraging existing infrastructure



managed by third-parties in the state. Through creating strategic partnerships to drive cost efficiencies, CAA has been able to significantly bring down the operating cost of the RecycleOn Center system relative to initial projections. The optimized system design will drive cost savings in this budget item across the entirety of the program plan.

5.3.1.7 REM Development and Verification

The original budget assumed REM development and verification activity to commence in 2025; however, the revised plan amendment adjusted this timeline, with verification beginning in 2026, and the REM standard development spanning from 2025–2027.

5.3.1.8 Specifically Identified Materials (SIM) Investments

Execution of specific material investments has been delayed until 2026 and 2027, with the focus in 2025 and 2026 to be conducting pilot programs to inform the strategy for future material investments.

5.3.1.9 Education and Outreach

Service Provider underutilization of printing funds in 2025 drove underspend versus ingoing estimate. One contributing factor was the Portland Metro region largely choosing to maintain use of their own materials until 2027, representing a quarter of the state's population. While a portion of this may ultimately manifest as total program savings, current 2026 budget assumes a shift of unspent 2025 funds into 2026, with no change to the total 2.5-year cost estimate.

5.3.1.10 PRO Management and Administration

The program plan budget had Jan. through June 2025 shared service costs reflected in “PRO Management and Administration.” Actuals have restated these costs to “Start-Up” as they are pre-program, driving a decrease to “PRO Management and Administration,” offset by a corresponding increase to “Start-Up.”

True underspend materialized due to over-forecasting of benefit package enrollment. CAA will leverage actual benefit package mix in updated fully loaded people cost assumptions to improve future personnel budget forecasts. Delays in National organization hiring, drove reduced shared service allocation.

5.3.1.11 Allowance for Bad Debt

CAA assumed allowance for bad debt equivalent to 5% of forecasted revenue (i.e. invoiced fees). However, to align with accounting standards and in light of the government mandated nature of the payments, the bad debt expense ultimately recorded for 2025 was equivalent to 5% of noncurrent receivables.

5.3.1.12 Start-Up Costs

The program plan budget had Jan. through June 2025 costs reflected in “PRO Management and Administration.” Actuals have restated these costs to “Start-Up” as they are pre-program, driving a decrease to “PRO Management and Administration,” offset by a corresponding increase to “Start-Up.”

5.3.1.13 Operating Reserve Management

In line with current legislation, the program budget includes operating reserves sufficient for risk management, working capital, cost overruns or revenue shortfalls, while also operating within a fiscally prudent and responsible manner. Reserves are intended to mitigate risk related to the most variable and challenging-to-predict elements of program implementation, namely the operations and funding requirements for recycling services.

CAA Oregon's operating reserves strategy is to maintain six months of projected variable operating costs under a steady-state program year (i.e. CY 2027). A steady-state program year is defined as the first 12-month program year post ramp-up (i.e., increased producer awareness has driven anticipated and ongoing participation rates) and in which all regulatory requirements are in effect. The program plan was designed with the intention to build operating reserves over its 2.5-year program duration, with a salience of 50%, 30% and 20% across 2025, 2026 and 2027 budgets / fees, respectively. Underspend in 2025 drove accelerated reserve accumulation and 2026 and 2027 reserve budgets have been adjusted correspondingly.



5.3.2 Earmarked Reserve Management

During annual producer fee-setting, specific budget items are allocated across a limited number of relevant material categories, impacting a specific set of materials' fee rates. As a result, funds raised by CAA against these specific budget items cannot be repurposed for reinvestment in other program activities. Any surplus of fees collected against such budget items, whose variability uniquely impacts a limited number of material rates must be reserved for either investment or a producer fee reduction against that specific budget item, in the following year. The following approach will be followed for earmarked funds:

5.3.2.1 Reserve Calculation and Profiling Methodology

1. Unspent funds for earmarked budget items will be managed as a reduction in producer fees for that same budget item in the following financial year (FY). CAA will adjust producer fees in a financially prudent and responsible manner, to reflect as a credit to the appropriate fee categories in the following FY, balancing factors such as, a) cash flow liability exceeding Schedule of Activities expense recognition, b) inherent uncertainty in a current year best estimate necessitating contingency, and/or c) fee stability year-over-year (within a 2-3 year horizon). While this may result in the full credit not being passed as a fee reduction in the FY following surplus generation, at program plan cycle end, any unspent funds collected for earmarked budget items will be returned to participant producers, based on the specific material categories they impact.
2. During a given FY, if incremental investment is needed to support an earmarked budget item vs. available funds, CAA may fund the "overspend / surplus" from its operating reserves, however, this must be carefully tracked and offset in the following FY by an increase in fees for the given earmarked budget item, in turn used to replenish the operating reserves.
3. In the case of a mid-program change to fee-setting methodology, CAA will account for an earmarked budget item's prior material allocation to credit back any remaining earmarked funds to participant producers in the following year's fees.
4. Per US Generally Accepted Accounting Principles (GAAP), these funds are part of CAA Oregon's net assets at FYE (revenue less expenses) along with all other operating reserves. These funds are given a separate proforma cash reserve categorization for the purpose of tracking over / under spend vs. ingoing fees as well as preventing the commingling of funds sourced from specific material categories and their corresponding participant producers.

The following table summarizes 2025 year-end Oregon reserves.

Reserves	2025 Actuals	2027 Target*
Operating Reserve	\$60M	\$71M
Earmarked Funds Reserve**	\$51M	\$0
LG Collection Services Expansion	\$12M	
Contamination Reduction Programming	\$14M	
Transportation Reimbursement	\$4M	
PRO Materials Management	\$18M	
Specific Material Investments	\$3M	
Total Reserves	\$111M	

Table 16. 2025 year-end Oregon reserves by budget item.

*2027 fees will be adjusted down (credits applied) to reach target reserve levels, if needed. Target reserve levels are reviewed annually based on revised steady-state variable operating cost estimates.

**Collected funds are anticipated to be spent across 2026 and 2027, however, any funds remaining at program end will be credited back to participant producers.

The following table summarizes the breakdown of 2025 earmarked reserves by line item and their impact on 2026 fee-setting, as well as the remaining balance of earmarked funds projected at 2026 year-end, which would be credited against 2027 producer fees.

Budget Item	2025 Fee	2025 Spend	2026 Spend Estimate	2026 Fee	Projected Earmarked Funds Remaining at End of 2026*
Local Government Collection Services Expansion	\$12M	\$0	\$47M	\$44M	\$9M
Contamination Reduction Programming	\$20M	\$6M	\$12M	\$12M	\$14M
Transportation Reimbursement (USCL)	\$6M	\$1M	\$10M	\$10M	\$4M
PRO Materials Management Depots	\$21M	\$3M	\$26M	\$22M	\$15M
Specific Material Investments	\$3M	\$0	\$1M	\$0	\$2M
Total	\$62M	\$11M	\$96M	\$89M	\$44M

Table 17. Earmarked reserves by budget item and impact on fee-setting.

*Excluding any 2026 over / under spend vs. the 2026 fee budgets forecasted spend.

5.3.3 CAA's Shared Services Model

CAA has built a national platform to deliver cost-efficient services to participant producers through scale of operations, harmonization of service delivery, and program planning consistency across multiple states where EPR legislation has been enacted and CAA has been approved by state regulators to act on participant producers' behalf. CAA operates in accordance with a shared services model wherein national costs are shared amongst the state-based CAA subsidiary PROs, proportionate to each subsidiary's percentage of the overall share of states' program costs.

CAA Oregon is a subsidiary of CAA, with a dedicated Oregon-based staff.

CAA Oregon was allocated 20% of CAA costs, based on a steady-state 2027 program size estimate, to cover Oregon costs incurred for the period 2023 to 2025, which included program start-up costs. Shared services costs include, but are not limited to, personnel staff, contractors, consultants, systems implementation costs (inclusive of IT development and ongoing portal costs), external communications, consumer education and more.

2027 relative program size estimates are subject to revision on an annual basis, behind updated financial forecasts. As a result, the 2026 allocation factors will be recalculated and may differ from prior years.

National costs are allocated across three subsidiary PRO programs (Oregon, Colorado and California), to which the bulk of CAA support was directed; however, as additional state programs are confirmed, the allocation model will be updated accordingly, so that emerging states bear their fair share of indirect costs. Direct start-up costs for emerging states will be recouped via state-specific producer fees, either early fees or fees in the first year of the respective program's operation in the same manner Oregon 2025 fees included a start-up budget line item. This process ensures equitable distribution of both indirect and direct pre-program costs across states.

The shared services model and CAA's formal allocation policy are overseen by the parent entity's finance team annually in accordance with the Shared Services Agreements signed between the parent and each state subsidiary. CAA's policy is to ensure indirect costs are allocated fairly and efficiently across all the states in which it operates in accordance with CAA's Guiding Principles of Consistency, Transparency, Compliance and Fairness.

The allocation policy is reviewed periodically and adjusted as needed.



6 Lessons Learned and Actions Taken

The first six months of the Oregon program was about laying the foundation for long-term success. In the process of initial engagement and launching the program, the CAA team has learned a great deal about how to best collaborate with our partners across the state to drive desired outcomes. These learnings are helping the team to optimize funding and service delivery, but equally important, these learnings will also be used in emerging states to improve future program roll outs.

At CAA, we maintain ACTIVE values as a central part of our organizational culture, which means our staff strives to operate with:



Accountability

We take responsibility for our actions and decisions, always striving to do what's right.



Collaboration

We believe in the power of teamwork and actively seek opportunities to work together towards common goals.



Trust

We foster an environment of trust, where open communication and transparency are valued.



Innovation

We encourage and embrace new ideas to continuously improve and find better solutions.



Velocity

We act with speed and purpose, taking decisive action to deliver results without sacrificing quality.



Empowerment

We provide the tools, resources, and support necessary for our employees to excel in their roles and grow professionally.

CAA expects to approach all our interactions, both internal and external to the organization, leading with these values. We believe approaching our work in Oregon with these values front and center has helped build trust with our partners across the state. The team hopes that our partners feel CAA is approaching our engagement in the state with a spirit of collaboration, transparency and innovation. We also hope our partners feel they can hold CAA accountable, raising concerns or questions to the team and that those concerns will be meaningfully addressed. While our team also strives to move with velocity to meet tight compliance timelines, we recognize that challenges have arisen that at times have slowed our ability to move quickly with partners. Some of those challenges are systemic, and difficult to change, some of them are process improvements that CAA is closely evaluating.

6.1 Program Challenges

During the first year of program implementation, the scale and complexity of launching multiple funding streams, contracting mechanisms and reporting processes highlighted the importance of clarity and coordination amongst

all program partners. Establishing new contractual relationships, aligning funding eligibility criteria and sequencing approvals required navigating different levels of preparedness, varied internal processes and evolving guidance.

The first year also reinforced that community readiness, data maturity and capacity are critical drivers of implementation readiness. Differences in staffing levels, procurement experience, data accuracy and governance timelines influenced how quickly communities could advance from initial outreach to execution, even after funding was available. Similarly, reporting and data collection efforts required iterative refinement as templates, definitions, and source data were aligned across new systems. Engagement and outreach activities further highlighted the need for culturally responsive approaches, language access planning and relationship-based engagement, especially when working with tribes and non-English-speaking communities.

With the launch of the RMA, CAA was obligated to engage with local governments and haulers in a way that allowed for managing competing prioritization of different funding streams. System expansion funding outreach needed to follow strict community funding prioritization, while the PRO RecycleOn Center launch followed a different prioritization for the purpose of logistics, and communities engaged on the contamination reduction funding on a first-come first-serve basis, when they were ready to engage. This forced CAA to distribute funding engagement across multiple teams, meaning local governments and haulers were, at times, engaging with multiple CAA staff simultaneously to complete various funding agreements. Ideally, CAA would have been able to assign account managers to jurisdictions and methodically move across the state completing all funding agreements with jurisdictions at once and with a singular point of contact. This would have streamlined the contracting process for both the PRO and the recipients of the funding. A recommendation for future program launches in other EPR states is to allow the approved PRO to define the community engagement prioritization and timeline for funding in the program plan to make contracting engagement more efficient for funding recipients.

Producers reported experiencing challenges with participating in the bonus eco-modulation program in 2025 for several reasons, which contributed to fewer than anticipated producers applying for Bonus A in the first program year. Producers cited the short window of time between program launch (July 1, 2025) and the bonus submission date (Aug. 15, 2025), combined with the complexity and novelty of the bonus program as key challenges. The current voluntary bonus program, as required in statute and rule, presents unique costs to producers that might not be recouped in the eco-modulation award. CAA will strive to offer a broader range of eco-modulation options to producers in future program plans.

Collectively, these lessons are informing refinements to program design, technical assistance, and sequencing in future years, with the goal of improving efficiency, clarity and long-term outcomes as the program continues to mature.

6.2 Program Modifications

During early program implementation, CAA, in consultation with DEQ, made several operational decisions that did not require a program plan amendment but supported more effective program operation. For example, while the approved program plan



anticipated that on-ramping proposals would be made through program plan amendments during the first plan period, discussions with DEQ and the timing of the next program plan submission led both parties to determine that on-ramping proposals would instead be addressed in the 2028–2032 program plan.

As the program transitioned from design to execution, several components of the contamination audit protocol and broader operational model were adapted to reflect real world implementation needs none of which required amendments to the program plan. While the original plan envisioned a fully developed audit protocol with standardized equipment, strict chain of custody controls, fixed sampling windows and direct CAA sign off authority, the actual rollout followed a phased approach. The program launched first in the Portland Metro area with incremental facility onboarding, capped sampling volumes during early participation, revised truck and load selection practices, alternative sample containers and sealing methods, adjusted documentation requirements and expanded allowances for out of spec samples.

Intake, verification, and sign off responsibilities were performed by an external contractor rather than CAA audit supervisors. Additionally, operational practices including notification timing, sample update frequency, bin maintenance, contamination definitions and documentation standards were refined throughout implementation to support consistent, scalable operations.

These adaptations allowed the program to respond to operational realities while maintaining alignment with program priorities and with DEQ. With learnings limited to six months of program operation, CAA does not have additional recommendations for changes to improve recycling and recovery at this time.





Appendices

- A. Acronym Glossary
- B. Definitions
- C. Member Producer Lists
 - 1. Participating Producers
 - 2. Non-Compliant Producers
 - 3. Producers that Exited the Program
- D. Actual Expenditures
 - 1. Payments to Local Government and Service Providers
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- E. RecycleOn Center Locations
- F. RecycleOn Center Audits
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Appendix A:

Acronym Glossary

ANSI	American National Standards Institute	ORS	Oregon Revised Statutes
ACV	Average Commodity Value	ORSAC	Oregon Recycling System Advisory Council
CBO	Community Based Organization	ORSOP	Oregon Recycling System Optimization Project
CMF	Contamination Management Fee	OTR	Opportunity to Recycle Act
COBID	Certification Office for Business Inclusion and Diversity	PCR	Post Consumer Recycled (content)
CRPF	Commingled Recyclables Processing Facility	PCRF	Processor Commodity Risk Fee
CY	Calendar Year	PE	Polyethylene
DEQ	Department of Environmental Quality	PET	Polyethylene terephthalate
E&O	Education and Outreach	PFA	Primary Funding Agreement
EPR	Extended Producer Responsibility	PP	Polypropylene
EPS	Expanded Polystyrene	PPA	Participant Producer Agreement
FY	Financial Year	PRO	Producer Responsibility Organization
GAAP	Generally Accepted Accounting Principles	RAL	Recycling Acceptance List
HCPA	Household & Commercial Products Association	REM	Responsible End Market
HDPE	High-Density Polyethylene	ROC	RecycleOn Center
IMD	Internal Management Directive	RRS	Resource Recycling Systems Team
LCA	Life Cycle Analysis	SAF	State Adjustment Factor
LCE	Life Cycle Evaluation	SCS	SCS Standards and Assurance Systems
LG	Local Government	SIM	Specifically Identified Materials
MRS	Material Recovery Survey (DEQ)	SP	Service Provider
OAR	Oregon Administrative Rules	TRP	The Recycling Partnership
OBRC	Oregon Beverage Recycling Cooperative	TSWAN	Tribal Solid Waste Advisory Network
		USCL	Uniform Standard Collection List

Appendix B:

Definitions

Below are the definitions used in ORS 459A.863, that are also used in this annual report.

1. **“Certification Body”** as adapted from ISO 17000, means an independent organization contracted to provide the service of auditing, certifying an entity’s conformance with an established protocol. Certification bodies must meet defined standards for governance, impartiality, capability, confidentiality and personnel management.
2. **“Collection rate”** means the percentage of a specific material that is collected for recycling calculated by dividing the tonnage collected into the tonnage generated on an annual basis.
3. **“Commingled recycling”** means the recycling or recovery of two or more materials that are mixed together and that generally would be separated into individual materials at a commingled recycling processing facility in order to be marketed.
4. **“Commingled recycling processing facility”** means a facility that:
 - a. Receives source separated commingled recyclable materials that are collected commingled from a collection program providing the opportunity to recycle; and
 - b. Separates the recyclable materials described in subparagraph (A) of this paragraph into marketable commodities or streams of materials that are intended for use or further processing by others.
 - c. “Commingled recycling processing facility” does not include:
 - i. Scrap metal recycling facilities;
 - ii. Scrap automotive or appliance recycling facilities;
 - iii. Full-service redemption centers or dealer redemption centers, as those terms are defined in ORS 459A.700, and recycling facilities owned and operated by a distributor cooperative established under ORS 459A.718;
 - iv. Recycling facilities handling covered electronic devices, as defined in ORS 459A.305;
 - v. Recycling processing facilities that process only non-commingled, source separated recyclable material from commercial entities;
 - vi. Recycling processing facilities that recover commingled recyclable material primarily from the construction and demolition debris waste stream;
 - vii. Recycling depots;
 - viii. Recycling reload facilities; or
 - ix. Limited sort facilities, as defined by rule by the Environmental Quality Commission.
5. **“Community Based Organization”** means a public or private nonprofit organization that has demonstrated capability in representing or meeting the needs of a specific community or a significant segment of a community.
6. **“Contaminant”** means:
 - a. A material set out for recycling collection that is not properly prepared and not on the list of materials accepted for recycling collection by a recycling collection program; or
 - b. A material shipped to a recycling end market that is not accepted or desired by that market.
7. **“Contamination”** means the presence of one or more contaminants in a recycling collection or commodity stream in an amount or concentration that negatively impacts the value of the material or negatively impacts a processor’s ability to sort that material.

8. **“Covered material”** means the respective materials that are designated in Applicable EPR Law and subject to Producer Fees as identified in each State Addendum, including but not limited to paper, packaging, and food serviceware.
9. **“Covered product”** means:
- a. Packaging
 - b. Printing and writing paper
 - c. Food serviceware
10. **“Covered product”** does not include:
- a. A beverage container, as defined in ORS 459A.700.
 - b. Bound books.
 - c. Napkins, paper towels or other paper intended to be used for cleaning or absorbing liquids.
 - d. Rigid pallets used as the structural foundation for transporting goods lifted by a forklift, pallet jack or similar device.
 - e. Specialty packaging items that are used exclusively in industrial or manufacturing processes, including but not limited to:
 - i. Cores and wraps for rolls of packaging sold by a mill to a packaging converter or food processor; and
 - ii. Trays, whether designed for a single use or multiple uses, used for the transport of component parts from a parts supplier to a manufacturer that assembles those parts.
 - f. Liquified petroleum gas containers that are designed to be refilled.
 - g. A material that the producer demonstrates is exempt under section ORS 459A.869.
 - h. Pallet wrap or similar packaging used to secure a palletized load if added by a person that is not the producer of the palletized covered products.
 - i. Packaging related to containers for architectural paint, as defined in ORS 459A.822, that has been collected by a producer responsibility organization under the program established under ORS 459A.820 to 459A.855.
 - j. Any item that is not ultimately discarded inside this state, whether for purposes of recovery or disposal.
 - k. Items sold on a farm or used on a farm, including items used for farm use, as defined in ORS 215.203, or for processing on a farm, provided that an item used on a farm is not subsequently sold at a retail establishment that is not located on a farm.
 - l. Items used by a nursery licensed under ORS 571.055 that generates the majority of the nursery’s revenue through the sale of nursery stock, as defined in ORS 571.005, provided that the items are not sold through retail sales.
 - m. Packaging and paper products sold or supplied in connection with:
 - i. Prescription drugs as defined in ORS 689.005;
 - ii. Nonprescription drugs as defined in ORS 689.005;
 - iii. Drugs marketed under a brand name as defined in ORS 689.515; or (iv) Drugs marketed under a generic name as defined in ORS 689.515.
 - n. Packaging and paper products sold or supplied in connection with drugs that are used for animal medicines, including but not limited to parasiticide drugs for animals.

- o. Packaging and paper products sold or supplied in connection with:
 - i. Infant formula as defined in 21 U.S.C. 321(z);
 - ii. Medical food as defined in 21 U.S.C. 360ee(b)(3); or
 - iii. Fortified oral nutritional supplements used for individuals who require supplemental or sole source nutrition to meet nutritional needs due to special dietary needs directly related to cancer, chronic kidney disease, diabetes, malnutrition, or failure to thrive, as those terms are defined by the International Classification of Diseases, Tenth Revision, or other medical conditions as determined by the commission.
 - p. Wine and spirit containers for which a refund value is established under Oregon law.
 - q. Packaging for products that are required under 40 C.F.R. 156.140, or other federal regulation pertaining to toxic or hazardous materials, to state on the label or container that the packaging should not be recycled or should be disposed of in a manner other than recycling; or
 - i. Identified by the commission by rule as product that is required by law to state on the label or container that the packaging should not be recycled or should be disposed of in a manner other than recycling. Any other material, as determined by the commission by rule, after consultation with the Oregon Recycling System Advisory Council.
11. **“Eco-modulation”** means the use of fee adjustments issued to producers based on their actions (or inactions) to improve the environmental performance of their packaging. The monetary adjustments are typically in the form of incentives (bonuses) or disincentives (maluses) applied to the producer’s base fees that are payable for a particular material category.
12. **“Equity”** means the consistent and systematic fair, just, impartial treatment and meaningful involvement of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty, inequality or negative effects of decisions on the environment. (The term “underserved communities” is defined later in this appendix.)
13. **“Food serviceware”** means paper or plastic plates, wraps, cups, bowls, pizza boxes, cutlery, straws, lids, bags, aluminum foil or clamshells or similar containers:
- a. That are generally intended for single-use; and
 - b. That are sold to a retailer or a dine-in food establishment or a take-out food establishment, regardless of whether the item is used to prepackage food for resale, is filled on site for food ordered by a customer or is resold as is.
14. **“Generator”** means a household, business or other entity that utilizes and then discards packaging or printed materials to be managed as waste or as reusable, refillable or recyclable material.
15. **“Litter”** means waste that is improperly placed so as to be a nuisance or aesthetic, health or environmental concern.
16. **“Local government”** means:
- a. A city;
 - b. A county; or
 - c. A metropolitan service district.
17. **“Local government’s service provider”** means:
- a. A collection service franchise holder under ORS 459A.085;

- b. Any person authorized by a city or county to provide recycling collection services described in subsection (25)(a) to (d) of this section; or
 - c. Any person authorized by a metropolitan service district to provide recycling collection services described in subsection (25)(d) of this section.
- 18. **"Market share"** means 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.
- 19. **"Mechanical recycling"** means a form of recycling that does not change the basic molecular structure of the material being recycled.
- 20. **"Metropolitan service district"** means a metropolitan service district established under ORS chapter 268.
- 21. **"Nonprofit organization"** means an organization or group of organizations described in section 501(c)(3) of the Internal Revenue Code that is exempt from income tax under section 501(a) of the Internal Revenue Code.
- 22. **"Opportunity to recycle"** has the meaning given that term in ORS 459A.005.
- 23. **"Packaging"** means:
 - a. Materials used for the containment or protection of products, including but not limited to paper, plastic, glass or metal or a mixture thereof;
 - b. Single-use bags, including but not limited to shopping bags; and
 - c. Nondurable materials used in storage, shipping or moving, including but not limited to packing materials, moving boxes, file boxes and folders.
 - d. "Packaging" does not include:
 - i. Food serviceware; or
 - ii. Sharps, as defined in ORS 459.386.
- 24. **"Printing and writing paper"** includes, but is not limited to, newspaper, magazines, flyers, brochures, booklets, catalogs, telephone directories and paper used for copying, writing or other general use.
- 25. **"Processor"** means a person that owns or operates a commingled recycling processing facility.
- 26. **"Producer"** means a person that is determined to be the producer of a covered product under ORS 459A.866.
- 27. **"Producer responsibility organization"** means a nonprofit organization established by a producer or group of producers to administer a producer responsibility program.
- 28. **"Producer responsibility program"** means a statewide program for the responsible management of covered products that is administered by a producer responsibility organization pursuant to a plan approved by the Department of Environmental Quality under ORS 459A.878.
- 29. **"Recycling collection"** means the act or process of gathering recyclable materials by:
 - a. On-route residential collection from the generator at the place of generation;
 - b. On-site nonresidential collection from the generator at the place of generation;
 - c. Multifamily on-route residential collection from each multifamily dwelling that has five or more units;
 - d. Recycling depots at a disposal site or another designated location that is more convenient to the population being served and expanded depots as described in ORS 459A.007; or
 - e. Other collection methods included in an approved producer responsibility program plan.
- 30. **"Recycling depot"** means a location where recyclable materials are accepted from the public or commercial businesses and transported to a location for processing or to an end market.

- 31. **“Recycling rate”** means the percentage or ratio of a material or set of materials that is collected and processed for recycling divided into the amount of that material or set of materials that is generated.
- 32. **“Recycling reload facility”** means a facility other than a recycling depot where recyclable materials are received, consolidated and made ready for transport to another location for processing or to a responsible end market.
- 33. **“Recycling system”** means all aspects of the programs and participants that have a role in Oregon’s statewide recycling structure, including producers of products sold in or into Oregon, generators of recyclable materials, governments that regulate materials management programs, businesses that collect and process recyclable materials and persons that receive recyclable materials to convert to new feedstock or products.
- 34. **“Responsible end market”** means a materials market in which the recycling or recovery of materials or the disposal of contaminants is conducted in a way that benefits the environment and minimizes risks to public health and worker health and safety.
- 35. **“Responsible management”** means the handling, tracking and disposition of covered products from the point of collection through the final destination of the collected material in a way that benefits the environment and minimizes risks to public health and worker health and safety.
- 36. **“Responsible recycling”** means the handling of covered products for recycling and removal of contaminants by a certified or permitted processor and disposition to a responsible end market.
- 37. **“Specifically identified material”** means a material or covered product identified by the department under ORS 459A.917.
- 38. **“Transcreation”** means text that is made coherent and understandable in another language, not simply translated word for word.
- 39. **“Underserved communities”** refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the definition of “equity” earlier in this appendix.
- 40. **“Uniform statewide collection list”** means the list of materials established in accordance with the requirements of ORS 459A.914 (4).
- 41. **“Wasteshed”** means a designated area where material is physically generated and managed for disposal, reuse, refilling or recycling.

Appendix C:

Member Producer Lists

A. Participating Producers

13 Scents Inc.	Active Berry Packers LLC	Akita Brands Inc.	American Builders & Contractors Supply Co., Inc.	Anderson Chemical Company	ASICS America Corporation
1888 Mills LLC	Acuity Brands Lighting, Inc.	AKU Outdoor Inc.		Andis Company	ASOS US Sales LLC
26 California Wholesale	Acushnet Company	Albany International Corporation	American Choice Paper Products, Inc.	Anheuser-Busch, LLC	Aspire Bakeries B.C ULC
3D Barrier Bags Inc.	Adams & Brooks, Inc.	Albany Packaging Inc.	American College of Healthcare Sciences	Anita’s Mexican Foods Corporation	Associated Hygienic Products, LLC
3Greenmoms Benefit LLC	Adams Group Inc.	Albaugh, LLC	American Colloid Company	Anova Applied Electronics, Inc.	AT&T Services, Inc.
3M	Adelsheim Vineyard, LLC	Albert Uster Imports, Inc.	American Dairy Queen Corporation	Ansell Healthcare Products LLC	ATD Tools Inc.
4 Cascade Partners LLC	adidas America, Inc.	Albertsons Companies, Inc.	American Foods Group, LLC	Apex Paper Box Company	Athea Laboratories, Inc.
4C Foods Corp.	Admiral Beverage Corporation	Albion Craftworks Ltd.	American Greetings Corporation	Apple Inc.	Athleta LLC
4imprint Inc.	Adtran Holding Inc.	Alchimie Forever LLC	American Honda Motor Co., Inc.	Appleton Grp LLC	Athletic Brewing Company LLC
5.11 Inc.	Advance Polybag, Inc.	ALDO US INC	American Licorice Company	Aqua Star (USA), Corp.	Atlantic Corporation of Wilmington Inc.
545 LLC	Advanced Fresh Concepts Franchise Corp.	AlEn International, Inc.	American Plastic Toys, INC.	Aqualisa Products Ltd	Atlas Bolt and Screw Company LLC
7-Eleven, Inc.	Advanced Innovative Technology Corp.	Alexander McQueen	American Snuff Company, LLC	AQUASALT, LLC	Atlas Roofing Corporation
9055-7588 Quebec INC	Advantage Sales & Marketing INC	Alexandria Moulding, Inc.	American Textile Company, Inc.	Arai Helmet, Inc.	Atmus Filtration Technologies Inc.
A to Z Wineworks, LLC	AE Direct Co, LLC	Alice + Olivia	American Woodmark Sales Company	Aramark	Attends Healthcare Products, Inc.
A&A Organic Farms, Corp.	AE OpCo I LLC	Align Technology, Inc.	AmeriCo Group, Inc.	Arbonne International LLC	Atticus LLC
A. L. Schutzman Company, Inc.	AE Retail West, LLC	Allbirds, Inc.	Amerock, LLC	Arcobasso Foods, Inc.	Auburn Dairy Products, Inc.
A. O. Smith Corporation	Aearo Technologies LLC	Allergy Research Group LLC	Ames Research Laboratories, Inc.	Arc'teryx Equipment, a division of Amer Sports Canada Inc.	Auclair Sports USA Inc.
AAON Coil Products Inc.	Aerco International, Inc.	All-One-God-Faith, Inc.	Amick Farms, LLC	Ardent Mills LLC	Australian Gold, LLC
AB Enzymes, Inc.	Aesop USA Inc.	Alltech Inc.	amika LLC	Arhaus LLC	Authentic Lifestyle Products, LLC
AB Mauri Food, Inc.	Aexcel Corporation	Alpha Baking Company, Inc.	AMO Sales and Service, Inc.	Ariat International, Inc.	Auto-Mark, Inc.
AB World Foods US, Inc.	AFP advanced food products llc	AlphaTheta Music Americas, Inc.	Amorepacific US, Inc.	Arista Networks, Inc.	Automated Logic Corporation
Abbott Laboratories	AFTCO MFG CO, INC	Alpine Food distributing	Amrize Building Envelope LLC	Arizona Beverages USA LLC	AutomationDirect.com Inc.
AbbVie US LLC	AG1 Inc.	Alpine Pet OpCo, LLC	AMS OIL INC	Arizona Foods Group, Inc.	Autosales, Inc.rporated
Abercrombie & Fitch Co.	Agilent Technologies, Inc.	ALSUR USA INC	AMTROL Inc.	Arla Foods Inc.	AutoZone Parts, Inc.
Accella Polyurethane Systems LLC	Agility Auto Parts Inc.	Altenloh, Brinck & Co. US, Inc.	Amway Corp.	Arla Foods Ingredients Inc.	AUX Cloud Commerce (USA) Inc.
ACCO Brands USA LLC	AGRO SEVILLA - U.S.A. INC	Alter Eco Foods LLC	Amy’s Kitchen, LLC	Arlee Home Fashions Inc.	Avenger Products LLC
Ace Hardware	Agron, inc.	Altria Client Services LLC	Anagram International LLC	Arlo Technologies, Inc.	Avery Products Corporation
Acer America Corporation	AHD Import Co Inc.	Amano Pioneer Eclipse Corporation	Anastasia Beverly Hills	Armstrong World Industries, Inc.	Avnet Inc.
ACH Food Companies, Inc.	AHF, LLC	Amarr Garage Doors	Anchor Packaging, LLC	Arthur Schuman Inc.	AVX Concessions Inc.
Ackerley Balickie LLC	Ajinomoto Foods North America Inc.	Amazon.com Services, LLC	Ancient Brands LLC	AS America, Inc.	Axalta Coating Systems
Acme Smoked Fish Corp.	Ajinomoto Health & Nutrition North America, Inc.	Amer Sports Winter & Outdoor Company	Andersen Corporation	ASCO, L.P.	Azteca Milling, L.P.
Acqua di Parma LLC		AmerCareRoyal		ASEA LLC	B D Loops, Inc.
		American Beverage Craft Group, Inc.		Ashley Furniture Industries, LLC	B&G Foods North America, Inc.

