

Topic paper 3: Glass collection

RMA Rulemaking 3: Prepared for Rulemaking Advisory Committee discussion – May 27, 2026

Recycling Acceptance Lists OAR 340-090-0630

Summary of proposed revisions

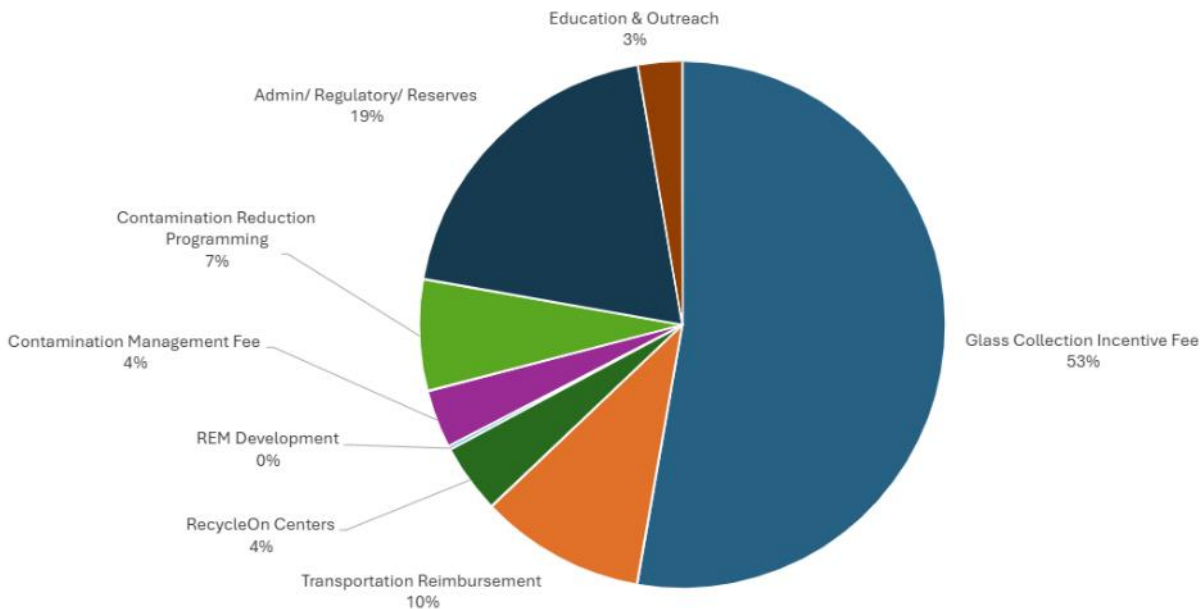
This document presents two options for potential rule amendments related to the collection of glass packaging. The options identify proposed amendments to both material acceptance lists for local governments and the Producer Responsibility Organization, or PRO. The proposed revisions would generally reduce the obligation of the PRO for the collection of glass packaging in Oregon, which would translate to lower fees paid into the system and to CAA by the producers of that glass packaging.

Background and process

ORS 459A.914 requires the Environmental Quality Commission to adopt [administrative rules](#) that identify materials that are suitable for recycling collection. Existing rules, adopted in 2023, require the Producer Responsibility Organization to provide for collection of glass, primarily through a network of depots or drop-off sites. A PRO may provide for an alternative system, which might involve an incentive payment to local governments that choose to provide on-route collection of glass instead. In response to concerns raised by the glass manufacturing industry and users of glass packaging, DEQ is reconsidering those 2023 rules to consider potential opportunities to reduce costs to glass producers through changes to collection requirements for glass or other strategies.

During the current program year (2026), CAA’s fee schedule provides for a base fee of \$0.10 per pound sold in or into Oregon for glass. Figure 1 below, provided by CAA, shows how glass fees are being spent in 2026. The “admin/regulatory/reserves” portion of costs, currently 19 percent, is expected to decline in future years as CAA is still actively building its initial reserve fund in 2026.

