



402 Oregon Eco-Modulation and LCA Bonus A Overview

June 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.

These antitrust laws prohibit competitors from engaging in actions that could result in an unreasonable restraint of trade.

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.

Failure to comply with these antitrust laws will not be accepted.

Welcome – Important Reminders

- 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

Agenda

- Producer Reporting and Fees
- Oregon LCA Bonus A Guidance
- Q&A

Producer Reporting and Fees

Preparing to Process Your 2025 Oregon EPR Invoice

- 2025 Oregon EPR invoices will be sent to producers who submitted a 2025 Oregon Producer Supply Report
- Invoices will be sent from circularactionalliance@myworkday.com, and to avoid any delays in receiving invoices, producers should contact their IT Security Team and request that inbound email traffic from this email address is whitelisted
- Invoices will be sent to the Primary Contact listed in your account. If you previously completed the Vendor Setup Confirmation Survey and/or provided a unique Billing Contact, they will also receive the invoice

Oregon 2025 Producer Fee Schedule Now Available

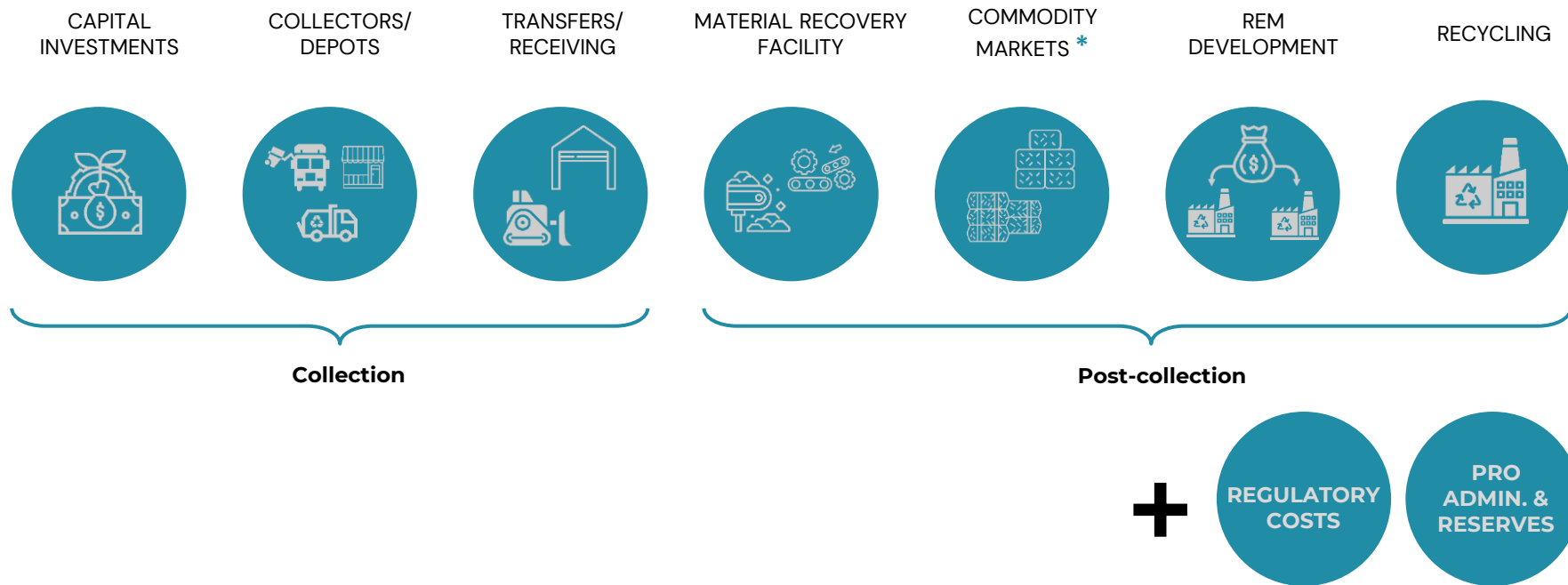
- The 2025 Oregon Producer Fee Schedule has been published, and invoices will be issued based on these fee rates for all current supply reports submitted by producers
- To view the 2025 Oregon Producer Fee Schedule, login to the Producer Portal, navigate to the Useful Links section on the Home page, and select the article titled **2025 Oregon Producer Fee Schedule**
- For questions related to registration, reporting, or the 2025 Oregon Producer Fee Schedule, please reach out via email at producer.support@circularaction.org