Babo Botanicals Inc.	Bauducco Foods	Best Buy Health, Inc.	Blue Sky the Color of Imagination, LLC	Bridgford Marketing Company	Butterball, LLC
BABOR Cosmetics America Corp	Bausch & Lomb Americas Inc.	Best Buy Stores, L.P.	BlueTriton Brands	Briggs & Stratton, LLC	Buxom US Buyer LLC
Baby Generation Inc.	Bay Center Foods, LLC	Best Diamond Plastics, LLC	Boardman Foods Inc.	Brightstar Products	Byoma US Inc.
Baby Life, LLC	Bay Island, LLC	Betco Corporation LLC	Bob Evans Farms, Inc.	Brioni	C & J Clark America Inc.
Baby Trend Inc.	Bayer HealthCare LLC	Better Earth LLC	Bob's Red Mill Natural Foods, Inc.	Bristol Farms	C&S Wholesaler Grocers LLC
babyark INC	BB17 Inc.	Better Planet Brands LLC	Boiron Americas Inc.	Bristol, Inc.	C.A.M.P. SpA Costruzione Articoli Montagna Premana
Bacardi USA Inc.	Be Satori LLC	BetterBody Foods & Nutrition LLC	Boise White Paper LLC	Britannica Home Fashions Inc.	C.H. Robinson Company, Inc.
Bahlsen North America Inc.	Bean Brothers LLC	Beyond Meat, Inc.	Bokebowl LLC	Britax Child Safety, Inc.	Cablofil, Inc.
Baldwin Richardson Foods Co.	Bearing Technologies, Ltd.	BG Products, Inc.	Boll & Branch LLC	Broadway 310 LLC	Caboo Paper Products USA LLC
Baléco Inc.	Beauty Pie U.S.A. INC	BIC Corporation	Bombas LLC	Broadway Kleer-Guard Corp	Cabot Hosiery Mills
Balenciaga	Beaverton Foods Inc.	Bicycle Tools Inc.rporated	Bonafide Health LLC	Broan-NuTone LLC	Cal Chef Foods
Ballard Designs, Inc.	Becker Designed, Inc.	Big Agnes, Inc.	Bondie Product, LLC	Brooklinen Inc.	CAL MARKETING PTY LTD
Balsam Brands Inc.	Becton, Dickinson and Company	Big Tree Farms Inc.	Bonnie Plants LLC	Brooks Sports Inc.	Calbee America, Inc.
BAMKO LLC	Beech-Nut Nutrition Company	Bigelow Trading	Boots Retail USA (BRUSA)	Brother International Corporation	Caleres
Banana Republic, LLC	BeFun Inc.	Bil-Jac Foods, Inc.	Bosch Automotive Service Solutions LLC	Brown & Haley	Calfed Financial Corporation
Bandai Namco Toys & Collectibles America Inc.	Behr Process LLC	Bimbo Bakeries USA, Inc.	Bosch Brake Components LLC	Brown Forman Corporation	Califia Farms LLC
Banyan Botanicals	Beiersdorf Inc.	Biodegradable Food Service llc	Bosch Rexroth Corporation	Brown Paper Products Company	California Cedar Products Company
Barcel USA, LLC	Beko US Inc.	Bioelements, Inc.	Bosch Thermotechnology Corp.	Browning	California Giant
Bard Manufacturing Company Inc.	Bel Brands USA Inc.	BioLab, Inc.	Boston Beer Corporation	BRP US Inc.	California Olive Ranch Inc.
Bareweb, LLC	Belden Inc.	Bio-Techne Corp	Bottega Veneta	BRP US Services LLC	Caliray Inc.
Barilla America, Inc.	Bell Sports, Inc.	BioTrust Nutrition, LLC	Boucheron	Bryan Steam, LLC	Callaway Golf Sales Company
BARK, Inc.rporated	Bella + Canvas, LLC	BIP, Inc.	Bounce Curl	BSH Home Appliance Corporation	CALZEDONIA USA INC
Barkman Honey, LLC	BellySwap, LLC	BISSELL Homecare, Inc.	Boundless Network, Inc.	Buena Vista Theatrical Group Ltd.	Cambro Manufacturing Company
Barnes & Noble Booksellers, Inc.	Benchmade Knife Company	Black Buffalo Inc.	BR Intimates LLC	Build A Bear Retail Management	CamelBak Products, LLC
Barrette Outdoor Living, Inc.	BENCHMARK LEARNING PRODUCTS, LLC	Black Diamond Equipment	Bradford White Corporation	BULA CANADA INC	Campagna-Turano Bakery, Inc.
Barry Callebaut U.S.A. LLC	Bendix Commercial Vehicle Systems, LLC	Black Diamond Group, Inc.	Bradley Company, LLC	Bulletproof 360, Inc.	Campari America LLC
Bar-S Foods Co.	Bendon, Inc.	Black Rifle Coffee Company	BRAKEBUSH BROTHERS, INC.	Bumble Bee Foods LLC	Campers World Apparel LLC
Base Brands, LLC	Benefit Cosmetics LLC	Blackhawk Industrial Distribution	Branded Custom Sportswear, Inc.	Bunge North America, Inc.	Canberra Corporation
Basic American Inc.	Benjamin Moore & Co	Blackstrap Inc.	Branding Iron Holdings	Bunzl Distribution Inc.	Candy Dynamics Inc.
BASIC CONVENIENCE FOODS	BENQ AMERICA CORP	Blanco America Inc.	Brandt Consolidated, Inc.	Burgerville LLC	Canon Medical Components USA, Inc.
Basic Resources LLC	Bentley Mills Inc.	Blaster Holdings	Branson Ultrasonics Corporation	Burley Design LLC	Canon U.S.A., Inc.
Basics, LLC	Berk Enterprises, Inc.	Blenders Eyewear LLC	Brasscraft Manufacturing	Burlington Coat Factory Warehouse Corporation	Canva US, Inc.
Bassett Furniture Industries, Inc.	Berne Apparel Company	Blistex Inc.,	Brazitech	Burnette Foods, Inc.	Canyon Bicycles USA, Inc.
Bassett Mirror Company, Inc.	Berry Fresh LLC	Blommer Chocolate Company LLC	Brazi Bites LLC	Burnham LLC	CAP Barbell, Inc.
BASX Inc.	Berry Global, Inc.	Blount Fine Foods Corporation	Brazilian Specialty Coffees LLC	Bush Brothers & Company	Caperton Furnitureworks, LLC
Bath & Body Works, LLC	Berryman Products, Inc.	Blu Dot Design & MFG, INC.	Bridgewell Agribusiness LLC	Bushnell Holdings, Inc.	Carboline Global
Batteries Plus LLC		Blue Diamond Growers		ButcherBox OpCo LLC	

Cardinal Glass Industries, Inc.
Cardinal Health 110, LLC
Cardinal Health 200, LLC
CAR-FRESHNER Corporation
Cargill, Inc.
Carhartt, Inc.
Carl Buddig and Company
Carl Zeiss Vision Inc.
Carlisle Construction Materials LLC
Carlisle EPS Holding LLC
Carl’s Jr. Restaurants LLC
Carma Laboratories
Carman Ranch Provisions LLC
Carolina Foods, LLC
Carolina Pet Company LLC
Carpenter Co.
Carrier Corporation
Carton Packaging & Print, Inc.
Cascade Designs Nevada LLC
Cascade Mountain Technologies, LLC
Cascades Holding US inc.
Casper Sleep Inc.
Catalina Snacks, Inc.
Catania Spagna Corporation
Caterpillar Inc.
Cavendish Farms Corporation
Caviness Beef
CCA&B, LLC
CCF Brands LLC
CCi Manufacturing
Illinois Corporation
Ce De Candy Inc.
Celine Inc.
Cellco Partnership
Celsius, Inc.
Central California Baking Company
Central Garden & Pet Company
Centric Brands LLC

Cerro Flow Products LLC
Cerro Wire LLC
CertainTeed Ceilings Corporation
CertainTeed, LLC
Certis USA LLC
Cervelo USA, Inc.
CFL USA LLC
CH Guenther & Son LLC
Chamberlain Coffee Inc.
CHAMPION COOLER CORP.
Champion Petfoods USA Inc.
CHANEL
Charles Komar & Sons, Inc.
Charleston Coffee Roasters, Inc.
Charter Next Generation, Inc.
Chase Products Co.
Chateau Diana LLC
Chattem, Inc.
Cheba Hut Franchising Inc.
Cheese Merchants of America LLC
Chem-Aqua, Inc.
Chem-Pak Inc.
Chevron Phillips Chemical
Company LP
Chewy, Inc.
Cheyenne International, LLC
Chicago Importing Co.
Chico’s FAS, Inc.
Chilled Black Dog Inc.
Chimney Rock Winery, LLC
Chiquita Fresh North America LLC
Chobani, LLC
Chocmod USA Inc.
Chocolaterie Limar
Christian Dior Perfumes LLC
Christian Dior, Inc.
ChromaDex, Inc.
Chug Inc.

Church & Dwight Co. Inc.
Church Brothers Farms
CID Resources, Inc.
Cimpress USA Manufacturing Inc.
Cimpress Windsor Corporation
Ciranda, Inc.
Cirkul, Inc.
Cisco Systems, Inc.
CITGO Petroleum Corp
CKF Inc.
Clarience Technologies, LLC
Clarins U.S.A. Inc.
Clark Core Services LLC
Clasen Quality Chocolate
Classic Foods, Ltd
Classic Home and Gardens
Clawfoot Supply, LLC
Clean Beauty for All, Inc.
Clean Control Corporation
Cleanaire Inc.
Clemens Food Group, LLC
Cleva North America, Inc.
Climate Tech - USA Digital
Clipay Corporation
Club Car LLC
Clutch Inc. DBA Carpe
Clysar, LLC
CMI Orchards, LLC
Cocofloss, Inc.
COGHLANS LTD
Coleto Brands LLC
Colgate Oral Pharmaceuticals
Colgate Palmolive CO.
Coloramics LLC
Colosseum Athletics Corporation
Columbia River Technologies LLC
Columbia Sportswear Company
COMBE Inc.rporated

Comcast Cable Communications
Management, LLC
Communications Test Design, Inc.
Community Coffee Company, LLC
Community Products LLC
Compass Minerals International, Inc.
CompleEats, LLC
Compound Development
Solutions, LLC
Computer Technology Link Corp.
Conagra Brands, Inc.
Conair LLC
Concept Laboratories
Concord Foods
Condair Inc.
Congo, LLC
Conifer Specialties, Inc.
Conklin Company, Inc.
Conopco Inc.
Conquest Scents Inc.
Constellation Brands, Inc.
Consumer Product Partners
Continental Mills
Converse Inc.
Cooper Lighting Solutions
Cooperative Regions of Organic
Producer Pools
Copeland Cold Chain LP
Copeland Comfort Control LP
Copeland Corporation LLC
Copeland LP
Coral Innovations LTD
CornellCookson, LLC
Corsair Memory Inc.
Corston USA LLC
Corteva Agriscience LLC
Cosmo Fiber Corp
Cosmos Corporation

Costco Wholesale Corporation
Coterie Baby, Inc.
Cot'n Wash, Inc. dba Dropps
Cotton On USA, Inc.
Coty Inc.
CP Skin Health Group, Inc.
CPS Products, Inc.
CRAFTMARK BAKERY LLC
Crain Marketing, Inc.
Crain Ranch, LLC
Crain Walnut Shelling, LP
Crayola LLC
Crazy Aaron Enterprises Inc.
CRC Industries, Inc.
Crider, Inc.
Crocs, Inc.
Crofters Food Ltd.
Crown Affair
Crown Bakeries, LLC
Crown Laboratories, Inc.
CROWN PACIFIC FINE FOODS
Crown Poly, Inc.
Crown Prince, Inc.
CRP Industries Inc.
Cruiser Accessories
Crunch Pak
Crunchyroll LLC
Crutchfield Corporation
Crystal Farms Dairy Co.
Crystal of America, Inc.
CS Beef Packers, LLC
CTI Foods Holdings Co., LLC
Cube Packaging Solutions Inc.
Cultskin Apothecary
Cumberland Packing Corp.
Cummins, Inc.
CURiO Brands, LLC
Curls Beauty Brand LLC

Current Lighting HoldCo, Inc.
Current Lighting Solutions, LLC
Curtis Instruments, Inc.
Custom Accessories, Inc.
Custom Building Products, LLC
CVS Pharmacy, Inc.
D&W Fine Pack
D6, Inc.
Daddy Ray's
Daikin Applied Americas Inc.
Daikin Comfort Technologies
North America, Inc.
Daily Harvest LLC
Daily's Premium Meats
Daimler Truck North America, LLC
Dairy Farmers of America, Inc.
Daiso USA LLC
Daiya Foods Inc.
Dakota Provisions LLC
Dal-Tile, Distribution
Dana Inc.rporated
Danby Products Inc.
Danco LLC
Danfoss LLC
Daniel's Amish Collection LLC
Danone US LLC
DAP Global Inc.
Darden Direct Distribution, Inc.
Darigold, Inc.
Dart Container Corporation
DAS Companies, Inc.
David Oppenheimer & Company, LLC
David Yurman Enterprises LLC
Davines North America Inc.
Dawn Food Products Inc.
DayGlo Color Corp.
Dayspring Cards, Inc.
DBI Distribution, Inc.

De Longhi America Inc.
De Wafelbakkers, LLC
Decathlon America LLC
DECIEM USA LLC
Deckers Outdoor Corporation
Dedoles LLC
Dehumidified Air Solutions Corporation LLC
Del Monte Foods, Inc.
Del Sol Food Company, Inc.
Delca Corporation
Delicato Vineyards, LLC
DELL Marketing LP
Delta Faucet Company
Delta Galil USA Inc.
Delta T LLC
DeMert Brands LLC
Deoleo USA Inc.
DePuy Synthes Sales, Inc.
Derry Enterprises, Inc.
Design Resources, Inc.
Designs for Health, Inc.
Dessert Holdings LLC
Dexter-Russell, Inc.
DEZI Cosmetics, LLC
DFS Gourmet Specialties, Inc.
DG Premium Brands LLC
DHC USA Inc.
Diageo Americas, Inc.
Diageo Beer Company
Diamond Pet food
Diamond Vogel, Inc.
DICK’S Sporting Goods
Dickson Furniture International LLC
Dieterich Standard, Inc.
Digilent, Inc.
Digital Products International, Inc.
Dillanos Coffee Roasters, Inc.

Dippin Dots, LLC
Direct Pack Inc.
Dirty Labs Inc.
Discovery Energy, LLC
DISH WIRELESS LLC
Disney Merchandise Sourcing & Distribution, LLC
Disney Shopping, Inc.
Disney Store USA, LLC
Disney Worldwide Services, Inc.
Display Pack
Diversey, Inc.
Diversified Chemical Technologies, Inc.
Divi Official Inc.
Dixon Ticonderoga Company
DMA Industries LLC
Dolan Designs, Inc.
Dolan Northwest llc
Dole Food Company, Inc.
Dole Packaged Foods
Dollar General Corporation
Dollar Shave Club, Inc.
Domaine Chandon
Domaine Drouhin Oregon, Inc.
Domaine Serene Vineyards and Winery, Inc.
Dominguez Family Enterprises
Domino Foods, Inc.
Domino’s Pizza LLC
Domo Industry Inc.
Domtar Paper Company, LLC
Donaldson Company, Inc.
Dorel Juvenile Group, Inc.
Dorman Products, Inc.
Dormont Manufacturing Company
Dorskocil Manufacturing Company, Inc.
DOT IT Restaurant Fulfillment, LLC

doTERRA Intl, LLC
Douglas County Bottling Co Inc.
Downlite International
Downlite Manufacturing, NC, Inc.
DPS Holdings Inc.
DPWagner LLC
Dr Wolff USA Distribution Inc.
Dr. Praeger’s Sensible Foods, LLC
Dr. Squatch LLC
Draco Distribution
Drake Holdings Inc.
Drake Refrigeration Inc.,
Dreyer’s Grand Ice Cream
DRI Duck Traders, Inc.
DribbleUp, Inc.
Driscoll’s, Inc.
DriSteem Corporation
D’s Naturals, LLC
DS Services
DSW Shoe Warehouse, Inc.
Duckhorn Wine Company
Duda Farm Fresh Foods, Inc.
DUDE Products LLC
Duke Cannon Supply Co.
Dunn-Edwards Corporation
DuPont de Nemours, Inc.
Duracell US Operations, Inc.
Duraflame Inc.
Duravit USA, Inc.
Dutch Bros., LLC
DUX INTERIORS, INC
Dyson Technology Inc.
E&J Gallo Winery
E.A. Sween Company
E.D. Bullard Company
e.l.f. Cosmetics Inc.
E.T. BROWNE DRUG CO., INC.
Eagle Creek Holdings LLC

Eagle Family Foods Group LLC
Eagle Industries Unlimited, Inc.
Earth Animal Ventures, Inc.
East Creek Farms LLC
East West Tea Company, LLC
Eastman Chemical Company
Eastman Kodak Company
Eberhard Creamery Inc.
ECCO USA, Inc.
ECHO Inc.
Eclectic Products LLC
ecobee Technologies ULC
Eco-Chic, LLC
Ecolab Inc.
EcoSafe Zero Waste Inc.
Eco-Shell, LP
EcoWater Systems, LLC
ECP Inc.
Edgewell Personal Care, LLC
Edward & Sons Trading Co., Inc.
eeBoo
Eileen Fisher, Inc.
Either/Or LLC
EJ USA, Inc.
Electrolux Home Products, Inc.
Electro-Voice Dynacord LLC
Element Appliance Company, LLC
Element TV Company, LP
Elenco Electronics LLC
Elevate Outdoor Collective, LLC
Elevate, LLC
Elliott Auto Supply Co., Inc.
Elmer Candy Corporation
EMD Holding Corp
Emerald Packaging
Emerson Automation Solutions Final Control US LP
Emerson Automation Solutions

Measurement Systems & Services LLC
Emerson Electric Co.
Emerson LLLP
Emerson Process Management Power & Water Solutions, Inc.
Emerson Process Management Regulator Technologies Tulsa, LLC
Emerson Process Management Regulator Technologies, Inc.
Emerson Process Management Valve Automation, Inc.
Emerson Professional Tools, LLC
Emery Jensen Distribution LLC
Emtek Products Group, LLC
Encore Industries
ENEOS USA, Inc.
Energizer Brands LLC
Engineered Floors, LLC
En-R-G Foods dba Honey Stinger
Entertainment Retail Enterprise
EO Products, LLC
Episciences, Inc.
Epoca International, LLC
Epson America, Inc.
Equal Exchange, Inc.
Equip Outdoor Technologies USA LLC
Erath PremiumCo LLC
Ericsson Enterprise Wireless Solutions, Inc.
Erno Laszlo, Inc.
ESALON.COM, LTD
ESI Cases & Accessories
Essence Bottling Company of Texas, Inc.
Essendant Co
Essential Industries, Inc.
ESSICK AIR PRODUCTS
Essity North America Inc.

ESTYLE Corp., LLC
ETERNAL BEVERAGES, INC
Ethel M. Chocolates, LLC
Ethicon US, LLC
Ethique LLC
Eu Natural, LLC
Eurasia Concepts Inc.
Euromarket Designs, Inc.
EuroPharma, Inc.
Eurostar, Inc.
Eurow O’ Reilly Corporation
Eva NYC LLC
Evenflo Company, Inc.
Eventful Sweets, LLC
Everest Group USA, INC.
Evereve, Inc.
Evergreen USA LLC
Everlane Inc.
Everyone’s Earth Inc.
Expanscience Laboratoires Inc.
Exped LLC
Exponential Technology Group, Inc.
Exxel Outdoors, LLC
ExxonMobil Oil Corporation
Eyeking, LLC
EZ Way Inc.
F. B. Purnell Sausage Company, Inc.
F. Korbel & Bros Inc.
Fabletics Inc.
Face Reality LLC
Factor75 LLC
Faherty Brand LLC
Falcon Trading Company, Inc.
FAM LLC
Fanatics LLC
Fancy Sprinkles LLC
Fanimation
Faribault Foods, Inc.

Fastenal Company Purchasing
FCA US LLC
Feastables, Inc.
Federici Brands LLC
FedEx Office and Print Services, Inc.
FedEx Supply Chain, Inc.
Feit Electric
Fender Musical Instruments Corporation
Fenix USA Retail, LLC
Ferguson Enterprises, LLC
Ferndale Farmstead
Ferrara Candy Company
Ferrero USA, Inc.
Festool USA LLC
Fevertree USA Inc.
FEWER BETTER THINGS INC.
FGF LLC
FHF Gear Inc.
FHP Manufacturing Company
Fiber Composites, LLC
FieldTurf USA Inc.
FIJI Water Company LLC
FILL-RITE COMPANY
Finelite, Inc.
First Brands Group, LLC
First Day Life Inc.
First Lite, LLC
First Quality Consumer Products, LLC
First Quality Products, LLC
Fisher Controls International LLC
Fisher Footwear LLC
Fiskars Brands, Inc.
Fiskars Living US, LLC
Five Below, Inc.
Fjallraven USA, LLC
Flagship Food Group
FleetPride, Inc.

FLEXIM Americas Corporation
Floor and Decor Outlets of America, Inc.
Flowers Foods, Inc.
Flowers, Inc.
Fluidmaster Inc.
Fluke Electronics Corporation
Fluker’s Cricket Farm, Inc.
Flylow Sports Inc.
FMC Corporation
Focal Point, LLC
FOLEXPORT, Inc.
Fontaine Spray Suppression
Fontem US LLC
Fonterra (USA) Inc.
foodmatch, inc.
FoodScience, LLC
FoodState, Inc.
Foot Locker Retail, Inc.
Forager Project LLC
Ford Motor Company
FORMA Brands, LLC
Formula Labs, LLC
Forrest Paint Co.
Fortune Brands Water
Innovations LLC
Fossil Group, Inc.
Foster Poultry Farms LLC
Foundation Consumer Healthcare
Four Hands LLC
Fourcompany Co., Ltd.
Fox Head, Inc.
Franke Home Solutions North America, LLC
Franklin Sports, Inc.
Fred Meyer Stores, Inc.
Frederic Thomas USA Inc.
Free Country Ltd

Free Fly Fishing Company, LLC
Free To Eat, Inc.
Freeland Foods. LLC
FREIXENET MIONETTO USA INC
Fresh Express Inc.rporated
Fresh Inc.
Fresh Innovations California LLC
Fresh Mark, Inc.
Freshpet, Inc.
Friction Labs LLC
From the Hearth Holdings, LLC
Frontgate Marketing, Inc.
Frontier Distribution, LLC
FRUITFUL YIELD INC
FUJIFILM Dimatix, Inc.
FUJIFILM Electronic Materials U.S.A., Inc.
FUJIFILM Healthcare Americas Corporation
FUJIFILM Imaging Colorants, Inc.
FUJIFILM North America Corporation
FUJIFILM Sonosite, Inc.
FUJIFILM Wako Chemicals U.S.A. Corporation
Fun Sweets, LLC
Funboy, Inc.
Function, Inc.
Funko LLC
FURMAN FOODS, INC.
Future Proof Brands, LLC
FYFFES NORTH AMERICA INC.
FyterTech Nonwovens LLC
G2G Ventures, PBC
Gabby’s Bagels Inc.
GAF Energy, LLC
GAF Materials, LLC
Gaia Herbs, Inc.
Galerie Inc.

Galloway Company
Games Workshop Limited
Games Workshop Retail, INC
Gannett Co. Inc.
Garan Manufacturing Corp.
Garden of Light Inc.
Garden-Fresh Foods
Gardner Asphalt Corporation
GARMIN INTERNATIONAL, INC.
Garnet Hill, Inc.
GCP Applied Technologies Inc.
Geiger Bros.
GEM Health Inc.
Gemini Industries, Inc.
Gem-Pack Berries, LLC
Generac Power Systems, Inc.
General Equipment and Manufacturing Company, Inc.
General HVAC Solutions America, Inc.
General Mills, Inc.
General Motors LLC
Genesis Topco Inc.
Genpak, LLC
Genuine Parts Company
Georg Fischer Central Plastics LLC
Georg Fischer LLC
George Packing Company
Georgia-Pacific Consumer Products LP
Georgia-Pacific Containerboard LLC
Georgia-Pacific Gypsum LLC
Georgia-Pacific Wood Products LLC
Gerber Childrenswear LLC
Gerber Plumbing Fixtures, LLC
GERBER PRODUCTS COMPANY
GFSI, LLC
Ghirardelli Chocolate Company
G-III Leather Fashions, Inc.

Gilster-Mary Lee Corp.
Gimme Health Foods, Inc.
Giorgio Armani Corporation
Giovanni Cosmetics, Inc.
Give Back Beauty LLC
Givenchy Corporation
Glanbia Performance Nutrition (NA), Inc.
Global Harvest Foods, LLC
Global Packaging LLC
Global Uprising PBC
Glossier, Inc.
Gluten Free Baking Company
Godiva Chocolatier, Inc.
Goetze’s Candy Company, Inc.
GOJO Industries, Inc.
Gold Medal Bakery, Inc.
Gold Medal Products Co.
Gold Tip, LLC
Gold, Inc.
Golden Artist Colors, Inc.
Golden State Foods LLC
Golden West Packaging Group, LLC
Golden West Trading INC
Golding Farms Foods, LLC
Goldmax Industries Inc.
GoMacro, LLC
Gonnella Baking Co
Gonnella Frozen Products
Good Foods Group LLC
Good Molecules, LLC
good2grow LLC
GoodCo Products LLC
Goody Products Inc.
Google LLC
goop, inc
GoPro, Inc.
Gordini USA, Inc.