Figure 1: Breakdown of 2026 Glass Fees. Data and chart provided by Circular Action Alliance



DEQ convened a [Technical Workgroup](#) in April 2026 [to provide technical input to DEQ](#) on opportunities to reduce costs for glass producers related to the collection of glass for recycling, and the potential impacts of those options. DEQ and Workgroup members considered the statutory criteria outlined in [ORS 459A.914\(3\)](#). The Workgroup met on [April 15](#) and [April 28](#), 2026.

The input from the Technical Workgroup was used to revise potential scenarios that correlated to different rule amendments, and DEQ brought those updated scenarios to the Materials Subcommittee of the Oregon Recycling System Advisory Council on May 4 and 12, 2026. The discussions and feedback at those two meetings resulted in DEQ advancing two collection-related options for consideration at the [May 20 meeting of the full Recycling Council](#) and for review by the Rulemaking Advisory Committee at its May 27 meeting.

Implementation of glass collection in Oregon under RMA

Circular Action Alliance was designated as the State's only producer responsibility organization (PRO) under the RMA with the approval of its first program plan in February 2025.

During early implementation of the RMA, CAA addressed glass specifically by:

- Providing a per-ton financial incentive to communities that choose to continue on-route or depot collection of glass.
- Including glass in CAA's expanding network of RecycleOn depots (for materials on the PRO Recycling Acceptance List), in those communities that lack other glass drop-off locations.
- Entering into agreements to reimburse local governments and service providers for the cost of transporting glass more than fifty miles to the nearest end market.
- Establishing regional consolidation locations in Eastern and Southern Oregon to provide a "hub and spoke" model for more efficient transportation.
- Proactively intervening to help move glass previously used as landfill cover or roadbase to Glass to Glass for a variety of communities distant from Portland (Douglas, Josephine, Jackson and Klamath counties and the City of Milton-Freewater).
- Connecting collection programs in Eastern Oregon with a (new-to-Oregon) end market, Environmental Abrasives (in Idaho), that uses the glass to offset demand and use of other materials such as slag products and garnet abrasive.
- Paying fees to local governments and service providers to fund generator-facing contamination reduction programming efforts, and a "Contamination Management Fee" to commingled recycling processing facilities to compensate them for their costs of removing and disposing (or in some cases, recycling) of non-USCL covered products (including glass).

In 2024 DEQ designated glass bottles and jars as a "Specifically Identified Material" (SIM) due to the potential for changes in how glass might be collected in some communities, and the anticipated need for special outreach materials that local governments and service providers might use to communicate the program change and encourage local generators to change recycling behaviors. CAA delivered these materials in early 2026 and in March of this year, DEQ, after consulting with CAA and the Oregon Recycling System Advisory Council, removed the SIM designation for glass bottles and jars, effective April 1, 2026.

Current status of glass collection in Oregon

In 2024, DEQ estimated that approximately 75% of glass packaging generated as waste in Oregon was recycled, substantially higher than the national average of approximately 31%. Setting aside access to Bottle Bill redemption sites, about 70% of Oregon's population was estimated as having access to curbside collection of glass, and another 13% had access to depots only.

- Communities with on-route collection of glass include many of the state’s larger cities, including all of the Metro region, Eugene, Salem, and Bend, and many mid-sized and smaller cities such as Brookings, Coos Bay, Ashland, Corvallis, Albany, Woodburn, Astoria, Hood River, and The Dalles.
 - Most communities providing on-route collection in the Metro region collect glass weekly, although some collect it every-other-week.
 - Outside of the Metro region, most communities with on-route collection provide for either every-other-week or once-a-month collection.
 - Medford provides for on-route collection of glass only for commercial and multi-family properties. Residential single-family generators are provided with a network of recycling depots located throughout the region.
- Other Oregon communities that rely on depots for collection include Grants Pass, Roseburg, Tillamook and Columbia Counties, Seaside, and most of Central and Eastern Oregon (outside of Deschutes County).

Under Oregon’s current administrative rules, none of these local governments or their service providers have any legal requirement to collect glass for recycling. Their current service levels largely mirror pre-RMA service levels. Prior to adoption of the RMA, local governments or their service providers were required to provide for glass drop-off at locations that accept solid waste from the public, such as transfer stations. Local governments in the Metro-region were (and remain) subject to a separate on-route collection mandate as part of Metro’s Regional Service Standard. Other on-route and depot collection opportunities were provided on a voluntary basis.

