



## Member Update on Oregon Planning

March 14, 2025

*The following should be used for informational purposes only and not construed as legal advice. Individual Producers are encouraged to consult with their own legal counsel regarding their specific compliance obligations.*

As a 501(c)(6) nonprofit, the directive of the Lubricants Packaging Management Association (LPMA) powered by Interchange 360 is to provide the Producers of petroleum and petroleum related products and packaging with sustainable, transparent, and cost-effective support for their Extended Producer Responsibility (EPR) compliance needs and their Circular Economy objectives.

With that goal in mind, over the course of the last six months, LPMA has been working with the Oregon Department of Environmental Quality (DEQ) and Circular Action Alliance (CAA) to implement an EPR program for the petroleum and automotive products industry that supports both compliance and recycling of its materials. This work includes:

- The development of a collection program for materials on the [LPMA Applicable Products List](#) that will then be sent to responsible end markets for processing. This program is set to begin in April 2025.
- [Notice to DEQ that LPMA members are compliant under the Plastic Pollution and Recycling Modernization Act \(RMA\)](#) given that LPMA will demonstrate to DEQ on an annual basis that its products are being managed as follows:
  - **Separate Collection:** Collected through a recycling collection service not provided under the opportunity to recycle, including the collection from commercial generators and collection points that will accept materials from consumers.
  - **Separate Management:** Sent directly to responsible end markets and will not undergo separation from other materials at a commingled recycling processing facility.
  - **Responsible End Markets:** Recycled at a responsible end market, verified by the PRO or certified responsible through third party certification from an Environmental Quality Commission-approved program.
- Ongoing engagement with DEQ and CAA to:
  - Ensure recycling of petroleum and petroleum related packaging.
  - Develop a coordination arrangement with CAA to ensure that each program is successful.

It has been LPMA's experience that everywhere there is a successful EPR program for packaging, there is a separate collection and material management system for petroleum and petroleum related packaging. LPMA's extensive outreach in Oregon will create such a recycling program for the industry and members of the petroleum and automotive industries are encouraged to join LPMA and support its efforts.

*As in all states, producers must assess their own compliance obligations and seek legal advice if necessary. Producers should note secondary and transport packaging is considered separate from the LPMA product list and should be reported to CAA.*

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For questions or more information, please visit the [Oregon](#) page on our website or contact Mark Carpenter, Director of Member Services at [mcarpenter@interchange360.com](mailto:mcarpenter@interchange360.com).