

## Allocation of Non-Material Management (Indirect) Costs

Non-material management costs include program operations and administration, program development and regulatory costs. These costs generally account for under 10% of annual program budgets and they have different cost drivers than material management costs. As these costs are often borne by all covered materials, they are allocated to materials using a different approach than material management costs.

## Publisher In-Kind in Lieu of Paying Fees (Print and Online Advertising)

In accordance with ORS 459A.884(7), CAA shall accept the value of print and online advertising services in lieu of all or a portion of fees payable by newspaper or magazine publishers. Eligible publishers shall notify CAA of their intention to participate in the program, and CAA staff will work with each participating publisher to develop a plan for advertising opportunities that align with CAA's needs and advance the objectives of the program.

The fee payment deadline for participating publishers will be deferred with extended payment terms to accommodate CAA's validation of the in-kind contributions during the program year. Participating publishers will apply to CAA for a credit to fees payable to CAA. The credit amount shall represent a fair market value for in-kind services and is subject to audit and verification by CAA. If approved, CAA will apply the credit to the participating publisher's account. Publishers are expected to pay the base fee in its entirety as outlined in the fee schedule unless an in-kind fee credit is applied, and any remaining balance after credits are applied will need to be paid in full. More details will become available as part of the CAA policy on in-kind contributions for publishers.

## Confidentiality

As per OAR 340-090-0710(2), CAA's fee-setting methodology is considered proprietary and confidential information. The detailed methodology will be included as part of a confidential addendum to the Program Plan submission.

### iii. Draft Base Fee Schedule Ranges

CAA is publishing the full detailed fee schedule for 60 material categories using two illustrative fee scenarios in this program plan as a requirement from DEQ's internal management directive (IMD). By using the two scenarios of fees with varying levels of estimated supply tons, CAA is also creating awareness for producers about the critical impact that supply reporting has on the variability of material fee rates.

Note that uncertainty around fee rates remains in place, due to a lack of producer supply data. Until producers report their actual amount of supplied materials in the first quarter of 2025, only the fee-setting methodology and a range of fee estimates can be provided.

In this plan submission, CAA is publishing an updated program cost budget that is informed by the outcomes of ORSOP, and CAA is also publishing a full base fee schedule with fee rates for 60 material categories for DEQ's approval. The low and high scenarios reflect the varying levels of producer supply reporting expected.

Given that the system expansion investment needs identified through the ORSOP survey were less costly than those of DEQ's 2023 needs assessment, and that some depot operating costs came down due to co-location opportunities, the overall program costs have decreased.

The final 2025 detailed fee schedule will be published in June 2025 after Oregon producers complete their supply reporting.

## Draft Base Fee Rate Estimates – Full Fee Schedule for 60 Materials

Materials labeled N/A in the following table are not accepted on either the USCL or PRO Recycling Acceptance List.

