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CAA-401

# 2025 Oregon Producer Fee Schedule Explained

May 29, 2025

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Circular Action Alliance is subject to federal, state, and international antitrust/ competition laws and has a policy of strict compliance with these laws, without exception.

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Consequently, competitors must avoid discussing certain topics when they are together, meeting virtually, or at any other time:

- Prices, fees, rates, profit margins, discounts, promotions, rebates, or other terms or conditions of sale;
- Pricing strategies, methods, trends, plans, or timing of price changes;
- Salaries, costs, and other factors that affect pricing; the hiring or recruitment of other members' employees;
- Allocation of markets or customers or division of territories;
- Topics that may lead participants to not deal with or to boycott a particular supplier, customer, or third party;
- Reductions of output; bid-rigging;
- Or any other anti-competitive topics or actions.

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# Welcome – Important Reminders

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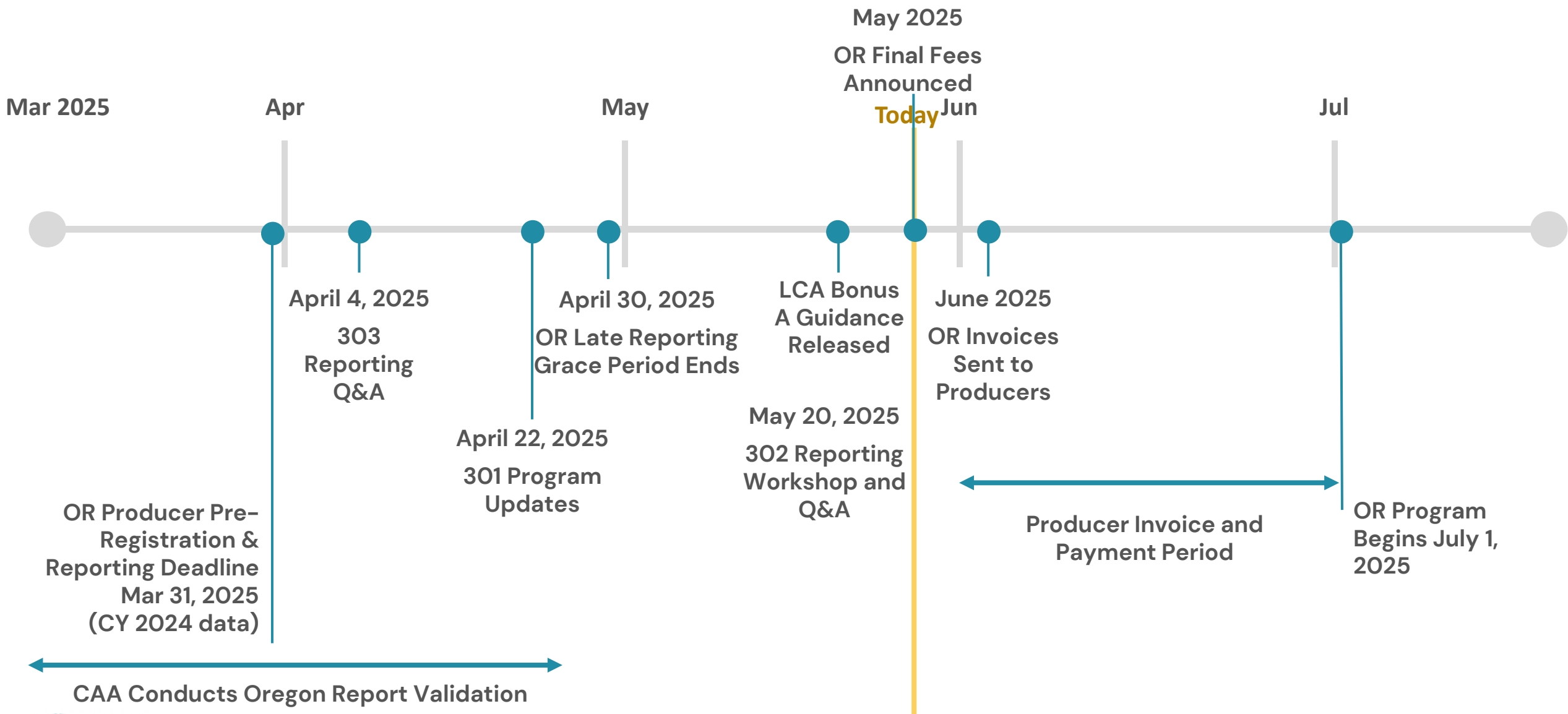
- Producer Services provides frequent opportunities for registered producers, their legal representatives and trade associations to learn about and discuss priority producer issues (reporting, fees, source reduction, recyclability, etc.).
- Recordings from previous CAA public webinars are available – 400 level meetings will not be recorded.
- Please use your name to ask questions – we can provide a written response to questions we are unable to answer if the question is not anonymous.
- CAA will continue to develop educational materials for producers, including guidance on the definition of producer and a guidebook for producer reporting that will be released this fall.
- Include others from your company as needed – we will be discussing everything from regulatory issues to packaging redesign.
- We are closing registration 24 hours in advance of each 400 session. Please register accordingly.
- We will be asking for company affiliation in the registration.
- Please use the Q&A feature to ask your questions. If you can't get your questions answered, please email [producer.support@circularaction.org](mailto:producer.support@circularaction.org)