Looking Ahead: Budgeting for Oregon 2026 Fees

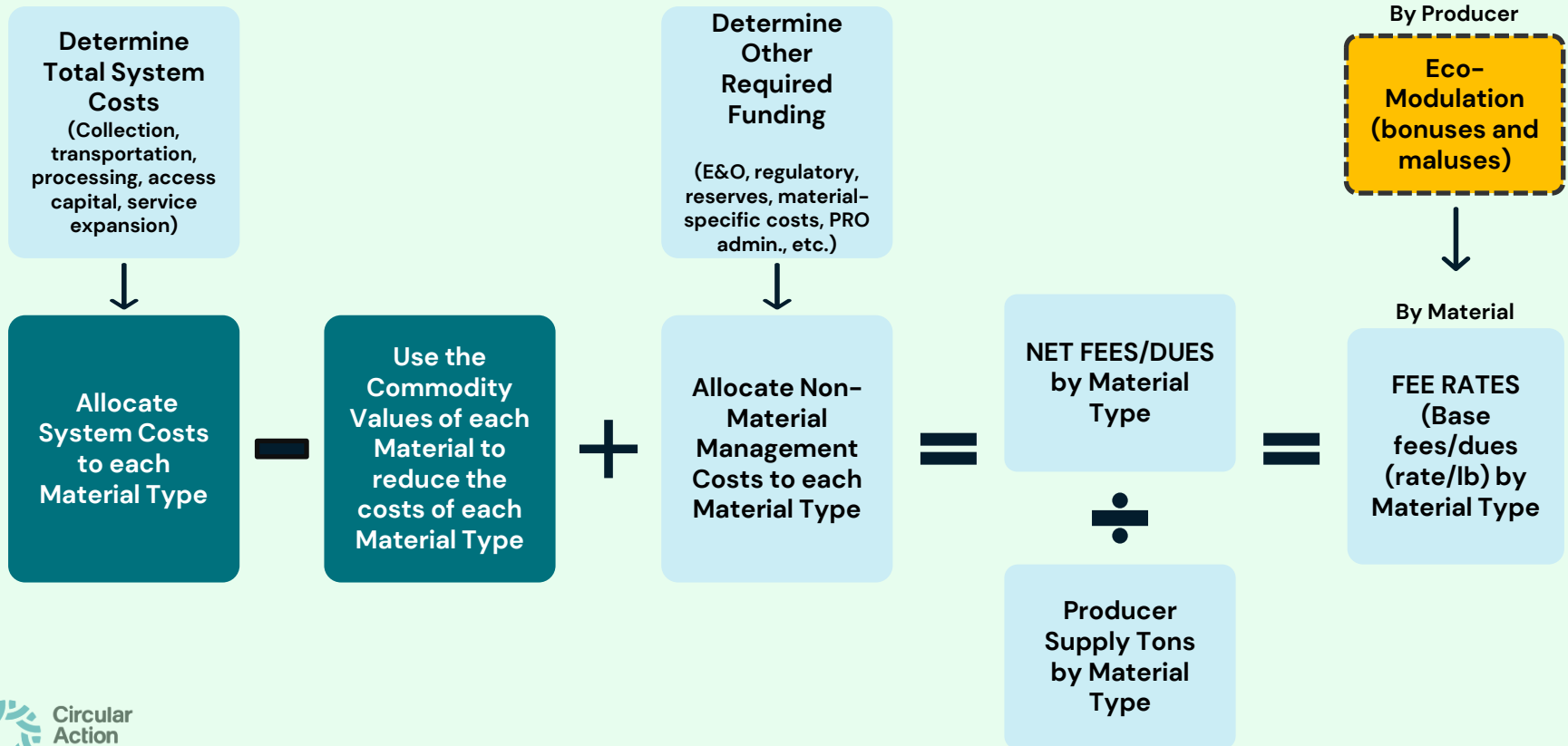
- Producers will not need to submit a new supply report for Oregon in 2026
- Billing will be based on the 2024 supply data producers submitted during the Oregon reporting deadline of March 31, 2025
- Producers will be billed for a whole calendar year (January–December)
 - The fee schedule for 2026 will be published in October 2025
 - Invoices will be issued in December 2025 (net 45 days to pay)
- Any adjustments or corrections made during the first billing cycle will be included in this next wave of fee setting and invoicing

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.

