



February 11, 2026

Chair Lively, Vice Chairs, and Members of the House Committee on Climate, Energy & the Environment:

Thank you for the opportunity to provide comments on HB 4030 and the proposed amendments. Recology is submitting the following comments and would also like to note that we are aligned with the letters submitted by both the Oregon Refuse & Recycling Association (ORRA) and the Association of Oregon Recyclers (AOR). Their comments provide a more detailed and robust discussion of the technical, operational, and policy concerns associated with HB 4030, and we support the issues and recommendations raised in those submissions.

First, establishing exemptions in statute sets a precedent that encourages other industries to seek similar carveouts. This quickly erodes the consistency and integrity of the Recycling Modernization Act (RMA). We believe packaging-specific determinations are best addressed through DEQ's existing rulemaking and exemption processes, which allow for technical evaluation, stakeholder input, and ongoing reassessment.

Second, permanent exemptions risk stifling innovation. Once a material is carved out of the RMA, producers no longer face incentives to redesign packaging, reduce waste, or shift toward more recyclable formats. This undermines one of the core purposes of the program: driving long-term improvements in packaging design and recyclability across the supply chain.

Third, exemptions create an unlevel playing field. Carving out certain products or sectors shifts costs onto the producers who remain within the system and weakens both the environmental and financial foundation of the RMA. Over time, this can reduce the resources available to improve recycling infrastructure and education statewide.

Finally, while we recognize that some types of packaging genuinely present technical or contamination challenges, others included in the bill — such as berry packaging — do not appear to require a statutory exemption. Many berry containers already exist in recyclable formats, and we have not seen evidence demonstrating that federal requirements preclude the use of compliant, recyclable packaging.

For these reasons, we encourage the Committee to avoid adopting permanent exemptions through legislation and instead rely on DEQ's established processes to evaluate any product-specific challenges going forward.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads 'Julia Mangin'. The signature is written in a cursive, flowing style.

Julia Mangin  
Director of Sustainability & Government Affairs  
Recology