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
<b>Printing and Writing Paper</b>	Newspapers	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>
	Newsprint (inserts and circulars)	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>
	Magazines and Catalogues & Directories	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>
	Paper for General Use	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>
	Other Printed Materials	USCL	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>	1.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>1.0 ¢/lb</b>
<b>Glass and Ceramics</b>	Glass Bottles and Jars & Other Containers	PRO	10.0 ¢/lb	0.7 ¢/lb	0.0 ¢/lb	<b>10.0 ¢/lb</b>	13.0 ¢/lb	1.0 ¢/lb	0.0 ¢/lb	<b>14.0 ¢/lb</b>
	Ceramic – All Forms	N/A	44.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>48.0 ¢/lb</b>	59.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>64.0 ¢/lb</b>
<b>Metal</b>	Aluminum Containers	USCL	6.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>6.0 ¢/lb</b>	8.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>8.0 ¢/lb</b>
	Aluminum Foil and Molded Containers	PRO	42.0 ¢/lb	1.6 ¢/lb	0.0 ¢/lb	<b>43.0 ¢/lb</b>	56.0 ¢/lb	2.2 ¢/lb	0.0 ¢/lb	<b>58.0 ¢/lb</b>
	Aluminum Aerosol Containers	PRO	59.0 ¢/lb	14.0 ¢/lb	0.0 ¢/lb	<b>73.0 ¢/lb</b>	79.0 ¢/lb	18.7 ¢/lb	0.0 ¢/lb	<b>98.0 ¢/lb</b>
	Aluminum Other Forms	N/A	32.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>35.0 ¢/lb</b>	43.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>47.0 ¢/lb</b>
	Steel Containers	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>
	Steel Aerosol Containers	PRO	59.0 ¢/lb	14.0 ¢/lb	0.0 ¢/lb	<b>73.0 ¢/lb</b>	79.0 ¢/lb	18.7 ¢/lb	0.0 ¢/lb	<b>98.0 ¢/lb</b>
	Steel – Other Forms	N/A	21.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>24.0 ¢/lb</b>	28.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>32.0 ¢/lb</b>
	Metal – Small Format	PRO	23.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>23.0 ¢/lb</b>	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>31.0 ¢/lb</b>
	Pressurized cylinders	PRO	96.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>96.0 ¢/lb</b>	128.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>128.0 ¢/lb</b>
<b>Paper/Fiber</b>	Aseptic and Gable-top Cartons	USCL	15.0 ¢/lb	14.6 ¢/lb	0.0 ¢/lb	<b>29.0 ¢/lb</b>	20.0 ¢/lb	19.4 ¢/lb	0.0 ¢/lb	<b>39.0 ¢/lb</b>
	Kraft Paper	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>
	Corrugated Cardboard	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
	Corrugated Cardboard (Tertiary/transport) non-consumer	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>
	Paperboard	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>
	Polycoated Paperboard	N/A	28.0 ¢/lb	1.2 ¢/lb	3.2 ¢/lb	<b>32.0 ¢/lb</b>	37.0 ¢/lb	1.6 ¢/lb	4.3 ¢/lb	<b>43.0 ¢/lb</b>
	Other Paper Laminates	N/A	27.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>31.0 ¢/lb</b>	37.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>41.0 ¢/lb</b>
	Other Paper Packaging	USCL	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>	3.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>3.0 ¢/lb</b>
	Paper – Small Format	USCL	32.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>32.0 ¢/lb</b>	43.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>43.0 ¢/lb</b>
<b>Plastic – Rigid</b>	PET (#1) – Bottles, Jugs, and Jars (Clear/Natural)	USCL	17.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>17.0 ¢/lb</b>	23.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>23.0 ¢/lb</b>
	PET (#1) – Bottles, Jugs, and Jars (Pigmented/Color)	N/A	55.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>58.0 ¢/lb</b>	73.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>78.0 ¢/lb</b>
	PET (#1) – Thermoformed Containers, Cups, Plates, Trays	N/A	22.0 ¢/lb	30.4 ¢/lb	3.2 ¢/lb	<b>55.0 ¢/lb</b>	29.0 ¢/lb	40.5 ¢/lb	4.3 ¢/lb	<b>74.0 ¢/lb</b>
	PET (#1) – Tubs	USCL	23.0 ¢/lb	3.9 ¢/lb	0.0 ¢/lb	<b>27.0 ¢/lb</b>	31.0 ¢/lb	5.2 ¢/lb	0.0 ¢/lb	<b>36.0 ¢/lb</b>
	PET (#1) – Other Rigid Items	N/A	55.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>58.0 ¢/lb</b>	73.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>78.0 ¢/lb</b>
	PET (#1) – Lids	N/A	43.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>46.0 ¢/lb</b>	57.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>61.0 ¢/lb</b>
	HDPE (#2) – Bottles, Jugs and Jars (Clear/Natural)	USCL	17.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>17.0 ¢/lb</b>	23.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>23.0 ¢/lb</b>
	HDPE (#2) – Bottles, Jugs and Jars (Pigmented/Color)	USCL	19.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>19.0 ¢/lb</b>	25.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>25.0 ¢/lb</b>
	HDPE (#2) – Pails & Buckets	PRO/USCL	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>31.0 ¢/lb</b>	41.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>41.0 ¢/lb</b>