OR LCA Bonus A Reporting Guidance

Summary of Topic

- OR DEQ outlined a prescriptive Life Cycle Evaluation (LCE) approach in its Phase II rulemaking.
- Today, CAA is providing a preview of the guidance it has developed for the submission of LCAs for Bonus A in Oregon. The presentation:
 - Reminds members the difference between mandatory LCA submissions (Top 25 producers) and voluntary LCA submissions to take advantage of Bonus A
 - Provides a start on planning & executing Bonus A reports, due August 15, 2025
- CAA has released the **reporting guidance** and **template report** to all producers mid-May – available on the producer portal & producer guidance webpage

LCA Bonus A & Mandatory Disclosures – Recap

Bonus A – granted for voluntary evaluation and disclosure of LCA for a product SKU or batch of related SKUs (i.e., SKUs with identical LCAs that can be lumped into the same LCA and LCA report).*

- Set at **10% of base fees (excluding the portion of fees applied to reserves)** for all materials in the SKU** or batch, up to a cap of \$20,000. Maximum 10 SKUs or batches of related SKUs to start.
- **Submissions due August 15, 2025** and bonuses will be granted in 2026.

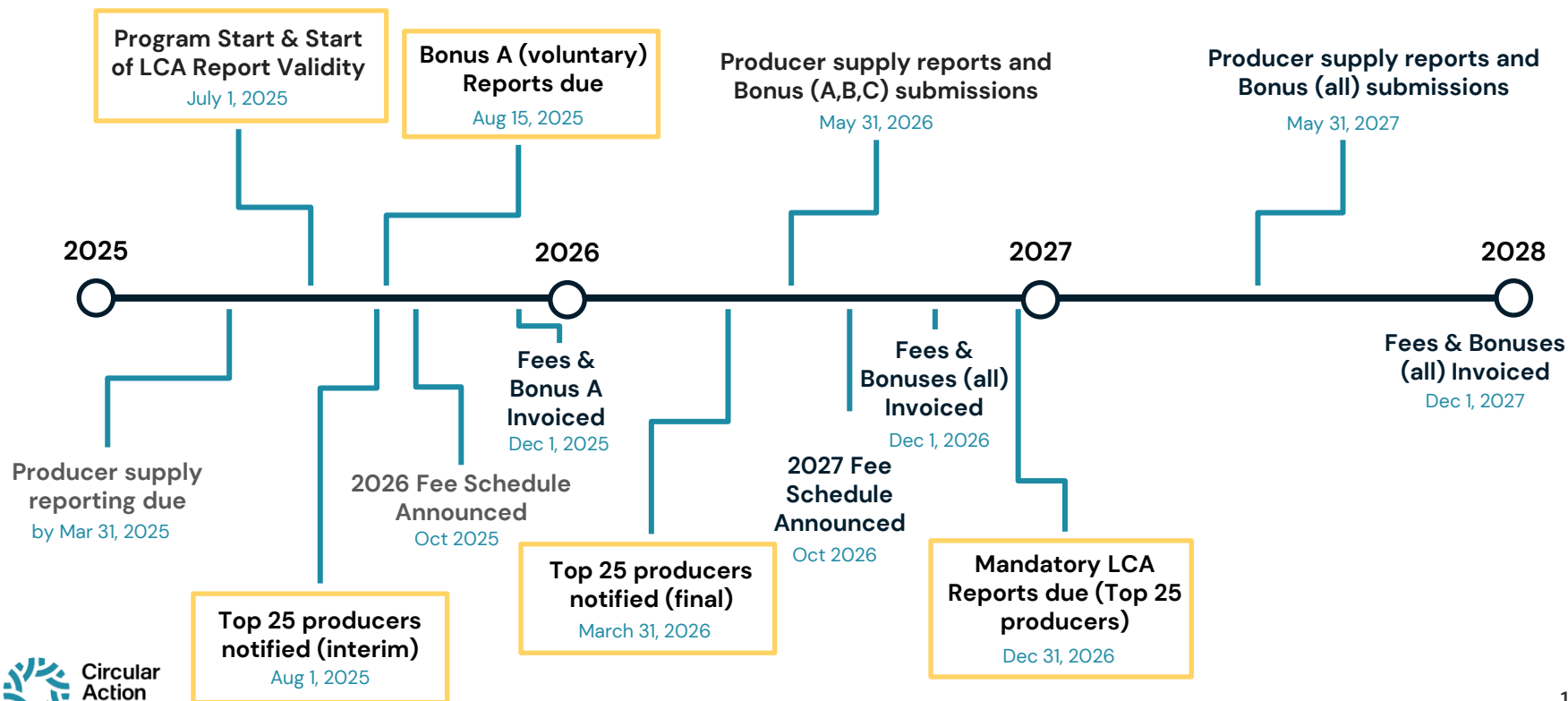
Mandatory LCA disclosures – mandatory LCA reports and disclosure of LCA reports for top 25 producers in OR on their top 1% (based on sales units) SKUs (SKUs can be batched)