Gorton’s Inc.
Goss Inc.
GP Corrugated LLC
GP Industrial Plasters LLC
Graco Children’s Products Inc.
Graham Packaging Company, L.P.
Grande Cheese Sales and Marketing LLC
Grange Cooperative Supply Association
Graphic Packaging International, LLC
Grass Advantage, LLC
Graver Technologies
Graybar Electric Co., Inc.
GRAYSON SULLIVAN, LLC
Great Eastern Sun Trading Co., Inc.
Great Lakes Cheese Co., Inc.
Great Lakes Label, LLC
Green Paper Products, LLC
Green Rabbit Inc.
Green Sheep Inc.
Green Valley Ranch LLC
Greenbrier International, Inc.
GreenChef Corporation
Greensource Brand Apparel, Inc.
GRG USA LLC
Grocery Delivery E-Services USA Inc.
Grocery Outlet
Group Rossignol USA, Inc.
Groupe BBH Inc.
Groupe SEB USA Inc.
Grove Collaborative, Inc.
Grow Fragrance, Inc.
Gruma Corporation
Grundens USA, LTD
Grundfos CBS Inc.
Grundfos Pumps Corporation
GSD Distribution LLC

GSI Outdoors LLC	Harry's USA, Inc.	Group, Inc.	House Foods Holding USA Inc.	Illinois Tool Works Inc.	International Refrigeration Products Inc.
Guardian Industries, Limited Liability Company	Hart Consumer Products, Inc.	Hermes of Paris, Inc.	HP Hood LLC	IM PRO Makeup NY LP	International Toy, Inc.
Guayaki Sustainable Rainforest Products Inc.	Hartford-Jackson, LLC	Herr Foods Inc.	HP Inc.	Image International Manufacturing LLC	International Vitamin Corporation
Gucci	Harvest Hill Beverage Company	Hestra Gloves LLC	HRBeauty LLC	Imperial Bag and Paper LLC	Interparfums
Guerlain Inc.	Hasbro, Inc.	HexArmor, Limited Partnership	HSN, Inc.	Imperial Paints LLC	Interparfums, USA LLC
Guitar Center, Inc.	Hawaiian Host Group	HFA, Inc.	HSS Enterprises Ltd	Implus Footcare LLC	INTERSAND
Gymshark USA INC.	Haworth, Inc.	High Life LLC	HT Clothing, Inc.	Impossible Foods Inc.	AMERICA CORPORATION
H&C Animal Health LLC	Haws Corporation	High Liner Foods, Inc.	Huel Inc.	Indian Industries, Inc.	Interstate Meat Distributors, Inc.
H&M Fashion USA INC	Hawthorne Hydroponics LLC	Highline Warren LLC	Huffy Corporation	Indiana Packers Corporation	Intertape Polymer Corp.
H.B. Fuller Company	Hazelnut Growers of Oregon LLC	Highwater Marine LLC	Hugo Boss Fashions, Inc.	INDIGO WILD, LLC	Intex Recreation Corp.
Hafele America	HD SUPPLY INC	Hill & Valley, Inc.	Huhtamaki	IndoorMedia, Inc.	Intirion Corporation
Haggar Clothing Co.	HDIS	Hill's Pet Nutrition, Inc.	Humble Brands, Inc.	INEOS Pigments USA Inc.	Ire-Tex Corp
Haggar Tribal, Inc.	HEAD USA Inc.	Hillyard, Inc.	Humm Kombucha	Infinium Spirits Inc.	iRobot Corporation
Haier U.S. Appliance Solutions	Health-Ade, LLC	Hilti	Hungryroot, Inc.	Ingram Book Group LLC	Iron Out Inc.
Halex Electric Company	Healthy Directions LLC	Himatsingka Linens (A Division of Himatsingka Seide Ltd.)	Hunter Fan Company	Ingram Library Services LLC	Irving Consumer Products Inc.
Halfdays Apparel Corp.	Hearth & Home Technologies	HLB90067 Inc.	Hunter Industries, Inc.	Ingram Publisher Services LLC	ITG Brands, LLC
Hallmark Marketing Company, LLC	Hearthmark	HLI Solutions, Inc.	Huntington House Inc.	Ingredion	ITG Cigars Inc.
Hamilton Beach Brands, Inc.	Hearthside USA - Corporate, Inc.	HNI Workplace Furnishings	Husqvarna Professional Products, Inc.	Ingrilli Citrus Inc.	Itoen North America. Inc.
Hanchett paper Company d/b/a Shorr Packaging Corp.	Heaven Hill Distilleries, Inc.	Hobart Brothers LLC	Husqvarna Water Corp.	Inline Plastics Corp	It's Greek to Me, Inc.
Hand2Mind, Inc.	Heineken USA Inc.rporated	Hobby Lobby Stores, Inc.	HydraForce, Inc.	Innersense Organic Beauty, Inc.	ITW Building Components Group Inc.
Handheld	Helen of Troy Texas Corporation	Hoffmaster Group Inc.	Hydrofarm LLC	Innova Electronics Corp	ITW Food Equipment Group LLC
Handi-Foil Corporation	Helena Agri-Enterprises, LLC	Home Depot USA, Inc.	Hyper Bicycles, Inc.	INNOVATION LINE SPECIALTIES	ITX USA, LLC
Hanesbrands	Helix Innovations LLC	Homecrest Outdoor Living, LLC	Hyponex Corporation	Innovation Specialties Inc.	J & J Snack Foods Corp.
Hansgrohe, Inc.	HELLY HANSEN US, INC	Homelegance, Inc.	Hyve Solutions Corporation	Innovative Water Care, LLC	J Choo USA, INC.
HAPPIEST BABY, INC.	Helmer Scientific LLC	Hometown Food - Chef Boyardee Company	IB Appliances Intermediate Holdings, LLC	Inspired Beauty Brands, Inc.	J Star Farms LLC
Happy Howie's, Inc.	Helmut Lang New York LLC	Hometown Food Company	ICC Acquisition Corporation	Instagrid Inc.	J&B Importers, Inc.
Harbor Foodservice of Seattle LLC	Henkel Corporation	Honey Baked Ham LLC	Icelandic Provisions, Inc.	Instrument & Valve Services Company	J&D Brush Inc.
Harbor Freight Tools USA Inc.	Henry Company LLC (A Carlisle Company)	Honey Heaven Wholesale	I-Con Systems, LLC	Integrated Bagging Systems	J&J Snack Foods Corp - BBST
Harbor Wholesale Grocery Inc.	Herb Pharm LLC	Honeywell International, Inc.	ICP Construction Inc.	Intel Corporation	J&J Snack Foods Corp MIA
Haribo Of America, Inc.	Herbalife International of America Inc.	Honma Golf US Ltd	Idemitsu Lubricants America Corporation	Intelligent Water Solutions by Watts Inc.	J&J Snack Foods Corp of California
Harley-Davidson Motor Company, Inc.	Herbert Malarkey Roofing Company	Hood River Distillers, Inc.	IGK LLC	Intercontinental Packaging Company	J. Strickland & Co.
Harman International Industries, Inc.	Herbivore Botanicals LLC	Hooker Furnishings Corporation	Ignik Outdoor Inc.	Interface, Inc.	J.CREW GROUP, LLC
Harris Tea Company	Herbruck Poultry Ranch Inc.	Hoosier Pride Farms LLC	IKEA Food Supply (US) INC	INTERNATIONAL DIRECT PACKAGING LIMITED	J.R. Simplot Company, LLC
Harry and David, LLC	Herbrucks of Pennsylvania LLC	Horizon Organic Dairy, LLC	ILIA, Inc.	International Motors, LLC	Jackson Family Wines, Inc.
	Here We Flo Ltd	Hormel Foods Corporation			Jafra Cosmetics Intl, Inc.
	Heritage Landscape Supply	Hornell Brewing Co Inc.			James Martin Signature Vanities, LLC

Jam’n Products, Inc.	Johnsonville, LLC	Ken’s Foods Inc.rporated	Kowa Health Care US Company, Ltd.	Lands’ End Inc.	LG H&H USA, INC.
Japan America Trading Agency	JOIE Children’s Products, Inc.	Kent Consumer Brands Americas, LLC	Kozy Shack, LLC	Lane Bryant Brands Opco LLC	Liberty Hardware Mfg. Corp.
Japonesque LLC	JOJO’s Chocolate LLC	Kenvue	Kraft Heinz Foods Company	L’ange Hair, Inc.	Liebherr America Inc.
JARROW FORMULAS, INC.	Jonathan Louis Inc.	Kering	Kraus USA Plumbing LLC	Larson Manufacturing Company of South Dakota, LLC	Liebherr Gear and Automation Technologies Inc.
Jason Pharmaceuticals, Inc.	Jones Steven Corp.	Kering Beaute	KraveBeauty LLC	Lash OpCo LLC	Life360, Inc.
Jasper Wyman & Son	Josam Industries, LLC	Kering Eyewear	Kreamer Feed, Inc.	Lassonde Pappas and Company, Inc.	Lifetime Brands, Inc.
Jazwares, LLC	Josh Rosebrook Skin and Hair Care LLC	Kerry Inc.	Krispy Krunchy Foods, LLC	Laura Mercier US Buyer LLC	LifeWave Inc.
JBR Inc.dba San Francisco Bay Coffee	Josie Maran Cosmetics, LLC	Kettle and Fire Inc.	Kruger Foods Inc.	Lavazza North America, Inc.	Lightning Source LLC
JBS Plainwell, Inc.	Jovial Foods, Inc.	Kevin Murphy USA Inc.	Kruger Products USA	Lavelle Industries, Inc.	Lightspeed Aviation, Inc.
JBS Souderton Inc.	Joy Cone Company	Keystone Automotive Operations	KSF Acquisition Corporation	Lawrence Foods, Inc.	Lincoln Electric Holding, Inc.
JBS Tolleson, Inc.	JRSK, Inc.	Kids2, LLC	Kuat Innovations LLC	Lawson Products Inc.	Lindt & Sprüngli (North America) Inc.
JBS USA Food Company	Just Born, Inc.	KIK International LLC	Kubota North America Corporation	LCT OpCo LLC	Lindt & Sprüngli (USA) Inc.
JBS USA Pork	Just Play, LLC	Kikkoman Sales USA, Inc.	KUIU LLC	Le Creuset of America, Inc.	Lineage Redistribution, LLC
JC Residential & Light Commercial, LLC	JUSTIN Vineyards & Winery LLC	Kimberly-Clark Corporation	Kuli Kuli, Inc.	Leaktite Corporation	Liphatech, Inc.
JDB PRO INC	JustSteven LLC	KIND LLC	Kureha America, Inc.	Leaktite West Corp	Lipman-Portland, LLC
Jeffco Foam LLC	Juul Labs, Inc.	King Arthur Baking Company, Inc.	Kyocera Document Solutions America, Inc.	Learning Resources, Inc.	Lisle Corporation
JEGS Automotive, LLC	JVCKENWOOD USA Corporation	KING ESTATE WINERY LP	L&W Supply Corporation	Leatherman Tool Group, Inc.	Litehouse, inc.
JELD-WEN Holding Inc.	KAI USA LTD	King Koil Manufacturing West LLC	L.A.T. Sportswear, Inc.	LEDVANCE LLC	Little Caesars Enterprises, Inc.
Jellycat Inc.	KAMCO Group LLC	Kirks Natural LLC	L.L.Bean, Inc.	LEE KUM KEE (USA) FOODS INC.	Living Spaces Furniture, LLC
Jelmar, LLC	KanPak LLC	Kitchen Fresh Candies, Inc.	La Prairie Inc.	Legend Brands	LKQ Corporation
JFE Franchising Inc.	Kao USA Inc.	Kittrich Corporation	La Sportiva NA, Inc.	Legendary Holdings	L’Occitane, Inc.
Jia Wei Lifestyle, Inc.	Kar Nut Products Company, LLC	KJUS North America, Inc.	La Terra Fina USA LLC	LEGO Brand Retail, Inc.	Loewe LLC
JIF CORP	KaramMD Skin, Inc.	Klean Kanteen, Inc.	La Tourangelles, INC.	LEGO Systems, Inc.	Loewen Inc.
Jiffy Foil	Kari Gran Inc.	Kleen Products, Inc.	LACO Industries LLC	Legrand AV Inc.	Logan Outdoor Products, LLC
Jim Beam Brands Co.	Kari-Out LLC	Kleen Test Products Corporation	LaCrosse Footwear, Inc.	Legrand Connectrac, LLC	Logitech Inc.
JMW Sales Inc.	Kaufhold’s Kurds, Inc.	Klein Foods, Inc.	Lactalis Cheese and Dairy Holding, Inc.	Legrand DPC, LLC	Logomark Inc.rporated
Jockey International, Inc.	Kawasaki Motors Corp., U.S.A.	Knauf Insulation, Inc.	Lafayette Bay Products LLC	Legrand Lighting Manufacturing Co.	Lollicup USA, Inc.
JOHN B SANFILIPPO & SON, INC	KEEN, Inc.	Knights Apparel, LLC	Laird Superfood, Inc.	Lehi Valley Trading Company	Lollytogs, LTD
John Middleton Co.	Keeprite Refrigeration, Inc.	Knix Wear LLC	Lakeshore Learning Materials, LLC	Lennox International Inc.	Lopez Island Creamery
JOHN PAUL MITCHELL SYSTEMS	KeHE Distributors, LLC	Knouse Foods Cooperative, Inc.	Lakeside Foods Inc.	Lenovo (United States) Inc.	L’Oreal USA S/D, Inc.
John Soules Foods, Inc.	Kellanova	Koch Foods Inc.rporated	Lakewood Organics, LLC	Lentus, LLC	Lorex Corporation
John Volpi & Company, Inc.	Kellogg Supply, Inc.	Kodak Alaris LLC	LALA U.S., Inc.	Lesaffre Yeast Corporation	Lotus Bakeries North America
Johnny Was, LLC	Kendo Holdings Inc.	Kodiak Cakes, LLC	Lallemand Specialties Inc.	LeVecke Corporation	Lotus Foods Inc.
Johns Manville	Kendra Scott LLC	Kohler Co.	Laltitude LLC	Levi Strauss & Co.	Louis Vuitton North America, Inc.
Johnson Controls US Holdings, Inc.	Kennys Candy & Confections, Inc.	Kohl’s Inc.	Lamb Weston Inc.	Lexington Furniture Industries Inc.	Loungefly, LLC
Johnson Outdoors, Inc.	Kenny’s Great Pies, LLC	Koki Holdings America Ltd.	Land O’Lakes, Inc.	Lexmark International, Inc.	Love All Little Ones, Inc.
	Kenosha Beef International Ltd.	Kolbe & Kolbe Millwork Co., Inc.		LG Electronics, Inc.	Lovehoney LLC
		Kontoor Brands, Inc.			

Lowe’s Companies, Inc.

LSP Products Group, Inc.

Lucas Oil Products, Inc.

lululemon athletica canada inc.

Lulu’s Fashion Lounge, LLC

Lume Deodorant LLC

Lush USA Inc.

Lutron Electronics Co. Inc.

LVMH Fragrance Brands LLC

Ly Brothers Corporation

Lyons Magnus, LLC

Lyv Life Inc.

M&G Partners LLP

M&M Manufacturing, Inc.

Macaron Queen LLC

Macy’s, Inc.

Made for Retail

Made in Nature, LLC

MAELYS COSMETICS USA INC.

Maesa LLC

Maestro Food Co.

Magic Kingdom, Inc.

Magnera Corporation

Magneto & Diesel Injector Service, Inc.

Magnussen Home Furnishings Inc.

Mahco Inc.

Maison Louis Marie

Make Nice LLC

Make Up For Ever LLC

Makedo Holdings Pty Ltd

Makhteshim Agan North America Inc.

MALIN & GOETZ INC.

Malnove Holding Company Inc.

Mamma Chia LLC

MANN+HUMMEL Filtration Technology US LLC

MANN+HUMMEL Purolator Filters LLC

Mannatech, Inc.

Mannington Mills, Inc.

Manscaped, Inc.

Mantrose-Haeuser Co., Inc.

Manzana Products Co Inc.

Maple Leaf Foods Inc.

Maple Mountain Group, Inc.

Marc Jacobs International, LLC

Maria Nila Inc.

Marin Mountain Bikes

Mark Anthony Brewing Inc.

Marketplace Brands, LLC

Markwins Beauty Brands, Inc.

Marmon Foodservice Technologies, Inc.

Marmot Mountain LLC

Marque of Brands Americas LLC

Mars Fishcare North America, Inc.

Mars Food US LLC

Mars Inc.dba Mars Symbioscience

Mars Petcare US, Inc.

Mars Wrigley Confectionery US LLC

Martin’s Famous Pastry Shoppe, Inc.

Marussia Beverages USA, Inc.

Marvin Lumber and Cedar Company, LLC

Mary Kay Inc.

Mary’s Gone Crackers, Inc.

Mary’s Harvest Fresh Foods

Masimo Corporation

Massimo Zanetti Beverage USA, Inc.

Master Lock Company LLC

Masterfit Enterprises, Inc.

Masters Gallery Foods, Inc.

Mast-Jaegermeister US, Inc.

Mastronardi Produce Limited

Materne North America Corp.

Mattel, Inc.

Maui Jim

MAV Beauty Canada, Inc.

Maxwood Furniture Inc.

McCain Food USA

McCormick & Company, Inc.

McDonald Wholesale LLC

McDonald’s USA, LLC

MCILHENNY COMPANY

McKee Foods Corporation

McLaughlin Gormley King

McMASTER-CARR SUPPLY COMPANY

MCS Dynasty Holdings

MCS Far East

MCS Industries Inc.

Mead Johnson & Company, LLC

Meat Eater, Inc.

Medik8 Inc.

MegaMex Foods LLC

Meguiar’s, Inc.

Mentor Worldwide LLC

Mercedes-Benz North America Corporation

Meredith Operations Corporation

MERI MERI, INC

Meristem Packaging Company, LLC

Merit Distribution Group, LLC

Mervin Mfg

Messtone LLC

Meta Platforms Technologies

Metsa Board Americas Corporation

Mettler Packaging LLC

Mettler-Toledo, LLC

MFI Holding Corporation

MGA Entertainment Inc.

Michaels Stores, Inc.

Micro Motion, Inc.

Microsoft Corporation

Midea America Corp.

Midwest Veterinary Supply, Inc.

Midwest Yogurt, Inc.

Midwood Brands, LLC

Miele Inc.

MiiR Holdings LLC

Mile High Athletic Inc.

Milika Inc.

Millennium Lighting, INC.

MillerKnoll, Inc.

Milwaukee Electric Tool Corporation

Minka Lighting LLC

MinMor Industries

MinnARK Group LLC

Miracle Gro Lawn Products inc

MIRC LLC

Misfits Market Inc.

Mission Produce, Inc.

MIT45

MITER Brands Holdco, LLC

Mitsubishi Electric Automotive America, Inc.

Mitsubishi Electric US, Inc.

Mitsubishi Motors North America, Inc.

Mizkan America, Inc.

Modena Fine Foods, Inc.

Moderna Products America LLC

Modoral Brands Inc.

Modus Furniture International

Moerie Beauty Inc.

Moet Hennessy USA, Inc.

Mohawk Carpet Distribution, LLC

MoistureShield, Inc.

Molson Coors Beverage Company USA LLC

Mon Chateau LLC

Monaco Industries LLC

MONAT GLOBAL CORPORATION

Moncler USA Inc.

Mondelez Global LLC

Mondo Collectibles, LLC

Monin, Inc.

Monofrax

Monogram Food Solutions, LLC

Monster Beverage Corporation

Monster Brewing Company LLC

Moody Dunbar, Inc.

Moose Toys LLC

Moran Home Pty Ltd

Morinaga America, Inc.

Morinaga Nutritional Foods

Moroccanoil, Inc.

Morrison Cup Solutions LLC

Morton Salt, Inc.

Mother Parkers Tea & Coffee USA, LTD.

Motherlove Herbal Company

Motion Industries

Motorcar Parts of America, Inc.

Motorola Mobility, LLC

Motul USA, Inc.

Mountain Rose, Inc.

Mountaire Farms, Inc.

Mouser Electronics, Inc.

MPM PRODUCTS

MPUSA LLC

MSC Industrial Direct Co., Inc.

Mt. Defiance Wine Company

MTA-USA LLC

MUD\WTR Inc.

Mule-Hide Products Co., Inc.

Mullally International Inc.

Munchkin, Inc.

Munk Pack Inc.

Murphy’s Naturals

Murray’s Cheese LLC

Musco Olive Products Inc.

Musco Sports Lighting, LLC

MUSH Foods, Inc.

MYOS CORP

N Wasserstrom & Sons, Inc.

Nani Pua LLC

NAOS USA INC.

NASCO Products, LLC

Natals, Inc.

Natasha Denona LLC

National Beef Packing Company LLC

National Checking Company

National Design LLC

National Geographic Partners, LLC

National Instruments Corporation

National Pen Co. LLC

National Presto Industries Inc.

National Pump Company

National Refrigerants Inc.

Native Microbials, Inc.

Natpets LLC

Natrol LLC

Natural American Foods LLB

Natural Factors Nutritional Products Inc.

Nature Fresh Farms Sales Inc.

Nature’s Bakery LLC

Nature’s Path Foods Inc.

Nature’s Touch Frozen Foods LLC

Nature’s Way Brands LLC

NatureSeal, Inc.

Naturipe Avocado Farms

Naturipe Farms LLC

Naturipe Value Added Foods, LLC

Naturipe Value Added Fresh LLC

Naturium LLC	Newmans Own Inc.	Northland Aluminum Products	Offspring Beauty Co. / VersedOfir Cosmetics, LLC	Ortlieb USA LLC	Pandol Bros., Inc.
Navajo Manufacturing Company Inc.	NEXGEN DEF, LLC	Northstar Maintenance Management Inc.	Oil-Dri Corporation of America	Orveon Global US LLC	Pandora Jewelry LLC
NBC Distribution Holder LLC	Nextera Packaging Inc.	Northwest Confections, LLC	Oiselle LLC	OSEA International, LLC	Papa John's International, Inc.
NCH CORPORATION	NIAGARA BOTTLING, LLC	Northwest Hazelnut Company	Olam Holdings Inc.	Otis McAllister	PAPATUI
Nécessaire, Inc.	NIBCO INC.	Northwest Natural Goods, LLC	Olaplex Inc.	Otter Products, LLC	Paper Culture LLC
Needed PBC	Nice-Pak Products, LLC	Northwest Paper Box Manufacturers, Inc.	Old Navy, LLC	Ouidad Holdings LLC	Paper Source, LLC
Negative Inc.	Nicholas and Company, Inc.	Northwest Pioneer Inc.	Old Trapper Smoked Prod, Inc.	Our Favorite Foods LLC	Paragon Films, Inc.
Nehemiah Manufacturing Company, LLC	Nichols Pistachio	Norwex USA Inc.	Oldcastle APG Northeast Inc.	Outdoor Research LLC	Parfums de Coeur Ltd.
Neil International, Inc.	Nicole Tonic Studios Inc.	Notes & Queries	Oldcastle APG South Inc.	OverSeas Food Trading	Parfums Francis Kurkdjian, LLC
Nemah, Inc.	Nidecker US Inc.	Novalis US LLC	Oldcastle APG West Inc.	Overture Promotions Inc.	Paris Presents Inc.rporated
NEMO Equipment, Inc.	Nike, Inc.	Novolex Holdings, LLC	Oldcastle Lawn & Garden, Inc.	Owens Corning	Parket Inc.
Neo G USA Inc.	Nikwax North America, Inc.	NOW Health Group, Inc.	Ole Smoky Distillery, LLC	Owlet Baby Care, Inc.	Parts Authority, LLC
Neogen Corporation	Ningbo Hong Tai Plastics Manufacturing Co., Ltd	NSI Group, LLC	OLFA U.S.A. Inc.	Oystershell Consumer Health, Inc.	Pass & Seymour, Inc.
NEOPERL, Inc.	NINGBO TAIOOR COOKWARE CO., LTD	Nu Skin Enterprises, Inc.	OLIPOP	P I Components Corp.	Pasta Montana LLC
Nespresso USA INC	Ninkasi Brewery, LLC	Nu-Calgon Wholesaler, Inc.	Olivier's Candies Ltd.	PAC Worldwide Corporation	Patagonia Works
Nestle Health Science	Nintendo of America Inc.	Nudestix Inc.	Ollie	Pacha Soap Co	Paterno Imports, Ltd.
Nestle Purina PetCare Company	Nissan North America	Nulastin Inc.	Olyra Foods Inc.	Pacific Coast Fresh Company	PATH WATER Inc.
NESTLÉ USA, INC.	Nite Ize, Inc.	Nuna Baby Essentials, Inc.	Omar Medical Supplies, LLC	Pacific Coast Producers	Pattern Beauty LLC
Netgear Inc.	Niteo Products, LLC	NuNaturals Inc.	Omni Industries, LLC	Pacific Motion LLC	Patterson Pump Company
Never Summer Industries, Inc.	Niterra North America, INC.	Nuovo Pasta Productions, LTD	ON DISPLAY, LTD., LLC	Pacific Northwest Baking Company	PB2 Foods, Inc.
New Balance Athletics, Inc.	NIU BODY Inc.	Nurture, LLC	On Inc.	Pacific Seafood Aquaculture, LLC	PBI-GORDON CORPORATION
New Belgium Brewing Company, Inc.	NJOY, LLC	Nutanix, Inc.	Once Upon a Farm, PBC	Pacific Seafood Distribution, LLC	Peace Coffee LLC
New Carrot Farms, LLC	NomNomNow, Inc.	Nutra-Blend, LLC	One Home Brands Inc.	Pacific Seafood Processing, LLC	Peace Out, LLC
New Classic Cooking LLC	Nongshim USA, Inc.	Nutraceutical Corp.	Online Meat & Seafood, Inc.	Pacific World Corporation	Peak Design LLC
New Frontier Bio, Inc.	Nonni's Foods LLC	Nutricia North America, Inc.	Onsite International, LLC	Packaging Corporation of America	Peak Performance Canada Inc.
New Image Global, LLC	Nook Digital LLC	Nutrien Ag Solutions, Inc.	Oola Life, Inc.	PACKECO SOLUTIONS INC.	Peanut Butter & Co, Inc.
New Milani Group LLC	Nordic Naturals, Inc.	Nuvik USA, Inc.	OOLY, LLC	PACKIT, LLC	PEERLESS INDUSTRIES, INC.
New Receiptco Opco LLC	Nordstrom Inc.	NWE Brands Inc.	Open Farm Inc.	Pact Collective	Peet's Coffee, Inc.
New Seasons Market, LLC	Normerica International Corporation	O.S. Holdings, Inc.	Oregon Fruit Company	Pactiv Evergreen, Inc.	Pegasus Laboratories, Inc.
New WinCup Holdings, Inc.	Nortek Air Solutions	Oatey Supply Chain Services, Inc.	Oregon Potato Company	Pakka Inc.	PelGar USA
New World Imports, Inc.	North Coast Electric Company	Oatly, Inc.	Oregon Tool, Inc.	Palace Industries Public Benefit Corp.	Pella Corporation
Newark Corporation	North Pacific Paper Company LLC	Oats Overnight, Inc.	O'Reilly Automotive, Inc.	Paleovalley LLC	Peloton Interactive, Inc.
Newegg Inc.	NORTHEAST FULFILLMENT INC	Oboz Footwear LLC	Organic India USA LLC	Palladio Beauty Group, LLC	Pendleton Woolen Mills
Newell Brands Distribution LLC	Northern Technologies International Corporation	Ocean Spray Cranberries Inc.	Organic Milk Exchange, LLC	Palm Bay International, Inc.	Penn Emblem Company
Newell Brands, Inc.rporated	Northern Tool & Equipment Company, Inc.	Odele, LLC	Organically Grown Company	PanaPesca USA LLC	Penn Machine Company LLC
Newly Weds Foods LLC		ODP Corporation	Orion Plastics Corporation	Panasonic Corporation of North America	Penney OpCo LLC
			Ornua Foods North America		Pentel of America, Ltd.
					Pepsi Northwest Beverages, LLC

PepsiCo, Inc.	Pilot Corporation of America	Post Consumer Brands, LLC	Purchasing 411	Razor USA, LLC	Revolution Sustainable Solutions Holdings LLC
Perdue Foods	PING, Inc.	Power Bus Way Ltd.	Pure Flavor Farms LP	RB Health (US) LLC	Rexnord Industries LLC
Perfetti Van Melle USA, Inc.	Pinnpack Capital Holdings, LLC	Powered By FTGU, LLC	Purely Elizabeth LLC	Ready Foods Inc.	Reynolds Consumer Products Inc.
Performance Food Group, Inc.	Pioneer Electronics (USA) Inc.	PPG Industries, Inc.	Purina Animal Nutrition, LLC	Ready Pac Foods, Inc.	Reznor LLC
Perlick Corporation	Pipes & Shaw, LLC	Prairie Star Farms LLC	Purple Innovation, LLC	Real Greek LLC	RGH Enterprises, LLC
Pernod Ricard USA LLC	Piping Rock Health Products, Inc.	Pratt Industries, Inc.	PurposeBuilt Brands	RealTruck, LLC	Rheem Manufacturing Company
Perrigo Co plc	Pitman Farms	Preferred Brands International, Inc.	PVH Corp	Reckitt Benckiser LLC	Rhodes International, Inc.
Perry Ellis International, Inc.	Pitney Bowes Inc.	Pregis LLC	PVH Legwear LLC	Recochem Inc.	Riceland Foods, Inc.
Pescanova Inc.	Pitt Plastics, Inc.	Premier Brands of America Inc.	QIAGEN LLC	Recreational Equipment, Inc.	Rich Products Corporation
Pet Honesty, LLC	Pittsburgh Paints Company	PREMIER MANUFACTURING, INC.	Qnity Electronics, Inc.	Recycled Content Law	Richard Ginori
Pet Nutrition Delivery, Inc.	Placon	Premier Nutrition Company, LLC	QSC, LLC	Recycline Inc.	Richemont North America Inc.
Pet-Ag, Inc.	pladis North America, Inc.	Premium Brands Opco LLC	Quality Bicycle Product	Red Bull North America, Inc.	Ricola USA Inc.
Petco Animal Supply Stores Inc.	Plaid Enterprises Inc.	Premium Near Beer (US) Inc.	Quanex Building Products Corporation	Red Diamond, Inc.	Ridge Tool Manufacturing Company
Petcurean Pet Foods Ltd.	Planet Gourmet INC.	Premium Waters, Inc.	QuestSpecialty Corp	Red Wing Shoe Company Inc.	Riello America LLC
Peter Millar LLC	PlantSwitch	PremiumCo LLC	QuietKat, Inc.	Red's All Natural, LLC	Rindler Poultry LLC
Peterson Brands, LLC	Plexus Worldwide LLC	PRESERVA PRODUCTS, LTD	Quincy Street Inc.	RefrigiWear LLC	Rinnai America Corporation
Peterson Farms Fresh, LLC	PLZ Corp.	Pressed Paperboard Technologies	Quinn Foods, LLC	Reichel Foods, Inc.	Riobel Inc.
Peterson Farms, Inc.	PMI WW Brands, LLC	Pretty Litter, Inc.	Quoizel, LLC	Reily Foods Company	Ripple Foods, PBC
PetIQ, LLC	POC USA LLC	Pretzels Inc.	QVC, Inc.	Reliance Worldwide Corporation	Rise Baking Company LLC
Petoskey Plastics, Inc.	Pogi Beauty LLC	Pretzilla, LLC	R.G. Barry Corporation	Relish Labs, LLC	Rise Wellness, INC.
PetSmart LLC	Polar Electro, Inc.	Primal Harvest LLC	R.J. Reynolds Tobacco Company	Rema Foods, Inc.	Ritter Sport USA, Inc.
Pez Candy Inc.	Polaris Industries Inc.	Prime Wire & Cable, Inc.	R.J. Reynolds Vapor Company	Remedy Drinks USA LLC	River Point Farms, LLC
PFALTZGRAFF FACTORY STORES, INC.	Polaris Sales Inc.	Primo Bedding Company Inc.	R.L. Albert & Son, Inc.	REMY COINTREAU USA, INC.	Riverside Furniture Corporation
PFB Manufacturing LLC	Polite Society, LLC	Printpack Inc.	R.M Palmer Company LLC	RenewAire, LLC	Riverside Natural Foods Inc.
PFD opco llc	Poly-America, LP	ProAmpac Donegal Limited	Rad Power Bikes Inc.	Renfro Foods, Inc.	Rivian Automotive, LLC
PG Golf LLC	Polyconcept North America, Inc.	ProAmpac Holdings Inc.	rag & bone Industries, LLC	Renfro LLC	Riviana Foods Inc.
PGP International, Inc.	POM Wonderful LLC	ProEdge Dental Products, Inc.	Ragolds USA Inc.	REP Fitness LLC	RJ Schinner Co Inc.
Pharmaceutical Specialties, Inc.	Pomellato	Profile Food Ingredients	Rallenti Pasta LLC	Republic Plastics, LTD	RMS Beauty
Pharmavite LLC	Pompeian Inc.	Prokoz, Inc.	Ralph Lauren Corporation	Research Products Corporation	Roar Beverages Inc.
Philip Morris USA Inc.	Pontoon Boat, LLC	Promethean Inc.	Rana Meal Solutions LLC	Reser's Fine Foods	Robert Bosch LLC
Philips North America LLC	Ponzi Vineyards LLC	Promier Products Inc.	Randa Accessories Leather Goods LLC	Resideo LLC	Robert Bosch Tool Corporation
Philly's FAMOUS WATER ICE	PopSockets LLC	Prose Beauty Inc.	Rangen, LLC	ResMed Inc.	Roberts Gordon LLC
PHINIA Delphi USA LLC	PORSCHE CARS NORTH AMERICA INC	Prosecco Source, LLC	Ranger Chocolate Co.	Resolution Pet Brands LLC	RoC Opco LLC
PHINIA USA LLC	Portland Pet Food Company	ProTeam, Inc.	Rare Beauty, LLC	Revino Inc.	Roche Diagnostics Corporation
PHLUR, LLC	Portland Roasting Holdings, LLC	ProVia LLC	Ravensburger North America, Inc.	Revision, LLC	RockAuto LLC
Phoenix Closures Inc.	Portland Specialty Baking Company	Pulmuone Foods USA, Inc.	Raw Sugar, LLC	Revlon Consumer Products LLC	Rockford International, LLC
Picnic Time, Inc.	Positec USA, Inc.	PUMA North America, Inc.		Revolution Beauty Inc.	Rockler Companies, Inc.