As CAA implements its first Program Plan (2025-2027), these collection services have been receiving funding from producers in the form of an “incentive payment” that helps CAA provide for alternative compliance for what would otherwise be an extensive contracted or PRO-operated depot network. Those incentive payments contribute more than half of the \$0.10 per pound fees paid by glass producers. The incentive payments provided by CAA are intended to only equate to CAA’s avoided cost of meeting convenience standards at glass-only depots, and do not cover many of the costs otherwise incurred by local governments or their service providers.

For example, the City of Portland maintains weekly on-route collection of glass and estimates that the service has a gross cost of approximately \$3.20 per household per month. Of that, the PRO’s glass incentive payment equates to roughly \$0.20 per household per month. Similarly, the City of Beaverton estimates that it receives approximately \$80,000 per year in glass collection incentive, as part of a comprehensive solid waste and recycling program that costs approximately \$25 million per year.

Known modifications, regardless of other potential rule changes

Through the Technical Workgroup and Recycling Council subcommittee meeting conversations, the Glass Packaging Institute shared its interest in working with CAA to build out its current system of hub-and-spoke consolidation points for collected glass. Such consolidation points serve as places where both on-route and drop-off collection programs can deliver smaller loads of glass for consolidation into larger containers for more cost-effective transport to a responsible end market. An expansion of that network has potential to reduce CAA’s transportation reimbursements to service providers and local governments, in part by reducing the overall costs of transporting glass.

To help enable a transition to such a system, DEQ intends to propose amendments to OAR 340-090-0770 that would clarify that local governments and their service providers could receive transportation cost reimbursement for materials, including glass, that must be moved more than 50 miles from a recycling depot or recycling reload facility to a commingled recycling processing facility (CRPF) or a responsible end market (REM) **or a consolidation point that delivers material to a CRPF or REM at no charge to the entity delivering the material.** Emphasis added by DEQ, with the underline and bold indicating proposed new

language. The addition of “consolidation point” would support the voluntary expansion of CAA’s hub-and-spoke model of glass packaging collection. DEQ plans to bring this proposal as a rule concept to the RAC at its July meeting.

May 2026 rule concepts: Focus on collection of glass

Based on discussions with DEQ’s Technical Work Group and the Materials Subcommittee of the Oregon Recycling System Advisory Council, DEQ is presenting to the RAC at its May 2026 meeting two options related to the PRO’s obligation to provide for collection of glass. These options aim to reduce producers’ costs by addressing the largest portion (57 percent) of their current obligation (see Figure 1 on page one: glass collection incentive [53 percent] plus RecycleOn Centers [4 percent]).

The focus of these options is limited to the PRO’s obligation to support collection. Both options would:

- incorporate potential changes to the hub-and-spoke consolidation system, as described above.
- retain the obligation of glass producers to pay fees to a PRO for other costs related to the management of glass as a covered product, including an allocated portion of costs related to:
 - contamination management and reduction,
 - education/outreach,
 - administrative/regulatory/reserves, and
 - market development (if needed; those fees are currently zero).

Option 1: Revert to pre-RMA collection requirements; require new PRO support in small, remote counties; maintain 45 percent collection rate

This option corresponds with “Scenario F” from the May 12 Recycling Council subcommittee meeting.

OAR 340-090-0630 would be amended as follows:

- Add glass packaging to the Local Government Recycling Acceptance List and treat it akin to motor oil and large appliances. As a result, local governments would be required to provide depot or drop-off collection opportunities for glass at sites that accept solid waste from the public, such as transfer stations. Local governments would retain the ability, without obligation, to voluntarily provide for on-route collection of glass if they desire.
- Two exemptions to this mandate would be provided as follows:
 - Maintain the existing exemption for very small transfer station/depot sites in OAR 340-093-0160(4).
 - Condition the Local Government Recycling Acceptance List above by exempting local governments in 10 “wastesheds” which, prior to the RMA, were not required to collect glass at depots: Curry, Grant, Harney, Lake, Malheur, Morrow, Sherman, Wallowa, Gilliam and Wheeler. These are wastesheds where, historically, glass was not designated as a “principal recyclable material” under OAR 340-090-0070, a rule that was replaced by the RMA rules in 2023.

