



DRAFT proposal for discussion: RMA Implementation Transition Period

A system of shared responsibility relies on coordination.

The Plastic Pollution and Recycling Modernization Act (RMA) will modernize Oregon’s recycling system through the coordinated efforts of many entities throughout the state. One of the most important changes is welcoming producers of printed paper, packaging, and food serveware to the table. In the new system:

- Producers of covered products will join producer responsibility organizations, or PROs.
- PROs will provide financial support to local governments, service providers, and commingled recycling processing facilities and work together to expand and improve recycling services.
- Commingled recycling processing facilities will be permitted and required to ensure that sorted materials only go to responsible end markets for final disposition.
- DEQ, in consultation with the new Recycling Council, will play an oversight, administration, and enforcement role.

Successful coordination takes time.

The success of the RMA is dependent on everyone playing their part. In many cases, the ability of one entity to meet its regulatory requirements is dependent upon the actions of other players in the system. For example, local governments and commingled recycling processing facilities will rely on PRO funding to fulfill their obligations.

DEQ recognizes it takes time to build a new system. It takes time to establish partnerships, plant seeds of change, and for those investments to yield results. It takes time to order and install equipment, to change collection services, and conduct effective outreach to the public. Therefore, DEQ is proposing a period of transition during the first few years of RMA implementation, to ensure changes can take place in the proper sequence and to allow for adaptation to new requirements.

What do you think?

As you read through the description of the transition proposal below, please consider:

- What do you like and dislike about this idea?
- What are the consequences or outcomes of this approach?
- What’s missing from the proposal?
- What questions still need to be answered?

Many requirements will still take effect on July 1, 2025.

As shown in the table below, many components of the RMA will roll out according to the original schedule.

RMA Launch	
By July 1, 2025...	
Producers	<ul style="list-style-type: none"> • Join and begin paying fees to a PRO.
PROs	<ul style="list-style-type: none"> • Begin implementing DEQ-approved program plans. • Develop educational resources and statewide campaigns to promote the Uniform Statewide Collection List. • Are establishing depots and collection points for materials on the PRO Recycling Acceptance List. • Are preparing to meet deadlines for verifying or certifying that end markets meet Oregon’s “responsible” standard.
Local Governments	<ul style="list-style-type: none"> • Are eligible to receive funding from PROs. • Send commingled recyclables to permitted/certified facilities. • Begin implementing PRO-funded contamination reduction programming.
Commingled Recycling Processing Facilities	<ul style="list-style-type: none"> • Accept all materials on the Uniform Statewide Collection List. • Are eligible to receive funding from PROs through contamination management and processor commodity risk fees. • Must meet permit requirements not dependent on PRO funding, such as marketing materials to responsible end markets and reporting on final disposition. Specifics will be determined in the second rulemaking process.

To allow flexibility, some obligations will phase in through 2027.

DEQ is proposing to use implementation tools, including enforcement discretion, to formalize a transition period through December 2027. The transition period will apply to certain RMA obligations that are dependent on actions from others or take more time to phase in.

Transition Period	
From July 1, 2025 to December 31, 2027, DEQ will allow time to come into compliance with some requirements.	
PROs	<ul style="list-style-type: none"> • May gradually meet the convenience standard by establishing collection points over time. Specifics will be determined in the program plan.
Local Governments	<ul style="list-style-type: none"> • May phase in collection of materials on the Uniform Statewide Collection List if additional time is needed. • May phase in implementation of Opportunity to Recycle program requirements that are dependent on PRO funding, such as service expansion identified through the needs assessment.
Commingled Recycling Processing Facilities	<ul style="list-style-type: none"> • Will have a grace period associated with certain permitting standards reliant on PRO funds, such as sorting effectiveness and the levels of contamination allowed in material sent to end markets. Specifics will be determined in the second rulemaking process.

The system is fully transitioned by 2028.

As 2027 draws to a close, so does the transition period. All regulatory requirements on PROs, local governments and commingled recycling processors are fully implemented and the second PRO program plan period begins.

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