Rockline Industries, Inc.

Rocky Brands Inc.

Rod Mclellan Company

Rodan & Fields Beauty, LLC

Roland Foods, LLC

Ronpak, Inc.

Roofline, Inc.

Room and Board

Roppe Corporation

Rosemount Inc.

Rosemount Nuclear Instruments, Inc.

Rosemount Tank Gauging North America Inc.

Ross Medford Farms LLC

Ross Stores, Inc.

Rotella's Italian Bakery, Inc.

Rothy's, Inc.

Royal Canin USA Inc.

Royal Enfield, A Unit of Eicher Motors Ltd.

Royal Interpack of North America

Royal Oak Enterprises, LLC

Royal Pacific Limited

Royal Robbins, LLC

Royce Too LLC

ROZ Hair Inc.

RPM Industrial Coatings Group, Inc.

RR Donnelley

Rubbermaid Commercial Products, LLC

Rubbermaid Inc.

Rudi's Organic and Gluten Free Brands, Inc.

Ruffwear, Inc.

Rules Beauty Inc.

Russell Stover Chocolates, LLC

Rust-Oleum Corporation

Rutherford Hill Winery, Company

Ryonet Corporation

S&S Activewear, LLC

S. C. Johnson & Son, Inc.

S. Martinelli & Company

SA Consumer Products, Inc.

Saalt, LLC

Sabert Holding Corporation

Safari Programs Inc.

Safe Step Walk In Tub, LLC

Saf-Gard Safety Shoe Company

Safilo USA Inc.

Sager Electrical Supply Company, Inc.

Saint-Gobain Abrasives, Inc.

Saint-Gobain Adfors America, Inc.

Saint-Gobain Ceramics & Plastics, Inc.

Saint-Gobain Gypsum USA, Inc.

Saint-Gobain Performance Plastics Corporation

Saint-Gobain Solar Gard, LLC

SakeOne Corporation

Saks Global Enterprises LLC

Salewa USA LLC

Sally Beauty Holdings, Inc.

sambazon inc

Samsonite LLC

Samsung Electronics America, Inc.

Samsung Lennox HVAC North America LLC

Samyang America, Inc.

San Mar Corporation

Sanders Candy, LLC

Sandisk Technologies Inc.

Sanford Winery Company, LP

Sanford, L.P.

Santa Cruz Bicycles, Limited Liability Company

Santa Fe Natural Tobacco Company, Inc.

Santoki LLC

Saputo Cheese Usa Inc.

Sara Lee Frozen Bakery, LLC

Saraya USA, Inc.

Sargento Foods Inc.

Satco Products Inc.

Sauder Woodworking Company

Sauna360

Savage X, Inc.

Savant Technologies LLC

Savencia Cheese USA LLC

Savor Brands, LLC

Savory Creations International, Inc.

SawStop, LLC

Sazerac Company Inc.

SBM Life Science Corp

Scale Media, Inc.

Scandinavian Tobacco Group Lane Ltd

SCARPA NORTH AMERICA INC

Scenic Fruit Company, LLC

Scentsy, Inc.

Schleich USA, Inc.

Schneider Electric IT Corporation

Schoeneckers Inc.

Scholastic Inc.

Schreiber Foods, Inc.

Schroeder and Tremayne, Inc.

Schwabe North America, Inc.

Schwank USA Inc.

Schylling Toys

Science of Skincare, LLC

SCIMETRICS LIMITED CORP.

Sconza Candy Company

Scotch Corporation / Instant Power Corporation

Scott USA

Seaboard Foods LLC

Sealed Air Corporation

Seaman Paper Company of Massachusetts, Inc.

Seattle Food Tech, Inc. dba Rebellious Foods

Second Bite Foods, Inc.

SECRETLAB US, INC.

Seed Health Inc.

See's Candies, Inc.

Sellars Absorbent Materials

SEM Products, Inc.

Seminole Consulting and Marketing

Seneca Foods Corporation

Sensio Inc.

Sensitech Inc.

Sentinel Hydrosolutions, LLC

Sephora USA, Inc.

SePRO Corporation

Serenity Kids

Service Champ LLC

Service Ideas, Inc.

Seville Classics

Sevillo Fine Foods, Inc.

SF USA, Inc.

SFC Global Supply Chain, Inc.

SFERRA Fine Linens LLC

Shakespeare Company, LLC

Shamrock Foods Company

Share Corporation

SharkNinja Operating LLC

Shaw Industries, Inc.

Shaws Since 1897 Limited

Shedrain Corporation

SHEIN Distribution Corporation

Shenzhen Aiyuxing Star Home Furnishing Co., Ltd.

Shenzhen Shi Fei Niao Guo Ji Shang Wu Guan Jia Zhong Xin

Shiseido Americas Corporation

Shure Inc.rporated

Shurtape Technologies, LLC

Shutterfly LLC

SIC Enterprise, Inc.

Siemens Industry Inc.

Sierra Nevada Brewing Co.

Sierra Pacific Industries

Signature Brands, LLC

Signify North America Corp

Sign-Zone, LLC

Simek's SBC

Simmons Animal Nutrition Inc.

Simmons Pet Food Inc.

Simmons Prepared Foods Inc.

Simms Fishing Products, LLC

Simple Mills, Inc.

SIMPLOT AB RETAIL, INC.

Simply Fuel LLC

Sipcam Agro USA Inc.

Siren Marine, Inc.

SiriusXM Radio, LLC

Skechers USA Inc.

Skeeter Products, Inc.

SKIMS Body, Inc.

Skinfix Inc.

Skout Organic LLC

Skratch Labs LLC

Sky Organics Limited Liability Company

Skyworth USA Corporation

Sleep Number

SLJ Group Inc.

SM Golf Holdings

SMA Solar Technology America LLC

SmartSweets Inc.

SMEG USA Inc.

Smith Brothers Holding Inc.

Smith Sport Optics Inc.

Smithers-Oasis

Smithfield Fresh Meats Sales Corp.

Smithfield Packaged Meats Sales Corp

Smokey Mountain Chew, Inc.

Snak-King LLC

Snap-on Inc.rporated

Snow Peak USA

Sokol Blosser LTD

Sol de Janeiro USA, Inc.

Solar Innovations, LLC

Solawave Corp

Solenis LLC

Solina USA Inc.

Solut!, Inc.

SolvChem, Inc.

Solventum US LLC

Sonos, Inc.

Sony Biotechnology Inc.

Sony Electronics Inc.

Sony Interactive Entertainment LLC

Sony Music Entertainment Inc.

Sony Pictures Home Entertainment Inc.

SOPHIECOMPANY CO., LTD.

Soter Vineyards, LLC

Souper Products LLC

Source (Inc. 6/24/1991) Delaware

South Chicago Packing LLC

Southern Champion Tray LLC

Southwire Company LLC

SP Holdings, Inc.

SP Holdings, Inc.

Spada Properties Inc.

Spangler Candy Company

Spartan Chemical Company, Inc.	Steven Madden, Ltd.	Sunday Riley Modern Skincare, LLC	Sysco Corporation	The a2 Milk Company	The Hartz Mountain Corporation
Specialty Foods Group	Steven-Robert Originals, LLC	Sundia Corporation	SYSTEMES KLR SYSTEMS INC	The Ames Companies, Inc.	The Hershey Company
Specialty Technologies, LLC	STEWART SUTHERLAND INC	SunFoods LLC	SYSTM Foods	The Avon Company	The Hillman Group, Inc.
Spectra Premium Mobility Solutions USA, LLC	Stich Industries Inc.	Sunny Delight Beverage Co.	T. Marzetti Company	The Bama Companies Inc.	The Honest Company, Inc.
Spectrum Brands Inc.	STIHL Inc.rporated	SunOpta Grains and Foods Inc.	TA Operating LLC a Delaware limited liability company	The Bazooka Companies, LLC	The Honest Kitchen Inc.
Speedo USA Inc.	Stila Styles	Sunshine Makers, Inc.	TAC SnugZ/USA Holdings, LLC	The Body Firm, LLC	The Honey Pot Company DE LLC
Spencer Gifts LLC	Stile Products, Inc.	Sunstar Americas Inc.	Taffy Town, Inc.	The Brand House Collective, Inc.	The ICEE Company
Spiceology Inc.	Stillwater Designs & Audio Inc.	Sunstar Industries Inc.	Takeda	The Buckle, inc.	The J. M. Smucker Company
Spin Master, Inc.	Stitch Fix, Inc.	SuperClean Brands LLC	Talking Rain Beverage Company, Inc.	The Burton Corporation	The Jel Sert Company
Spirit Halloween Superstores LLC	Sto Corp.	Superfeet Worldwide LLC	Target Corporation	The Campbell's Company	The Kyjen Company, LLC
SpoiledChild, Inc.	Stöckli Swiss Sports AG	Superior Group of Companies, Inc.	Tarkett USA Inc.	The Cannon Group Inc.	The Lagunitas Brewing Company
Sportsman's Guide	StockX	Supplying Demand, Inc.	Tarte	The Cheesecake Factory Inc.	The Legacy Companies, LLC
Springfield Creamery Inc.	Stoli Group USA, LLC	SupplySideUSA, Inc.	Taste Salud	The Chemours Company FC, LLC	The Libman Company, Inc.
Sprite Industries Inc.	Stoller Vineyard Inc.	Sutter Home Winery, Inc.	Tata Consumer Products US Inc.	The Children's Place, Inc.	The Magnum Ice Cream Company
SRAM, LLC	Stone Glacier, Inc.	Suzuki Marine USA, LLC	Tata's Natural Alchemy, LLC	The Clorox Company	The Martin Brower Company, LLC
SRS Distribution Inc.	Stone Island USA Inc.	Suzuki Motor USA, LLC	Taylor Fresh Foods Inc.	The Coca-Cola Company	The Modern Fan Company
St Regis Inc.	Stonewall Kitchen LLC	SVP SEWING BRANDS LLC	Taylor Made Golf Company Inc.	The Coleman Company, Inc.	The Nunes Company, Inc.
St. Cousair, Inc.	Stonhard, Division of	Swany America Corp.	TCT Mobile (US) Inc.	The Cookware Company (USA) LLC	The Original Cakerie Co.
Stahlbush Island Farms, Inc.	StonCor Group, Inc.	Swarovski U.S. Holding Limited	TD SYNEX Corporation	The Creme Shop, Inc.	The Original Cast Lighting, INC
Standard Motor Products, Inc.	Storck USA, L.P.	Swedencare Tillverka, Inc.	Tea Forte, INC	The Crump Group Inc.	The Pampered Chef Ltd.
Standard Process, Inc.	Stout Stuff, LLC	Swedish Match USA, Inc.	Team Ten LLC	The Dallas Group of America, Inc.	The Pictsweet Company
Standard Textile Co., Inc.	Stratas foods, llc	Sweet Candy Company	Tech Gear 5.7 Inc.	The Dow Chemical Company	The Pokémon Company International, INC.
Stanley Black & Decker	Straus Family Creamery, Inc.	Sweet Loren's Inc.	Tecnica Group USA	The Edrington Group USA, LLC	The Power of Pure, LLC
Staples, Inc.	Streamlight, Inc.	Sweetwater Sound, LLC	Tekmar Control Systems, Inc.	The Ergo Baby Carrier, Inc.	The Procter & Gamble Company
Starbucks Corporation	Strottmann International Inc.	SWI-DE, LLC	Tekni-Plex, Inc.	The Estee Lauder Companies	The Purple Cow America Inc.
StarKist Co.	STS North America, LLC	Swift Beef Company	TemperPack Technologies Inc.	The Farmer's Dog, Inc.	The Quikrete Companies, LLC
Starline Holdings, LLC	Stuckey's Corporation	Swire Pacific Holdings Inc.	Tempur World, LLC	The Flavor of California LLC	The Radio Flyer Company
Starline USA Inc.	Suave Brands Co, LLC	Swisher International, Inc.	Tenacious Holdings, Inc.	The Foreign Candy Company, Inc.	The Raymond Corporation
State Industrial Products Corporation	Subaru of America, Inc.	Swiss Farms Products, Inc.	Terry Precision Cycling, LLC	THE FUTURE OF LATINX BEAUTY INC.	The RealReal, Inc.
Stateside Brands LLC	Subco Foods Inc.	Sylvamo North America, LLC	Terry Town Corporation	The Gap, Inc.	The Scotts Company LLC
Ste. Michelle Wine Estates LLC	Sub-Zero Group, Inc.	Symmons Industries, Inc.	Tescom Corporation	The Gem Group, Inc.	The Sherwin-Williams Company
Steelcase INC	Sugar Foods LLC	SYNC Performance	Test Rite International Co., Ltd.	The Gifting Company	The Talbots LLC
Steelite International USA Inc.	Suit Up Brands LLC	SYNCHRONICITY SPA INC	Test-Rite Products Corp.	The Golf Warehouse	The TJX Companies, Inc.
Stemilt Growers	suja life	Synergy Company of Utah, BLLC	Teton Outfitters, LLC	The Gorilla Glue Company LLC	The Toro Company
Step Furniture Manufacturer Sdn Bhd	Summer Fridays, LLC	SynergyLabs, LLC	Textron Specialized Vehicles Inc.	The Gorman-Rupp Company	The UPS Store, Inc.
Sterno Group, LLC	Sun Gro Horticulture Inc.	Syngenta Crop Protection, LLC	TFG Holding Inc.	The Haddad Apparel Group, Ltd.	The Vita Coco Company, Inc.
	Sun Maid Growers of California	Syngenta Flowers, LLC	The 7 Virtues Beauty USA LLC	The Hain Celestial Group, Inc.	The Wasserstrom Company
	Sunbeam Products, Inc.				

The Watt Stopper, Inc.	Tom's of Maine Inc.	Truck Shields LLC	United States Distilled Products Co.	Verdes Toys Corp	W Sternoff LLC
The Willamette Valley Company LLC	TOMS Shoes, LLC	TruckPro, LLC	UNITED STATES OF ARITZIA INC.	Verite Inc.	W. L. Gore & Associates, Inc.
The William Carter Company	Tonies US, Inc.	True Botanicals, Inc.	Universal Protein Supplements Corporation	Veritiv Operating Company	W.blvd Corp.
The Wine Group, Inc.	Tony's Chocolonely Inc.	TruSkin, LLC	Universal Tea Company, Inc.	Verizon Value, Inc.	W.F. Young, Inc.
The Wiremold Company	Tool Aid LLC	TruStile Doors, LLC	Uponor, Inc.	Vermont Creamery, LLC	W.M. Barr & Co., Inc.
The Yankee Candle Company, Inc.	topco associates llc	TST/Impreso Inc.	UpSnack Brands, Inc.	Vermont Maple Sugar Company	W.W. Grainger, Inc.
Theo Chocolate, Inc.	Totalenergies Marketing USA, Inc.	TT Life Sciences LLC	Upstanders LLC	Versuni USA Corporation	W3LL People Inc.
Theory LLC	TOTO USA, Inc.	TTE Technology, Inc.	Upton's Naturals Co	Vertical Supply Group, Inc.	Wahl Clipper Corporation
Thermal Solutions Products, LLC	Touchstone Life Essentials	TTI, Inc.	Urban Remedy, Inc.	Vestergaard Frandsen, Inc.	Waiakea, Inc.
Therma-Stor LLC	Toy Investments Inc.	Tuffy's Pet Foods, Inc.	Ursa Major Natural Care	Vesync (US) Corporation	Walgreen Co.
Therma-Tru Corp.	Toyota Material Handling, Inc.	Tuffy's Pet Treats, Inc.	US Foods, Inc.	Victoria's Secret & Co	Walker's Shortbread Inc.
Thermo King LLC	Toyota Motor North America, Inc.	Tulsack, LLC	USA Legwear LLC	Viega LLC	Walmart Inc.
Thermo King Puerto Rico Manufactura, Inc.	TR Toppers, Inc.	Tumi Inc.	USA Underwear LLC	Viessmann Manufacturing Company (U.S.) Inc.	Walter E Nelson Company
Thermos LLC	Tractor Beverage Co.	Turtle Island Food Inc.	USANA Health Sciences, Inc.	ViewSonic Corporation	WANT WANT NORTH AMERICA, LLC
This Realm, LLC	Tractor Supply Company	Turtle Wax, Inc.	USG Corporation	Vilore Foods Company, Inc.	Warby Parker Inc.
Thistle Health Inc.	Trader Joe's Company	TV Paints, LLC	UTEC, Inc.	Vintner's Daughter LLC	WARN INDUSTRIES, INC.
Thomas Allen Vineyards & Winery, LLC	Traditional Medicinals	TW Garner Food Company	Utz Quality Foods, LLC	Virbac Corporation	Warner Music Inc.
Thomas Foods International USA	Trane U.S. Inc.	Twinnings North America, Inc.	V.F. Corporation	Virtual Gateways, LLC	Warren Oil Company, LLC
Thorne Research, Inc.	Transcontinental US LLC	Two Peaks LLC	VACATION INC.	Virtual Gateways, LLC	Washington Shoe Company
Three Trees Foods, Inc.	Trans-Ocean Products, Inc.	Tyson Foods, Inc.	Valassis Communications, Inc.	Virtue Labs LLC	Watco Manufacturing Company, LLC
Threshold Enterprises, LTD.	TravisMathew, LLC	Tytus Grills, LLC	Valassis Direct Mail, Inc.	Visible Service LLC	WATER TECH CORP
Thrive Causemetics, Inc.	Treasury Wine Estates Americas Company	U.S. Boiler Company, LLC	Valio USA Inc.	Vitabest Nutrition, Inc.	Watkins Inc.rporated
Thrive Market, Inc.	Tree Top, Inc.	U.S. Smokeless Tobacco Company LLC	Valley Fresh Foods Inc.	Vitacost.com, Inc.	Watkins Wellness
Tiffany and Company U.S. Sales, LLC	TreeHouse Foods, Inc.	UA Destination, LLC	Valley Oasis Foods LLC	Vital Farms Inc.	Watts Heating and Hot Water Solutions, LLC
Tigi Linea Corp	Trek Bicycle Corporation	Ubiquiti Inc.	Valve Corporation	Vitamin Cottage Natural Food Markets, Inc.	Watts Regulator Co.
Tillamook Country Smoker, LLC	Tribe 9 Foods	Ulta Beauty Inc.	Vanguard Direct LLC	Vitamin Well USA LLC	WAWGD Newco, LLC
Tillamook County Creamery Association	TricorBraun Inc.	Umpqua Dairy Products Co.	Vanguard Soap LLC	Vitamin World USA Corporation	Waxman Sales LLC
Time's Up	Triform Custom Apparel, LLC	Under Armour, Inc.	Vapor Technologies, Inc.	VITASOY USA INC.	Way To Be Designs, LLC
Timex Group USA Inc.	Trilliant Food & Nutrition LLC	Union Underwear Company, Inc.	Vaughan-Bassett Furniture Company Inc.	Vivid Ink, LLC	WAYB, Inc.
Tinno USA Inc.	Trinidad Benham Corporation	Union Wine Company	Vegamour LLC	Volkswagen Group of America	Wayfair LLC
TKO Evolution Apparel Inc.	Trinity Plastics Inc.	UNIQLO USA LLC	Velocio Holdings, LLC	Volm Companies Inc.	Wayfare Health Foods, LLC
T-Mobile USA, Inc.	Trioworld Corp	Unique Pretzel Bakery, Inc.	Velocity Boiler Works, LLC	Volpi Italian Foods Inc.	Wayne-Sanderson Farms LLC
Tnemec Comopany, Inc.	TRIXIE Pet Products, Inc.	United Construction Products	VELUX America LLC	Vornado Air, LLC	WD-40 Company
Toad&Co International Inc.	Tronex International	UNITED LEGWEAR COMPANY LLC	Ventura Foods, LLC	Voss Production Americas, Inc.	We Are The Chompians LLC
Tommy Bahama R&R Holdings, Inc.	Tropicana Manufacturing Company, Inc.	UNITED NATURAL FOODS, INC.	Venus Laboratories Inc.	VOXX Electronics Corporation	We Evolvetogether, INC.
	Tru Fru, LLC	United Salt Corporation	Verb Products Inc.	VTech Electronics North America LLC	Weather Shield Mfg., Inc.
		United States Bakery		Vuori, Inc.	WEHAH FARM, INC.

Welch Foods Inc., A Cooperative
Weld-On Adhesives, Inc.
Wellmore Holdings LP
Wellmore Holdings Parent LP
Wellness Marketing Corporation
Wellness Natural USA Inc.
Wellness Pet, LLC
Wells Enterprises, Inc.
Wells Lamont Industry Group, LLC
Wells Lamont LLC
Werner Gourmet Meat Snacks, Inc.
West Coast Paper Company
West Madison Foods
West Paw, Inc.
Western Pulp Products Co.
Westinghouse Lighting LP
Westlife Distribution LLC
Westman Atelier LLC
WESTMORE BEAUTY ULTRA, LLC
WestRock Company
WeVeel LLC
Weyco Group Inc.
WH Products, LLC
Wheels Manufacturing, LLC
Whirlpool Corporation
White Castle Food Products
White Toque LLC
White's Boots Inc.
Who Gives A Crap Inc.
Whole Foods Market Pacific Northwest, Inc.
Wholearth Brands
Wilbert Funeral Services, Inc.
Wilbur-Ellis Holdings II, LLC
WILCOX FARMS INC
Wild Alaskan, Inc.
Wild Pastures OC Inc.
Wild Planet Foods, Inc.

Wild West Chocolate, LLC
Wildlife Research Center, Inc.
Willamette Valley Meat Company
Willamette Valley Vineyards
WILLERT HOME PRODUCTS, INC.
William Grant & Sons Inc.
Wilson Sporting Goods Co.
Wilton Industries Inc.
WinCo Foods, LLC
Windsor Windows & Doors
Wine by Joe, LLC
Wineshipping.com LLC
Winfield Solutions, LLC
Winix America Inc.
Winland Foods, Inc.
Winning Solutions Inc.
Wintersteiger, Inc.rporated.
WIP Wholesale LLC
Wise Water Solutions LLC
WishGarden Herbs, Inc.
WK Kellogg Sales LLC
Wm. Bolthouse Farms, Inc.
WN Pharmaceuticals Inc.
Wolverine World Wide, Inc.
Wonder Group, Inc.
Wonderful Citrus Packing LLC
Wonderful Pistachios & Almonds LLC
Wondertreats, Inc.
Wood Castle Furniture Co.
Woodbolt Distribution, LLC
Woodford Manufacturing Company, LLC
Woodland Foods, LLC
Woods Equipment Company
Woodstream Corporation
Workwear Outfitters, LLC
World Centric
WORLD MARKET MANAGEMENT SERVICES LLC

World of Jeans & Tops
World Wide Gourmet Foods, Inc.
Worldwide Sport Nutritional Supplements, Inc.
Worthington Cylinder Corporation
WOW Tech USA Limited
X Mondo Hair LLC
Xerox Corporation
XYMOGEN
Yamaha Corporation of America
Yamaha Marine Systems Company
Yamaha Motor Corp. U.S.A.
Yamamoto of Orient, Inc.
Yanmar America Corporation
Yaxin Inc.
Yerba Prima, Inc.
Yergat Packing Co, Inc.
YETI Coolers, LLC
YG Laboratories, Inc.
Yoobi Global, LLC
Yradiant USA Inc.
YSL
YummyEarth Inc.
Yves Rocher North America Inc.
Zachary Confections, Inc.
ZARA USA, Inc.
Zep, Inc.
Zephyr Ventilation, LLC
Zest Brands LLC
Zidian Management, LLC
Ziehl-Abegg Inc.
Zinus
Z-Lite US Inc.
ZO Skin Health, Inc.
Zodiac Pool Systems LLC
Zoetis Inc.
Zojirushi America Corp
ZOLT LLC

ZPE Systems, Inc.
Zurn Holdings, Inc.

B. Non-Compliant Producers

None

C. Producer Exits

None

Listings are published on CAA Oregon’s website at circularactionalliance.org/oregon

Appendix D:

Actual Expenditures

A. Payments to Local Governments and Service Providers

ORS 459A.890 delineates the eligible expenses that local governments or local governments' service providers can request to be funded or reimbursed. These include:

- Transportation reimbursement
- Contamination reduction programming
- System expansion funding
- The cost of complying with ORS 459A.9908 (Roll carts)

Transportation Reimbursement (Glass)

Jurisdiction	Invoices (\$)
Bend	59,196
Brookings	9,424
Coos Bay	5,308
Douglas County	875
Eugene	51,254
Florence	4,680
Hood River	9,446
Keizer	3,240
La Grande	2,938
Madras	860
Newport	3,031
Salem	2,705
St. Helens	1,619
The Dalles	3,779
Total	158,355

Transportation Reimbursement (USCL)

Jurisdiction	Invoices (\$)
Bend	137,679
Brookings	25,326
Coos Bay	198,622
Florence	34,128
Grants Pass	50,573
Hood River	24,560
Jackson County	83,637
Klamath Falls	119,000
La Grande	7,739
Lincoln City	38,894
Madras	740
Newport	39,572
Ontario	1,290
The Dalles	22,671
Total	784,428

Contamination Reduction Programming

Jurisdiction	Invoices (\$)
Eugene	187,717
Roseburg	82,506
Wilsonville	41,630
Total	311,853

System Expansion Funding

Jurisdiction	Invoices (\$)
Cottage Grove	11,264
Roseburg	221,813
Total	233,077

Roll Carts

The RMA requires CAA to cover any cost differential when roll carts containing at least 10% post-consumer recycled (PCR) content cost more than comparable carts made from virgin material. To assess potential cost differences, CAA conducts quarterly market reviews by collecting pricing data from national suppliers for both virgin and PCR content roll carts. Pricing is analyzed by cart size to determine any material cost variance. Based on supplier pricing data for Q3 and Q4 2025, CAA found no material cost difference between virgin roll carts and those containing at least 10% PCR content.

Finance Reconciliation

The below table reflects the payments to Oregon jurisdictions for 2025 invoices at the time of Annual Report Submission ("2025 Invoices to Date") and compares them to CAA's internal Financial reporting and expense recognition for 2025 ("2025 Recognized Expenses (SOA)"). The SOA is CAA's Schedule of Activity totals for the 2025 Fiscal Year.

Budget Item	2025 Invoices to Date	2025 Recognized Expenses (SOA)	Over / Under Accrual	Notes
Transportation Reimbursement (glass)	\$158,355	\$296,513	\$(138,158)	Year end accrual for \$222K in Dec.—Higher than final 2025 invoices posted
Transportation Reimbursement (USCL)	\$784,428	\$1,393,809	\$(609,381)	2025 invoice postings lighter than forecasted/accrued for \$950K in Dec. 2025 accrual
Contamination Reduction Programming	\$311,853	\$6,323,146	\$(6,011,293)	YE accrual accounted for the entire 6-month liability of CRP in 2025. CAA accrued for this liability (\$6.3M), however at the time of Annual report only \$311K has been claimed and invoiced. Additional 2025 CRP expected to be claimed moving forward and new reconciliation expected post claim deadlines.
System Expansion	\$233,077	\$233,077	\$-	
TOTAL	\$1,487,713	\$8,246,545	\$(6,758,832)	

B. Payments to CRPFs

Total CMF & PCRF \$	CMF \$	CMF Tonnage	PCRF \$	PCRF Tonnage
\$19,211,978.09 ²⁸	\$3,013,759	8,435.71	\$16,198,218.63	136,242.94

CRPFs that received funding in 2025:

- EFI
- International Paper
- Waste Management
- FarWest Portland
- Republic Salem
- Westrock
- FarWest Hillsboro
- Waste Connections

²⁸ \$19.2M payments reflected differ from CAA SOA \$19.1M driven by CAA EOY under accrual.