# Today's Agenda

- Producer Reporting and Validation
- CAA's Fee-Setting Methodology
- 2025 Oregon Producer Fee Schedule
- Oregon Program Implementation
- Q&A

# Producer Reporting and Validation

# OR-2025 Program Timeline



# Report Validation Process

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Review  
Methodology

Review Brands  
and Associated  
Producers

Validate  
Reported  
Categories &  
Weights

Compare  
Reports against  
Industry Sector  
Modeling

- So far, CAA has:
  - Reviewed producer supply reports that account for 85%+ of supply weight (lbs.)
  - Assessed associated producers to validate exemptions and low volume categories
  - Applied 869(13) active and passive (i.e. pooled) exemptions
- CAA will continue to:
  - Validate reports and conduct audits to ensure accurate supply data
  - Issue Corrections to Producers as errors are found
  - Intake and approve Adjustment requests initiated by Producers



# OR-2025 Reporting and Invoicing Update

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- **Definitions:**

- **Producer Supply Report:** a report submitted annually by a Participant to a CAA State Program outlining the quantities of Covered Material supplied in or into the state to inform a Producer's Base Fees, including brands, methodology and other information as outlined in the State Addendum.
- **Correction:** a change to a Producer Report required by CAA because of its ongoing report validation or because of an independent audit.
- **Adjustment:** a change to an already submitted report initiated by a Participant.

- **June invoicing on track:** OR-2025 Producer Supply Reports are locked and will be invoiced with adjustments and corrections made before May 28, 2025

- Going forward, both Corrections and Adjustments will result in a corrected invoice or an adjusted invoice

- **Adjustment Requests:** CAA will accept Adjustment Requests from producers who discover an error or omission in their submitted report

- To request an adjustment, please email [Producer.Support@circularaction.org](mailto:Producer.Support@circularaction.org) with subject line "Oregon Report 2025 Adjustment Request"
- Include in the email what needs to be changed, why it needs to be changed, and how big the change in reported pounds will be
- Producers are only allowed one adjustment request for a submitted report, and the adjustment request must include all changes required to your report