- No Bonus A will be granted on top 1% by sales SKUs for top producers (but can be used for Bonus B or C); mandatory reporting on top 1% of SKUs will be needed every two years (and top 1% SKUs determined at each 2-year period)
- CAA notifies Top 25 producers of their interim status on August 1, 2025; Final notification of Top 25 status on March 31, 2026; mandatory LCAs are due December 31, 2026.

*LCAs cover the product's packaging (not the product), unless the product is itself is a covered product (e.g., wrapping paper). In most cases, product is excluded.

LCA Analysis includes primary, secondary and tertiary materials. **Bonus payments apply to primary packaging materials only.

Oregon Bonus Timeline



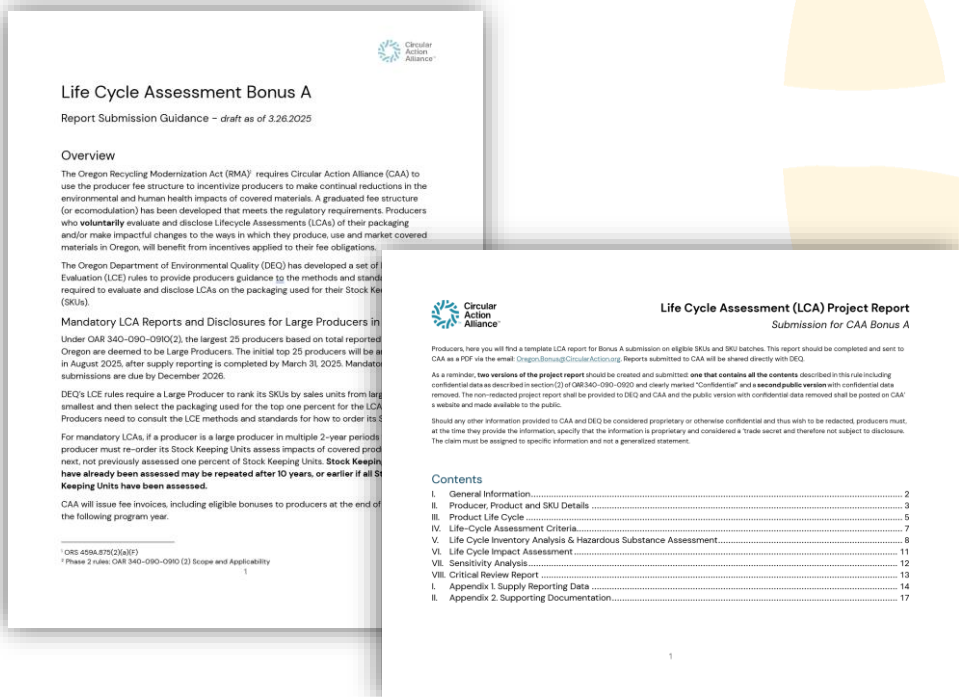
Bonus A Reporting Guidance is ready!

