



Date: March 14th, 2025

To: Oregon DEQ - Justin Gast and Nicole Portley

Re: **Supplemental information to December 20th, 2024, letter**

Dear Justin and Nicole,

Further to our letter of December 20th, 2024, regarding the Oregon Plastic Pollution and Recycling Modernization Act (RMA), I would like to provide you with an update and some additional information on our approach in Oregon to collect, recycle and report on the management of petroleum and petroleum related packaging.

In our experience, everywhere that there is a successful Extended Producer Responsibility program for packaging, there is a separate collection and material management system for petroleum and petroleum related packaging. In British Columbia, Canada (population 5.6M), for example, the Interchange program operates an independent collection system from the common packaging management system that if applied in Oregon would help deliver on the recycling, environmental, and human health goals of the RMA. The BC program has approximately 7,000 collection points, including 300 public return collection facilities (e.g., local government and private depots, retailers, and service stations) through which it collects approximately 95% of the petroleum containers sold in B.C.

Our understanding, which we believe is consistent with the information provided by DEQ on the webinar held on February 4th, 2025, is:

1. The primary objective of the RMA is to increase recycling.
2. The primary purpose of the Exemption clause is to recognize the recycling of material not collected by the PRO, and ensure there is no cost burden on the PRO.
3. As the Exemption process is not clearly outlined in the Act or in rule, the DEQ has flexibility to support our approach which will provide a better environmental outcome than if it is not supported.

Our approach and commitment

We are intending to begin collection of petroleum and petroleum related packaging starting in April 2025 (before July 1, 2025) and will report supply and collection annually to the department and Circular Action Alliance (CAA), with an aim to meet the same recycling targets that CAA has in their approved Plan.

Our detailed Applicable Product List of petroleum and petroleum related products and packaging (developed in coordination with CAA in Colorado) is - <https://interchange360.com/wp-content/uploads/2024/12/LPMA-Applicable-Product-List-2024.12.15.pdf>



We also intend to develop a coordination arrangement with CAA that includes a commitment to participate in public education campaigns, development of procedures for verification of Responsible End Markets and ensure that there will be no cost burden on CAA for the collection and recycling of LPMA products. CAA could also choose to advise DEQ that it intends to add LPMA products to the PRO Recyclable Acceptance List (OAR 340-090-0650(1)(i)) and count the collection of these containers toward the plastic recycling rates noted under ORS 459A.926.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "DL", is written over a light blue horizontal line.

David Lawes

CEO

Cc: Kim Holmes, Circular Action Alliance