Circular Action Alliance™

Preparing to Report Your Supply Data

V1. November 27, 2024

Contents

Version History

This table outlines the different versions of the document that have been published.

Version Number	Date of Publication	Comments
V1	November 27, 2024	The document is published for the first time.

1 Introduction

This guidance offers producers a comprehensive overview of the information and data required for reporting to Circular Action Alliance (CAA). Producers must submit both qualitative and quantitative data related to their business or organization and the packaging and paper products supplied to the market in the relevant data year associated with the annual producer report.

1.1 Purpose and Scope

The purpose of this guidance is to provide producers with a comprehensive resource for preparing and submitting the data required for reporting to CAA. This guide outlines the data collection process, encompassing both qualitative and quantitative information necessary for compliance with state Extended Producer Responsibility (EPR) requirements.

The scope includes preparing your data for all packaging, paper, and food serviceware supplied to the market in U.S. EPR states where CAA operates as a Producer Responsibility Organization (PRO). This document includes information on how to report supply volumes and associated packaging weights, as well as on how to provide additional information regarding methodologies, affiliates and brands.

1.2 Define Responsibility for EPR Reporting

The first step in preparing for EPR reporting is to designate an individual or team within your company to oversee this process. Identifying who will be responsible for gathering, verifying, and submitting data ensures accountability and streamlines the reporting workflow. This role may involve coordination with departments such as supply chain, packaging development, sustainability, finance, or product management, depending on the scope of covered materials. Defining responsibility early on is essential to maintaining accuracy and compliance with EPR requirements.

2 Qualitative Producer Data

Before entering the weight of covered materials supplied, you must provide qualitative information about your company or organization. This includes identifying all relevant affiliates and brands associated with your supply data for each applicable state.

Please note, according to CAA policy, producers must complete a separate producer report for each entity that has its own tax identification number, i.e. Employer Identification Number (EIN). CAA reserves the right to grant an exception and allow reporting by an entity that aggregates quantities of Covered Materials for multiple subsidiaries (with separate EINs) if CAA is satisfied, at its sole discretion, that such exemption will not compromise CAA's ability to validate producer reporting. **In all cases, a producer shall combine its data with all its associated producers for the purpose of determining eligibility for any exemptions or additional reporting requirements.**

2.1 List of Your Company's Affiliated or Associated Producers (Even If Not Included in This Report)

In this section, you are required to list information on all affiliated or associated producers, even if they are not included within the scope of your report. This information will be used to validate any small producer exemptions or large producer requirements. As a reminder, in all cases, a producer shall combine its data with all its associated producers for the purpose of determining eligibility for any exemptions or additional reporting requirements.

In California, Colorado and Oregon Corporate Law, the term "affiliate" typically refers to a relationship where one entity controls, is controlled by, or is under common control with another entity. This definition can encompass a variety of relationships, including parent companies, subsidiaries, and entities with common ownership or control.

California: Under the California Corporations Code, a corporation is defined as an "affiliate" of, or a corporation is "affiliated" with, another specified corporation if it directly, or indirectly through one or more intermediaries, controls, is controlled by or is under common control with the other specified corporation.

Colorado: Under the Colorado Business Corporation Act Section 7-101-401 - General definitions:

> *(2) "Affiliate" means any person that directly or indirectly, through one or more intermediaries, controls, or is controlled by, or is under common control with, the person specified.*

Oregon: For the purposes of specific provisions in ORS 459A.863(8) Large Producers and (32) exempted Small producers, the term "producer" encompasses not only the primary producer but also any Associated Producers. In Oregon, a producer shall combine its data with all its Associated Producers for the purpose of determining eligibility for any exemptions or additional reporting requirements, e.g. Large Producer LCA requirements.

