

Glass Technical Workgroup: Options for action and criteria for consideration

April 24, 2026

DEQ convened a 2026 Technical Workgroup on Glass Collection to provide input to DEQ on opportunities to reduce costs for glass producers related to the collection of glass for recycling, and potential impacts of those options. The Technical Workgroup's charter and information from its first meeting can be viewed on the [2026 RMA Rulemaking webpage](#).

On April 15, 2026, the workgroup met and began initial review of potential options for action and the criteria DEQ would consider in the evaluation of options for potential development of rule concepts. This document summarizes options, both those presented by DEQ and provided by workgroup members on April 15, and is a companion document to the matrix of potential options and criteria for consideration. Both will be discussed at the April 28, 2026, meeting of the workgroup.

Options for action

Following the April 15 discussion, at the request of workgroup members, DEQ assessed the full brainstormed list of options against the statutory and discretionary criteria relevant to the consideration of glass packaging in Oregon's modernized recycling system. In doing so, DEQ concluded that several options could be held back from further evaluation, including the following:

- **Remove the SIM designation on glass packaging** – This action was completed April 1, 2026, and is no longer applicable.
- **Divert collected glass to alternative markets such as fill** – DEQ determined that this is inconsistent with the State of Oregon's policy for hierarchy of uses (ORS 459.015(2)), as it would likely divert glass packaging to low-value (and low-benefit) uses. In addition, it could undermine public confidence in recycling.
- **New rules to require PROs to ensure parity of cost (price) implications across material type** – This is outside the scope of current rulemaking and likely would run contrary to the requirements of ORS 459A.884; however, policy questions like this proposal will be kept by DEQ for potential future consideration by the Oregon Recycling System Advisory Council.
- **Hybrid system: Limited on-route/curbside (potentially related to population), continue to collect commercial both based on density with hub-and-spoke style depot model for less densely populated areas** – This proposed solution combines several options; for the purposes of this Technical Workgroup DEQ wants to evaluate options in isolation, without bundling them into hybrid options (at this time). There are far too many possible permutations of combined options to assess, but once assessment of individual options is completed, DEQ expects to consider a smaller number of hybrid options (including potentially the one suggested) with the Oregon Recycling System Advisory Council and/or the Rulemaking Advisory Committee, following the conclusion of the workgroup.

After considering DEQ's original list of options, additional options suggested by TWG members in discussion on April 15, and one new option subsequently identified by DEQ, and then after removing the options listed above, DEQ has prepared a revised list of options for further evaluation. Options are grouped below based on

general categories of the changes, and the order of the potential actions does not indicate any preference or ranking by DEQ. Many options could also be combined with other options to create a much larger number of hybrid combinations. These are not described or evaluated separately. Please also note that the numbers used below do not correlate with the original numbered list provided in advance of the April 15 workgroup meeting.

Options involving local government mandates:

1. Place glass packaging on the Local Government Recycling Acceptance List (statewide) and designate it for the Uniform Statewide Collection List
2. Place glass packaging on the Local Government Recycling Acceptance List but exclude it from the Uniform Statewide Collection List – with five variations:
 - a. Statewide on-route collection mandate (for existing programs, no change in frequency; for new programs, low frequency)
 - b. Statewide on-route collection mandate (low frequency)
 - c. Statewide on-route collection mandate, but only for commercial sources
 - d. Collection mandate for certain communities, based on location (distance to collection point and/or end market)
 - e. Collection mandate for certain communities, based on community population
3. Place glass on the Local Government Recycling Acceptance List (statewide) but only for depot collection – with two variations:
 - a. PRO is simultaneously obligated to meet convenience standard, but not at sites where local governments or their service providers are separately obligated (shared responsibility for depots – local governments/service providers operate some, while PRO operates or funds others)
 - b. PRO has no obligation to meet convenience standards

Additional options (additional to 3a) where glass packaging remains on the PRO Recycling Acceptance List

4. Maintain glass packaging on the PRO Recycling Acceptance List, but reduce the convenience standard
5. Maintain glass packaging on the PRO Recycling Acceptance List, but re-examine the on-route collection subsidy

Additional options

6. Build out a “hub-and-spoke” collection infrastructure to reduce transportation costs (possibly in coordination with OBRC)
7. Remove glass packaging from any and all recycling collection lists
8. Changes to transportation reimbursements – this option was not previously discussed by workgroup members, and DEQ will provide a short summary at the April 28 meeting, in addition to the information contained in the matrix included here as Attachment A.

Questions for workgroup member consideration

1. What comments do you have on DEQ’s initial assessment of options, included here as Attachment A?
2. For the communities in Oregon with which you are well acquainted, how do you anticipate they might respond to these options?
3. What data or information do you, or your organization, currently have that would help inform DEQ’s

evaluation of the various options, especially with regard to costs (to service providers/rate payers and PRO/producers), contamination, material flows (tonnages) and environmental impacts?

4. What other data sources would you recommend to DEQ as it considers the development of potential rule concepts that would help meet the objective of reducing costs to the producers of glass packaging within the shared-responsibility model of Oregon's Recycling Modernization Act?

Statutory evaluation criteria

The evaluation criteria contained in Attachment A include many, but not all, of the statutory criteria contained in ORS 459A.914(3) and described in the second background paper prepared in advance of the April 15 meeting. To these, DEQ has added several more criteria, including "cost to ratepayers", "cost to producers", and "convenience to generators".

Several statutory criteria are excluded from Attachment A:

- "Amount of material available" (ORS 459A.914(3)(e)) was excluded because there is no difference across any of the options.
- "Ability for waste generators to easily identify and properly prepare the material" (ORS 459A.914(3)(h)) was excluded for the same reason. The ability to identify glass and prepare it for recycling is the same regardless of whether the collection infrastructure provides for convenient or inconvenient service, or at a higher or lower cost to the generator.
- "The policy expressed in ORS 459.015(2)(a) to (c)" was excluded partially because differences in environmental and well-being outcomes ((2)(a)) and potential reductions in material use ((2)(b)) are evaluated using separate criteria, and otherwise there is no meaningful difference across any of the options when viewed against this criterion.

More information

Contact Stephanie.Caldera@DEQ.Oregon.Gov or visit DEQ's [Recycling Modernization Act website](#).

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