

Oregon Enforcement Process

Obligated producers under the Recycling Modernization Act (RMA) must register and report sales information to Circular Action Alliance (CAA) by **March 31, 2025**. This document outlines the enforcement process for non-compliant producers.

1 CAA NOTIFICATION

CAA will conduct outreach to notify non-registered and non-reporting producers of their obligations under the law.

Producers found to be non-compliant will retroactively pay all fees during the period of non-compliance, subject to any late charges or liquidated damages.

2 PUBLIC LISTING

As required by ORS 459A.869(8), CAA will publish a searchable registry online disclosing all compliant and non-compliant member producers.

3 REFERRAL TO DEQ

CAA will refer non-compliant producers to Oregon DEQ. After DEQ confirms the violation, DEQ will typically issue a warning letter with an opportunity to correct the violation and return to compliance with CAA.

4 FAILURE TO COMPLY

If a producer does not comply by the DEQ deadline or has repeated violations, DEQ will send a pre-enforcement notice and refer the producer to the Office of Compliance and Enforcement for formal enforcement, which can include civil penalties and/or a compliance order.

5 PENALTIES

Failing to register or become a member of a producer responsibility organization is a Class 1 violation that can result in fines of up to \$25,000 per day.

The Oregon Department of Justice may bring an action seeking to prohibit the sale of a covered product in Oregon against any producer that sells, offers to sell or distributes a covered product into the state in violation of the Act.

Register and report today at
circularactionalliance.org