# CAA vendor information now available for billing setup

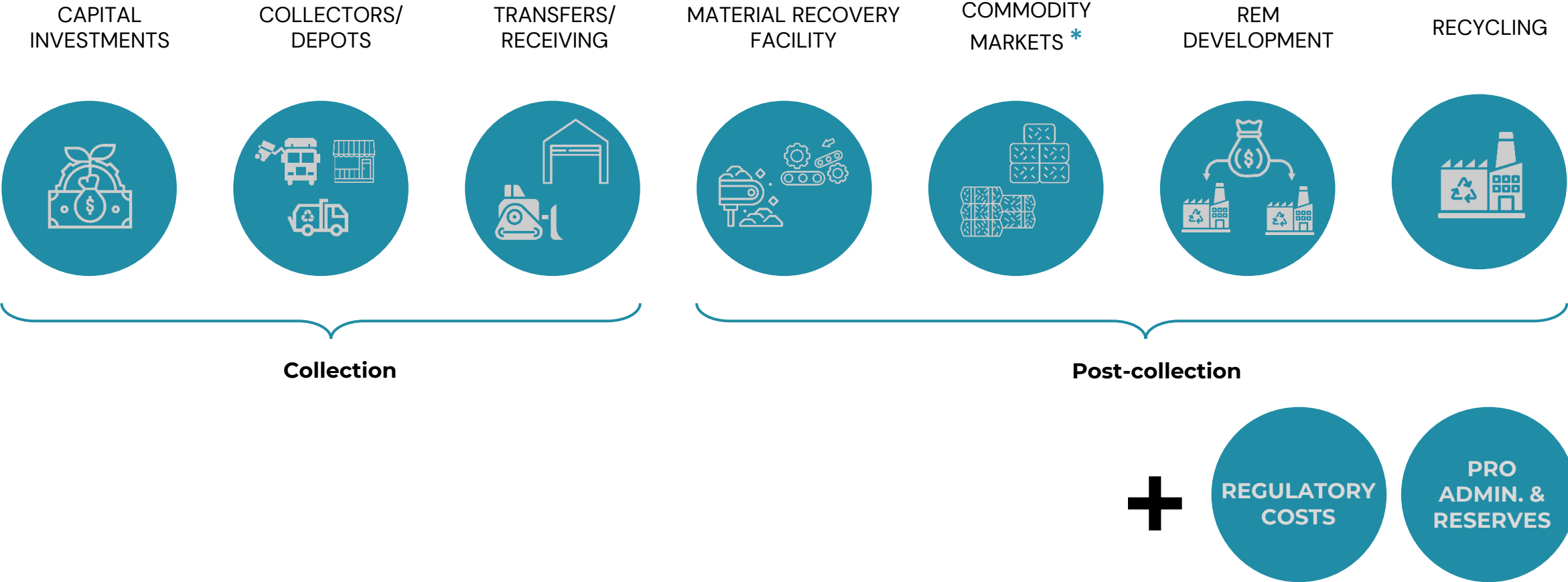
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- All producers should start now to configure CAA as a vendor in their systems and prepare to receive invoices from CAA
  - Each Oregon report will generate a separate invoice
- CAA's vendor information is now available in the Producer Portal, "CAA Vendor Information" article
  - If your company requires a W-9 to be on file for your vendor set up process, CAA has linked our W-9 in the vendor setup article on the Producer Portal
- Producers should confirm vendor setup with CAA once completed – Please complete the [Vendor Set Up Confirmation](#) form (link in webinar follow-ups, Producer Portal article and AR support inbox)
  - On this form, you will also be able to add a PO number if it is required on CAA's invoice for processing.
  - Only PO numbers submitted in the confirmation survey will be added to CAA invoices.
- For questions about vendor setup or making payments to CAA, please contact our Accounts Receivable inbox at: [AR@circularaction.org](mailto:AR@circularaction.org).