Appendix E:

RecycleOn Center Locations

PROID	DEQ Permit Number	Name of collection point	Street Address	City	ZIP	County	Latitude	Longitude	Wasteshed	OBRC Zone Region	Collection Point Type	Existing Depot	Status
ROC_97754_1		Crook County Landfill	110 SW Landfill Rd.	Prineville	97754	Crook	44.2966	-120.861	Crook	4	RecycleOn Center		Operational
ROC_97702	1315	Deschutes Recycling/Knott Landfill	61050 SE 27TH St.	Bend	97702	Deschutes	44.01756	-121.253	Deschutes	4	DEQ permitted facility	Y	Operational
ROC_97520_1		Southern Oregon Goodwill Industries Ashland	777 E Jefferson Ave.	Ashland	97520	Jackson	42.1897	-122.688	Jackson	3	RecycleOn Center		Operational
ROC_97741		Madras Sanitary Recycle Depot (aka Owenjay)	1778 NW Mill St.	Madras	97741	Jefferson	44.6407	-121.138	Jefferson	4	RecycleOn Center		Operational
ROC_97756_1	430	Negus Transfer Station	2400 NE Maple Ave.	Redmond	97756	Deschutes	44.28976	-121.141	Deschutes	4	DEQ permitted facility	Y	Operational
ROC_97759		Northwest Transfer Station	68200 Fryrear Rd.	Unincorporated	97759	Deschutes	44.2715	-121.428	Deschutes	4	DEQ permitted facility	Y	Operational
ROC_97520_2		Recology Ashland Recycling Depot	220 Water St.	Ashland	97520	Jackson	42.20114	-122.713	Jackson	3	RecycleOn Center		Operational
ROC_97527_2		Republic Services Grants Pass Depot	1920 NW Washington Blvd.	Grants Pass	97526	Josephine	42.46112	-123.326	Josephine	3	DEQ permitted facility		Operational
ROC_97526_1		Republic Services Josephine Recycling and Transfer Station	1749 Merlin Rd.	Grants Pass	97526	Josephine	42.4837	-123.42	Josephine	3	DEQ permitted facility		Operational
ROC_97701		Republic Services-Bend Garbage and Recycling	20835 Montana Way	Bend	97701	Deschutes	44.0976	-121.298	Deschutes	4	DEQ permitted facility	Y	Operational
ROC_97502_1		Southern Oregon Goodwill Industries Central Point	1249 Plaza Blvd A.	Central Point	97502	Jackson	42.3775	-122.906	Jackson	3	RecycleOn Center		Operational
ROC_97526_2		Southern Oregon Goodwill Industries Grants Pass	346 NE Beacon Dr.	Grants Pass	97526	Josephine	42.4486	-123.309	Josephine	3	RecycleOn Center		Operational
ROC_97603		Southern Oregon Goodwill Industries Klamath Falls	3401 Washburn Way, Ste B.	Klamath Falls	97603	Klamath	42.2106	-121.758	Klamath	3	RecycleOn Center		Operational
ROC_97501_1		Southern Oregon Goodwill Industries Lars Way	2077 Lars Way	Medford	97501	Jackson	42.34643	-122.9	Jackson	3	RecycleOn Center		Operational
ROC_97501_2		Southern Oregon Goodwill Industries Medford	1241 S Riverside Ave Ste A.	Medford	97501	Jackson	42.3136	-122.879	Jackson	3	RecycleOn Center		Operational
ROC_97503_1		Southern Oregon Goodwill Industries White City	8080 Crater Lake Hwy, Ste A.	White City	97503	Jackson	42.4337	-122.858	Jackson	3	RecycleOn Center		Operational
ROC_97524		Southern Oregon Sanitation - Eagle Point	42 Ball Rd.	Eagle Point	97524	Jackson	42.4726	-122.803	Jackson	3	RecycleOn Center		Operational
ROC_97527_1	492	Southern Oregon Sanitation-Redwood Transfer Station	1381 Redwood Ave.	Grants Pass	97527	Josephine	42.4193	-123.328	Josephine	3	RecycleOn Center		Operational
ROC_97739_2		Southwest Transfer Station	U.S. 97 54580	Unincorporated	97739	Deschutes	43.6736	-121.503	Deschutes	4	DEQ permitted facility	Y	Operational
ROC_97503_2	483	Waste Connections-Rogue Disposal Transfer Station and MRF	8001 Table Rock Rd.	White City	97503	Jackson	42.43179	-122.888	Jackson	3	DEQ permitted facility	Y	Operational
ROC_97007_1		Aloha Garbage and Recycling	20525 SW Blanton St.	Beaverton	97007	Washington	45.49237	-122.899	Metro	1	DEQ permitted facility		Prospect
ROC_97814		Baker Sanitary Service	3110 Campbell St.	Baker City	97814	Baker	44.78237	-117.844	Baker	5	DEQ permitted facility	Y	Prospect
ROC_97621		Beatty Transfer	21000 Yellow Jacket Springs Rd.	Beatty	97261	Klamath	42.4749	-121.208	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97420_1		Beaver Hill Solid Waste Facility	55722 HWY 101	Unincorporated	97420	Coos	43.2176	-124.253	Coos	2	DEQ permitted facility	Y	Prospect
ROC_97818_1		Boardman Recycling Depot (Front Street NE)	NE BoaRd.man Ave.	Boardman	97818	Morrow	45.5692	-122.638	Morrow	5	DEQ permitted facility	Y	Prospect
ROC_97623		Bonanza Transfer	Bly Mountain Cutoff Rd.	Bonanza	97623	Klamath	42.2762	-121.403	Klamath	3	DEQ permitted facility	Y	Prospect

PROID	DEQ Permit Number	Name of collection point	Street Address	City	ZIP	County	Latitude	Longitude	Wasteshed	OBRC Zone Region	Collection Point Type	Existing Depot	Status
ROC_97361		Brandt's Sanitary	158 Pacific Ave S.	Monmouth	97361	Polk	44.84772	-123.23	Polk	1	DEQ permitted facility	Y	Prospect
ROC_97403_2		BRING Recycling	4446 Franklin Blvd.	Eugene	97403	Lane	44.04195	-123.031	Lane	2	DEQ permitted facility		Prospect
ROC_97416		Camas Valley Transfer Station	350 S Camas Valley Transfer Rd.	Camas Valley	97416	Douglas	43.0608	-123.884	Douglas	2	RecycleOn Center	Y	Prospect
ROC_97417		Canyonville Transfer Station	600 Jordan Creek Rd.	Canyonville	97417	Douglas	42.7267	-117.458	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97702		Cascade Disposal-Waste Connections	1300 SE Wilson Ave.	Bend	97702	Deschutes	44.0447	-121.287	Deschutes	4	DEQ permitted facility		Prospect
ROC_97703		Central Oregon Community College	2600 NW College Way	Bend	97703	Deschutes	44.0714	-121.349	Deschutes	4	RecycleOn Center		Prospect
ROC_97731		Chemult Landfill	400 Chemult Dump Rd.	Chemult	97731	Klamath	43.2167	-121.782	Klamath	3	RecycleOn Center	Y	Prospect
ROC_97624		Chiloquin Transfer	2301 Sprague River Hwy	Chiloquin	97624	Klamath	42.5792	-121.866	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97141		City Sanitary of Tillamook	2303 11St. St.	Tillamook	97141	Tillamook	45.4639	-123.843	Tillamook	1	DEQ permitted facility	Y	Prospect
ROC_97055	121	Clackamas County Sandy Transfer Station	19600 SE Canyon Valley Rd.	Sandy	97055	Clackamas	45.38226	-122.225	Metro	1	DEQ permitted facility	Y	Prospect
ROC_97016		Clatskanie City Park	35 Park St.	Clatskanie	97016	Columbia	46.1047	-123.207	Columbia	1	DEQ permitted facility	Y	Prospect
ROC_97051		Columbia County HHW & Transfer Station	1601 Railroad Ave.	St. Helens	97051	Columbia	45.84237	-122.816	Columbia	1	DEQ permitted facility	Y	Prospect
ROC_97230		COR Recycling	4530 NE 138TH Ave.	Portland	97230	Multnomah	45.55539	-122.517	Metro	1	DEQ permitted facility		Prospect
ROC_97730		Corvallis Disposal	110 NE Walnut Blvd.	Corvallis	97330	Benton	44.59225	-123.251	Benton	2	RecycleOn Center	Y	Prospect
ROC_97424_2		Cottage Grove Garbage	2055 Getty Cir.	Cottage Grove	97424	Lane	43.7924	-123.024	Lane	2	DEQ permitted facility	Y	Prospect
ROC_97424_2	383	Cottage Grove Transfer Station	78760 Sears Rd.	Cottage Grove	97424	Lane	43.7924	-123.024	Lane	2	DEQ permitted facility	Y	Prospect
ROC_97733		Crescent Transfer	3601 Crescent Cutoff Rd.	Gilchrist	97733	Klamath	43.3206	-121.593	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97306		D&O Garbage	1140 Boone Rd. SE	Salem	97306	Marion	44.88277	-123.032	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97322		Divert Albany Processing Facility	950 SE Jackson St.	Albany	97322	Linn	44.63127	-123.099	Linn	2	DEQ permitted facility		Prospect
ROC_97436		Elkton Transfer Station	250 Elkton Transfer Rd.	Elkton	97436	Douglas	43.6353	-123.575	Douglas	2	RecycleOn Center	Y	Prospect
ROC_97123	1718	Far West Recycling	6440 SE Alexander St.	Hillsboro	97123	Washington	45.49572	-122.915	Metro	1	DEQ permitted facility	Y	Prospect
ROC_97330		First Alternative Co-Op (3rd Street)	1007 SE Third. St.	Corvallis	97330	Benton	44.55385	-123.265	Benton	2	DEQ permitted facility	Y	Prospect
ROC_97439_1	416	Florence Transfer Station	2820 Rhododendron Dr.	Florence	97439	Lane	43.9882	-124.117	Lane	2	DEQ permitted facility	Y	Prospect
ROC_97830	472	Fossil Solid Waste Transfer Station and Recycling Station	17487 Black Butte County Rd. 19	Fossil	97830	Wheeler	45.0037	-120.205	Wheeler	5	DEQ permitted facility	Y	Prospect
ROC_97301_1	388	Gaffin Road Transfer Station	3250 Deer Park Rd SE	Salem	97301	Marion	44.87828	-122.969	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97303_3		Garten Recycling Center	3334 Industrial Way NE	Salem	97303	Marion	44.96846	-123.011	Marion	1	DEQ permitted facility		Prospect
ROC_97442		Glendale Transfer Station	240 Glendale Transfer Rd.	Glendale	97442	Douglas	42.7416	-123.419	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97403_1	289	Glenwood Central Receiving Station	3100 E. 17TH Ave.	Eugene	97403	Lane	44.0422	-123.047	Lane	2	DEQ permitted facility	Y	Prospect
ROC_97443		Glide Transfer Station	13921 Glide Transfer Rd.	Roseburg	97462	Douglas	43.3016	-122.931	Douglas	2	Return to Retail	Y	Prospect
ROC_97015		Grand Ronde Recycling Depot	Tyee Road	Grand Ronde	97128	Yamhill	45.0601	-123.609	Yamhill	1	RecycleOn Center	Y	Prospect

PROID	DEQ Permit Number	Name of collection point	Street Address	City	ZIP	County	Latitude	Longitude	Wasteshed	OBRC Zone Region	Collection Point Type	Existing Depot	Status
ROC_97210		Green Century Recycling	2950 NW 29th Ave	Portland	97210	Multnomah	45.5441	-122.711	Metro	1	RecycleOn Center		Prospect
ROC_97209		Ground Score	624 NW Couch St.	Portland	97209	Multnomah	45.5231	-122.677	Metro	1	RecycleOn Center		Prospect
ROC_97230_2		Habitat for Humanity Portland Metro	610 NE 181st Ave.	Gresham	97230	Multnomah	45.5274	-122.477	Metro	1	Return to Retail		Prospect
ROC_97216		Habitat for Humanity Portland Metro	10445 SE Cherry Blossom Dr.	Portland	97216	Multnomah	45.5136	-122.558	Metro	1	Return to Retail		Prospect
ROC_97005_1		Habitat for Humanity Portland Metro	13475 SW Millikan Way	Beaverton	97005	Washington	45.4933	-122.81	Metro	1	Return to Retail		Prospect
ROC_97501_3		Habitat Restore Rogue Valley	2233 S. Pacific Hwy	Medford	97501	Jackson	42.3036	-122.858	Jackson	3	Return to Retail		Prospect
ROC_97116		Habitat Restore West Tuality	3731 Pacific Ave.	Forest Grove	97116	Washington	45.5193	-123.096	Metro	1	Return to Retail		Prospect
ROC_97813		Humbert Refuse Landfill	79378 Gerking Flat Rd.	Athena	97813	Umatilla	45.8386	-118.497	Umatilla	5	DEQ permitted facility	Y	Prospect
ROC_97478		International Paper Springfield Recycling	800 48th St.,	Springfield	97478	Lane	44.0491	-122.962	Lane	2	DEQ permitted facility		Prospect
ROC_97221		James Recycling	5541 SW Beaverton-Hillsdale Hwy	Portland	97221	Multnomah	45.5189	-122.652	Metro	1	DEQ permitted facility		Prospect
ROC_97603_1		Keno Transfer	15353 Keno Worden Rd.	Keno	97603	Klamath	42.1236	-121.926	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97601_1		Klamath Falls Landfill	801 Old Fort Rd.	Klamath Falls	97601	Klamath	42.2357	-121.758	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97601_3		Klamath Works	2520 Montelius St.	Klamath Falls	97601	Klamath	42.2158	-121.773	Klamath	3	DEQ permitted facility	Y	Under contract
ROC_97303_1		Loren's Sanitation Service	1141 Chemawa Rd N	Keizer	97303	Marion	44.99734	-123.045	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97130		Manzanita Transfer Station	34995 Necarney City Rd.	Manzanita	97130	Tillamook	45.2021	-123.962	Tillamook	1	DEQ permitted facility	Y	Prospect
ROC_97303	400	Marion Resource Recovery Facility	3680 Brooklake Rd. NE.	Salem	97303	Marion	44.9963	-123.007	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97633		Merrill Transfer	13400 Lower Lake Rd.	Merrill	97633	Klamath	42.0035	-121.598	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97210	409	Metro Central Transfer Station	6161 NW 61st Ave.	Portland	97210	Multnomah	45.56777	-122.748	Metro	1	DEQ permitted facility	Y	Prospect
ROC_97113		Metro Cornelius property	N 4TH Ave & N Holladay St.	Cornelius	97113	Washington	45.52672	-123.067	Metro	1	DEQ permitted facility		Prospect
ROC_97214_1		Metro RID Deployment Center	1630 SE 8th Ave.	Portland	97214	Multnomah	45.51117	-122.657	Metro	1	DEQ permitted facility		Prospect
ROC_97045	350	Metro South Transfer Station	2001 Washington St.	Oregon City	97045	Clackamas	45.3705	-122.59	Metro	1	RecycleOn Center	Y	Prospect
ROC_97862_1		Milton-Freewater Recycling Depot	13 SE 9th	Milton-Freewater	97862	Umatilla	45.92745	-118.383	Milton-Freewater	5	DEQ permitted facility	Y	Prospect
ROC_97862_2		Milton-Freewater Sanitary Landfill	84222 Meharry Rd.	Milton-Freewater	97862	Umatilla	45.9333	-118.389	Milton-Freewater	5	DEQ permitted facility		Prospect
ROC_97457		Myrtle Creek Transfer Station	300 Myrtle Creek Transfer Rd.	Myrtle Creek	97457	Douglas	43.0285	-123.298	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97217		New Seasons Market Arbor Lodge	6400 N InterSt.ate Ave.	Portland	97217	Multnomah	45.56883	-122.682	Metro	1	Return to Retail		Prospect
ROC_97005_2		New Seasons Market Cedar Hills	3495 SW Cedar Hills Blvd.	Beaverton	97005	Washington	45.49438	-122.812	Metro	1	Return to Retail		Prospect
ROC_97211		New Seasons Market Concordia	5320 NE 33rd Ave.	Portland	97211	Multnomah	45.56123	-122.63	Metro	1	Return to Retail		Prospect
ROC_97232		New Seasons Market Grant Park	3210 NE Broadway	Portland	97232	Multnomah	45.5353	-122.63	Metro	1	Return to Retail		Prospect
ROC_97086		New Seasons Market Happy Valley	15861 SE Happy Valley Town Center Dr.	Happy Valley	97086	Clackamas	45.42843	-122.5	Metro	1	Return to Retail		Prospect
ROC_97214_2		New Seasons Market Hawthorne	4034 SE Hawthorne St.	Portland	97214	Multnomah	45.512	-122.629	Metro	1	Return to Retail		Prospect

PROID	DEQ Permit Number	Name of collection point	Street Address	City	ZIP	County	Latitude	Longitude	Wasteshed	OBRC Zone Region	Collection Point Type	Existing Depot	Status
ROC_97222		New Seasons Market Milwaukie	10840 SE Oak St.	Milwaukie	97222	Clackamas	45.4446	-122.629	Metro	1	Return to Retail		Prospect
ROC_97035		New Seasons Market Mountain Park	3 Monroe Parkway Ste R.	Lake Oswego	97035	Clackamas	45.43374	-122.703	Metro	1	Return to Retail		Prospect
ROC_97062		New Seasons Market Nyberg Rivers	7703 SW Nyberg St.	Tualatin	97062	Washington	45.38419	-122.756	Metro	1	Return to Retail		Prospect
ROC_97124		New Seasons Market Orenco Station	1453 NE 61St. Ave.	Hillsboro	97124	Washington	45.53448	-122.919	Metro	1	Return to Retail		Prospect
ROC_97034		New Seasons Market Palisades	1377 McVey Ave.	Lake Oswego	97034	Clackamas	45.4053	-122.678	Metro	1	Return to Retail		Prospect
ROC_97007		New Seasons Market Progress Ridge	14805 SW Barrows Rd, Ste 103	Beaverton	97007	Washington	45.43025	-122.829	Metro	1	Return to Retail		Prospect
ROC_97225		New Seasons Market Raleigh Hills	7300 SW Beaverton Hillsdale Hwy	Portland	97225	Multnomah	45.4876	-122.751	Metro	1	Return to Retail		Prospect
ROC_97202_1		New Seasons Market Sellwood	1214 SE Tacoma St.	Portland	97202	Multnomah	45.4655	-122.653	Metro	1	Return to Retail		Prospect
ROC_97202_2		New Seasons Market Seven Corners	1954 SE Division St.	Portland	97202	Multnomah	45.5047	-122.646	Metro	1	Return to Retail		Prospect
ROC_97210		New Seasons Market Slabtown	2170 NW Raleigh St.	Portland	97210	Multnomah	45.5338	-122.696	Metro	1	Return to Retail		Prospect
ROC_97203		New Seasons Market University Park	6300 N LombaRd. St.	Portland	97203	Multnomah	45.58506	-122.731	Metro	1	Return to Retail		Prospect
ROC_97227		New Seasons Market Williams	3445 N Williams Ave.	Portland	97227	Multnomah	45.548	-122.667	Metro	1	Return to Retail		Prospect
ROC_97206		New Seasons Market Woodstock	4500 SE WoodStock Blvd.	Portland	97206	Multnomah	45.47877	-122.616	Metro	1	Return to Retail		Prospect
ROC_97365_1	377	Newport Recycling Center	7450 NE Avery St.	Newport	97365	Lincoln	44.69167	-124.059	Lincoln	2	RecycleOn Center	Y	Prospect
ROC_97367_1		North Lincoln Sanitary Service (AKA Next Gen)	1726 SE Hwy 101	Lincoln City	97367	Lincoln	44.9557	-124.013	Lincoln	2	DEQ permitted facility	Y	Prospect
ROC_97071		North Marion County Recycling & Transfer Station	17827 Whitney Ln NE	Woodburn	97071	Marion	45.1776	-122.856	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97325		NW Greenlands Recology Aumsville	8712 Aumsville Hwy SE	Aumsville	97325	Marion	44.8661	-122.9	Marion	1	RecycleOn Center		Prospect
ROC_97462		Oakland Transfer Station	220 Oakland Sutherlin Transfer Rd.	Oakland	97462	Douglas	43.3885	-123.317	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97601		Odessa Transfer	26000 Hwy 140 West at mile post 48	Odessa	97601	Klamath	42.2675	-121.962	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97135		Pacific City Transfer Station	38255 S Brooten Rd.	Pacific City	97135	Tillamook	45.1994	-123.962	Tillamook	1	DEQ permitted facility	Y	Prospect
ROC_97305		Pacific Sanitation	3475 Blossom Dr. NE	Salem	97305	Marion	44.99394	-122.99	Marion	1	RecycleOn Center		Prospect
ROC_97751		Paulina Transfer Station	15595 SE Beaver Creek Rd.	Paulina	97751	Crook	44.0966	-119.951	Crook	4	RecycleOn Center	Y	Prospect
ROC_97801_1		Pendleton Recycling Depot (downtown)	610 SW Emigrant	Pendleton	97801	Umatilla	45.6721	-118.789	Umatilla	5	DEQ permitted facility	Y	Prospect
ROC_97801_2	444	Pendleton Transfer Station	5500 NW Rieth Rd.	Pendleton	97801	Umatilla	45.67023	-118.855	Umatilla	5	DEQ permitted facility	Y	Prospect
ROC_97370		Philomath Public Works	1515 Willow Ln.	Philomath	97370	Benton	44.53589	-123.364	Benton	2	RecycleOn Center		Prospect
ROC_97140	422	Pride Recycling Company	13910 SW Tualatin Sherwood Rd.	Sherwood	97140	Washington	45.36672	-122.819	Metro	1	RecycleOn Center	Y	Prospect
ROC_97103	382	Recology Astoria Transfer Station	1790 Williamsport Rd.	Astoria	97103	Clatsop	46.17657	-123.817	Clatsop	1	DEQ permitted facility	Y	Prospect
ROC_97128	1258	Recology Valley Recovery Zone	2200 NE OrchaRd. Ave.	McMinnville	97128	Yamhill	45.22046	-123.175	Yamhill	1	DEQ permitted facility	Y	Prospect
ROC_97520_3	475	Recology Valley View Transfer Station	3000 N. Valley View Rd.	Ashland	97520	Jackson	42.26325	-122.736	Jackson	3	DEQ permitted facility	Y	Prospect
ROC_97347		Recology Western Oregon Waste	26690 Salmon River Hwy	Grand Ronde	97347	Polk	45.06086	-123.576	Polk	1	DEQ permitted facility		Not feasible

PROID	DEQ Permit Number	Name of collection point	Street Address	City	ZIP	County	Latitude	Longitude	Wasteshed	OBRC Zone Region	Collection Point Type	Existing Depot	Status
ROC_97027		Red, White and Blue Thrift Store	19239 SE McLoughlin Blvd.	Gladstone	97027	Clackamas	45.3842	-122.594	Metro	1	Return to Retail		Prospect
ROC_97467		Reedsport Transfer Station	300 Reedsport Transfer Station Rd.	Reedsport	97467	Douglas	43.68987	-124.071	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97338		Republic Services - Dallas	1030 W. Ellendale Ave.	Dallas	97338	Polk	44.92977	-123.331	Polk	1	DEQ permitted facility	Y	Prospect
ROC_97321_1		Republic Services Albany-Lebanon Recycling Depot	1439 InduSt.rial Way	Albany	97321	Linn	44.6261	-123.103	Linn	2	DEQ permitted facility	Y	Prospect
ROC_97330	306	Republic Services Coffin Butte	29175 Coffin Butte Rd.	Corvallis	97330	Benton	44.6286	-123.278	Benton	2	DEQ permitted facility	Y	Prospect
ROC_97756_2		Republic Services High Desert Disposal	1090 NE Hemlock Ave.	Redmond	97756	Deschutes	44.2786	-121.169	Deschutes	4	DEQ permitted facility		Prospect
ROC_97739_1		Republic Services La Pine	51420 Russell Rd.	La Pine	97739	Deschutes	43.66814	-121.482	Deschutes	4	DEQ permitted facility	Y	Prospect
ROC_97701		Republic Services Mid-Oregon Recycling	63005 18th St.	Bend	97701	Deschutes	44.0976	-121.28	Deschutes	4	DEQ permitted facility	Y	Prospect
ROC_97381		Republic Services of Marion County - Silverton	830 McClaine St.	Silverton	97381	Marion	45.00623	-122.797	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97754_2		Republic Services Prineville Disposal Reload Station	1751 N Main St.	Prineville	97754	Crook	44.31713	-120.848	Crook	4	DEQ permitted facility	Y	Prospect
ROC_97071	381	Republic Services-Woodburn Recycle Center	2215 N Front St.	Woodburn	97071	Marion	45.1525	-122.855	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97070		Republic Willamette Resources TS/MRF	10295 SW Ridder Rd.	Wilsonville	97070	Washington	45.33287	-122.782	Metro	1	DEQ permitted facility	Y	Prospect
ROC_97720		Rim Rock Recycling	29903 Hotchkiss Lane #2	Hines	97720	Harney	43.55682	-119.076	Harney	4	DEQ permitted facility	Y	Under contract
ROC_97603_2		Rogue Klamath Transfer	4005 Tingley Lane, Klamath Falls	Rogue River	97603	Jackson	42.2076	-121.737	Jackson	3	DEQ permitted facility	Y	Prospect
ROC_97470		Roseburg Transfer Station	165 McClain West Ave.	Roseburg	97470	Douglas	43.1851	-123.376	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97367_2		Schooner Creek Public Transfer Station	367 S Anderson Creek Rd.	Lincoln City	97367	Lincoln	44.9253	-123.999	Lincoln	2	DEQ permitted facility	Y	Prospect
ROC_97138		Seaside Public Recycling Center	855 Avenue S	Seaside	97138	Clatsop	45.9827	-123.919	Clatsop	1	DEQ permitted facility	Y	Prospect
ROC_97378		Sheridan Recology Recycling Depot	957 SE Sheridan Rd.	Sheridan	97378	Yamhill	45.095	-123.392	Yamhill	1	RecycleOn Center		Prospect
ROC_97065	440	Sherman County Transfer Station	72526 Welk Rd.,	Wasco	97065	Sherman	45.6725	-120.688	Sherman	1	DEQ permitted facility	Y	Prospect
ROC_97394		South Lincoln Recycle & Transfer Station	3300 Crestline Dr.	Waldport	97394	Lincoln	44.4266	-124.068	Lincoln	2	DEQ permitted facility	Y	Prospect
ROC_97639		Sprague River Transfer	23101 Drews Rd.	Sprague River	97639	Klamath	42.4667	-121.505	Klamath	3	DEQ permitted facility	Y	Prospect
ROC_97424_3		St. Vincent De Paul	910 Row River Rd.	Cottage Grove	97424	Lane	43.7979	-123.043	Lane	2	RecycleOn Center		Prospect
ROC_97058_1		St. Vincent de Paul	505 West 9th St.	The Dalles	97058	Wasco	45.6004	-121.194	Wasco	1	RecycleOn Center		Prospect
ROC_97321_2		St. Vincent De Paul - Albany	2220 Pacific Blvd.	Albany	97321	Linn	44.6359	-123.078	Linn	2	RecycleOn Center	Y	Prospect
ROC_97404_1		St. Vincent De Paul - Chad	2890 Chad Dr.	Eugene	97408	Lane	44.08841	-123.061	Lane	2	RecycleOn Center		Prospect
ROC_97404_2		St. Vincent De Paul - Division	201 Division Ave.	Eugene	97404	Lane	44.08841	-123.061	Lane	2	RecycleOn Center		Prospect
ROC_97439_2		St. Vincent De Paul - Florence	2315 Hwy 101	Florence	97439	Lane	43.9871	-124.103	Lane	2	RecycleOn Center		Prospect
ROC_97402_1		St. Vincent De Paul - Garfield	888 Garfield St.	Eugene	97402	Lane	45.38226	-122.225	Lane	2	RecycleOn Center		Prospect
ROC_97402_2		St. Vincent De Paul - Hwy99	1175 State Hwy 99 N	Eugene	97402	Lane	45.38226	-122.225	Lane	2	RecycleOn Center		Prospect
ROC_97448		St. Vincent De Paul - Junction City	333 Pacific Hwy 99	Junction City	97448	Lane	44.21718	-123.205	Lane	2	RecycleOn Center		Prospect

PROID	DEQ Permit Number	Name of collection point	Street Address	City	ZIP	County	Latitude	Longitude	Wasteshed	OBRC Zone Region	Collection Point Type	Existing Depot	Status
ROC_97301_2		St. Vincent De Paul - Salem	445 Lancaster Dr.	Salem	97301	Marion	44.93498	-122.985	Marion	1	RecycleOn Center		Prospect
ROC_97402_3		St. Vincent De Paul - Seneca	705 S Seneca Rd.	Eugene	97402	Lane	44.0452	-123.127	Lane	2	RecycleOn Center		Prospect
ROC_97478		St. Vincent De Paul - Springfield Main	4555 Main St.	Springfield	97478	Lane	44.04512	-122.956	Lane	2	RecycleOn Center		Prospect
ROC_97477		St. Vincent De Paul - Springfield Q Street	199 Q St.	Springfield	97477	Lane	44.06165	-123.023	Lane	2	RecycleOn Center		Prospect
ROC_97317		Suburban Garage	6075 State St.	Salem	97317	Marion	44.92814	-122.937	Marion	1	DEQ permitted facility	Y	Prospect
ROC_97496		Sunrise Enterprises of Winston	126 SW Douglas Blvd.	Winston	97496	Douglas	43.1205	-123.428	Douglas	2	RecycleOn Center		Prospect
ROC_97479		Sutherlin Sanitary Service	1050 S Calapooia St.	Sutherlin	97479	Douglas	43.37742	-123.318	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97016		Swatco	15945 NW Sellers Rd.	Banks	97106	Washington	45.6762	-123.034	Metro	1	RecycleOn Center		Prospect
ROC_97213		The Arc of Portland	6929 NE Halsey St.	Portland	97213	Multnomah	45.5336	-122.595	Metro	1	RecycleOn Center		Prospect
ROC_97365_2		Thompsons Transfer and Disposal Agate Beach Transfer Station	8096 NE Avery St.	Newport	97365	Lincoln	44.6954	-124.061	Lincoln	2	DEQ permitted facility	Y	Prospect
ROC_97141	395	Tillamook Transfer Station	1315 Eckloff Rd.	Tillamook	97141	Tillamook	45.41404	-123.853	Tillamook	1	DEQ permitted facility	Y	Prospect
ROC_97484		Tiller Transfer Station	150 Tiller Transfer Rd.	Tiller	97484	Douglas	42.7393	-123.425	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97391		Toledo Transfer Station	5441 West Hwy 20	Toledo	97391	Lincoln	44.6215	-123.939	Lincoln	2	DEQ permitted facility	Y	Prospect
ROC_97232		Trash For Peace	2201 Lloyd Center Ste 2029	Portland	97232	Multnomah	45.5338	-122.654	Metro	1	RecycleOn Center		Prospect
ROC_97882		Umatilla Recycling Depot	Corner of Sixth Street and Yerxa Ave.	Umatilla	97882	Umatilla	45.1752	-121.081	Umatilla	5	Return to Retail	Y	Prospect
ROC_97223		Value Village Thrift Store	12060 SW Main St.	Tigard	97223	Washington	45.4293	-122.772	Metro	1	DEQ permitted facility		Prospect
ROC_97838_4		Wallowa County Recycling Center	301 Fish Hatchery Ln.	Enterprise	97828	Wallowa	45.4266	-117.278	Wallowa	5	DEQ permitted facility	Y	Prospect
ROC_97761		Warm Springs Landfill	4430 Dry Creek Trail Rd.	Warm Springs	97761	Jefferson	44.7467	-121.264	Jefferson	4	DEQ permitted facility	Y	Prospect
ROC_97013	443	Waste Connections Canby Transfer & Recycling Center	1600 SE 4TH Ave.	Canby	97013	Clackamas	45.26106	-122.676	Metro	1	DEQ permitted facility	Y	Prospect
ROC_97286		Waste Connections City of Echo Recycling Depot	334 West Main St.	Echo	97286	Umatilla	45.7436	-119.199	Umatilla	5	RecycleOn Center	Y	Prospect
ROC_97037		Waste Connections City of Maupin Recycling Depot	604 Water Ave.	Maupin	97037	Wasco	45.1752	-121.081	Wasco	1	RecycleOn Center	Y	Prospect
ROC_97823	415	Waste Connections Condon Transfer Station	18342 Brown Ln.	Condon	97823	Gilliam	42.1897	-121.736	Gilliam	5	DEQ permitted facility	Y	Prospect
ROC_97415		Waste Connections Curry Transfer and Recycling	17498 Carpenterville Rd.	Brookings	97415	Curry	42.0904	-124.299	Curry	2	DEQ permitted facility	Y	Prospect
ROC_97403_2	458	Waste Connections Ecosort Material Recovery Facility	3425 E 17TH Ave.	Eugene	97403	Lane	44.0371	-123.05	Lane	2	DEQ permitted facility		Prospect
ROC_97029_1		Waste Connections Grass Valley glass depot	South St. and Hwy 216	Grass Valley	97029	Sherman	45.3597	-120.787	Sherman	1	RecycleOn Center		Prospect
ROC_97838_1		Waste Connections Hermiston Recycling Depot	220 W Harper Rd.	Hermiston	97838	Umatilla	44.28354	-121.157	Umatilla	5	RecycleOn Center	Y	Prospect
ROC_97031		Waste Connections Hood River Transfer Station	3440 Guignard Dr.	Hood River	97031	Hood River	45.68311	-121.533	Hood River	1	DEQ permitted facility	Y	Prospect
ROC_97015		Waste Connections KB Recycling MRF	9602 SE Clackamas Rd.	Happy Valley	97015	Clackamas	45.40995	-122.565	Metro	1	DEQ permitted facility	Y	Prospect
ROC_97403_1		Waste Connections Lane County	1650 Glenwood Blvd.	Eugene	97403	Lane	44.0373	-123.039	Lane	2	RecycleOn Center		Prospect
ROC_97041		Waste Connections Mt. Hood Recycling Depot	Mt. Hood Town Hall 6675 OR-Highway 35	Mt. Hood	97520	Hood River	45.5192	-121.599	Hood River	1	DEQ permitted facility	Y	Prospect