Summary

The amendments described above would effectively revert back to requirements of local governments and service providers that pre-dated the RMA, although they would be supported by producers (for example, long-distance freight compensation) in ways that did not exist prior to the RMA.

In Option 1, glass would exist on both the Local Government Recycling Acceptance List and also the PRO Recycling Acceptance List. The PRO's collection obligations, however, would be limited by the following amendment to OAR 340-090-0640 (convenience standards):

- Remove glass from most convenience standards established in OAR 340-090-0640.
- Limit the PRO's obligation to provide for glass collection, requiring it only at sites that accept solid waste from the public (such as transfer stations) in the 10 wastesheds that are proposed for exemption above (Curry, Grant, Harney, Lake, Malheur, Morrow, Sherman, Wallowa, Gilliam and Wheeler).

The glass collection rate in OAR 340-090-0660(2)(a) would be maintained at 45 percent. As currently defined in rule, local government collections of glass count towards the numerator (even if the PRO plays no role in supporting them) and bottle bill collections are removed from the denominator. Maintaining the collection rate at 45 percent serves two functions:

1. It requires the PRO to continue monitoring glass recycling writ large, thereby serving as an "early warning system" if glass collections demonstrate significant backsliding.
2. It acts as a backstop against significant backsliding, while providing the PRO with maximal flexibility in how it could respond should glass collection infrastructure erode.

Considerations

The key benefits of this option are that it provides significant cost savings (a reduction in collection obligations on the order of 90 percent) for glass packaging producers, and it guarantees a basic level of opportunity to recycle glass in all communities of the state. It also requires the continuation of glass recycling services in communities where CAA has recently introduced it, such as Burns.

Key disadvantages of this option are that it introduces a mandate for many local governments, although the mandate is moderate. There is no on-route collection mandate; only local governments that operate or oversee solid waste disposal sites are obligated (thereby exempting most cities); and exemptions are provided for both very small sites as well as local governments in 10 lower-population and more remote wastesheds.

Further, the loss of the collection incentive might contribute to some local governments deciding to scale back on glass recycling, although the impact of that may be small (given the relatively small size of the incentive in the first place). If local governments do respond by scaling back on collection service, generators might respond by placing their glass packaging into the commingled system instead. That would disrupt the commingled processing system and end markets, and would eventually obligate the PRO (and glass producers) to pay higher fees as a result.

However, CAA would have ample warning of this change, as a shift of glass into the commingled system would be observed at CAA's audit center. If this becomes a significant concern, CAA could (and presumably would) report the issue to DEQ and the Recycling Council, and partners could consider another round of adjustments.

Option 2: Depot obligation shared between PRO and local governments

This option corresponds with "Scenario D" from the May 12 Recycling Council subcommittee meeting.

Summary

As with Option 1, Option 2 assigns depot obligations to both local governments and the PRO(s), but it allocates the obligations differently.

To understand Option 2, one must first understand how the current convenience standard operates. Current rules (OAR 340-090-0640) require the PRO to provide for:

- Depot collection of materials on the PRO Recycling Acceptance List at all existing depots where doing so “is possible” (defined); and
- A certain number of depots in each city and county, based on populations.
 - “Existing depots” can count towards those population-based quotas. As a practical matter, the quotas are low enough that in many communities, providing for service at existing depots will fully satisfy them.
 - But in large-population areas, such as Medford, Bend, Eugene and the Portland Metro region, the number of existing depots doesn’t meet the population-based quotas, thereby requiring the PRO to either provide additional “neighborhood based” depots, or provide for an alternative compliance approach.
 - Currently, CAA’s alternative compliance method involves the payment of a per-ton collection incentive to local governments or service providers that either provide additional depots (such as Medford) or that provide on-route collection (in lieu of additional depots).