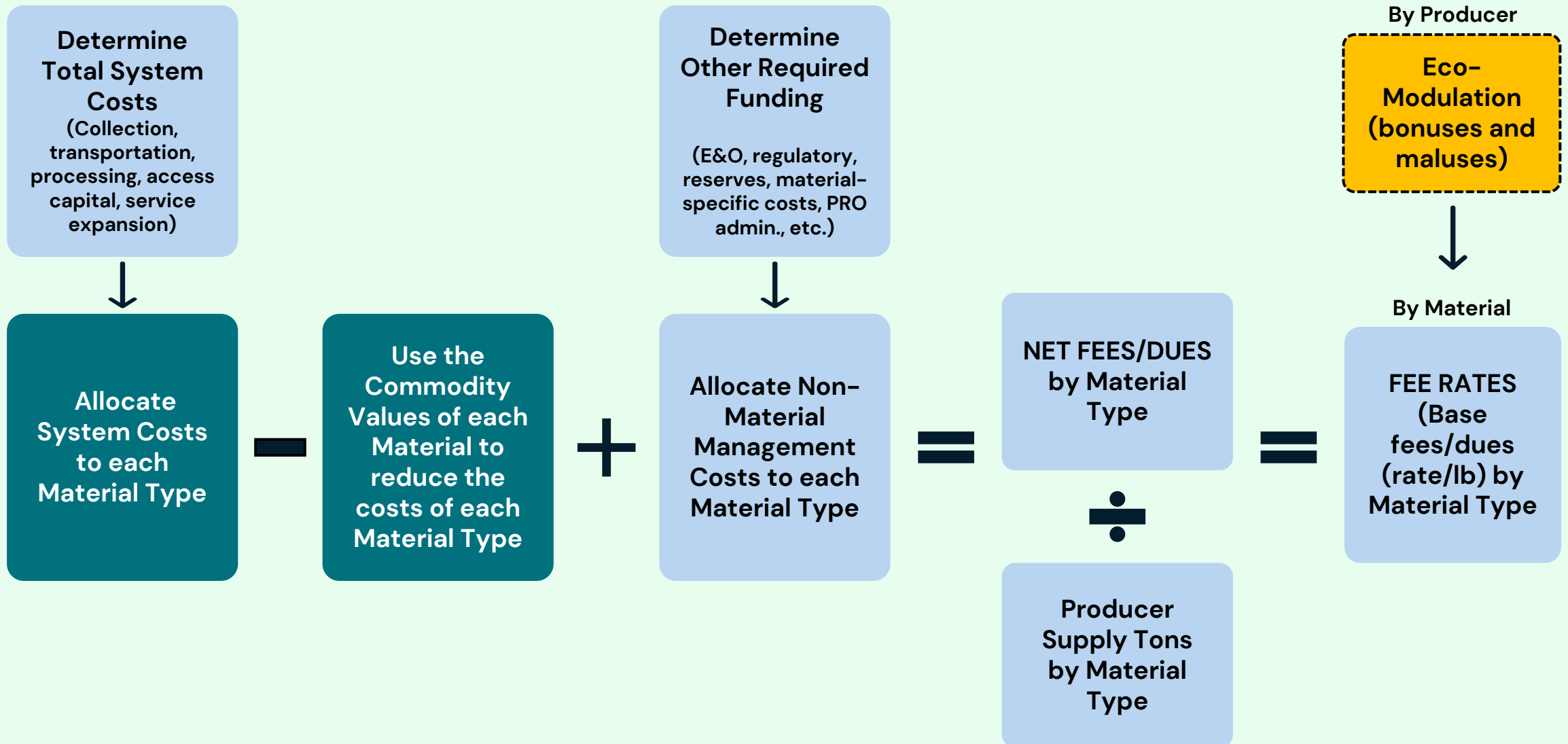
# Fee Setting Methodology

# Program Budgeting and Fee-Setting Process: a National Fee-Setting Approach

The following program cost components are typically required to establish the program cost budget to inform producer fees.



# National Fee-Setting Methodology



# CAA's Fee Setting Methodology – Guiding Principles

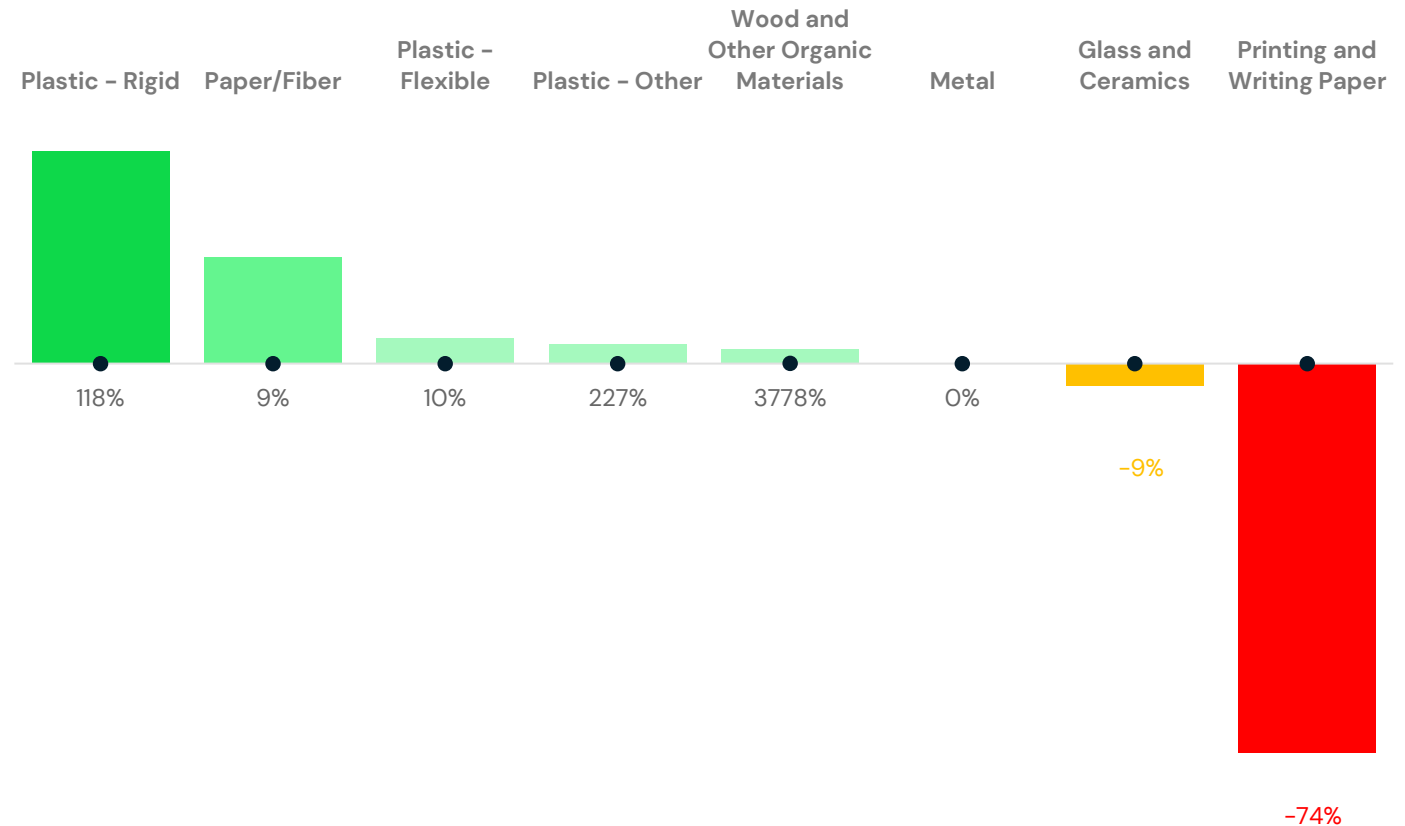
Guiding Principle	Description
Harmonization	Fee rates should be developed using a national fee-setting methodology that is consistent across states unless state-specific laws or conditions require adjustments. Fee structures will vary in each state due to state-specific inputs.
Fairness	Producers supplying covered materials to end users must contribute to the costs of the recycling system, including those who use materials not collected for recycling or are not recycled.
Material-Specific Costs	Fee rates will reflect material-specific management costs in each state using the best available data.
Commodity Revenue	Fee rates will reflect state-specific commodity revenues, and these revenues will be attributed to the corresponding material categories that earned them.
Eco-Modulation	Fee-setting will account for measurable environmental objectives and state-mandated eco-modulation policies using CAA's eco-modulation principles.
Responsible End Markets	Fee-setting will factor in the development and maintenance of viable responsible markets with any associated costs borne by the material category and as required by state EPR laws.
Clarity	Fee-setting materials and consultations will be prepared and conducted in a manner that clearly communicates to producers the principles, methodologies and approach that Circular Action Alliance is using to determine fee rates.

