

Circular Action Alliance Underscores Consequences of Non-Compliance with Upcoming Oregon Packaging EPR Compliance Deadline

Article By:

K. Russell LaMotte

Allyn L. Stern

Nicole J. Waxman

With the March 31, 2025 deadline to comply with Oregon's packaging extended producer responsibility (EPR) law rapidly approaching, producers of covered materials, including packaging, paper products, and food serviceware, should register with the Circular Action Alliance (CAA) and prepare their covered materials reports as soon as possible. In a recent webinar, CAA, the producer responsibility organization tasked with implementing Oregon's packaging EPR law, highlighted that it is required under Oregon law to publish a list of compliant and non-compliant producers on its website, as well as the reason for noncompliance. [ORS 459A.869\(8\)\(a-b\)](#). For producers that do not register and report in advance of the March 31 deadline, CAA may assess late penalties, require retroactive payment into the PRO for the time missed, and could refer any enforcement action to Oregon Department of Environmental Quality (ODEQ). CAA will provide notice of noncompliance to non-compliant producers and give them an opportunity to cure prior to a formal ODEQ enforcement action or penalty assessment. Under this law, ODEQ has the authority to assess penalties of up to \$25,000 per day of noncompliance. ORS 459A.995.

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