PROID	DEQ Permit Number	Name of collection point	Street Address	City	ZIP	County	Latitude	Longitude	Wasteshed	OBRC Zone Region	Collection Point Type	Existing Depot	Status
ROC_97818_2	1261	Waste Connections North Morrow County Transfer Station	69900 Frontage Ln.	Boardman	97818	Morrow	45.8325	-119.622	Morrow	5	DEQ permitted facility	Y	Prospect
ROC_97914	436	Waste Connections Ontario Sanitary Service Transfer Station	540 SE 9th Ave.	Ontario	97914	Malheur	44.01658	-116.957	Malheur	5	DEQ permitted facility	Y	Prospect
ROC_97029_2		Waste Connections Rufus glass depot	400 Main St.	Rufus	97029	Sherman	45.6936	-120.72	Sherman	1	RecycleOn Center		Prospect
ROC_97839	406	Waste Connections South Morrow Transfer Station	57185 Hwy 74	Heppner	97839	Morrow	45.49941	-119.792	Morrow	5	DEQ permitted facility	Y	Prospect
ROC_97058_2	462	Waste Connections The Dalles Transfer Station and HHW Facility	1317 W 1st St.	The Dalles	97058	Wasco	45.6111	-121.199	Wasco	1	DEQ permitted facility	Y	Prospect
ROC_97420_2	401	Waste Connections West Coast Recycling and Transfer	1210 S. Broadway St.	Coos Bay	97420	Coos	43.3628	-124.218	Coos	2	DEQ permitted facility	Y	Prospect
ROC_97501_4		Waste Connections-Rogue Disposal Glass 1 - Sherm's Thunderbird	2347 W Main St.	Medford	97501	Jackson	42.3225	-122.901	Jackson	3	RecycleOn Center		Prospect
ROC_97504_1		Waste Connections-Rogue Disposal Glass 2 - Food4Less	2230 Biddle Rd.	Medford	97504	Jackson	42.3452	-122.874	Jackson	3	RecycleOn Center		Prospect
ROC_97504_2		Waste Connections-Rogue Disposal Glass 3 - Rogue Credit Union	955 N. Phoenix Rd.	Medford	97504	Jackson	42.3342	-122.836	Jackson	3	RecycleOn Center		Prospect
ROC_97502_2		Waste Connections-Rogue Disposal Glass 4 - Ray's Market	126 E Pine St.	Central Point	97502	Jackson	42.3739	-122.916	Jackson	3	RecycleOn Center		Prospect
ROC_97530		Waste Connections-Rogue Disposal Glass Depot #6 - Ray's Market	401 N 5th St.	Jacksonville	97530	Jackson	42.31599	-122.965	Jackson	3	RecycleOn Center		Prospect
ROC_97838_2	429	Waste Connections-Sanitary Disposal Transfer Station	81144 N Hwy 395	Hermiston	97838	Umatilla	45.88592	-119.298	Umatilla	5	DEQ permitted facility	Y	Prospect
ROC_97386	365	Waste Connections-Sweet Home Sanitation Transfer Station	1325 18TH Ave.	Sweet Home	97386	Linn	44.39961	-122.723	Linn	2	DEQ permitted facility	Y	Prospect
ROC_97116	368	Waste Management Forest Grove Transfer Station	1525 B St.	Forest Grove	97116	Washington	45.5196	-123.105	Metro	1	DEQ permitted facility	Y	Prospect
ROC_97132	366	Waste Management Newberg Transfer and Recycling Center	2904 Wynooski Rd.	Newberg	97132	Yamhill	45.28539	-122.949	Yamhill	1	DEQ permitted facility	Y	Prospect
ROC_97850		Waste-Pro Transfer Station	3412 US-30	La Grande	97850	Union	45.3065	-118.057	Union	5	DEQ permitted facility	Y	Prospect
ROC_97601_2		WM Reload Facility	1812 Greensprings Dr.	Klamath Falls	97601	Klamath	42.2174	-121.77	Klamath	3	RecycleOn Center	Y	Not feasible
ROC_97499		Yoncalla Transfer Station	555 Yoncalla Transfer Rd.	Yoncalla	97499	Douglas	43.5989	-123.287	Douglas	2	DEQ permitted facility	Y	Prospect
ROC_97123_2	1280	Hillsboro Landfill	3215 SE Minter Bridge Rd.	Hillsboro	97123	Washington			Metro	1	DEQ permitted facility	Y	Not feasible
ROC_97818_1		Boardman Recycling Depot (Front Street NE)	NE Boardman Ave.	Boardman	97818	Morrow	45.5692	-122.638	Morrow	5	DEQ permitted facility	Y	Prospect

Appendix F:

RecycleOn Center Audits

A. Audit Checklist

Today's Date _____ Open Date _____

Site Name _____ Site ID _____

Site Address _____

Hours of ROC Operation _____

Primary site contact _____

Type of Site:

- RecycleOn Center (Container) 20 / 40
- Donation Center RecycleOn Spot
- Consolidation Point

Details _____

Number of totes on site _____ Number of bag frames on site _____

State of equipment _____

Other collection equipment (CAA or other — list items and state of equipment)

Access to Site

Access to RecycleOn Center or bins paved or ADA accessible? Y/N

Proximity to public transportation Y/N (500 ft) Totes or storage area for OBRC/Collector paved and accessible? Y/N

Who collects from this site? _____

Performance Standards

Hours Signs visible Y/N

Collected material kept out of weather Y/N

Program Information Available Y/N

Staff works to prevent contamination Y/N (explain efforts for preventing and handling):

Campus is relatively litter and debris free Y/N. Notes: _____

Onsite staff has read RecycleOn Collectors Handbook Y/N. Notes: _____

Onsite staff awareness of RecycleOn collection standards Y/N. Notes: _____

Security apparatus or measurements on site Y/N. Describe: _____

Other issues of note: _____

To Do: _____

Site Staff Name: _____

Site Staff Signature: _____

Date: _____

CAA Staff Signature: _____

B. RecycleOn Centers Audited in 2025

Unique Site Id	Location Name	Address	City	ZIP	Wasteshed	Audit Date
ROC_97754_1	Crook County Landfill	110 SW Landfill Rd.	Prineville	97754	Crook	2025-11-24
ROC_97520_1	Goodwill of Southern Oregon Ashland	777 E Jefferson Ave	Ashland	97520	Jackson	2025-11-20
ROC_97520_2	Recology Ashland Recycling Depot	220 Water Street	Ashland	97520	Jackson	2025-11-20
ROC_97527_2	Republic Services Grants Pass Depot	1920 NW Washington Blvd	Grants Pass	97526	Josephine	2025-11-20
ROC_97526_1	Republic Services Josephine Recycling and Transfer Station	1749 Merlin Rd.	Grants Pass	97526	Josephine	2025-11-20
ROC_97502_1	Southern Oregon Goodwill Industries Central Point	1249 Plaza Blvd A,	Central Point	97502	Jackson	2025-11-20
ROC_97526_2	Southern Oregon Goodwill Industries Grants Pass	346 NE Beacon Dr	Grants Pass	97526	Josephine	2025-11-19
ROC_97603	Southern Oregon Goodwill Industries Klamath Falls	3401 Washburn Way Suite B.	Klamath Falls	97603	Klamath	2025-11-19
ROC_97501_1	Southern Oregon Goodwill Industries Lars Way	2077 Lars Way	Medford	97501	Jackson	2025-11-19
ROC_97501_2	Southern Oregon Goodwill Industries Medford	1241 S Riverside Ave Suite A,	Medford	97501	Jackson	2025-11-20
ROC_97503_1	Southern Oregon Goodwill Industries White City	8080 Crater Lake Hwy Suite A	White City	97503	Jackson	2025-11-19
ROC_97524	Southern Oregon Sanitation - Eagle Point	42 Ball Rd.	Eagle Point	97524	Jackson	2025-11-20
ROC_97527_1	Southern Oregon Sanitation-Redwood Transfer Station	1381 Redwood Ave	Grants Pass	97527	Josephine	2025-11-20

Appendix G:

Contamination Audit Center

Results by Jurisdiction

In Sept. 2025, CAA began processing samples at its Contamination Audit Center to better understand the composition and quality of recycled materials collected across the Oregon recycling system. The results of these audits are shared regularly with participating communities to support targeted contamination reduction efforts. Additionally, CAA is committed to publishing the aggregated results by region on an annual basis, contained in this appendix.

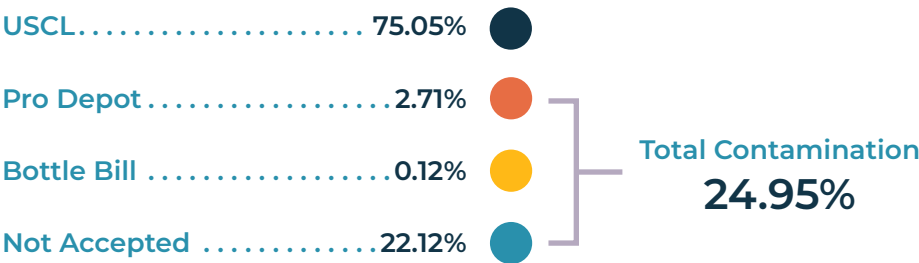
Since the opening of the Contamination Audit Center, 554 audits were processed. Of these, 544 samples represented the Metro Portland region and only 10 samples came from the rest of the state. Due to the small number of samples from regions outside of Metro Portland and low statistical confidence in the results, these results have been omitted from the report. As CAA continues to process an increasing number of samples from across the state, additional regional data will be available in future reports.

CAA will be moving to a randomized sample selection process later in 2026. This approach will ensure more areas of the state will be sampled, allowing more characterization reports to be prepared. The reports will include a pie chart showing the breakdown by major category and a table showing the percentage breakdown by each of the 122 audit categories. Reports will be prepared for individual communities where there are at least two audit samples available. More regional reports may be prepared as necessary, ensuring a higher level of confidence in the results.

Metro Portland Audit Results

Material Category	Percentage
Printed Paper	13.20%
Paper Packaging — No Liquids	58.39%
Paper Packaging — With Liquids	0.74%
Aluminum	0.39%
Steel	2.58%
Plastics — #1 PET Rigid	2.00%
Plastics — #2 HDPE Rigid	2.39%
Plastics — #3 PVC Rigid	0.01%
Plastics — #4 LDPE Rigid	0.06%
Plastics — #5 PP Rigid	0.68%
Plastics — #6 PS Rigid	0.15%
Plastics — #7 Others Rigid	0.61%
Plastics Flexible	1.06%
Other Plastic	0.07%
Glass Container	1.50%
Organic Materials	0.45%
Deposit Containers	0.79%
Miscellaneous	6.35%
Hazardous Materials	0.93%
Other	7.67%
Total	100%

Metro Portland Contamination Breakdown by Material Class



Appendix H: Sample E&O Materials



Contamination Meta reel frame



Contamination Meta post



Recycling

Reciclaje
Rác Tái chế
Resiklo

回收 재활용
पुनर्चक्रण
إعادة التدوير

Переработка отходов
Dibu warshadayn
Переробка відходів

Oregon cart label

Recycling Tip

Consejo de reciclaje

Don't bag your recyclables. Place recyclables loose in your cart.

No coloque los reciclables en bolsas. Coloque los reciclables sueltos en su contenedor.



localwebsite.gov | 123-456-7890



English/Spanish info card - front

Recycling Guide

Thanks for recycling these items! All items must be empty and dry.



Following the guidelines of what is allowed in your recycling bin saves natural resources, reduces pollution and creates jobs.



Scan for: العربية, 简体中文, 繁體中文, 藏語, 中文, 한국어, Русский, Af-Soomaali, español, Tagalog, українська, tiếng Việt.

Plastic



Bottles, tubs, buckets, and rigid plant pots
Caps OK if screwed on. All items must be 2 inches by 2 inches or larger.

Metal



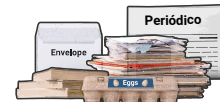
Aluminum and steel cans and scrap metal
Less than 10 pounds and 18 inches.

Cardboard and Cartons



Flattened cardboard, packaging boxes, food and beverage cartons
Pizza boxes must be empty with no food residue.

Paper



Newspaper, magazines, office paper, egg cartons, mail, paperback books, bags, and non-metallic gift wrap

No!



No bagged recyclables



No batteries



No food or liquid (empty all containers)



No plastic bags or stretchy plastics (store or depot drop-off)



No hoses, cords, or wires



Recycling guide



Thanks for recycling these items!

¡Gracias por reciclar estos materiales!

All items must be empty and dry. Todos los artículos deben estar vacíos y secos.



Plastic bottles, tubs, buckets, and rigid plant pots

Botellas, cubetas, macetas rígidas y envases de plástico



Aluminum and steel cans, and scrap metal

Latas de aluminio y de acero y chatarra metálica



Flattened cardboard boxes, and food and beverage cartons

Cajas de cartón corrugado aplanadas y cajas de cartón para alimentos y bebidas



Paper, newspaper, magazines, egg cartons, mail, paperback books, and paper bags

Papel, periódicos, revistas, cartones para huevo, correo, libros de carátula suave y bolsas de papel

No! ¡No!



No bagged recyclables

No se acepta el reciclaje en bolsas de plástico



No plastic bags or stretchy plastics

No se aceptan bolsas de plástico ni plásticos flexibles



No food or liquid

No se aceptan restos de comida ni líquidos



No batteries

No se aceptan baterías/pilas

Spanish – Std.

English/Spanish info card - back



Thanks for recycling these items!

All items must be empty and dry.



Scan for:
简体中文,
Русский,
español,
tiếng Việt.



Plastic bottles, tubs, buckets, and rigid plant pots



Aluminum and steel cans, and scrap metal



Flattened cardboard boxes, and food and beverage cartons



Paper, newspaper, magazines, egg cartons, mail, paperback books, and paper bags

No!



No bagged recyclables



No plastic bags or stretchy plastics



No food or liquid



No batteries



Bill insert - English side



¡Gracias por reciclar estos materiales!

Todos los artículos deben estar vacíos y secos.



Scan for:
简体中文,
Русский,
español,
tiếng Việt.



Botellas, cubetas, macetas rígidas y envases de plástico



Latas de aluminio y de acero y chatarra metálica



Cajas de cartón corrugado aplanadas y cajas de cartón para alimentos y bebidas



Papel, periódicos, revistas, cartones para huevo, correo, libros de carátula suave y bolsas de papel

¡No!



No se acepta el reciclaje en bolsas de plástico



No se aceptan bolsas de plástico ni plásticos flexibles



No se aceptan restos de comida ni líquidos



No se aceptan baterías/pilas



Spanish — Std.

Bill insert - Spanish side

Recycling Glass

Vidrio Thủy tinh 玻璃 Стекло

Bottles and Jars



Scan for: العربية, 简体中文, 繁體中文, हिन्दी, 한국어, Русский, Af-Soomaali, español, Tagalog, українська, tiếng Việt.



No!



No bagged recyclables



No plastic bags or stretchy plastics

Decal - glass

Recycling

Recicle Rác tái chế 回收 Утилизировать вторсырьё



Plastic



Metal



Cardboard and Cartons



Paper



Scan for: العربية, 简体中文, 繁體中文, हिन्दी, 한국어, Русский, Af-Soomaali, español, Tagalog, українська, tiếng Việt.



No!



No bagged recyclables



No plastic bags or stretchy plastics

Decal

Recycling Guide

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Scan for: العربية, 简体中文, 繁體中文, 繁體中文, हिन्दी, 한국어, Русский, Af-Soomaali, español, Tagalog, українська, tiếng Việt.

Plastic



Bottles, tubs, buckets, and rigid plant pots

Caps OK if screwed on. All items must be 2 inches by 2 inches or larger.

Metal



Aluminum and steel cans and scrap metal

Less than 10 pounds and 18 inches.

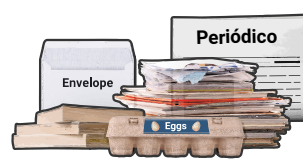
Cardboard and Cartons



Flattened cardboard, packaging boxes, food and beverage cartons

Pizza boxes must be empty with no food residue.

Paper



Newspaper, magazines, office paper, egg cartons, mail, paperback books, bags, and non-metallic gift wrap

No!



No bagged recyclables



No batteries



No food or liquid (empty all containers)



No plastic bags or stretchy plastics (store or depot drop-off)



No hoses, cords, or wires



OOPS! ¡Ups!

Please leave these items out!
¡Por favor, deje estos artículos fuera!



**No bagged
recyclables**

*No se acepta el reciclaje
en bolsas de plástico*



**No plastic bags or
stretchy plastics**

*No se aceptan bolsas
de plástico ni plásticos
flexibles*



No food or liquid

*No se aceptan restos
de comida ni líquidos*



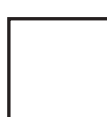
No batteries

*No se aceptan
baterías/pilas*



**No hoses,
cords, or wires**

*No se aceptan
mangueras, cables
ni cadenas*



**Other
Otros**



Scan for: العربية, 简体中文, 繁體中文, हिन्दी,
한국어, Русский, Af-Soomaali, español,
Tagalog, українська, tiếng Việt.



Thanks for recycling these items!

¡Gracias por reciclar estos materiales!

All items must be empty and dry.

Todos los artículos deben estar vacíos y secos.



**Plastic bottles, tubs,
buckets, and rigid
plant pots**

*Botellas, cubetas,
macetas rígidas y
envases de plástico*



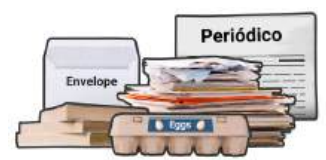
**Metal cans, foil, empty
aerosols, scrap metal,
and empty paint cans**

*Latas de metal, papel de
aluminio, aerosoles vacíos,
chatarra metálica y latas de
pintura vacías*



**Flattened cardboard
boxes, and food and
beverage cartons**

*Cajas de cartón corrugado
aplanadas y cajas de
cartón para alimentos y
bebidas*



**Paper, newspaper,
magazines, egg cartons,
mail, paperback books,
and paper bags**

*Papel, periódicos, revistas,
cartones para huevo, correo,
libros de carátula suave y
bolsas de papel*

Glass Vidrio



Place in glass bin

*Colóquelos en el contenedor
exclusivo para vidrio*

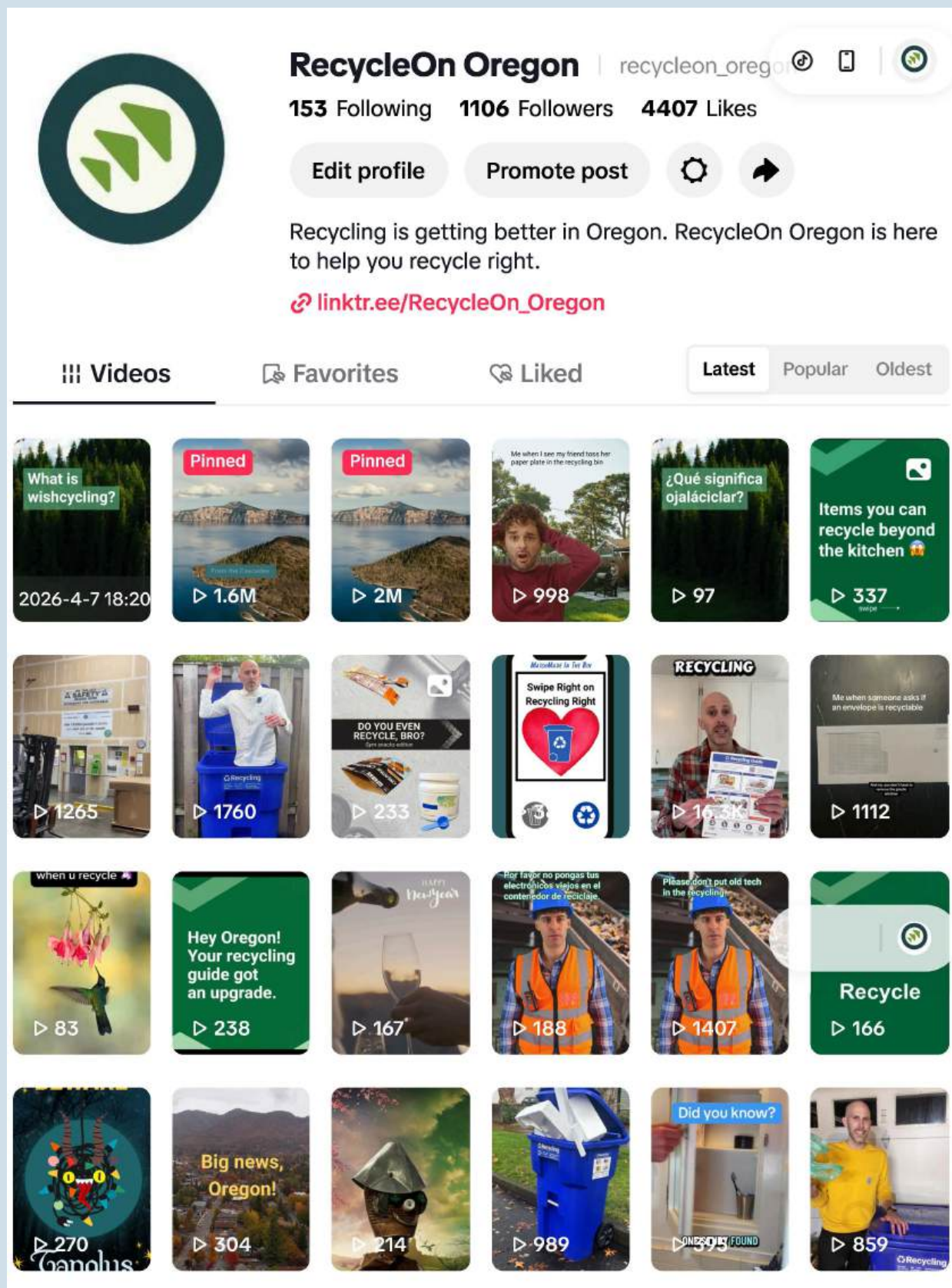
Bottles and jars

Botellas y frascos de vidrio

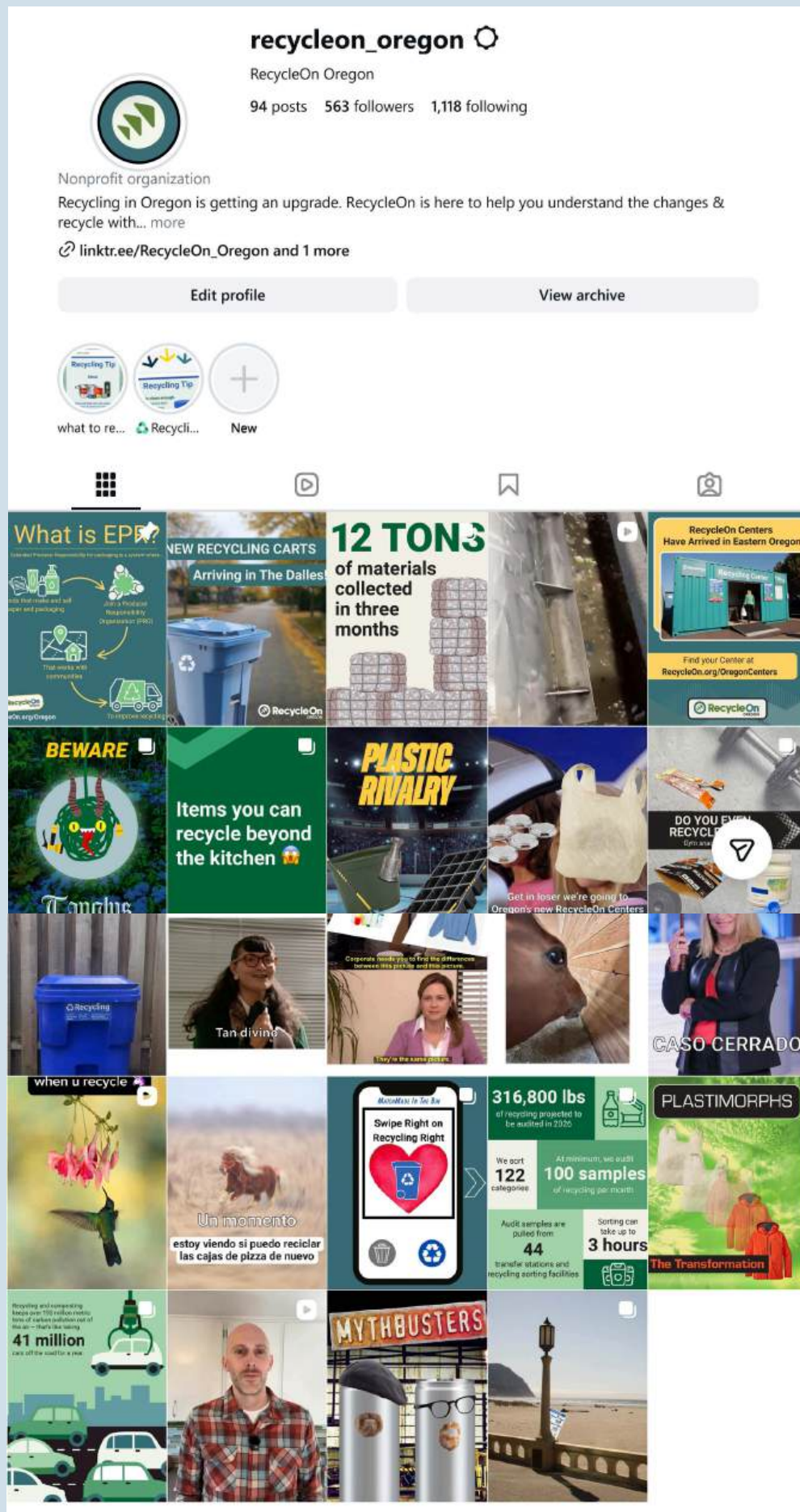
Spanish — Alt.

English/Spanish oops tag - front

English/Spanish oops tag - back



RecycleOn Oregon Tiktok profile



RecycleOn Oregon Instagram profile

RecycleOn Center And Glass Depot Locator

Some Items Can't Go in Your Bin, But You Can Still Recycle Them

Some items can't go in your recycling at home or work. But that doesn't mean they can't be recycled!

By the end of 2027, more than 140 new RecycleOn Centers will open across the state. These free, drop-off centers will make it easier to recycle more items.

Select your language to download the RecycleOn Center guide in your language:

Select your language

Download the Guide



Find a Location Near You

Use the tool below to find a RecycleOn Center or glass recycling depot near you.

Don't see one yet? Don't worry! Over 140 locations will open across Oregon by the end of 2027. Scroll down to see a full list of what's accepted.

Filter by Category

Ashland Recycling Center
 Categories:
 Glass Bottles And Jars
 Aluminum Foil And Trays
 Plastic Bags And Stretchy Plastics
 Plastic Buckets And Pails
 Plastic Lids
 Rigid Plastic Package Handles
 Shredded Paper
 220 Water St.
 Ashland, OR 97520, USA
 Mon Closed
 Tue - Sat 9 a.m. - 5 p.m.
 Sun Closed
[Directions](#)

Baker Sanitary

What Are RecycleOn Centers?

Helping You to Recycle More Items

RecycleOn Centers are convenient drop-off locations for items that aren't accepted in your recycling bin at home or work. There is no cost to use RecycleOn Centers.

This includes items like plastic bags, plastic lids, plastic buckets, shredded paper and aluminum foil.

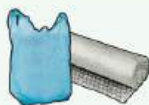
Community members with disabilities who are unable to transport their recycling to a RecycleOn Center can request a free pickup using this [form](#).

Businesses with large volumes of materials, please [Contact Us](#) to arrange for alternative collections.

! RecycleOn Centers are not bottle return locations and won't offer deposit refunds.

What do RecycleOn Centers Accept?

Plastic Bags & Stretchy Plastic



Empty and dry. Your finger should be able to stretch the plastic easily. If it stretches instead of tearing or crinkling, it's usually accepted. Skip anything that's shiny, crunchy, or foil-lined, like candy wrappers, chip bags, pet food bags, or pouches. No six-pack rings.

Plastic Lids and Caps



Clean and dry plastic lids from items like yogurt, salsa and other containers. Screw on plastic caps from items like cartons, bottles, jugs and other containers.

Rigid Plastic Package Handles

Plastic Buckets & Pails

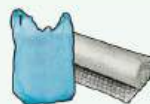
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Plastic Lids and Caps



Clean and dry plastic lids from items like yogurt, salsa and other containers. Screw on plastic caps from items like cartons, bottles, jugs and other containers.

Rigid Plastic Package Handles



Plastic Buckets & Pails



Aluminum Foil & Trays



Empty and dry. Ball foil up as best you can.

Shredded Paper



In a paper bag, rolled, or stapled shut.

Glass Bottles and Jars



The Latest News From Oregon



Garden & Yard Season: What to Do with Empty Soil Bags, Plant Pots and Fertilizer Containers

BLOG



Understanding Oregon's Recycling Guidelines: February Q&A

BLOG



Why Wishcycling Hurts Recycling (and What to Do Instead)

BLOG



An initiative of Circular Action Alliance

Mission

Recycling 101

What is EPR?

The Latest

For Industry

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What Can I Recycle?

What You Recycle Matters – Help Oregon Do It Right

Every item you correctly recycle helps create a cleaner, more circular economy for Oregon. Together, we can make a real impact by recycling right.

Select your language to download the statewide recycling guide in your language:

Select your language

Download the Guide

What Can I Recycle?