# Oregon Fee Details

# Reported Supply and Difference from Projected Tons

## Reported vs. Projected Tons Variance

- Projected vs. Reported Supply comparison is using the High Fee scenario from the final Program Plan
- Under-reporting of **Printing and Writing Paper** was observed
- More supply tons reported in **rigid plastics, plastic – other and wood in reported supply** were observed





# Final Fee Summary – Average for each Material Class

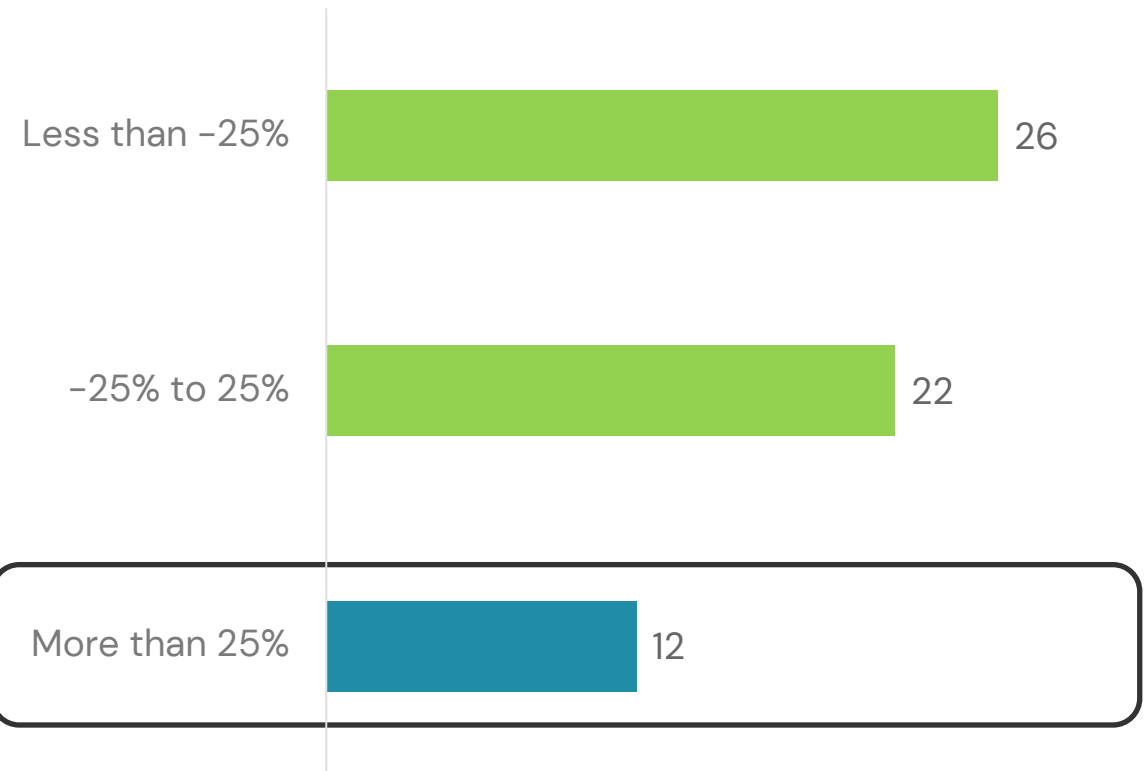
Category	Program Plan High Fee Scenario	Final Fees	% Diff	Notes
Printing and Writing Paper	1.0 ¢/lb	4.0 ¢/lb	300%	Increase over projected fees due to low reporting
Glass and Ceramics	14.4 ¢/lb	11.0 ¢/lb	-23%	Glass fees reduced in part due to new data about tons collected curbside vs. projected depot collection
Metal	23.8 ¢/lb	14.6 ¢/lb	-39%	Most categories have lower fees than projected, N/A categories have higher fees
Paper/Fiber	8.5 ¢/lb	7.6 ¢/lb	-10%	Most categories had little change, cartons are lower and cardboard is higher than projected
Plastic – Rigid	53.8 ¢/lb	45.5 ¢/lb	-15%	Almost all categories have lower fees than projected
Plastic – Flexible	113.4 ¢/lb	76.7 ¢/lb	-32%	All categories lower than projected
Plastic – Other	49.7 ¢/lb	50.5 ¢/lb	2%	Significantly lower fees for plastics with automotive fluids, pesticides, etc.
Wood and Other Organic Materials	210.0 ¢/lb	108.0 ¢/lb	-49%	Large drop due to higher reporting than expected
Overall Average	22.6 ¢/lb	23.1 ¢/lb	2%	Marginal change to fee rates driven by slightly lower (-1%) than expected total reported supply tons (vs. the high fee rate scenario)