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
	HDPE (#2) – Tubs, Nursery (plant) pots & trays	USCL	19.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>19.0 ¢/lb</b>	25.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>25.0 ¢/lb</b>
	HDPE (#2) – Package Handles, Lids	PRO	31.0 ¢/lb	1.5 ¢/lb	0.0 ¢/lb	<b>32.0 ¢/lb</b>	41.0 ¢/lb	2.0 ¢/lb	0.0 ¢/lb	<b>43.0 ¢/lb</b>
	HDPE (#2) – Other Rigid Items	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>67.0 ¢/lb</b>	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>89.0 ¢/lb</b>
	PVC (#3) – Rigid Items	N/A	78.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>82.0 ¢/lb</b>	105.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>109.0 ¢/lb</b>
	LDPE (#4) – Bottles, Jugs and Jars	N/A	78.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>82.0 ¢/lb</b>	105.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>109.0 ¢/lb</b>
	LDPE (#4) – Lids	PRO	31.0 ¢/lb	2.3 ¢/lb	0.0 ¢/lb	<b>33.0 ¢/lb</b>	41.0 ¢/lb	3.1 ¢/lb	0.0 ¢/lb	<b>44.0 ¢/lb</b>
	LDPE (#4) – Other Rigid Items	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>67.0 ¢/lb</b>	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>89.0 ¢/lb</b>
	PP (#5) – Bottles, Jugs and Jars	USCL	44.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>44.0 ¢/lb</b>	58.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>58.0 ¢/lb</b>
	PP (#5) – Other Rigid Containers, Cups, Plates, Trays (non-nursery (plant))	N/A	22.0 ¢/lb	6.9 ¢/lb	3.2 ¢/lb	<b>32.0 ¢/lb</b>	30.0 ¢/lb	9.2 ¢/lb	4.3 ¢/lb	<b>43.0 ¢/lb</b>
	PP (#5) – Lids	PRO	31.0 ¢/lb	2.3 ¢/lb	0.0 ¢/lb	<b>33.0 ¢/lb</b>	41.0 ¢/lb	3.1 ¢/lb	0.0 ¢/lb	<b>44.0 ¢/lb</b>
	PP (#5) – Tubs, Pails and Buckets, Nursery (plant) pots & trays	USCL /PRO	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>31.0 ¢/lb</b>	41.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>41.0 ¢/lb</b>
	PP (#5) – Other Rigid Items	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>67.0 ¢/lb</b>	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>89.0 ¢/lb</b>
	PS (#6) Expanded/Foamed Hinged Containers, Plates, Cups, Tubs, Trays, and Other Foamed Containers	N/A	190.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>194.0 ¢/lb</b>	254.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>258.0 ¢/lb</b>