Help Oregon recycle better! Recycling only the items accepted by your community helps keep the system running smoothly, reduces the cost of recycling, and ensures that more materials are turned into new products.

Below is the base list that most Oregon communities recycle. Learn what items your community recycles using the tool below, and recycle with confidence:

Plastic



Plastic bottles, tubs, jugs and rigid plant pots

Caps OK if screwed on. All items must be 2 inches by 2 inches or larger

Metal



Aluminum and steel cans

Empty and dry

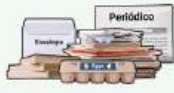
Cardboard & Cartons



Flattened cardboard, packaging boxes, and food and beverage cartons

No food residue or frozen food boxes

Paper



Newspaper, magazines, mail and paper bags

No paper towels or napkins

Glass Bottles & Jars



Please place in a separate bin or drop-off at a collection point



All items must be empty and dry

Pour liquids down the drain and, if possible, compost food waste.



No Bagged Recyclables

Place recyclables directly into the bin, do not pre-bag.

Enter your Oregon address to see your recycling options:



Search for your address here

See My Options

What Can't I Recycle?

Not sure what goes in your bin? Don't guess! Use the recycling look-up tool or check with your local recycling program for clear guidance. When the wrong items end up in the recycling, they can damage

What Can't I Recycle?

Not sure what goes in your bin? Don't guess! Use the recycling look-up tool or check with your local recycling program for clear guidance. When the wrong items end up in the recycling, they can damage equipment and ruin other recyclables.

Below are items that should NEVER go in your recycling bin. Keeping them out helps make recycling safer, cleaner, and more effective for everyone.



Plastic bags and stretchy plastics

These items tangle in recycling equipment and cause accidents or injuries. Take these to a [RecycleOn Center](#) or find other options for recycling at [PlasticFilmRecycling.org](#)



Batteries

Batteries can start fires at garbage and recycling facilities. Never put batteries inside your garbage or recycling bin. Find recycling options at [The Battery Network](#)



Food and liquids

Dirty and wet containers can spoil other recyclables. Pour liquids down the drain and, if possible, compost food waste.



Hoses, cords and wires

Items like these get caught in recycling machinery. [Contact](#) your recycling company or local government for recycling or disposal options.



Non-recyclable plastics

Not all plastics can be recycled. Plastic utensils, straws, and clamshell



Frozen food boxes

These boxes have a coating to protect them in the freezer that also reduces their



Electronics

These items create safety hazards and need special handling. Visit [Oregon E-Cycles](#) to find recycling options near you.



Clothing

Clothing should not be placed in your recycling bin as it can jam sorting equipment. Consider donating them.



Diapers and medical waste

These items create unsafe conditions for recycling workers and should never be recycled. [Contact](#) your garbage company or local

The Latest News From Oregon



Garden & Yard Season: What to Do with Empty Soil Bags, Plant Pots and Fertilizer Containers

BLOG



Understanding Oregon's Recycling Guidelines: February Q&A

BLOG



Why Wiserecycling Hurts Recycling (and What to Do Instead)

BLOG



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What is EPR?

The Latest

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Contact Us

Follow us for the latest

Enter your email



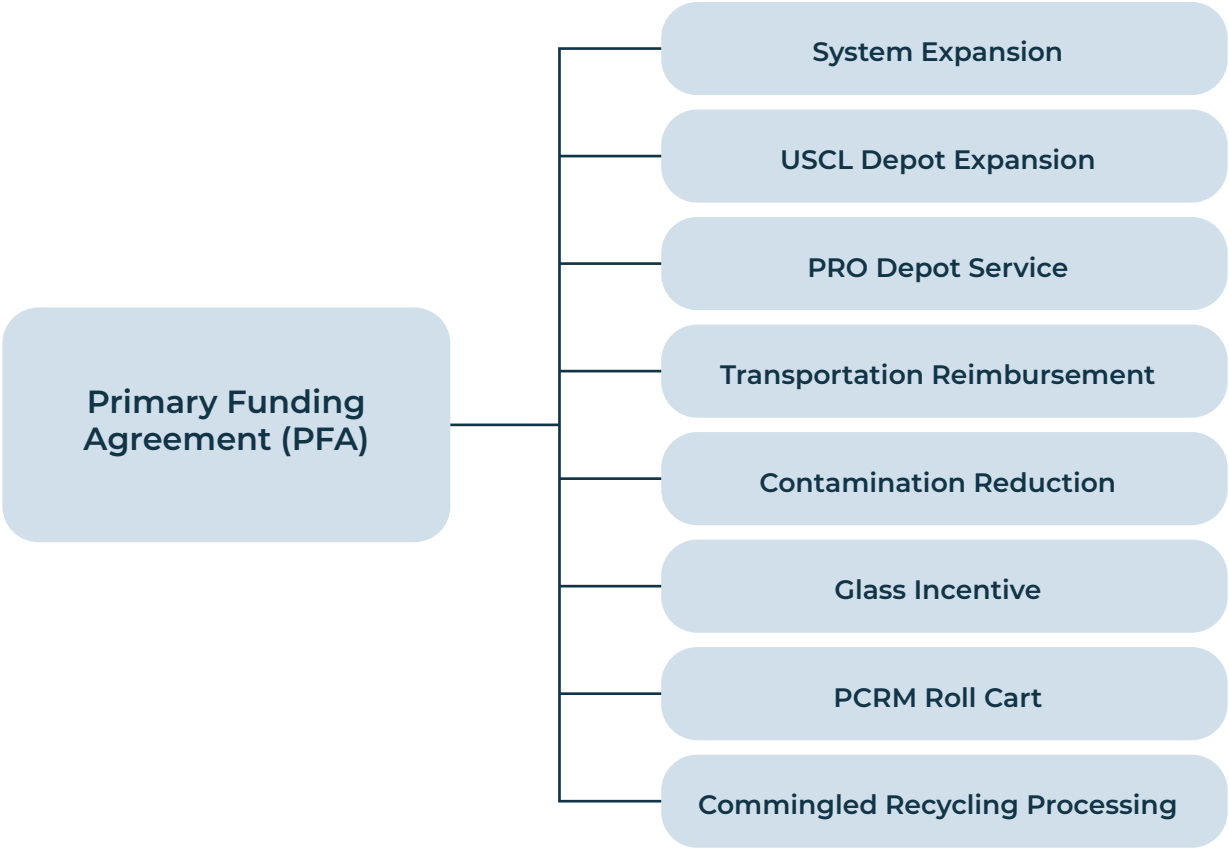
Appendix I:

Funding Methods

Funding Agreements

CAA Oregon’s funding agreement structure includes a Primary Funding Agreement (PFA) and an individual addendum for each funding stream. The PFA outlines the general terms of the funding relationship, while the addendum provides the specific details and terms of that specific funding stream.

To receive payment or reimbursement from CAA Oregon, both the PFA and a relevant addendum must be signed by the recipient and CAA Oregon. This applies to all communities, service providers and partner organizations that are applying for funding from CAA Oregon, whether for system expansion, glass incentive, transportation, etc. Each funding stream will have its own addendum.



Primary Funding Agreement (PFA) Process

1. The fillable [PFA](#) is downloaded, completed, and emailed to oregoninfo@circularaction.org.
2. CAA reaches out for edits and approval.
3. When CAA legal counsel finalizes edits, the final PFA is sent for signature.

Addendum Consultation Process

1. Once the PFA is signed, CAA sends a welcome email with portal login instructions. The email typically arrives within 2-3 business days from serviceproviders.support@circularaction.org.
2. A second email starts the addendum consultation and includes a CAA specialist's contact information and introduces the relevant funding applications.
3. To facilitate the addendum process, a CAA specialist works with each funding recipient to complete an application for each relevant funding addendum. Addendum consultations for glass, transportation, and CRPFs are prioritized.
4. CAA legal counsel provides each final addendum. These can be edited and approved before the execution process.
5. When CAA legal counsel has finalized edits, they send the final addendum for signature.

Addendum Type	Estimated Timeframe for Engagement	Estimated Timeline for Completion
Glass Incentive, Transportation Reimbursement, Commingled Recycling Processing (CRPF)	Beginning of program period, Q2/Q3 2025	2–3 weeks consultation
Contamination Reduction	Q3 2025	2–3 weeks consultation
System Expansion	Ongoing based on identified priority group A - F (Q3 2025 – Q4 2027)	2–3 weeks consultation
PRO Depot (Recycling Center)	Ongoing	Based on Regional 1-5 rollout (Q3 2025 – Q4 2026)
USCL Depot	Ongoing based on identified priority group A – F (Q3 2025 – Q4 2027)	1–2 weeks consultation
PCRM Roll Cart	CAA will notify each jurisdiction when there is a roll cart pricing market change	No cost difference at this time

Funding for Glass Reimbursement, PRO Depots and Contamination Reduction follow the standard consultation reimbursement process. Additional information on Transportation Reimbursement and System Expansion funding are below:

Transportation Funding

1. **Initial Outreach:** CAA performed initial outreach to the service providers known to be 50 miles or greater from an existing Commingled Recycling Processing Facility (CRPF) or Responsible End Market (REM).
2. **Responses Received:** As the service providers responded to communications and conversations, CAA staff ensured that the Primary Funding Agreement (PFA) between CAA and the service provider was signed and executed. If not, then CAA staff sent the Primary Funding Agreement to the service provider and informed them that this must be signed and executed to move forward.
3. **Draft Application Sent:** If the PFA was signed/executed, then CAA staff sent the draft Transportation Reimbursement application together with an offer to schedule a virtual meeting or phone call to further explain the application and answer any questions that the service provider might have.
4. **Application Specifics:** The type of application is dependent on the material being hauled 50 miles or more, and the location of the service provider's reload facility in relation to the nearest CRPF or REM for that material. The three types of Transportation Reimbursement applications for service providers are:
 - a. Commingled & Glass Transportation Reimbursement Application;
 - b. Glass Only Transportation Reimbursement Application; and
 - c. Source Separated Transportation Reimbursement Application.
5. **Received Draft Applications:** CAA received draft transportation reimbursement applications from service providers with their populated information. This information includes origin, destination, truck type, material, tons/haul, annual tons and per haul cost. Each application is processed as follows:
 - a. **Haul Costs Comparison:** CAA applies a transportation model developed by a third party that references hauling, tonnage, route data and labor to calculate the haul costs between Reload facilities and CRPFs. CAA staff uses this model and these costs to compare to assess service provider applications.
 - b. **Application Approval:** The reimbursement application undergoes a multi-tiered internal approval process that takes into consideration the proposed costs and associated transportation routes. The annual funding for each material is calculated. An approved application triggers the development of an addendum that sets out the reimbursement details, including jurisdiction, service provider estimated hauls cost per haul, total annual reimbursement estimate. The addendum is then sent to the service provider for signature.
 - c. **Process Approved Applications:** Purchasing Order Established: Upon receipt of the executed addendum, CAA creates a PO and the service provider is registered in the CAA portal.
 - d. **Invoicing and Reports:** Each service provider invoice must include a corresponding report that the service provider downloads from the portal and uploads in the portal as an attachment along with a pdf of the invoice. The attached report includes individual haul charge amounts, total haul charges, pdf invoice amount, and portal invoice amount must all match or CAA will return the invoice for revision.
 - e. **Invoice is Submitted for Approval:** The final step in the process is supervisor approval and finance then submits for payment to the service provider.

System Expansion Funding

1. **Initial Outreach and Consultation:** CAA conducts initial outreach to the community to introduce the program, confirm points of contact and hold a consultation to discuss needs, timing and overall process.
2. **ORSOP Results Verification:** CAA and the community review and verify ORSOP results to ensure data accuracy and alignment with current system conditions before moving forward.
3. **System Expansion Application Sent to Community:** CAA prepares and sends the System Expansion (SE) application to the community for completion.
4. **Community Returns SE Application with Equipment Quote:** The community completes and returns the SE application, including required equipment specifications and vendor quotes.
5. **SE Addendum Prepared and Sent for Execution:** Based on the approved application, CAA prepares the System Expansion addendum and sends it to the community for review and execution.
6. **Purchase Orders Issued by CAA:** Upon execution of the SE addendum, CAA issues purchase orders for the approved equipment.
7. **Community Orders Equipment:** The community places equipment orders in accordance with the approved purchase orders.
8. **CAA Reimburses Community for Received Equipment:** After equipment is received and documentation is submitted, CAA reimburses the community for eligible costs.
9. **Equipment Placed and Services Begin:** The community places the equipment into service and expanded or improved recycling services begin.

Appendix J:

Implementation Timelines

Program Plan Development & Approval Process/Compliance	Details	Comments	Timeline
Program Plan Submission Deadline — V1			Week of Mar. 25, 2024
ORSAC review — V1		Delayed from Mar. to Apr.	Week of Apr. 22 to week of July 22, 2024
Final deadline for DEQ approval or rejection of v1 plan submission	(120 days after submission with 30 days for public comment)		Week of July 29, 2024
Revised plan submission	(+60 days)		Week of Sept. 23, 2024
DEQ approve or reject revised submission	(+90 days)	Originally scheduled Dec. 12	Week of Nov. 11, 2024
2024 Annual Admin Fee Provisional Invoice	Sept. 2024	First invoice delayed with approval from DEQ to 7/2025	Week of Sept. 2, 2024 Week of Sept. 1 to week of Sept. 22, 2025
Potential Program Plan Approval			Week of Dec. 30, 2024
2024 Annual Admin Fee Due	(within 30 days of final invoice)	First invoice delayed with approval from DEQ to 7/2025	
Recurring Annual Admin invoice date	(Sept. 1 of preceding program year for payment within 30 days)	First invoice received July 10, 2025	Week of July 14, 2025
Recurring Annual Admin Fee Due	(within 30 days of invoice)	First invoice paid Aug. 10, 2025	Week of Aug. 11, 2025
Deadline to submit for next program plan	(180 days before end of program — July 4, 2027)		
Confirmation of 10% threshold	(Dec. 31 each year)		Week of Dec. 30, 2024 Week of Dec. 29, 2025 Week of Dec. 28, 2026
Goals	Details	Comments	Timeline
Measurement against targets/goals begins			Week of July 1, 2024 Week of July 7, 2025 Week of July 6, 2026 Week of July 5, 2027

Local Government Compensation	Details	Comments	Timeline
Detail to be added during Oregon Recycling System Optimization Project			
LGs and Service Providers System Expansions and Improvements	Local government and service provider consultation and discussion		Week of Apr. 1, 2024 to week of Sept. 28, 2026
	Updated Program Plan Funding Schedule and Estimates		Week of Aug. 26 to week of Sept. 23, 2024
	Pre-Program Funding Negotiations		Week of Apr. 1 to week of June 24, 2024
	Funding Disbursements (As per program plan schedule)		
Transportation Funding	Local government and service provider consultation and discussion		Week of Apr. 1, 2024 to week of June 30, 2025
	Updated Program Plan Amendments	No amendment submitted	
	Pre-Program Program Registrations		Week of Apr. 1 to week of June 24, 2024
	Funding Disbursements		Week of July 7, 2025 to week of Dec. 27, 2027
Contamination Reduction Funding	Local government and service provider consultation and discussion		Week of Apr. 1 to week of Aug. 26, 2024
	Updated Program Plan Amendments	No amendment submitted	Week of Aug. 26 to week of Sept. 23, 2024
	Pre-Program Program Registrations		Week of Jan. 6 to week of June 30, 2025
	Funding Disbursements Begin		Week of July 7, 2025 to week of Dec. 27, 2027
Roll Carts	Local government and service provider consultation and discussion		Week of Apr. 1 to week of Aug. 26, 2024
	Updated Program Plan Amendments	No amendment submitted	Week of Aug. 26 to week of Sept. 23, 2024
	Pre-Program Program Registrations		
	Funding Disbursements Begin	No disbursements in 2025 due to no material difference in the cost of virgin roll carts compared to roll carts containing a minimum of 10% recycled content	Week of Apr. 6, 2026 to week of Dec. 27, 2027

PRO Depot Network	Details	Comments	Timeline
Establishing a depot collection system	Preliminary negotiations with depots		Week of Apr. 1 to week of Sept. 16, 2024
	Consultations with CBOs, women & minority-owned businesses & underserved populations		Week of Apr. 1 to week of Sept. 16, 2024
	Updated Program Plan Amendments	No amendment submitted	Week of Aug. 26 to week of Sept. 23, 2024
	Finalization of Service Contracts	Contract negotiations are ongoing throughout the program period	Week of Nov. 4, 2024 to week of Dec. 27, 2027
	Collection points open & operational	The first RecycleOn Center opened in Southern Oregon in Sept. 2025	Week of Nov. 4, 2024 to week of Dec. 27, 2027
Education & Outreach	Details	Comments	Timeline
Audience research	Quantitative survey, analysis and reporting		Week of Apr. 1 to week of May 27, 2024
	Qualitative research: concept testing for English and Spanish campaigns		Week of July 1 to week of Sept. 30, 2024
	Qualitative research: concept testing for 6 other languages		Week of Oct. 21, 2024 to week of Mar. 3, 2025
Statewide campaign	Campaign conceptualing		Week of May 27 to week of June 17, 2024
	Naming and mark development		Week of May 6 to week of June 10, 2024
	Media planning, discussion, approval and hotsheet of ad specs developed		Week of Oct. 14 to week of Nov. 18, 2024
	PR planning, messaging and materials development		Week of Dec. 16, 2024 to week of Mar. 3, 2025 Week of Mar. 31 to week of May 26, 2025
	Media negotiation and coordination		Week of May 5 to week of July 28, 2025
	Campaign launches first with PR/local governments		Week of June 30 to week of July 28, 2025
	Ad campaign and other outreach launches		Week of Aug. 4 to week of Nov. 24, 2025
	Formal campaign launch (July 1, 2025)		

Education & Outreach	Details	Comments	Timeline
Stakeholder engagement	Initial engagement of CBOs		Week of May 6 to week of June 24, 2024 Week of June 30, 2025
	Develop local government engagement plan/process outline		Week of Apr. 8 to week of May 27, 2024
	Business association outreach		Week of Mar. 10 to week of June 30, 2025
Consultations with ORSAC	Proposed: Review campaign concept prior to testing		Week of June 23 to week of June 30, 2025
	Proposed: Audience research and campaign concept presentation		Week of Sept. 22 to week of Oct. 13, 2025
	Proposed: Review key messaging, creative direction, etc. prior to production		Week of Oct. 27 to week of Nov. 17, 2025
Communications strategy	USCL instructions/communications strategy		Week of Aug. 4 to week of Sept. 8, 2025
	Local government review of USCL instructions/communications strategy		Week of Sept. 15 to week of Oct. 13, 2025
	Compile and incorporate feedback		Week of Oct. 6 to week of Oct. 13, 2025
	Ongoing communications: getting accurate information to all residents, businesses and institutions to educate on new recycling behaviors		Week of July 7 to week of Dec. 29, 2025
	Deliver support to effectively engage frequent, infrequent and non-participating audiences to increase capture of materials		Week of Jan. 5, 2026 to week of Dec. 27, 2027

Education & Outreach	Details	Comments	Timeline
Production of materials	Batch 1 materials due 2/1/25: USCL guide, cart label, style guide, messaging timeline, newsletter article, web domain/QR code (English only) available for download but not yet on portal		Week of Oct. 20, 2025 to week of Feb. 9, 2026
	Batch 2 materials due 4/1/25: Social toolkit, press release, newsletter article, website with "change is coming" messaging, print materials (USCL mailer/poster, postcard, bill insert, depot/enclosure signage). Available in all languages.		Week of Dec. 1, 2025 to week of Mar. 2, 2026
	Transcreation of Batch 2 materials		Week of Mar. 9 to week of Apr. 6, 2026
	Batch 3 materials due 6/1/25: Website strategy, design, development and QC to have live, updated with downloadable materials		Week of Jan. 5 to week of May 25, 2026
	Batch 4 materials due 7/1/25: Ad materials (video, radio, banner, social, native, OOH, print, search). English and Spanish first (17 weeks) followed by remaining languages (8 weeks).		Week of Dec. 1, 2025 to week of Apr. 27, 2026
	Transcreation of Batch 4 materials		Week of May 4 to week of June 29, 2026
Portal development	Mail house coordination		Week of Mar. 2 to week of June 29, 2026
	Portal design (must begin after Batch 1 materials are final)		Week of Feb. 2 to week of Feb. 23, 2026
	Portal testing		Week of Mar. 2 to week of Mar. 23, 2026
	Portal launch (with English first, other languages added later as available)		Week of Apr. 6 to week of Apr. 27, 2026

Materials: Transition to USCL	Details	Comments	Timeline
To be adapted per material once plan is approved	Detailed plan development in coordination with DEQ, MRFs, end markets and producers		Week of Apr. 1, 2024 to week of June 30, 2025
	Proposed timing for inclusion on the USCL: PET thermoforms	Materials on-ramping research is ongoing throughout the program plan period	Week of July 5, 2026
	Proposed timing for inclusion on the USCL: Transparent blue and green PET bottles	Materials on-ramping research is ongoing throughout the program plan period	
	Proposed timing for inclusion on the USCL: Spiral wound containers	Materials on-ramping research is ongoing throughout the program plan period	
Materials: SIMs	Details	Comments	Timeline
To be adapted per material once plan is approved	Detailed plan development in coordination with DEQ, MRFs, end markets and producers		Week of Apr. 1, 2024 to week of June 30, 2025
	Begin implementation of plans		Week of July 7, 2025
Responsible End Markets (REMs) — Verification	Details	Comments	Timeline
Review Program Plan (DEQ comments)	Anticipating revisions from DEQ and resubmission of program plan		Week of Apr. 1 to week of Apr. 29, 2024
	Finalize and approve Program Plan REM Content V2	First REM amendment was submitted on Aug. 12, 2025.	Week of Apr. 29 to week of Sept. 23, 2024
Initial screening assessments (step 1)	Distribute Self-Attestation form (Collaboration with CRPFs)		Week of July 1 to week of Sept. 23, 2024
	Provide access to service provider portal for them to access self attestation form		Week of July 1, 2024 to week of June 30, 2025
	Direct reach out to certain end markets entities (~40)		Week of Sept. 2 to week of Dec. 30, 2024
	Start negotiation with brokers and access their clients self-attestation forms		Week of Nov. 18, 2024 to week of May 12, 2025
	Complete all self-attestation forms by July 1, 2025 (and on-going after)		Week of May 12 to week of June 30, 2025

Responsible End Markets (REMs) — Verification	Details	Comments	Timeline
Develop Material Flow Management System	See portal details		
	Pilot system with 1 targeted CRPF for 1 commodity (commissioning, troubleshooting)		Week of May 6 to week of June 24, 2024
	Adapt system based on pilot results		Week of June 24 to week of Aug. 26, 2024
	Develop system training content		Week of July 29, 2024 to week of Feb. 24, 2025
	Start service providers training (if needed)		Week of Mar. 3 to week of June 30, 2025
Select Verification Body(ies)	Finalize protocol for audit and random bale tracking	Initial audit conducted by Verico in Apr. 2025 to inform REM amendment efforts	Week of July 8 to week of Aug. 26, 2024
	Write and publish RFP	Pending amendment approval	Week of Aug. 26 to week of Oct. 14, 2024
	Select verification body(ies)	Pending amendment approval	Week of Oct. 14 to week of Dec. 30, 2024
Engage end market entities	Reach out to reclaimers to explain REM requirements (~100)		Week of July 1 to week of Oct. 28, 2024
	Prepare agreement allowing data sharing and chain of custody control		Week of Nov. 4, 2024 to week of Mar. 31, 2025
	Sign agreement with end market entities		Week of Mar. 31 to week of June 30, 2025

Responsible End Markets (REMs) — Verification	Details	Comments	Timeline
Start annual verification (step 2)	List local, state and national laws and international treaties applicable to the different entities	Pending approval of REM amendment	Week of Jan. 6 to week of Feb. 24, 2025
	Select sites to be audited (based on criteria developed)	Pending approval of REM amendment	Week of Mar. 3 to week of Apr. 28, 2025
	Start pre-audit exchange information	Pending approval of REM amendment	Week of May 5 to week of June 30, 2025
	Perform audit	Pending approval of REM amendment	Week of July 7 to week of Dec. 29, 2025
	Produce audit reports	Pending approval of REM amendment	Week of Jan. 5 to week of Apr. 20, 2026
	Reach out to non-compliant entities for implementation of corrective actions	Pending approval of REM amendment	Week of Apr. 27 to week of Aug. 3, 2026
	Receive evidence of corrective actions and update audit reports	Pending approval of REM amendment	Week of Aug. 10 to week of Dec. 21, 2026
	Decide possible intervention and inform CRPFs/brokers for non-compliant entities	Pending approval of REM amendment	Week of Dec. 28, 2026 to week of Apr. 5, 2027
	Produce required information PR 340-090-0670(3)(f) - Complete by July 1, 2027	Pending approval of REM amendment	Week of Apr. 5 to week of June 28, 2027
Responsible End Markets (REMs) — Intervention and material management	Details	Comments	Timeline
Prepare marketing and processing contracts	Define REM clauses for processing contract		Week of Jan. 6 to week of Jan. 27, 2025
	External validation of REM clauses		Week of Jan. 27 to week of Feb. 24, 2025
	Prepare MSA for end market entities		Week of Feb. 24 to week of Mar. 31, 2025
	External validation of MSA for end market entities		Week of Mar. 31 to week of Apr. 28, 2025
	Outreach to end market entities for materials under CAA's control (PRO, material CAA has taken ownership of)		Week of Apr. 28 to week of May 19, 2025
	Negotiate contract with end market entities		Week of May 19 to week of June 30, 2025

Responsible End Markets (REMs) — Intervention and Material Management	Details	Comments	Timeline
Undertake practicable actions for non-compliant REM	Based on verification results, decide to take action or not, and type of action		Week of July 7 to week of Sept. 29, 2025
	Develop action plan and budget accordingly	Practicable action reports were submitted on Oct. 3, 2025 and Dec. 1, 2025 summarizing outreach to end markets and self attestation engagement.	Week of Oct. 6 to week of Dec. 29, 2025
Reporting & Communications	Details	Comments	Timeline
Quarterly disposition reporting	(no later than 45 days after end of each calendar quarter)	All required quarterly reports were submitted within the appropriate schedule.	Week of Sept. 29 to week of Oct. 27, 2025 Week of Dec. 29, 2025 to week of Jan. 26, 2026
Annual Reports due	(July 1 each year)		Week of July 7, 2025 Week of July 6, 2026 Week of July 5, 2027
CAA DEQ Meetings	Meeting Frequency to be Determined	CAA and DEQ have regularly scheduled syncs every other week	Week of Apr. 8, 2024 to week of Dec. 29, 2025, every other week Week of Jan. 26, 2026 to week of Dec. 27, 2027, every four weeks
ORSAC Engagement	Meeting Frequency to be Determined	CAA attends all ORSAC meetings and presented as requested by the committee chair. CAA also regularly attends relevant ORSAC Sub committee meetings as requested.	
Local Governments	Meeting Frequency to be Determined	Meetings with LGs are held as part of the contracting, system expansion and ROC development process. CAA offered additional meeting opportunities for Local Governments at the Annual AOR Conference held in June, 2025 and at the League of Oregon Cities conference on Oct. 2, 2025	
PCRFs	Meeting Frequency to be Determined	Meetings with PCRFs are held monthly	

Other Stakeholders	Meeting Frequency to be Determined	Meetings with Haulers, CBOs and other stakeholders are held as part of the contracting, system expansion and ROC development process. CAA offered additional meeting opportunities for Haulers and CRPFs at the ORRA Conference held in Sept., 2025. All Interested parties were offered meeting opportunities at the AOR Conference held in June, 2025	
Producer Engagement	Meeting Frequency to be Determined	LCA Life Cycle Assessment report of top 25 producers to DEQ submitted Aug. 1, 2025 PRO of approved PP must have members with combined market share at least 10% of total combined market share of all producers submitted Dec. 31, 2025	
Website updates to reflect searchable registry of compliant members	(at least once per calendar quarter)	Posted Sept. 30, 2025 and updated on Dec. 31, 2025	Week of July 7, 2025 Week of Oct. 6, 2025 Week of Jan. 5, 2026
Fees	Details	Comments	Timeline
Initial Program Plan Fee Schedule 2025			Week of Mar. 25, 2024
Revised Program Plan Fee Schedule 2025			Week of Sept. 30, 2025
Producers register and provide data reports to CAA			Week of Mar. 3 to week of Mar. 31, 2025
Final Fee Schedule for 2025			Week of June 16, 2025
CAA provides supply and market share reports to DEQ			Week of Aug. 4, 2025 Week of Mar. 23, 2026 Week of June 29, 2026 Week of Mar. 29, 2027 Week of June 28, 2027
CAA sets fees and invoices producers for subsequent program years		2026 fees were published in the producer portal on Oct. 29, 2025. Confirming Oct. 1 is the plan for releasing fee schedules for each year forward.	Week of Oct. 6, 2025 Week of Oct. 5, 2026 Week of Oct. 4, 2027

IT & Portal Development	Details	Comments	Timeline
Front Office CRM and Portals (Producer, Service Provider, Municipality)	Delivery Sprints Leading to Go Live		Week of Mar. 4, 2024 to week of June 16, 2025
	Steady State Support	Producer portal launched Nov. 24 SPP portal launched June, 2025	Week of June 23, 2025 to week of Dec. 27, 2027
Front Office Stakeholder Support Services Call Center	Delivery Sprints Leading to Go Live		Week of Apr. 1 to week of Dec. 30, 2024
	Steady State Support	Implemented Nov. 2024	Week of Jan. 6, 2025 to week of Dec. 27, 2027
Back Office HR & Payroll	Delivery Sprints Leading to Go Live		Week of Mar. 4 to week of Dec. 30, 2024
	Steady State Support	Implemented Nov. 2024	Week of Jan. 6, 2025 to week of Dec. 27, 2027
Back Office Finance (including Project Accounting & Procurement)	Delivery Sprints Leading to Go Live		Week of Mar. 4 to week of Dec. 30, 2024
	Steady State Support	Implemented Nov. 2024	Week of Jan. 6, 2025 to week of Dec. 27, 2027
Security & Infrastructure	Cybersecurity	Implemented Nov. 2024	Week of Apr. 1, 2024 to week of June 28, 2027
	Computers, Firewalls, Tools and IT Support Desk	Implemented Nov. 2024	Week of Mar. 4, 2024 to week of June 28, 2027
Data Quality, Governance, Master Data Management	Delivery Sprints Leading to Go Live		Week of Mar. 4 to week of Dec. 30, 2024
	Steady State Support	Launched June 2025	Week of Jan. 6, 2025 to week of Dec. 27, 2027
Data Lake, Reporting and Analytics	Delivery Sprints Leading to Go Live		Week of Apr. 1 to week of Dec. 30, 2024
	Steady State Support	Launched June 2025	Week of Jan. 6, 2025 to week of Dec. 27, 2027

Appendix K:

Collected Materials Indexed Against Population

Tons of material collected through commingled, depot and other applicable programs from July – Dec. 2025, indexed against population metrics. Waste generation metrics are not available for the 2025 reporting year.