# Out of 60 material categories, 12 have fee rates that are more than 25% higher than projected

Material categories with fee rates more than 25% higher than projected **due to lower reported supply**, e.g.:

- Newspapers
- Newsprint (inserts and circulars)
- Magazines and Catalogs & Directories
- Paper for General Use
- Other Printed Materials
- Ceramic – All Forms
- Corrugated Cardboard
- HDPE (#2) – Tubs, Nursery (plant) pots & trays

Material Categories Fee Rate Variance Ranges

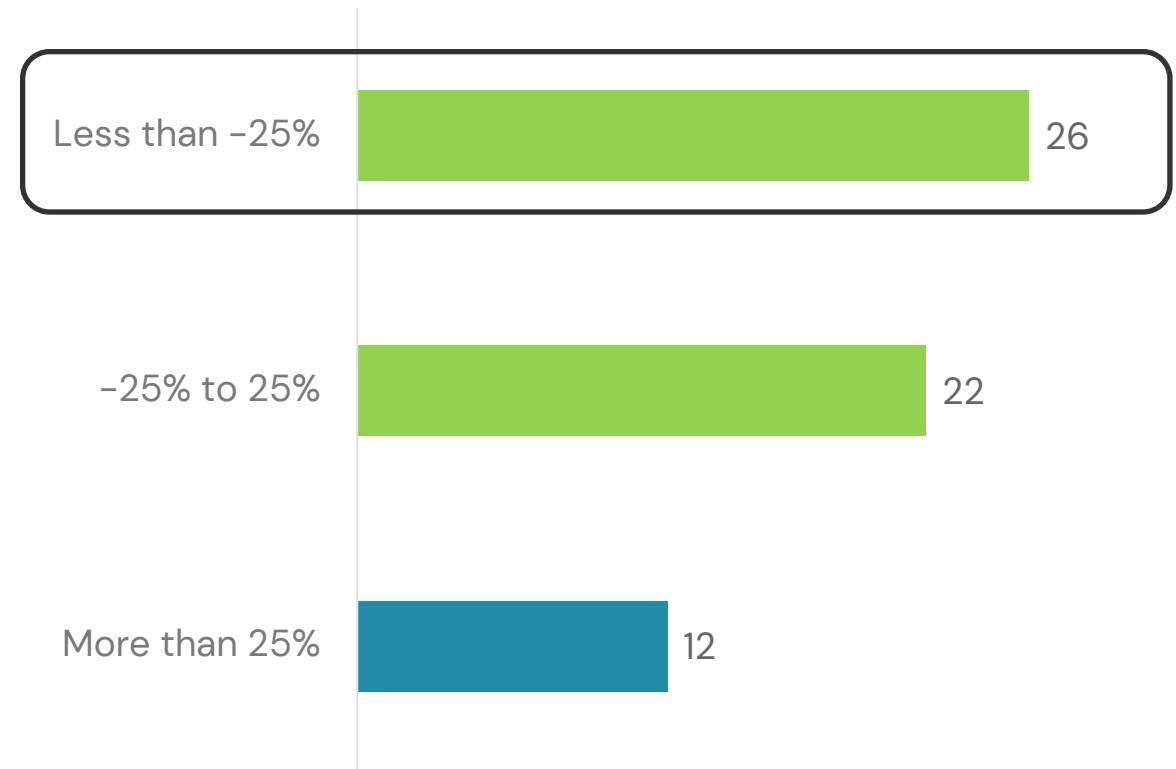


# Material Categories with Fee Rates more than 25% lower than projected due to higher reported supply

Material categories with fee rates more than 25% lower than projected **due to higher reported supply**, e.g.:

- Aluminum Containers
- Aluminum Foil and Molded Containers
- Steel Aerosol Containers
- Pressurized cylinders
- Aseptic and Gable-top Cartons
- PET (#1) – Bottles, Jugs, and Jars (Clear/Natural)
- HDPE (#2) – Bottles, Jugs and Jars (Clear/Natural)
- HDPE (#2) – Bottles, Jugs and Jars (Pigmented/Color)
- PP (#5) – Bottles, Jugs and Jars
- Plastic containers for motor oil, antifreeze, or other automotive fluids, pesticides or herbicides, or other hazardous materials (flammable, corrosive, reactive, toxic)
- Wood and Other Organic Materials

Material Categories Fee Rate Variance Ranges



# Tertiary Packaging

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- DEQ provided us with total tons for two categories for the 869(13) exemptions
- HDPE (#2)/LDPE (#4) (Pallet Wrap) non-consumer
  - All exempted tons have been pro-rated to producers who have submitted reports.
  - Any late reports will pay the fee for all reported material in this category
- Corrugated Cardboard (Tertiary/transport) non-consumer
  - There are still exempted tons available and the fee rate for this category has been set to zero
  - We will continue to monitor late reports, but don't expect to exceed the total exempted tons
- Producers who did not report accurately in these categories, but do supply this packaging to the market **are still required to report these material categories (despite a zero-rated fee)**
  - Please initiate an adjustment request if your company inaccurately reported and did not include tertiary packaging in the correct category
  - You may also receive a correction from CAA if you do not proactively submit an adjustment in a timely manner

# Oregon Program Implementation Update

# System Expansion

# System Expansion Engagement

Initial meetings with all Priority A Communities are complete.



Outreach to Priority B, C, D underway



Counties transitioning to statewide recycling list in July: Deschutes, Jackson, Lane and Marion



**\$ 17.5 M+** The amount CAA plans to invest in the 16 Priority A Communities.

## Next Steps



Finalize Primary Funding Agreements and addendum with Priority A communities.



Prepare other priority communities for upcoming engagements.



Continue to engage with Priority B Communities.



Begin funding disbursement after July 1, 2025.

# PRO Recycling Centers



# PRO Recycling Center Overview

- In the next 2.5 years, CAA will build out a network of PRO-funded Recycling Centers and collection points across the state.
- Education and outreach efforts will help communities locate and use the centers.



*RecycleOn Recycling  
Center Concept Design*

# Purpose of PRO Recycling Centers

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- PRO Recycling Centers collect materials that:
  - Are not collected in home or business recycling bins.
  - Cannot be easily sorted at a recycling facility.
  - Have proven responsible end markets.
- 144 Recycling Centers are needed to meet the convenience standard, by the end of 2027.
- CAA will provide the equipment, compensation, material collection and ensure materials are delivered to Responsible End Markets (REMs).

# Recycling Center Acceptance List



Round plastic lids



Aluminum foil and foil products



Plastic buckets and pails



Shredded paper



Rigid plastic package handles (6-pack handles)