Includes:

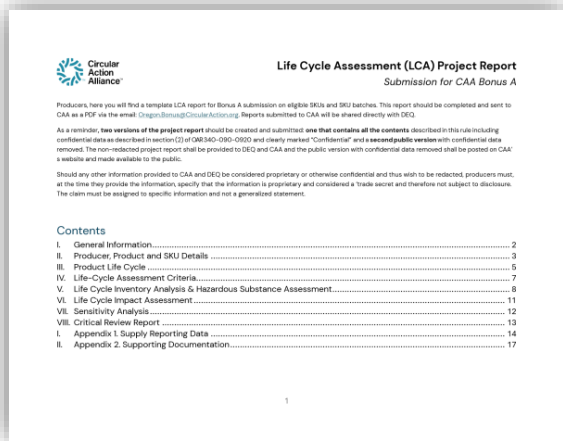
- Bonus A Reporting Guidance
- LCA Project Report Template
- *Results Excel Template (coming soon)*
- *SKU Supply Volume Excel Template (coming soon)*

Bonus A due date:

- August 15, 2025



LCA Project Report



- LCA reports include a “critical review” (i.e., they need to be **third-party verified**)
- Once completed, LCA reports must be **submitted to CAA**, who will share directly with OR DEQ.
- **Two versions will be submitted:** (1) with confidential information (marked “Exempt from Disclosure; Confidential”) (2) redacted without confidential information (marked “Public Report”).
- Non-confidential versions of reports will be available on **CAA’s website**
- LCA reports must include a **detailed identification of SKUs/SKU batches**, (or UPCs), word description of the SKU, and an image of product and/or product label
- LCA report will include **life cycle inventory analysis results, impact assessment results, and assessments of intentionally-added or contaminant hazardous substances**
- **Associated supply weights** of materials in the SKU from supply reporting should be included in the report (for Bonus calculations) – *Excel template forthcoming*

Confidential vs Non-Confidential Report Versions

Public versions need to include (from rule):

- **General Information:** producer, SKU/UPC details, word description of the SKU, and an image of product and/or product label.
- **Life Cycle Inventory Analysis:** aggregate biogenic carbon, input/output flows of Modules, etc.
- **Hazardous Substance Assessment:** intentionally-added or contaminant hazardous substances and human health impacts
- **Life Cycle Impact Assessment:** for impact categories given by DEQ

Note: It is the responsibility of producers to designate confidential information within the “Exempt from Disclosure; Confidential” version, including as much of the above necessary information as possible. Confidential information should be substantiated as trade secret or otherwise business sensitive information

LCA Boundaries, Methodologies & Software

Life cycle boundaries are cradle-to-grave inclusive of Modules A-C. Module B (see “Use Stage” below) is related to reusable/refillable packaging. Module D is outside system boundaries but can be reported for any relevant impacts.

Module A				Module B			Module C			Module D				
Production stage				Use Stage			End of life Stage			Beyond System Boundaries				
A1	A2	A3	A4	B1	B2	B3	C2	C3	C4	D				
X	X	X	X	N/A	N/A	N/A	X	X	X	X				
Raw Materials	Transport	Manufacturing	Customer Transport	Return Transportation	Washing & sterilization	Redistribution transport	Transport to end-of-life processing	Waste processing of covered materials	Disposal or recovery	Recovery Benefits	Incineration	Landfilling	Composting	Material Substitution

Relevant Methodologies:

ISO Standards:

- [ISO 14044:2006](#)
- [ISO 14040: 2006](#)
- [ISO 14025:2006](#)
- [ISO 21930:2017](#)

EU PEF Methodology:

- [Office Journal of the European Union, Commission Recommendation EU 2021/2279](#)

Plastic Leakage Methodology:

- [Plastic Footprint Network Methodology](#)

Hazardous Substance & Human Health Impact Methodologies:

- [Directive 2013/34/EU](#)
- [Commission Regulation EU 2023/2772](#)

Recycling Rate Surveys:

- [OR DEQ Material Recovery Survey](#)

Software & Databases:

Software tools utilized should comply with ISO 14044 and ISO 14040 standards for Life Cycle Assessment (LCA).

Neither CAA nor DEQ prescribe specific software or databases to use.

Software used and data for emissions from databases must be cited within the project report and verified as appropriate during the independent verification process.

