Oregon EPR (Recycling Modernization Act)

Producer Snapshot & Compliance List

As of May 2026.

This summary is provided for information only and is not compliance or legal advice. Please confirm applicability to your specific products and packaging with counsel and regulators.

For PCPC Members only. Please, do not distribute.

Program Overview

Oregon's Recycling Modernization Act (RMA) was the first packaging EPR program in the country to go fully operational, and producer fees have been in effect since July 1, 2025. A producer's obligation turns on three things: what each package is made of, whether that material sits on the state's acceptance lists, and how much the producer puts into the Oregon market.

PRO	Circular Action Alliance (CAA), approved PRO
Scope	Packaging, paper products, and food service ware (all materials)
Program Start	July 1, 2025. Fees and reporting obligations already active
Fee Structure	Per-pound base rates set by material, covering 60 reporting categories across 8 material classes
Eco-modulation	Fee credits come from lifecycle-assessment bonuses (tiers A and B now, tier C in progress); qualifying means running and reporting SKU-level LCAs
Material Lists	Curbside follows the Uniform Statewide Collection List (USCL); the PRO Acceptance List adds depot-only materials. Anything on neither list draws the highest fees
Top 25 Producers	Named by DEQ Aug. 2025. Required to disclose LCAs on 1% of SKUs by Dec. 31, 2026

IMPORTANT: Oregon is the most mature CAA program. Obligations are fully active, invoices are flowing, and CAA has begun referring unresolved producer delinquencies to DEQ for enforcement.

Where Things Stand (Regulatory Status)

- **Third-phase Rulemaking:** is moving forward and should run into early 2027, covering exemptions, changes to the acceptance lists, compostability, and the reach of producer obligations.
- **Fee System:** Active. Two 50% invoice installments per year (Jan. and July). 2026 fee rate schedule posted in the Producer Portal Oct. 29, 2025.
- **Enforcement:** CAA is now referring unresolved producer delinquencies to DEQ. Non-compliance determinations will appear in CAA's public registry of Oregon participant producers. List was published in May 2026.
- **Lawsuit:** Oregon’s EPR law is being challenged in court. In February 2026, a federal district court granted a limited preliminary injunction blocking enforcement of the law against NAW’s members, finding “serious

questions” going to the merits of certain constitutional claims, while allowing the majority of claims to be dismissed or proceed toward trial. The law otherwise remains in effect for most producers, and the case is expected to proceed to trial in July 2026.

2026 Key Operational Milestones

Date	Milestone	Producer Action
January 2026	First 2026 invoice cycle issued (first 50% installment)	Pay per CAA invoice terms. Based on CY2024 supply data
Jan. 6 to Mar. 31, 2026	2027 private recycling exemption claim window	Submit claims by 5 p.m. PT on March 31 if applicable
March 31, 2026	Producer Portal opens for CY2025 Annual Supply reporting	Verify portal access; compile CY2025 Oregon supply data
May 31, 2026	CY2025 Annual Supply Report DUE + voluntary LCA Bonus applications (A/B/C)	File supply report and any LCA project reports via Producer Portal
July 2026	Second 2026 invoice installment due (second 50%)	Pay per CAA invoice terms
October 2026	2027 Oregon fee rate schedule published	Use for 2027 budget finalization
Dec. 31, 2026	Top 25 producers: first LCA disclosures DUE	If named in DEQ Top 25, disclose LCAs for 1% of SKUs

Key Watchouts for Personal Care Producers

Watchout	
Material-driven cost exposure	Fees are driven almost entirely by material type and acceptance status. Not-accepted materials can be 20x more expensive per pound than USCL-accepted materials.
Rigid vs. flexible divide	Rigid plastics generally land in accepted categories. Flexible films, laminates, and multi-material pouches often fall into the not-accepted tier at the top of the fee range.
Eco-modulation requires LCAs	Bonuses are earned only through SKU-level life cycle assessments. Good design intent alone does not reduce fees. LCA studies are an investment.
Acceptance vs. collection gap	Being collected in curbside does not equal being accepted for end-market recycling. Materials must clear sortation and have viable end markets to qualify for lower fee tiers.

Resources

- Oregon DEQ – Recycling Modernization Act overview and producer resources
- Final RMA regulations (OAR Chapter 340, Division 90)
- Oregon SB 582 enrolled bill text
- Circular Action Alliance – Oregon producer resources, program plan, and fee schedule
- DEQ life cycle evaluation guidance

This summary is provided for information only and is not legal advice. Please confirm applicability to your specific products and packaging with counsel and regulators.