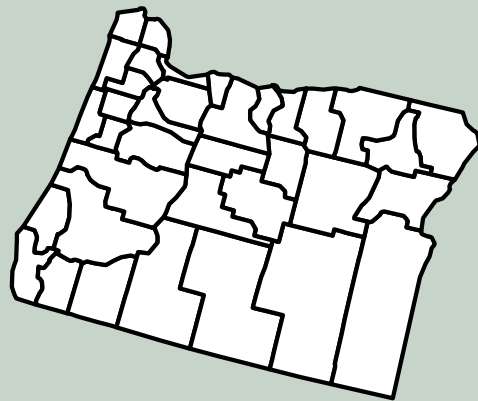


Oregon

EPR Snapshot for Envelope & Mail Producers



Summary

PRO: Circular Action Alliance (CAA)

Status: Live

Litigation: NAW v. Oregon DEQ — trial firmly set for July 13, 2026; outcome will determine whether NAW members obtain permanent injunctive relief

Next deadline: Second fee installment invoiced July 2026

Oregon has the broadest scope of any EPR state — it covers packaging, printing and writing paper, and food serviceware. Key obligations under Oregon's Recycling Modernization Act took effect July 1, 2025.

Litigation Note: A narrow court preliminary injunction pauses enforcement specifically for members of the National Association of Wholesaler-Distributors (NAW) who joined before February 6, 2026 — but this injunction does NOT cover all producers. Unless you are a qualifying NAW member, Oregon's requirements apply to you in full. Litigation is ongoing and worth monitoring closely. A five-day trial is scheduled to begin July 13, 2026, that will determine the ultimate outcome of the NAW challenge. AF&PA remains fully committed to pursuing all available legal and strategic options to protect its members' interests, despite having their motion to intervene being denied.

What Is Covered

- Packaging materials (including envelopes used as packaging)
- Printing and writing paper — the broadest coverage of any state
- Food serviceware

Oregon's inclusion of printing and writing paper means that paper communications products — including direct mail — may be covered. This is the most significant scope distinction from other states.

Practical Takeaways

- If your envelopes function as packaging, assume coverage and conduct a product-by-product analysis
- If your products include printed paper / direct mail / transactional mail, Oregon's scope may extend to those — consult legal counsel

- If you are not a qualifying NAW member, the injunction does not protect you

Key Dates

- July 1, 2025 — Program went live; Recycling Modernization Act changes took effect
- February 21, 2025 — DEQ approved CAA's plan
- March 31, 2025 — 2024 supply data was due for registered producers

Key Resources

- [Oregon DEQ EPR Page](#)
- [CAA Oregon Page](#)
- [CAA Producer Resource Center](#)

Practical briefing only; not legal advice. Consult qualified counsel to determine how EPR obligations apply to your specific products and operations. Last updated June 2026.