Life Cycle Inventory Analysis Results

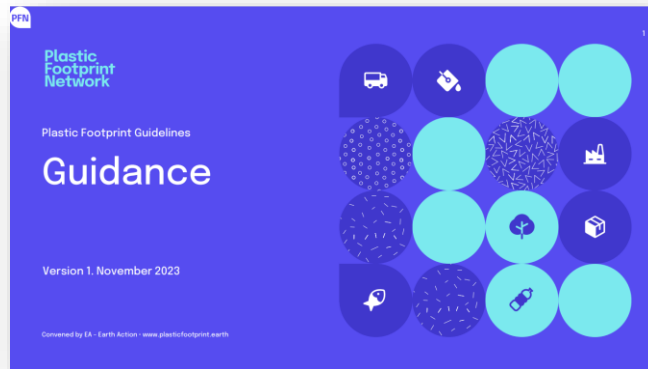
Life cycle inventory analysis are input and output flows to be shown for the whole life cycle of the SKU's covered product(s). The evaluation must include any primary, secondary, and tertiary packaging associated with a Stock Keeping Unit, as well as the product contained or protected by the packaging if it is a covered product. Those are:

- **Biogenic carbon flows** (inputs and outputs) of covered products across required information modules consistent with ISO21930:2017 §7.2.7.
- **Input & Output inventory material, water, energy & emission flows** per lifecycle Module of the full life-cycle assessment
- **Hazardous waste**, as defined in ORS 466.005(7) that is disposed of within any life cycle stage of the covered product
- **Non-hazardous waste** that is disposed of in the covered product life cycle.
- **Plastic leakage inventory**, based on the methodologies of the Plastic Footprint Network (PFN) V1 Nov. 2023) – inclusive of modules for (1) Macroplastic: Packaging and (2) Microplastic: tires
- **Methane leakage** (including methane leakage that happens at wellhead, pipeline, transport, refinery, and production facilities,) – *available via multiple databases such as Sphera and Ecoinvent databases*

Plastic Leakage Inventory

Plastic leakage inventory is to be calculated via the methods outlined in the Plastic Footprint Network (PFN)'s Plastic Leakage Methodology. This includes (at a minimum) modules for:

1. “Macroplastics: Packaging”
2. “Microplastics: tires”



Plastic Leakage Calculations: producers will need to download the methodology from the PFN website and follow equations and guidelines from both modules (and can choose to optionally include others as needed).

Impact Assessment Results for Bonus A

Impact Category	Unit	A1	A2	A3	A4	B1	B2	B3	C2	C3	C4	D
A Climate Change	kg CO2 eq.											
B Ozone depletion	kg CFC-II eq.											
C Human toxicity, cancer	CTUh											
D Human toxicity, non-cancer	CTUh											
E Particulate matter	no. of disease incidents											
F Ionizing radiation, human health	kBq U-235 eq.											
G Photochemical ozone formation, human health	kg NMVOC eq.											
H Acidification	mol H+ eq.											
I Eutrophication, terrestrial	mol N eq.											
J Eutrophication, freshwater	kg P eq.											
K Eutrophication, marine	kg N eq.											
L Ecotoxicity, freshwater	CTUe											
M Land use	pt											
N Water use	m3 water eq											
O Resource use, minerals and metals	kg Sb eq											
P Resource use, fossils	MJ											

LCA Critical Reviews

Table 32 Scoring system for each relevant competence and experience topic for the assessment of the competences of verifier(s)

			Score (points)				
	Topic	Criteria	0	1	2	3	4
Mandatory criteria	Verification and validation practice	Years of experience (1)	<2	$2 \leq x < 4$	$4 \leq x < 8$	$8 \leq x < 14$	≥ 14
		Number of verifications (2)	≤ 5	$5 < x \leq 10$	$11 \leq x \leq 20$	$21 \leq x \leq 30$	> 30
	LCA methodology and practice	Years of experience (3)	<2	$2 \leq x < 4$	$4 \leq x < 8$	$8 \leq x < 14$	≥ 14
		Number of LCA studies or reviews (4)	≤ 5	$5 < x \leq 10$	$11 \leq x \leq 20$	$21 \leq x \leq 30$	> 30
	Knowledge of the specific sector	Years of experience (5)	<1	$1 \leq x < 3$	$3 \leq x < 6$	$6 \leq x < 10$	≥ 10
Additional criteria	Review, verification/validation practice	Optional scores relating to verification/validation	— 2 points: Accreditation as third party verifier for EMAS — 1 point: Accreditation as third party reviewer for at least one EPD scheme, EN ISO 14001:2015, or other EMS				