Under this option, OAR 340-090-0630 would be amended similar to Option 1, but without the exclusion for the 10 historically-excluded wastesheds. Very small transfer station/depot sites would continue to be exempted under OAR 340-093-0160(4).

Glass would remain on the PRO Recycling Acceptance List, but with different convenience standards. DEQ would revise OAR 340-090-0640 (convenience standards) to release the PRO of any obligation to provide for service at existing depots or drop-off sites. The population-based quotas would be retained, as would the ability of the PRO to count existing depots or drop-off sites (under this measure, operated by local governments or service providers) against the PRO’s own quotas.

The net result is that in many communities, the PRO would have no collection obligation, but in high-population communities, the PRO would retain much of its current collection obligations.

Considerations

Key benefits of this option include a higher level of opportunity to recycle glass in all communities of the state. This option would also result in a reduction of costs to the PRO (and lower fees for glass producers), although the fee reductions would not be as significant as in Option 1.

Key disadvantages of this approach include the same “new” requirements for local governments and service providers as in Option 1, but in this case, extended to local governments in 10 small population, remote wastesheds that previously were not subject to this mandate. While the PRO would engage in cost-sharing by providing for freight reimbursement, the obligation to provide for at-depot collection would be new. However, where the service is actually new, those local governments in turn could ask the PRO to pay for the creation and operation of those depots (under ORS 459A.890(5)), which would protect local rate payers but further burden the PRO, thereby reducing the cost-savings effect of this measure and fee relief for producers.

Effectively, in Option 2, the PRO would end up paying the same collection costs as in Option 1 (small population, remote depots) but would also be paying for depots (or an equivalent cost value of service) in high population areas of the state. In the rest of the state, the PRO would have no collection obligation, which could result in the same type of backsliding (and increasing contamination of CRPFs) as was described in Option 1.

Comparison of both options

A summary of PRO and local government obligations under current rules and options 1 and 2 are shown below.

Figure 2: Table showing PRO and local government obligations under current state and both options

Requirement	Current Case	Option 1 (F)	Option 2 (D)
PRO Obligation: Transportation (freight reimbursement)	Yes	Yes, but reduce producer (fee) costs by optimizing “hub and spoke”, amending OAR 340-090-0770	
PRO Obligation: “Opportunity to Recycle” (OTR) depots	Yes	Limited*	Limited*
PRO Obligation: supplemental “neighborhood depots”	Yes	No	Yes
Optimize PRO “collection incentive” (alternative compliance options)	No	Limited	Yes
Local Government Obligation: OTR depots	No	Yes (most)	Yes

*An asterisk indicates that the requirement would only be applicable to the Curry, Grant, Harney, Lake, Malheur, Morrow, Sherman, Wallowa, Gilliam and Wheeler wastesheds.

Additional topics for feedback

1. Effective date for potential rule amendments

DEQ received feedback from Committee members and others that any change to glass collection services will influence the revenues paid to service providers and/or local governments, which typically recover uncompensated costs through user fees (rates).

- Effects of either option could be economically harmful if changes are enacted without the time to modify rates or service agreements among those providers and local governments.
- Allowing more time, and predictability of what changes are occurring, would allow service providers and local governments the time to modify service agreements and/or rates.

- If proposed and adopted in mid-January 2027, the rules would be effective in mid-February 2027 unless otherwise specified.

Does the Committee favor that standard effective date or would Committee members recommend a specific, later, effective date for any changes to glass packaging collection requirements?

2. Extension of on-route mandate for commercial glass collection outside of Metro service area, based on population and business density

Currently, [the rules](#) require that local governments provide for on-route collection of glass from non-residential sources in the Metro service area.

Does the Committee favor an expansion of this type of collection outside of the Metro area, related to the community's population, density of businesses or other factors?

Do Committee members have any feedback on what general parameters (population size, distance of collection to end market or consolidation point, etc.) would be feasible for any sort of expansion?

Committee discussion questions

1. Which of the proposed options do you prefer? What informs that preference?
2. What do you recommend regarding the additional issues (effective date and commercial glass collection), and why?
3. Are there other potential outcomes not accounted for by DEQ that you think are important for the consideration of these amendments?

Contact

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