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
	PS (#6) White Expanded/Foamed Cushioning and Void Fill	PRO	108.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>108.0 ¢/lb</b>	144.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>144.0 ¢/lb</b>
	PS (#6) Colored Expanded/Foamed Cushioning and Void Fill	N/A	190.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>194.0 ¢/lb</b>	254.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>258.0 ¢/lb</b>
	PS (#6) Rigid Non-Expanded	N/A	67.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>71.0 ¢/lb</b>	90.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>94.0 ¢/lb</b>
	PLA, PHA, PHB – Rigid Items	N/A	78.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>82.0 ¢/lb</b>	105.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>109.0 ¢/lb</b>
	Other/Mixed Rigid Plastic	N/A	63.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>67.0 ¢/lb</b>	84.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>89.0 ¢/lb</b>
<b>Plastic – Flexible</b>	HDPE (#2)/LDPE (#4) Flexible and Film Items	PRO	54.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>54.0 ¢/lb</b>	72.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>72.0 ¢/lb</b>
	HDPE (#2)/LDPE (#4) (Pallet Wrap) non-consumer	PRO	54.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>54.0 ¢/lb</b>	72.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>72.0 ¢/lb</b>
	PP (#5) Flexible and Film Items	N/A	104.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>107.0 ¢/lb</b>	138.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>143.0 ¢/lb</b>
	PLA, PHA, PHB – Flexible and Film Items	N/A	104.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>107.0 ¢/lb</b>	138.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>143.0 ¢/lb</b>
	Plastic Laminates and Other Flexible Plastic Packaging	N/A	104.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>107.0 ¢/lb</b>	138.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>143.0 ¢/lb</b>
<b>Plastic – Other</b>	Plastic – Small Format	PRO	31.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>31.0 ¢/lb</b>	41.0 ¢/lb	0.0 ¢/lb	0.0 ¢/lb	<b>41.0 ¢/lb</b>
	Plastic containers for motor oil, antifreeze, or other automotive fluids, pesticides or herbicides, or other hazardous materials (flammable, corrosive, reactive, toxic)	N/A	201.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>205.0 ¢/lb</b>	269.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>273.0 ¢/lb</b>

			LOW				HIGH			
Material Class	Covered Material	Type	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate	Base Fee Rate	SIM Portion	Disposal Portion	Fee Rate
<b>Wood and Other Organic Materials</b>	Wood and Other Organic Materials	N/A	154.0 ¢/lb	0.0 ¢/lb	3.2 ¢/lb	<b>157.0 ¢/lb</b>	206.0 ¢/lb	0.0 ¢/lb	4.3 ¢/lb	<b>210.0 ¢/lb</b>
			<b>Average Fee Rate</b>		<b>17.0 ¢/lb</b>		<b>Average Fee Rate</b>		<b>23.0 ¢/lb</b>	

Table 20

Note the fees are directly proportional to the reported volumes, underpinning the importance of accurate producer reporting in advance of the July 1, 2025 program start date. As part of the fee-setting process, CAA aggregated some material categories because they are generally handled in the same way and they ship in the same commodity bale. Categories affected include: 1) all printed papers, 2) aluminum and steel aerosols, 3) kraft paper along with paperboard and other paper packaging, 4) lids, 5) flexible films, and 6) the majority of rigid plastics (with the exception of PET and HDPE bottles). Aggregation of those categories only occurred if the material categories had like treatment, either being collected on the USCL list, the PRO RAL, or were a non-accepted material.

Accurate fee-setting for EPR requires four key pieces of information:

- 1) An understanding of the universe of obligated producers;
- 2) Reliable program cost estimates;
- 3) Availability of critical data inputs; and
- 4) Accurate reporting of supply weights by material type across which program costs can be spread

With the completion of ORSOP, CAA is now equipped with the information necessary to finalize the program budget. Data from ORSOP also allows CAA to present more accurate, but not yet final, fee rate estimates for the proposed 60 fee reporting categories in this program plan submission. The types of information from ORSOP that were used in this program plan are described in Appendix E.

Having assessed this new information from ORSOP, CAA has determined that there is an overall, substantial cost reduction to the planned program. However, even with the refinement of estimates based on ORSOP results, it is important to note that rates can only be finalized once producer supply data is received in the first quarter of 2025.

## Flat Fees

In accordance with ORS 459A.884(6), CAA proposes tiered uniform fees for low volume producers with gross revenues of less than \$10 million or covered materials sold for use in Oregon of less than five metric tons. Producers with gross revenues of less than \$10 million but supplying covered materials sold for use in Oregon greater than five metric tons may also choose to pay a flat fee according to the following schedule:

Tiered Flat Fee Structure (for producers with gross revenues of \$5m up to \$9.999m)		
Annual Supply Tons (Metric)	Low	High
1 to 2.5 tons	\$700	\$900
Over 2.5 tons to 5 tons	\$1,400	\$1,900
Over 5.0 to 7.5 tons	\$2,400	\$3,100
Over 7.5 tons to 10 tons	\$3,300	\$4,400

Table 21