> *(a) Associated producers are two or more producers that are:*
>
> > *(A) Owned by members of the same family, including siblings, spouses, ancestors, and lineal descendants, and engaged in the same type of business activity;*
> >
> > *(B) Jointly owned where one producer owns or controls, directly or indirectly, more than 50 percent of the outstanding stock, membership, partnership or similar interests of the other producer or producers;*
> >
> > *(C) Members of the same controlled group as defined in Section 1563(a) of the Internal Revenue Code;*
> >
> > *(D) A fiduciary or fiduciaries of a trust and a corporation of which more than 50 percent in value of the outstanding stock is owned or controlled by the trust or by a person who is a grantor of the trust;*
> >
> > *(E) A corporation and a partnership or LLC, or partnerships or LLCs, if the same persons own or control more than 50 percent of the outstanding stock,*

or more than 50 percent of the interest, of the corporation and of the partnership or LLC;

(F) S corporations or C corporations if the same persons own or control more than 50 percent of the outstanding stock of each or all corporations.

(b) Associated producers' data on covered product sold in or into the state and gross annual revenues must be aggregated for the purpose of applying the large producer and small producer definitions.

Please make sure that your list of affiliated or associated producers are kept up to date with CAA. Any change to the list of affiliated or associated producers should be reflected in subsequent annual producer reports that are submitted to CAA.

2.2 Disclosure of all Methodologies Used to Prepare Your Supply Data

As part of the reporting requirements, producers must specify all methodologies that were used to determine supply volumes, packaging weights and total reported supply for their covered materials. This disclosure helps ensure transparency and accuracy in data reporting, as it clarifies whether specific methods, such as those described below, were applied to estimate the weights of packaging components. Producers should use the methodologies that best match the available data and the nature of their product offerings for estimating and reporting the quantities of materials supplied to the market.

Key considerations when disclosing methodologies may include the following:

- **What data sources and reporting methodologies were used to calculate supply volumes, packaging weights, and total reported quantities?** Provide details on key data sources (e.g., sales records, inventory systems, or direct measurements) and specific methods (e.g., Specific Material Reporting Method, Average Bill of Materials, or apportionment formulas). If multiple methodologies were used, specify which were applied to each product or material category.
- **What assumptions or adjustments were applied in your reporting?** Include details of any key assumptions, deductions, updates from prior-year data, or other adjustments present in the report data.
- **What internal processes or tools were used to ensure data accuracy and compliance with CAA's reporting requirements?** Describe any validation procedures, third-party tools, or substantiation methods employed to confirm the reliability of reported figures.

2.3 List of Brands for all Covered Materials in Your Report

When prompted, please list all the brands associated with the Covered Materials included within your annual producer report. Please make sure that your list of divisions and brands is also kept up to date with CAA. Any change to your divisions or brands should be reflected in subsequent annual producer reports.

2.4 List of Subsidiaries Supplying all Covered Materials in Your Report (only if applicable)

Only if an exception has been granted by CAA to allow reporting by an entity that aggregates quantities of Covered Materials for multiple subsidiaries, the producer must provide a list of the legal company names of each individual subsidiary supplying covered materials within your report. CAA assumes that any companies not listed are registered separately as an obligated producer with CAA and will be submitting their own producer report.

3 Quantitative Producer Data

3.1 What to include in Your Supply Report

To meet reporting requirements, your supply report should include all covered materials associated with the packaging, paper or food serviceware for which you are the obligated producer. Follow these steps to ensure accurate reporting:

1. **Determine Supply Volumes**: First, identify the total unit volumes of covered materials supplied in each applicable EPR state. This includes identifying all product types, sales channels, and any specific exemptions. Refer to additional CAA guidance to confirm your producer status and obligations for packaging, paper products and food serviceware, in each state program.
2. **Calculate Packaging Weights Using Accepted Methodologies:** After establishing supply volumes, use an accepted reporting methodology to determine the packaging weights associated with each product type. Choose from methods such as the Specific Material Reporting Method (SMRM) or the Average Bill of Materials (ABOM), depending on the data available to you. These methodologies will help estimate the average weight of each packaging component by product type.
3. **Calculate Total Reported Supply by Reporting Category:** Finally, multiply the supply volume of each product by its associated packaging weight to calculate the total weight of covered materials supplied in each EPR state. This total weight (in lbs.) by material category is the value you will report to CAA.