Plastic bags & stretchy plastic



Glass bottles and jars

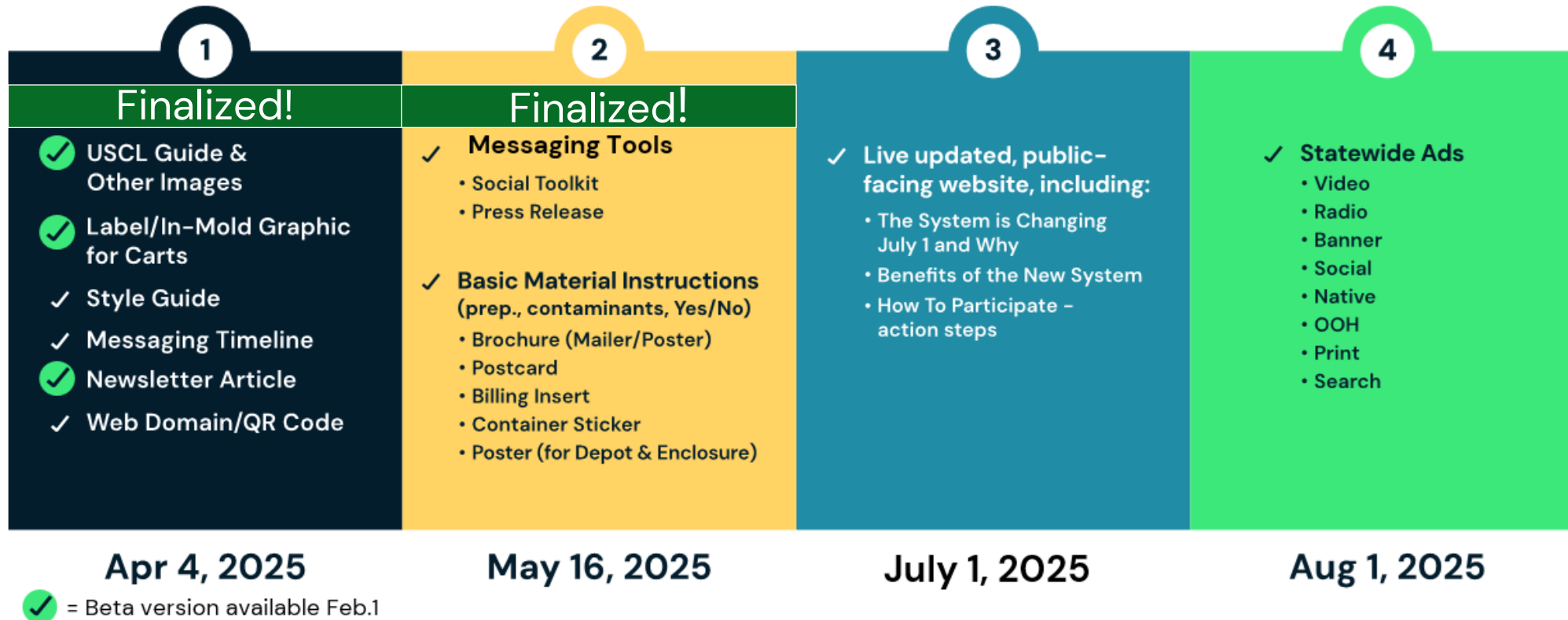


Block white expanded polystyrene\*

\*Special collection

# Education & Outreach

# Education & Outreach Material Timeline





# Education & Outreach Materials



Recycling Guide



Label for identifying recycling carts



Billing insert



Info Card



Recycling Container Decals



Cart tags

Additional E&O materials include brochure/mailler, door hangers, poster, and enclosure signage.

# Oregon Audit Center

# Audit Center Location

- Located at City of Roses Disposal in NE Portland.
- The yellow box is approximately the area CAA will lease.
- The Audit Center will house:
  - Contamination auditing functions
  - Recycling Center material storage
  - Some office and meeting space





# July 2025: What's to come?



Producers begin paying fees to CAA.



Money begins to flow to improve and modernize Oregon's recycling system.



Communities around the state will start collecting a new list of materials.



New E&O materials begin to go out.



Updated reporting.

## EPR in Oregon: A dial, not a switch



*Start of the RMA*  
July 1, 2025

*Full implementation*  
Dec. 31, 2027

# Questions?

# Meeting Recap and Reminders

## 401 Oregon Final Fees (May 28, 2025)

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- Oregon invoicing will begin in early June, program start in July 2025
- **URGENT:** CAA vendor setup should be started now to ensure on-time payment of OR-2025 invoice
- 2025 Oregon Producer Fee Schedule now available on Producer Portal
- **Other Reminders:**
  - Minnesota registration on the Producer Portal before July 1, 2025
  - Colorado Reporting Guidance, Portal and State Addendum live next week (sign up for webinars in June & July 2025)

# Stay Engaged

- Email [producer.support@circularaction.org](mailto:producer.support@circularaction.org)
- **Registered Producer Resource Center**
  - Producer guidance and webinar content
- **Monthly Newsletter**
  - The latest updates for each state & new resources
- **Upcoming Events**
  - 302 Reporting Workshop and Q&A – Tuesday, June 3
  - 201 Producer Portal Training – Thursday, June 5
  - 302 Reporting Workshop and Q&A – Tuesday, June 17



Scan the QR code or click the link to See our [producer events page](#).



# Thank You



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