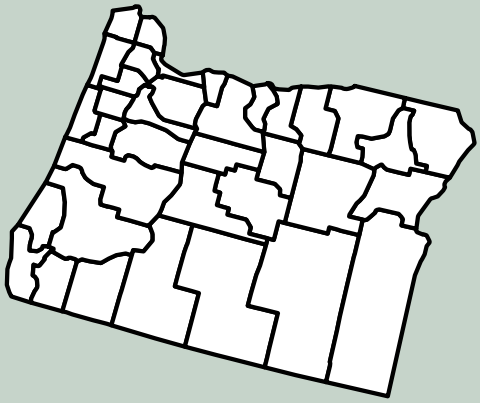
Oregon

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. On August 27, 2026, a federal court upheld Oregon's EPR law in its entirety, rejecting the NAW challenges. On September 24, 2026, NAW officially filed a notice of appeal with the U.S. Court of Appeals for the Ninth Circuit. NAW's opening brief is scheduled for December 17, 2026

Next deadline: The first lifecycle assessment (LCA) disclosure for the state's 25 largest producers is due December 31, 2026. January 1, 2027 ongoing biannual fee invoices due.

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. 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
- May 31, 2026 - Deadline for producers to submit their Annual Supply Reports (CY 2025 data)
- July 30, 2026 - The second 50% installment for 2026 Program Year fees was invoiced and due
- January 1, 2027 - Next round of ongoing biannual fee invoices issued by CAA

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 October 2026.