Wasteshed	Population	Material Collected (tons)	Material Collected per Capita (tons)	Material Collected per Capita (lbs)
Baker	16,746		0.0000	0.0
Benton	97,720	17	0.0002	0.4
Clatsop	41,785	1,189	0.0285	56.9
Columbia	53,639	1,163	0.0217	43.4
Coos	65,270	1,433	0.0220	43.9
Crook	26,366	626	0.0238	47.5
Curry	23,597	448	0.0190	38.0
Deschutes	208,612	4,414	0.0212	42.3
Douglas	111,129	148	0.0013	2.7
Gilliam	2,108		0.0000	0.0
Grant	7,181		0.0000	0.0
Harney	7,463		0.0000	0.0
Hood River	24,357	458	0.0188	37.6
Jackson	220,999	2,387	0.0108	21.6
Jefferson	25,447	51	0.0020	4.0
Josephine	87,416	1,977	0.0226	45.2
Klamath	69,878	1,659	0.0237	47.5
Lake	8,221		0.0000	0.0
Lane	382,771	14,777	0.0386	77.2
Lincoln	51,153	1,972	0.0386	77.1
Linn	130,848	6,056	0.0463	92.6
Malheur	31,419	21	0.0007	1.4
Marion	347,798	12,063	0.0347	69.4
Metro	1,838,183	87,857	0.0478	95.6
Morrow	12,791		0.0000	0.0
Polk	88,799	539	0.0061	12.1
Sherman	1,927		0.0000	0.0
Tillamook	27,574	67	0.0024	4.9
Umatilla	81,030	7	0.0001	0.2
Union	26,052		0.0000	0.0
Wallowa	7,497		0.0000	0.0
Wasco	26,444	405	0.0153	30.6
Wheeler	1,483		0.0000	0.0
Yamhill	109,682	5,037	0.0459	91.8
Grand Total	4,263,385	144,771	0.0340	67.9

Appendix L:

Quarterly Disposition Reports

ORS 459A.887(2)(q) requires the PRO to include in its annual report a summary of the materials disposition reports submitted to DEQ on a quarterly basis.

Given the complexity of the end market disposition reporting and the need for a ramp up phase of reporting, DEQ has deferred the disposition reporting requirements under ORS 495A.887(6) until more complete disposition reporting is performed by end markets. Once DEQ determines the data is sufficient to perform this analysis, CAA will produce that report on a quarterly basis. Once available, a summary of these reports will be available as an appendix to future annual reports.

Appendix M:

Oregon Supplementary Financial Information

Supplementary Information and Report
of Independent Certified Public
Accountants

Circular Action Alliance

Circular Action Alliance Oregon LLC

December 31, 2025

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REPORT OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

Board of Directors
Circular Action Alliance

Opinion

We have audited, in accordance with auditing standards generally accepted in the United States of America, the consolidated financial statements of Circular Action Alliance (CAA) as of and for the year ended December 31, 2025, and our report thereon dated May 8, 2026 expressed an unmodified opinion on those financial statements. Our audit was performed for the purpose of forming an opinion on the consolidated financial statements as a whole. We have not performed any procedures with respect to the audited consolidated financial statements subsequent to May 8, 2026.

The accompanying schedule of financial position as of December 31, 2025 and schedule of activities for the year then ended for CAA's wholly owned subsidiary, Circular Action Alliance Oregon LLC, are presented for purposes of additional analysis and is not a required part of the consolidated financial statements. Such supplementary information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures. These additional procedures included comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the consolidated financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the supplementary information is fairly stated, in all material respects, in relation to the consolidated financial statements as a whole.

Grant Thornton LLP

Arlington, Virginia
June 24, 2026

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**Circular Action Alliance
Circular Action Alliance Oregon LLC**

SCHEDULE OF FINANCIAL POSITION

December 31, 2025

ASSETS

Investments	\$ 122,069,236
Accounts receivable, net	12,093,474
Due to affiliates	15,309,001
Prepaid expenses and other assets	5,589,224
Property and equipment, net	<u>322,864</u>
Total assets	<u><u>\$ 155,383,799</u></u>

LIABILITIES

Accounts payable and accrued expenses	\$ 18,192,189
Reserve for producer fee adjustments	5,700,000
Deferred revenue	8,994,844
Operating lease liability	<u>1,429,450</u>
Total liabilities	<u>34,316,483</u>

Net assets

Without donor restrictions	<u>121,067,316</u>
Total net assets	<u>121,067,316</u>
Total liabilities and net assets	<u><u>\$ 155,383,799</u></u>

This schedule should be read in conjunction with the accompanying report of independent certified public accountants and the consolidated financial statements and notes thereto.

**Circular Action Alliance
Circular Action Alliance Oregon LLC**

SCHEDULE OF ACTIVITIES

Year ended December 31, 2025

Revenues	
Producer fees	\$ 167,867,885
Investment income	24,717
Total revenues	167,892,602
 Expenses	
Local government collection services expansion	233,077
Contamination reduction programming	6,323,146
Transportation reimbursement (USCL)	1,393,809
Others (audit center)	522,148
Payments to CRPFs (MRFs)	19,087,812
PRO materials management (Depots)	2,685,770
REM development and verification	56,486
Special materials investments including SIMS	2,143
Education and outreach	3,816,809
Regulatory	4,000,000
Bad debt expense	584,461
Other direct program costs ¹	1,757,629
Start-up costs ²	3,306,852
Other shared service costs ³	3,055,144
Total expenses	46,825,286
CHANGE IN NET ASSETS	121,067,316
 Net assets, beginning of year	 -
Net assets, end of year	 \$ 121,067,316

¹ Other direct program costs incurred from July 1, 2025 through December 31, 2025

² Includes direct program and shared service costs incurred January 1, 2025 through June 30, 2025

³ Shared service costs incurred from July 1, 2025 through December 31, 2025

This schedule should be read in conjunction with the accompanying report of independent certified public accountants and the consolidated financial statements and notes thereto.

**Circular Action Alliance
Circular Action Alliance Oregon LLC**

NOTES TO SUPPLEMENTARY INFORMATION

December 31, 2025

NOTE 1 - NATURE OF OPERATIONS

Circular Action Alliance Oregon LLC (CAA Oregon) is a limited liability company wholly owned by Circular Action Alliance, a national Section 501(c)3 organization that has been established on behalf of producers as a Producer Responsibility Organization (PRO) to implement Extended Producer Responsibility (EPR) laws for paper and packaging. CAA Oregon is currently operating a program in Oregon on behalf of Circular Action Alliance. Because the accompanying supplementary information presents only CAA Oregon, it is not intended and does not present the financial position or changes in net assets of Circular Action Alliance.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

The accompanying supplementary information has been prepared on the accrual basis of accounting, in accordance with accounting principles generally accepted in the United States of America.

Basis of Presentation

Net assets and changes in net assets are classified based on the existence or absence of donor-imposed restrictions. Accordingly, net assets are classified and reported as follows:

- *Net assets without donor restrictions:* Represents net assets that are not subject to donor-imposed stipulations and are fully available to be utilized in any of the CAA Oregon's programs or supporting services.
- *Net assets with donor restrictions:* Represents net assets subject to donor-imposed stipulations that will be met by actions of CAA Oregon and/or the passage of time. When a donor restriction expires, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the schedule of activities as net assets released from restrictions.

Use of Estimates

The preparation of the supplementary information in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts and disclosures. Actual results could differ from those estimates.

Accounts Receivable and Allowance for Credit Losses

Accounts receivable represents amounts owed for producer fees and are presented net of an allowance for credit losses. Accounts receivable as of December 31, 2025 was \$12,093,474. CAA Oregon has established an allowance for credit losses to provide an estimate of uncollectible receivables. Since CAA Oregon is in the early stages of collecting producer fees and does not yet have significant historical loss data, management has conservatively applied an allowance of approximately 5% of the outstanding accounts receivable balance as of December 31, 2025. This approach will be refined as the Organization develops its own loss experience and risk model. As of December 31, 2025, CAA had an allowance for credit losses of \$584,461, which is reported net of accounts receivable in the schedule of financial position.

Investments

Investments are stated at fair value and include only stable value funds. Purchases and sales of securities are reflected on a trade-date basis. Dividends are accrued based on the ex-dividend date. Interest is recognized as earned.

**Circular Action Alliance
Circular Action Alliance Oregon LLC**

NOTES TO SUPPLEMENTARY INFORMATION - CONTINUED

December 31, 2025

Property and Equipment

Property and equipment consist of machinery and equipment and leasehold improvements, which are stated at cost, net of accumulated depreciation and amortization. CAA Oregon follows the practice of capitalizing all expenditures for property and equipment in excess of \$5,000. Depreciation is calculated on a straight-line basis over the lesser of the estimated useful lives of the assets or the lease term. The estimated useful life of machinery and equipment is five years. Maintenance and repair costs are expensed as incurred.

Leases

CAA Oregon assesses whether an arrangement qualifies as a lease (i.e., conveys the right to control the use of an identified asset for a period of time in exchange for consideration) at inception and only reassesses its determination if the terms and conditions of the arrangement are changed. CAA Oregon recognizes a right-of-use (ROU) asset and lease liability for its leases. The associated lease liability represents the net present value of the future amounts due under the lease, calculated using a risk-free rate of return selected based on the term of the lease. Non-lease components are not separated from lease components for accounting purposes. Leases with an initial term of 12 months or less are not recorded on the schedule of financial position. Lease expense is recognized for these leases on a straight-line basis over the lease term.

Deferred Revenue

Revenue received in advance for producer fees is shown as deferred revenue in the accompanying schedule of financial position. Deferred revenue totaled \$8,994,844 as of December 31, 2025. This balance represents overpayments made by producers in the normal course of business.

Revenue Recognition

As a PRO, CAA Oregon generates revenue principally from producer fees, which are considered exchange transactions as producers pay fees to support statewide recycling activities and infrastructure, education, drop-off depots, and other costs as prescribed under state laws. Producers are required to register with a PRO and pay requisite fees to comply with state EPR laws. CAA Oregon's revenue cycle aligns with the calendar year, and the related services represent a single performance obligation that is satisfied ratably over the annual reporting period. Accordingly, producer fee revenue is recognized in the calendar year to which the fees relate.

Producers are required to submit material data that form the basis of their fee assessment. Under program policies, producers have up to two years to correct previously reported data. If corrections are submitted and approved by CAA Oregon, the related producer fees are adjusted. In accordance with ASC 606, *Revenue from Contracts with Customers*, CAA Oregon estimates the amount of variable consideration to which it expects to be entitled and recognizes a reserve for expected adjustments to producer fees. Because CAA Oregon is in the early stages of fee collection and has limited historical experience with corrections, management's estimate is based on currently available data and observable trends. For the year ended December 31, 2025, management applied an estimated reserve of approximately 3% of producer fees. As of December 31, 2025, the reserve for producer fee adjustments totaled \$5,700,000. Management will update its estimate prospectively as additional correction data becomes available.

NOTE 3 - INCOME TAXES

Circular Action Alliance follows guidance that clarifies the accounting for uncertainty in tax positions taken or expected to be taken in a tax return, including issues relating to financial statement recognition and

**Circular Action Alliance
Circular Action Alliance Oregon LLC**

NOTES TO SUPPLEMENTARY INFORMATION - CONTINUED

December 31, 2025

measurement. This guidance provides that the tax effects from an uncertain tax position can only be recognized in the financial statements if the position is “more-likely-than-not” to be sustained if the position were to be challenged by a taxing authority. The assessment of the tax position is based solely on the technical merits of the position, without regard to the likelihood that the tax position may be challenged.

Circular Action Alliance is exempt from federal income tax under Internal Revenue Code Section 501(c)(3), though it is subject to tax on income unrelated to its exempt purpose, unless that income is otherwise excluded by the Code. Circular Action Alliance has processes presently in place to ensure the maintenance of its tax-exempt status; to identify and report unrelated income; to determine its filing and tax obligations in jurisdictions for which it has nexus; and to identify and evaluate other matters that may be considered tax positions. CAA Oregon has determined that there are no material uncertain tax positions that require recognition or disclosure in the supplementary information.

CAA Oregon is single-member limited liability company, which is disregarded for income tax purposes.

NOTE 4 - LIQUIDITY OF FINANCIAL ASSETS

CAA Oregon’s financial assets available within one year of the schedule of financial position date for general expenditures are as follows:

	<u>2025</u>
Investments	\$ 122,069,236
Accounts receivable, net	<u>12,093,474</u>
Financial assets available to meet cash needs for general expenditures within one year	<u>\$ 134,162,710</u>

CAA Oregon regularly monitors liquidity required to meet its operating needs and other contractual commitments and structures its financial assets to be available as its general expenditures, liabilities, and other obligations come due.

NOTE 5 - FAIR VALUE MEASUREMENTS

Fair value is defined as the exchange price that would be received to sell an asset or paid to transfer a liability in the principal or most advantageous market for the asset or liability in an orderly transaction between market participants on the measurement date. The framework for measuring fair value provides a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (Level 1) and the lowest priority to unobservable inputs (Level 3). The three levels of the fair value hierarchy are described as follows:

Level 1 - Unadjusted quoted market prices for identical assets or liabilities in active markets.

Level 2 - Other observable inputs, either directly or indirectly, including:

- quoted prices for similar assets or liabilities in active markets;
- quoted prices for identical or similar assets or liabilities in inactive markets;
- inputs other than quoted prices that are observable for the asset or liability; and

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NOTES TO SUPPLEMENTARY INFORMATION - CONTINUED

December 31, 2025

- inputs that are derived principally from or corroborated by observable market data by correlation or other means.

If the asset or liability has a specified (contractual) term, the Level 2 input must be observable for substantially the full term of the asset or liability.

Level 3 - Inputs that cannot be corroborated by observable market data and, therefore, require other pricing assumptions or methodologies in the determination of fair value.

The asset's or liability's fair value measurement level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement. Valuation techniques used need to maximize the use of observable inputs and minimize the use of unobservable inputs.

Following is a description of the valuation methodologies used for assets measured at fair value on a recurring basis.

Money Market Funds

Valued at the daily closing price as reported by the fund. The fund is registered with the Securities and Exchange Commission (SEC) and is required to publish the daily net asset value (NAV) and to transact at that price. The fund seeks to maintain a stable NAV of \$1.00 per share.

The preceding methods described may produce a fair value calculation that may not be indicative of net realizable value or reflective of future fair values. Furthermore, although CAA Oregon believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine the fair value of certain financial instruments could result in a different fair value measurement at the reporting date.

The following tables set forth, by level, within the fair value hierarchy, CAA Oregon's assets measured at fair value on a recurring basis as of December 31, 2025.

Assets at Fair Value as of December 31, 2025				
	Level 1	Level 2	Level 3	Total
Money market funds	\$ 122,069,236	\$ -	\$ -	\$ 122,069,236
Total	\$ 122,069,236	\$ -	\$ -	\$ 122,069,236

All assets have been valued using a market approach. There were no changes in the valuation techniques during the current year.

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NOTES TO SUPPLEMENTARY INFORMATION - CONTINUED

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NOTE 6 - PREPAID EXPENSES AND OTHER ASSETS.

Prepaid expenses and other assets as of December 31, 2025, consist of the following:

	<u>2025</u>
Prepaid expenses	\$ 4,127,550
Right of use asset	1,418,395
Security deposits	18,566
Dividends receivable	<u>24,713</u>
Total	<u>\$ 5,589,224</u>

NOTE 7 - PROPERTY AND EQUIPMENT, NET

Property and equipment, net, as of December 31, 2025, is comprised of the following:

	<u>2025</u>
Machinery and equipment	\$ 244,098
Leasehold improvements	48,800
Work in progress	<u>42,206</u>
	335,104
Less: accumulated depreciation and amortization	<u>(12,240)</u>
Total property and equipment, net	<u>\$ 322,864</u>

Depreciation and amortization totaled \$12,240 for the year ended December 31, 2025.

NOTE 8 - LEASES

On May 1, 2025, CAA Oregon entered into an operating lease for a facility in Oregon with additional phases of the lease commencing on July 1, 2025 and October 1, 2025, as additional space was made available for use. The lease requires monthly payments, increasing as additional space was added, and then annually over the term. The lease expires on December 31, 2027, and contains an option to extend the term for periods of time selected by CAA Oregon not to collectively exceed ten years. As CAA Oregon is reasonably certain it will extend the lease for an additional five years, the ROU asset and lease liability have been calculated for a lease term ending on December 31, 2032. The lease agreements do not contain any material residual value guarantees or material restrictive covenants. At the time of execution, CAA Oregon paid a security deposit of \$18,566, which is included in prepaid expenses and other assets on the accompanying schedule of financial position as of December 31, 2025.

The amount recognized as a ROU asset is included in prepaid expenses and other assets in the accompanying schedule of financial position as of December 31, 2025, while the related lease liability is included in operating lease liability. Operating lease costs of \$109,554 were recorded for the year ended December 31, 2025, and are included in occupancy in the accompanying schedule of functional expense.

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NOTES TO SUPPLEMENTARY INFORMATION - CONTINUED

December 31, 2025

The following table provides quantitative information concerning CAA Oregon's leases:

	<u>2025</u>
Right-of-use assets obtained in exchange for lease liabilities:	
Operating leases	\$ 1,418,395
Weighted-average remaining lease term:	
Operating leases	7 years
Weighted-average discount rate:	
Operating leases	3.96%
Operating lease cash expenditure	98,500

Future minimum lease payments due under CAA Oregon's operating lease are:

<u>Years Ending December 31,</u>	<u>Amount</u>
2026	\$ 211,575
2027	217,923
2028	229,476
2029	236,364
2030	243,456
Thereafter	<u>509,064</u>
Total lease payments	1,647,858
Less: imputed interest (at rates ranging from 3.88% to 4.02%)	<u>(218,408)</u>
Total lease liability	<u>\$ 1,429,450</u>

NOTE 9 - LEGAL AND REGULATORY MATTERS

CAA Oregon operates in a highly regulated and evolving policy environment. Changes in, or differing interpretations of federal, state, or local laws, regulations, or administrative guidance related to extended producer responsibility (EPR), recycling standards, or environmental compliance could materially affect CAA Oregon's operating model, cost structure, or ability to implement and administer approved program plans. In addition, CAA Oregon may from time to time be subject to litigation, administrative proceedings, or enforcement actions involving regulators, producers, service providers, or other interested parties. Such matters could arise in connection with program design or implementation, fee-setting methodologies, procurement or contracting decisions, or compliance with applicable legal and regulatory obligations. Adverse outcomes, or the cost associated with defending or resolving such matters, could result in financial loss, operational disruption, reputational harm, or delays in program implementation.

Appendix N:

Additional Financial Information

Additional financial Information includes information not provided in the Supplementary Financial Information from the prior Appendix or in the Consolidated Audited Financial statements or includes additional information beyond the scope of 2025 CAA consolidated financial statements (e.g. prior period expenses). These are included here to provide additional clarity on costs and expenses for CAA Oregon's first year of program.

1. Pre-Program Start-Up Costs

Start-up costs are defined as those incurred prior to program live date of July 1, 2025. One exception is start-up costs on Education & Outreach (i.e., those prior to July 1, 2025 are included as direct program E&O expenses.)

COSTS	2022	2023	2024	2025	TOTAL
Direct costs incurred		\$799,371	\$5,405,119	\$1,503,680	\$7,708,169
Indirect costs (allocated to state)	\$112,459	\$1,227,370	\$2,126,900	\$1,803,172	\$5,269,902 ²⁹
Total	\$112,459	\$2,026,741	\$7,532,019	\$3,306,852	\$12,978,072

Table N1: Pre-Program Start-up Costs

CAA Oregon included a total of \$16.4 million (\$9.5 million under "Start-Up" in program plan and \$6.9 million of start-up shared service allocation under "Program Management and Administration" in program plan) in the 2025 Producer Fees related to start-up costs. The difference in the amounts billed vs amounts incurred is due to the fact that Producer Fee rates and related billings are based on projections of program year costs. It is generally expected that there will be a variance between the projections and the actuals. The variance in this case is immaterial in relation to total producer fees billed. Any over or under recovery of actual costs will be held in reserves and considered in setting future year billing rates.

2. Sufficiency of Fees

As per ORS (459A.884), CAA Oregon's FY'25 producer fee revenue totaled \$167.9 million against program expenses of \$56.5 million³⁰ thereby confirming that producer fees were sufficient against the costs of the program in the year.

Excess fees collected are held separately as Program Reserves under 2 categorizations:

- i. Earmarked Reserves: held exclusively for specific activities. These are excess funds collected from identified activities and will be spent against those activities in future years. These totaled \$51 million.
- i. Operating Reserves: These are general reserves held in accordance with ORS (459A.875). These reserves are not earmarked for any specific activities but held to maintain sufficient program reserves as required by ORS 459A.875 (2) (m-n). These reserves are managed according to the processes outlined in the program plan and any deficit/excess is adjusted in future year's fees.

	\$M
Producer Fee Revenue recognized in FY'25	167.9
Addback: Allowance for future producer adjustments	5.7
Addback: Producer FY'25 adjustments executed in FY'26	12.3
Less: Late Fee Revenue	(0.3)
Total Producer EPR compliance fees invoiced in FY'25	185.6

Table N2: Reconciliation of FY2025 Recognized Revenue to 2025 Producer Fee Invoices

²⁹ Previously reflected in PRO Management & Admin in the Program Plan.

³⁰ Includes \$9.7 million of 2022-2024 startup costs.

Appendix O:

Program Goal Metrics

Goal	Performance Metric	PG Ref
1a	Percentage of recycled material going to REMs, including SIMs.	28
	Number, kind and specific REMs used by CRPFs and CAA for depot material.	28
	Number of REM non-conformance issues identified, corrected and brought into conformance.	32
	Summary of REM verification undertaken.	31
	Percentage of chain-of-custody anomalies detected during quarterly reporting review process.	32
	Number of challenges identified by end markets and assistance deployed to work through those problems.	31
	Number of materials identified for which impacts of disposition pathways differ meaningfully from one another.	32
	Percent of these materials assessed for compliance against and ultimately complying with the hierarchy disposition requirement, using a methodology developed by DEQ and CAA by the end of the program plan period.	32
	Percent of materials shifted from lower-benefit to higher-benefit markets, using a methodology developed by DEQ and CAA.	32
	Base fees in the 60 Reporting and Fee Categories for covered materials reflecting their individual features as directed by the RMA.	58
1b	Data on producer changes to packaging materials and formats that reflect effects of base fees (and at a later date, as applicable, graduated fees).	62
	Quantity and types of specific environmental impacts reduced through eco-modulated fee incentives.	62
	Number and types of adjustments made to eco-modulated fees to produce stronger impacts.	62
	Number of bonuses granted.	62
	Number of participant producers that have qualified for bonuses.	62
2a	PRO material collection and recycling rates in relation to plan targets.	25
	Number and types of local government service expansions funded, and number and types of new collection opportunities created for waste generators.	12
	Consumer awareness and use of PRO material depots.	23
	Diversion rates associated with USCL materials.	19
	Extent of new SIMs collection efforts established.	28
	Tons of plastic materials sent to responsible end markets divided into tons of covered plastic materials generated.	34
	Extent of covered costs funded within 30 months of program implementation.	12
	At least 10% of the PRO depot sites operational by end of 2025, 65% of sites operational by end of 2026, and fully meeting the convenience standard by end of 2027 through a combination of permanent sites and collection events, where needed.	20

Goal	Performance Metric	PG Ref
2b	Funding provided to CRPFs through the PCRF and CMF, with associated tonnage and funding amounts.	16
	Capture rate and bale quality data from DEQ and from CAA.	19
	Individual CRPF capacity to accept and effectively sort USCL materials.	18
3a	Tons of material collected through commingled, depot and other applicable programs, indexed against population and generation metrics.	12
	Amount and percentage of contaminants in collected streams and in streams entering CRPFs.	18
	Measures of waste generator awareness, knowledge and confidence in recycling (for example, participation rates) through surveys or other data collection.	48
3b	Number and kinds of recycling services provided for populations with access or mobility issues.	27
	Number of local governments and CBOs regularly consulted to provide recycling opportunities to communities which have been historically underserved.	38
	Number of COBID organizations contracted with the PRO to provide services under the RMA.	11
	Number and kinds of recycling opportunities addressing gaps identified by local governments and community groups.	12
	Number and kinds of new educational materials created and distributed, numbers and kinds of communication channels used, and number and kinds of audiences reached.	39 , 46
	Number and types of system expansions within the first program plan period.	12
	Number and types of adjustments made to grow system expansion that address previously underserved or unaddressed engagement.	12
4a	Number, kind and operational status of systems and mechanisms for CAA management obligations.	54
	Number and nature of gaps or issues that needed to be addressed and resolution status of those gaps/issues.	54
	Producer compliance activity reports.	56
4b	Number and kind of platforms in place for interaction with interested parties.	49
	Extent of platform use (number of users, etc.).	49
	Number and kind of issues with platforms expressed through participant feedback and any related adjustments made to platforms.	49
	Development of dispute resolution process.	18

Appendix P:

Statutory Reporting Requirements

Statutory Reporting Requirements		PG Ref
ORS 459A.887(2)(a)	A list of the producers that participated in the producer responsibility program;	80
ORS 459A.887(2)(b)	A list of any producers found to be out of compliance with the producer responsibility program plan and steps taken to bring those producers into compliance;	93
ORS 459A.887(2)(c)	The total amount, by weight and type of material, of covered products sold or distributed in or into this state by participating producers in the prior calendar year;	6
ORS 459A.887(2)(d)	A description of the producer responsibility organization's efforts, including work with processors, to ensure that the collected covered products were responsibly managed and delivered to responsible end markets;	28
ORS 459A.887(2)(e)	A complete accounting and summary of payments requested by local governments and local governments' service providers and paid by the producer responsibility organization under ORS 459A.890 (Compensation to local governments) ;	94
ORS 459A.887(2)(f)	A description of all expansions and improvements to recycling collection systems that have been paid for by the producer responsibility organization, whether those expansions or improvements have been implemented, the funds provided for such expansions and improvements, and what collection programs are still scheduled for expansions or improvements in the remaining duration of the producer responsibility program plan;	12
ORS 459A.887(2)(g)	A summary of payments paid by the producer responsibility organization under ORS 459A.920 (Contamination management fee) and 459A.923 (Processor commodity risk fee) ;	16
ORS 459A.887(2)(h)	A summary of payments requested by local governments or local governments' service providers that were denied or reduced by the producer responsibility organization;	17
ORS 459A.887(2)(i)	A summary of all other payments made to satisfy the producer responsibility organization's obligations under ORS 459A.860 (Legislative findings) to 459A.975 (Rules) , including but not limited to payments made to support responsible recycling of specifically identified materials, as described in ORS 459A.917 (Specifically identified materials) ;	64
ORS 459A.887(2)(j)	A summary of the financial status of the producer responsibility organization, including annual expenditures, revenues and assets;	133
ORS 459A.887(2)(k)(A)	The membership fee schedule described in ORS 459A.884 ;	58
ORS 459A.887(2)(k)(B)	The fees collected pursuant to the membership fee schedule for the reporting year;	58
ORS 459A.887(2)(k)(C)	A description of how the current membership fee schedule meets the requirements of ORS 459A.884 (Membership fees charged by producer responsibility organization) ;	58
ORS 459A.887(2)(l)	A description of activities undertaken by the producer responsibility organization that relate to the uniform statewide collection list and the specifically identified materials list;	28
ORS 459A.887(2)(m)	An assessment of whether the producer responsibility organization has met collection targets, convenience standards and performance standards established by the Environmental Quality Commission under ORS 459A.914 (Uniform statewide collection list) and efforts planned to meet or continue meeting such targets and standards;	22
ORS 459A.887(2)(n)	A summary of efforts taken by the producer responsibility organization to meet the statewide plastic recycling goal established under ORS 459A.926 (Recycling rate of plastic) and efforts planned to maintain performance in meeting the goal or, if the goal has not been met, efforts planned to meet the goal;	33

Statutory Reporting Requirements		PG Ref
ORS 459A.887(2)(o)	The results of any in-person site inspections, material tracking or other audits conducted during the reporting year, including whether any major safety or environmental management practices were not properly followed and, if so, the corrective actions taken;	18 , 24 , 31
ORS 459A.887(2)(p)	Recommendations for any changes to the producer responsibility organization's plan to improve recovery and recycling;	71
ORS 459A.887(2)(q)	A summary of the quarterly reports described in subsection (6) of this section and an evaluation of the adequacy of responsible end markets;	132
ORS 459A.887(2)(r)	A summary of actions actually taken or planned by the producer responsibility organization to improve responsible end markets, pay for improvements in processing infrastructure or improve the resiliency of the producer responsibility program;	28
ORS 459A.887(2)(s)	The number of producers that received each type of membership fee adjustment offered under ORS 459A.884 (Membership fees charged by producer responsibility organization) and the amount of covered products, by material and format, for which producers received each type of adjustment;	62
ORS 459A.887(2)(t)	An evaluation of the effectiveness of membership fee adjustments at encouraging producers to reduce the environmental and human health impacts of covered products, with relation to the factors and criteria used by the producer responsibility organization's membership fee structure;	62
ORS 459A.887(2)(u)	An evaluation of the producer responsibility organization's compliance with ORS 459A.860 (Legislative findings) to 459A.975 (Rules) and, if necessary, actions that will be taken to achieve compliance;	54
ORS 459A.887(2)(v)	A report by an independent certified public accountant, retained by the producer responsibility organization at the organization's expense, on the accountant's audit of the organization's financial statements;	133
ORS 459A.887(2)(w)	The results of any nonfinancial audits or assessments measuring performance or outcomes;	18 , 24 , 31
ORS 459A.887(2)(x)	A description of activities undertaken by the producer responsibility organization that relate to the educational resources and promotional campaigns described in ORS 459A.893 (Development of educational resources)	40

Appendix Q:

Contact Information

Have a question or feedback? Please select the appropriate email address below to direct your inquiry, and a CAA team member will respond directly.

- **General Inquiries – Oregon Program:** OregonInfo@circularaction.org
- **Media Requests:** Media@circularaction.org
- **Service Provider Support:** ServiceProviders.Support@circularaction.org
- **Producer Support (questions pertaining to registration, reporting and fees):** Producer.Support@circularaction.org
- **Accounts Receivable (questions related to producer billing and invoicing):** AR@circularaction.org
- **Other General Inquiries:** Info@circularaction.org

To receive regular updates, sign up for [CAA's monthly newsletter](#).