This process ensures a comprehensive and accurate producer report of all covered materials supplied to the market, sorted into applicable material reporting categories, within the reporting data year.

3.2 Determining Your Supply Volume

After identifying all covered packaging, paper products and food serviceware for which you are the obligated producer you must determine the available data sources to quantify the amount supplied in each material reporting category. You can typically extract a sales report from your internal accounting system for all products directly supplied to the market in the applicable state for which you are the obligated producer during the relevant data year.

Besides the packaging, paper product and food serviceware associated with products supplied to the market, your company may have services or other activities that generate covered materials that should be included in your annual producer report. This includes paper materials such as marketing materials, flyers, brochures, sales receipts, bank statements, and annual company reports supplied to the market in the relevant state. Data sources for these materials might come from various departments within your organization, such as human resources, marketing, customer relations, or investor relations.

3.2.1 Reported Data Should Reflect Supply Volume from The Data Year

Producers must distinguish between the Data Year, Report Date, Payment Date, and Program Year to accurately align their reporting and compliance obligations with program requirements.

- **Data Year**: The calendar year or period for which a producer's reported supply data should be representative.
- **Report Date**: The deadline by which your producer supply report must be submitted to CAA.
- **Payment Dates**: The date by which your producer fees/dues are paid to CAA, as specified on the invoice and subject to any applicable payment terms.
- **Program Year**: The calendar year or period when program compliance obligations and targets apply. Typically, the Program Year follows the Payment Date and Report Date by one year, and follows the Data Year by two years, though there may be exceptions during the program's startup phase.

3.2.1.1 Example for Oregon Program (Proposed Dates)

Data Year	Report Date	Payment Dates	Program Year
Jan – Dec, 2024*	Mar 31, 2025	Jul 15, 2025	Jul – Dec, 2025**
		Jan 15 & Jul 15, 2026	Jan – Dec, 2026
Jan – Dec, 2025	May 31, 2026	Jan 15 & Jul 15, 2027	Jan – Dec, 2027
Jan – Dec, 2026	May 31, 2027	Jan 15 & Jul 15, 2028	Jan – Dec, 2028

Notes:

*Data submitted on the March 31, 2025 Report Date will be used to set fees for both Program Years 2025 and 2026.

**Program Year 2025, while only 6 months in duration, is still informed by a full 12 months of producer supply data, and Program Year 2025 fee rates should be multiplied by a producers' full 12 months of supply volume to estimate total fee obligations in Program Year 2025.

3.2.1.2 Data Year Guidance Specifically for Oregon's March 31, 2025 Report Date

This section provides guidance for Oregon producers in preparing their supply data for producer reports that will be submitted by the March 31, 2025 Report Date. In all cases, Producers are responsible for ensuring that their reported data accurately reflects their 2024 supply in Oregon, and their reports are subject to substantiation by CAA.

What Data Year Should Producers Use for Oregon's 2025 Reporting Deadline?
Producers' 2025 reports for Oregon should reflect the supply data during the 2024 calendar year. To prepare representative 2024 data, producers may:

- Use 2024 Supply Data: Collect and submit data directly from the 2024 calendar year.
- Use 2023 Data with Necessary Updates: If 2024 data is not fully available, producers may use 2023 supply data as a baseline and update it to accurately represent 2024 supply. This approach is permitted solely for the March 31, 2025 submission.

Examples of Necessary Updates
When using 2023 data as a basis, producers should apply updates to ensure accuracy, including:

- Material Sales Changes: Adjust for substantial year-over-year sales changes from 2023 to 2024.
- New Brands or Materials: Estimate and add tonnage for any brands or materials introduced in 2024.
- Discontinued Brands or Materials: Remove tonnage associated with brands or materials no longer supplied in 2024.

