State of Oregon
DEQ Department of Environmental Quality

Memorandum

To: Jen Parrott, Land Quality Division Administrator

From: Stephanie Caldera, RMA Rulemaking 3 Project Manager

Date: Aug. 10, 2026

Subject: Rulemaking Advisory Committee review and feedback on Draft Fiscal and Racial Equity Impact Statements, RMA Rulemaking 3

On July 20, 2026, as part of the group's fifth and final meeting, the Rulemaking Advisory Committee for the Recycling Modernization Act Rulemaking 3 (2026) reviewed and provided input to DEQ on the Draft Fiscal and Economic Impact Statement and Draft Racial Equity Statement. Both Statements were developed by DEQ as part of rulemaking standard processes and as required by Oregon law. This document summarizes verbal feedback provided by committee members and other input received in writing from RAC members after the meeting.

Fiscal and Economic Impacts

As ORS 183.33 requires, DEQ asked for the committee's recommendations on:

- Whether the proposed rules would have a fiscal impact
- The extent of the impact
- Whether the proposed rules would have a significant impact on small businesses and complies with ORS 183.540

DEQ presented its draft fiscal and economic impacts analysis at the July 20, 2026, meeting. No committee member indicated that the proposed rules and rule amendments would have a significant impact on small businesses or would otherwise not comply with ORS 183.540. Committee members provided feedback at the meeting on some portions of the draft statement, including:

- Concerns about the appearance of certainty related to potential fee reductions for glass packaging
- A correction that members of the public who pay for recycling/garbage services, not local governments/service providers, may be the entity that absorbs an expected shift in costs (25 cents per month for residential customers) related to proposed amendments to glass collection.
- Typographical and grammatical errors in the document.

Kim Holmes, representing Circular Action Alliance, submitted addition written input via email on Aug. 6, 2026. Regarding the Draft Fiscal and Economic Impact Statement, Holmes requested the exclusion of specifics, and any related appearance of certainty from DEQ, on projected potential fee reductions related to proposed amendments to glass collection.

DEQ may make revisions to the Draft Fiscal and Economic Impact Statement based on committee feedback. The revised Statement will be part of the Public Notice and Request for Comment issued by DEQ for this rulemaking, projected for mid-September 2026.

Racial Equity Impacts

ORS 183.335(2)(b)(F) requires state agencies to provide a statement identifying how adoption of rules, or rule amendments, will affect racial equity in Oregon. DEQ presented its draft racial equity analysis to the committee at the July 20, 2026, meeting and asked for feedback on the information.

Generally, the committee agreed with DEQ's information. Adam Rack, representing small businesses with expertise in reuse, noted that reuse is generally not considered in many parts of the proposed rules and amendments, and there is evidence to support that better reuse outcomes supported better equity and environmental justice outcomes.

DEQ may make revisions to the Draft Racial Equity Impacts Statement based on committee feedback. The revised Statement will be part of the Public Notice and Request for Comment issued by DEQ for this rulemaking, projected for mid-September 2026.

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