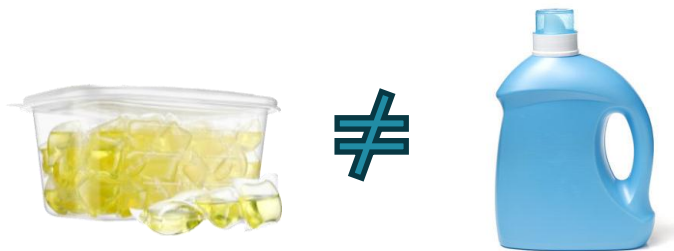
- **1 critical review** per LCA needed from 1 verified third-party reviewer
- **Verifier will provide a self-declaration** on the scoring system constituting the minimum requirement (6 points)
- **CAA has provided a checklist** for critical reviewers within Template Report, in addition to ISO conformity

SKU Definitions



SKU Definition

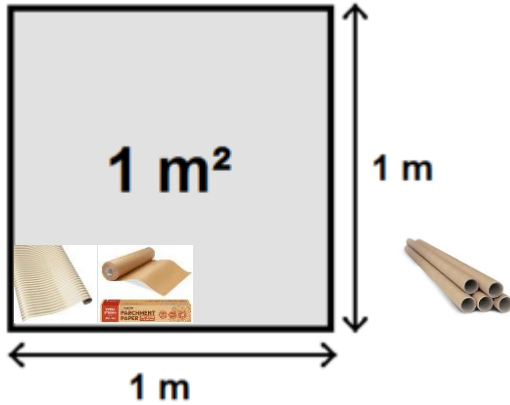
A SKU (Stock Keeping Unit) or UPC (Universal Product Code) or other product and packaging unique identifier is needed for the LCA report to allow for tracking of product details and LCAs. Each LCA (and thus unique SKU) can be submitted every 3 years barring packaging changes (and thus change to LCAs).



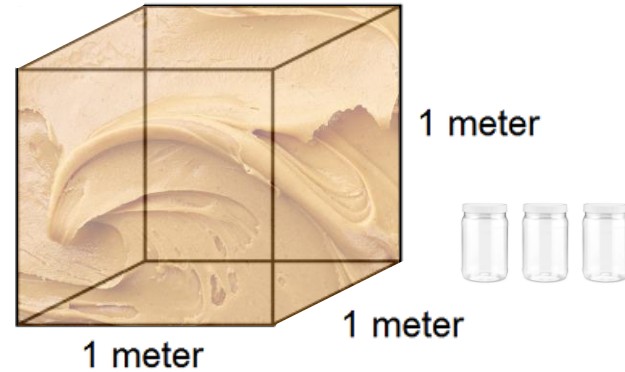
SKU Batching

SKU Batching allowed as long as the same or proportional LCA could be expected (i.e., packaging composition is the same with only cosmetic or proportional differences in color, size, etc.).

Functional Unit (FU) – 1 sq m OR 1 cubic m of (covered product) capacity



Amount of covered product (in kg) required to cover X sq m of capacity



Amount of covered product (in kg) required to contain X cubic m of capacity

Declared no. of units will translate to primary, secondary and tertiary packaging utilized in LCA (per channel split)

More questions? *Write us at producer.support@circularaction.org*

Bonus A Recap:

Submission deadline: **August 15, 2025**

Submission process:

- Once complete and verified, project reports (with critical reviews), any written justification of confidential information, and supporting documents should be submitted as 2 PDF reports by email to **Producer.Support@circularaction.org** with subject line **“ATTN: Oregon Bonus A Submission – [Producer Name].”**
- Problems with Functional Unit? Contact DEQ: **RethinkRecycling@deq.oregon.gov**.
- More questions? Put in a **[help & support request](#)** via the producer portal.

Questions?

Thank You



Producer.Support@CircularAction.org



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