3.2.2 Apportioning National Sales to a Program When State-Specific Data is Not Available

If you cannot obtain state-specific sales data for products or services supplied through retailers or vendors, you may use the following formula to estimate sales for each applicable EPR state. This apportionment method should be used only when actual point-of-sale data from retail partners is unavailable, as direct sales data provides a more accurate reflection of supply for the reporting year.

CAA acknowledges the need for this option during the initial years of U.S. EPR programs, allowing producers time to improve data collection processes. However, this method is not intended as a permanent solution. Producers are expected to work toward obtaining more precise data from vendors and retailers for future reporting periods to enhance accuracy and compliance.

Even when national apportionment is used to estimate units supplied in each state program, Producers are still responsible for ensuring that their reported data accurately reflects their supply in Oregon, and the methodology used and submitted reports are subject to substantiation by CAA.

Formula to Estimate Units Supplied in a U.S. EPR Program Using Population:

- **(P1/P2) × U.S. national sales**

Where:

- **P1** = Population of the EPR state (e.g., California, Colorado, Oregon), according to the latest U.S. Census Bureau data.
- **P2** = Total population of all U.S. states and Washington D.C. where a representative volume the product is sold, based on the latest U.S. Census data. Exclude U.S. states from P2 if an immaterial or nonrepresentative volume of the product is sold.
- **U.S. national sales** = Total units of the product and associated packaging sold in the U.S. during the Data Year.

This calculation helps allocate national sales proportionally to each EPR state program based on population. Ultimately, Producers should make appropriate adjustments or use another method if using this methodology knowingly creates an inaccurate estimate for units supplied into the U.S. EPR program.

3.2.3 Exemptions

Specific requirements for managing exemptions or how to report data to CAA under exemption programs, e.g. ORS 459A.869(13), are still being aligned with regulators, i.e. DEQ in Oregon. CAA will provide guidance to producers as state requirements are defined.

3.2.4 Eco-modulation reporting

CAA will also provide guidance to producers on reporting requirements for eco-modulation as they are finalized.

3.3 Calculate Packaging Weights Using Accepted Methodologies

To determine packaging weights linked to your company's supply data, the following accepted reporting methodologies are recommended.

3.3.1 Specific Material Reporting Method

The Specific Material Reporting Method (SMRM) involves calculating and reporting the exact weight of each individual packaging component and paper product, categorized by material type for which you are the responsible producer. This approach is ideal for producers who maintain detailed bills of materials and inventories specifying the weight and type of materials used for each packaging and paper product.

Using this method, producers report specific weights for each material type associated with their products, providing a highly accurate representation of quantities supplied to the market. This method is the preferred approach for preparing data for the annual producer report submitted to CAA, as it allows for precise, reliable reporting. In future reporting periods, the use of the Specific Material Reporting Method will be strongly encouraged to ensure data accuracy and compliance.

3.3.2 Average Bill of Materials (ABOM) Method

The ABOM method is a practical approach for producers who supply a wide range of products and covered materials but lack readily available data on the types or weights of individual packaging and paper materials. This method relies on representative sampling strategies within groups of products that share similar packaging formats and attributes to estimate the total quantities of covered materials supplied.

Rather than weighing the packaging for each individual product, producers using the ABOM method can select a representative sample from each subgroup of similar products. By weighing the packaging in these samples, producers can compile supply data more efficiently while achieving reasonable data accuracy.

This method is particularly useful for streamlining the reporting process without compromising data integrity, as it reduces the time and resources needed for individual item measurements. Further guidance on applying the ABOM Method for product groups with similar packaging is provided below.

3.3.3 Sector Calculators

CAA does not provide sector-specific calculators, tools that estimate packaging weights based on industry norms, since using these calculators is generally less accurate than SMRM or ABOM methodologies. They should be relied upon only in cases of significant data gaps where other reporting methodologies are not feasible. Producers using sector calculators must disclose the methodologies applied, including details of any assumptions or averages used, as part of their reporting submission.

