



West Coast Seafood Processors Association
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February 10, 2026

House Committee on Climate, Energy, and Environment
Oregon State Legislature

RE: Support for HB 4030 Exemption for Seafood Processing

Dear Honorable Members of the House Committee on Climate, Energy, and Environment,

On behalf of the West Coast Seafood Processors Association (WCSPA), I am writing to express strong support for HB 4030 and urge the Legislature to clarify that raw meat, poultry, and seafood packaging is **exempt** from the Recycling Modernization Act's Extended Producer Responsibility (EPR) program. WCSPA represents shoreside seafood processing companies and related businesses located in California, Oregon and Washington. Our processors range from "mom and pop" operations to some of the largest seafood companies in the West Coast, employing thousands of workers in harvesting, processing, transporting, and distributing seafood across the country and throughout the world. Oregon's seafood industry generates billions of dollars in sales and is a critical source of year-round employment in many economically-depressed coastal communities.

Oregon's seafood processors operate under some of the most stringent food safety regulations in the country. Packaging used for raw seafood products is fundamentally different from other consumer packaging. It is governed by strict Federal food safety requirements and relies on FDA-approved materials specifically designed to prevent contamination, control pathogens, and protect public health. These materials are engineered first and foremost for food safety, not recyclability.

While we support the intent of Oregon's EPR program to improve recycling outcomes and reduce environmental impacts, including raw protein packaging runs counter to these goals. The Oregon Department of Environmental Quality (DEQ) has acknowledged that this packaging is not accepted in Oregon's uniform statewide recycling system, enters recycling streams only as contamination, and poses health and safety risks to workers when mishandled. DEQ has further recognized that even a single contaminated item can compromise an entire load of recyclable material, diverting otherwise high-value recyclables to landfill. Including raw protein packaging in EPR would therefore erode – rather than improve – system performance.

In addition, including raw meat, poultry, and seafood packaging in the EPR program could directly impact food affordability and food security. The seafood industry operates on razor-thin margins, particularly for domestically produced, safely regulated protein. New compliance fees or administrative costs cannot be absorbed by processors and harvesters and would ultimately be passed through the supply chain, increasing grocery prices. At a time when many Oregonians are

facing rising food costs and food insecurity, increasing the cost of essential, nutritious protein runs counter to the state's affordability and equity goals.

HB 4030 provides a necessary clarification that aligns recycling policy with public health protections, contamination reduction objectives, and economic realities. Exempting raw meat, poultry, and seafood packaging would reduce contamination, protect workers and public health, preserve high-value recyclable materials, and help maintain access to affordable, locally sourced food for Oregon families.

For these reasons, we respectfully urge the Legislature to support HB 4030 and clarify the exemption for raw meat, poultry, and seafood packaging. Doing so will allow Oregon's recycling system to focus on materials that genuinely improve environmental outcomes while maintaining food safety, public health, and access to affordable and sustainable protein.

Thank you for your consideration and for your continued leadership on effective, practical recycling policy.

Sincerely,

A handwritten signature in black ink that reads "Lori L. Steele". The signature is written in a cursive, flowing style.

Lori Steele
Executive Director