Furthermore, the use of sector calculators may not be permitted indefinitely. Producers are encouraged to work towards collecting more precise, product-specific data over time, as reliance on general estimations may be phased out in favor of more accurate data sources.

3.4 Calculate Total Reported Supply for Submission on CAA's Producer Portal

Obligated producers are required to include all covered packaging, paper products and food serviceware supplied to the market in the applicable material reporting category of the annual producer report in the CAA Producer Portal.

3.4.1 Reporting using the Specific Material Reporting Method

As described above, the Specific Material Reporting Method entails determining and reporting the specific weight of individual packaging materials and other covered materials associated with the covered products for which you are the obligated producer, categorized according to applicable material reporting categories.

Producers with detailed bill of materials data and inventories on the weight and material types for each designated packaging and paper product are best suited to utilize this approach to reporting.

Under the Specification Management Method, for each product and associated covered materials for which you are the obligated producer, you will multiply the total number of units supplied in the state in a data year by the weight of the applicable material reporting category associated with that packaging.

Where packaging or paper product being reported for a particular product is comprised of more than one material reporting category, the total number of units supplied in the data year will be multiplied by the weight of each applicable material reporting category for that package or product. This will yield the total amount of covered materials that is supplied in each material reporting category on a per product basis.

In the simplified example presented below, the producer is obligated for only (2) two products for which the associated covered material must be reported to CAA. In this example, the two products are OLED flat screen televisions, with Product 1 having larger dimensions than Product 2 as reflected in the packaging weights per unit supplied.

In this example, both products use the same covered materials which in this case includes a Corrugated Cardboard box, Expanded Polystyrene cushion packaging and an owner's manual. The owner's manual is the same for both products and therefore the weight per unit is identical.

This information could be organized in a spreadsheet or data management tool in a format like the table below. Once the weights are determined for each packaging material used, these are simply multiplied by the total number of units supplied to determine the total quantity, in pounds, for each applicable material reporting category. The total quantities of each material reporting category are summed and entered into the applicable row in the "Total Supply" column of the "Supply Weight" section of the Producer Portal.

In this example, a total of 209,000 lbs of covered material is associated with Product 1, of which 165,000 lbs is Corrugated Cardboard, 11,000 lbs are Other Printed Materials and 33,000 lbs are Expanded Polystyrene. For Product 2, there is a total of 682,000 lbs of covered materials supplied, of which Corrugated Cardboard is 528,000 lbs, Other Printed Materials is 44,000 lbs and Expanded Polystyrene is 110,000 lbs.

Because producers are required to report only the total quantity of covered materials in each material reporting category supplied to the Producer Portal, in this example, the producer would report a total of 693,000 lbs of Corrugated Cardboard, 55,000 lbs of Other Printed Materials and 143,000 lbs of Expanded Polystyrene in the applicable materials reporting category fields.

		Product 1	Product 2	Total
	Units Supplied	50,000	200,000	250,000
Per unit weight	Corrugated Cardboard (lbs./unit)	3.3	2.64	
	Other Printed Material (lbs/unit)	0.22	0.22	
	Expanded Polystyrene (lbs/unit)	0.66	0.55	
Total Weight	Corrugated Cardboard (lbs)	165,000	528,000	693,000
	Other Printed Materials (lbs)	11,000	44,000	55,000
	Expanded Polystyrene (lbs)	33,000	110,000	143,000
	Total (lbs)	209,000	682,000	891,000

3.4.2 Reporting using the Average Bill of Material (ABOM) Method

Producers that supply many products for which there may be limited or no readily available data on either the types of covered materials used and/or their respective weights may, where appropriate, prepare ABOMs for groups of products with similar packaging profiles.

When creating ABOMs (there can be multiple ABOMs used by producers associated with the various departments, divisions or accounts within their business), it is important to ensure that the types of packaging and paper used for products within an individual ABOM are sufficiently similar so that the averages created provide a reasonable representation of the actual quantities of designated material supplied to the market.

This section outlines the suggested steps to build an ABOM for a large group of products that use similar materials to package products.

Step one: Identify like-products with similar packaging and create sub-groups

In the example provided in the table below, a Producer determines that, in a particular sales division of the company, all televisions that are supplied to the market use similar packaging formats.

In this hypothetical example, there are a total of 60 different products or SKUs that all use Corrugated Cardboard, Other Printed Paper, and Expanded Polystyrene materials to package these products. Ten of the 60 television models also use a LDPE/HPDE Film bag to protect the product from moisture inside the box.

In this case, the producer has determined that three sub-groups of televisions should be established to reflect that the 60 models can be grouped into small, medium and large size categories that reflect the range of expected packaging weights in each sub-group.

Step two: Choose a representative sample from each sub-group

Once the sub-groups have been established, a sample product from each sub-group should be selected and the weight of each packaging material category used should be established by physically weighing and recording the weight in pounds. The sample used to represent each of the sub-groups should be selected randomly from all eligible products included within the sub-group.

In the example in the table below, the randomly selected product to represent the **'small'** sub-group of the television ABOM had packaging weights of 1.76 lbs for Corrugated Cardboard, 0.66 lbs for Expanded Polystyrene and 0.22 lbs for Other Printed Paper.

The same process is repeated for each of the ABOM product sub-groups as can be seen in the example in the table below. The packaging weights for Corrugated Cardboard, Expanded Polystyrene and Other Printed Paper of the selected sample representing the **'medium'** and **'large'** sub-groups are greater than the representative sample for the **'small'** sub-group, as the product sizes are larger and use more packaging.

For the 'large' sub-group of televisions, an additional packaging material type LDPE/HDPE Film and Flexible Items was used. The weight of this material from the selected sample to represent the 'large' sub-group is 0.132 lbs.

Step three: Capture the sales units in each sub-group and calculate the relative share of total sales that each sub-group represents

In the example in the table below, 10,000 units were supplied to the market in the 'small' sub-group of products, representing 25% of the total supplies of all products within this ABOM. Similarly, 20,000 units were supplied in the 'medium' sub-group, accounting for 50% of total sales. Sales of products in the 'large' sub-group represented 25% of the total supplied quantities in the sales year.

The proportionate share of sales that each sub-group represents in the ABOM is used to calculate the contribution that each representative sample makes to the overall average weight per unit supplied for each material type used. This is described in Step 4 below.

			A	B	C	D	E
Sub-group	# of individual SKU's	Total Units Supplied	% of Total Units Supplied	Corrugated Cardboard - Sample SKU (lbs)	Polystyrene - Sample SKU (lbs)	Other Printed Paper - Sample SKU (lbs)	LDPE/HDPE Film - Sample SKU (lbs)
Small	30	10,000	25%	1.76	0.66	0.22	0
Medium	20	20,000	50%	2.64	0.88	0.22	0
Large	10	10,000	25%	5.5	1.1	0.22	0.132
Total	60	40,000	100%				

Step four: Calculate the weighted average (lbs) for each material by Reporting and Fee Category

To calculate the weighted average (lbs) for each material reporting category in the ABOM, the material weights from each sub-group's sample are multiplied by each sub-group's percentage share of total sales and then summed.

Using the example of the Corrugated Cardboard box, multiplying the percent of total units supplied (Column A in the table above) by the weight of the Corrugated Carboard box (Column B in the table above) for the 'small', 'medium' and 'large' sub-groups yields the weight that each sub-group contributes to the weighted average for each material reporting category.

In the table below, the results of the step described above is illustrated for each of the material reporting categories found with the example ABOM. When these values are summed, the weighted average weight for the Corrugated Cardboard box for the ABOM is 314 lbs.

Using a weighted average that reflects the relative sales volumes in each sub-group provides a more accurate reflection of quantities of covered materials supplied to the market associated with products included in the ABOM.

	A x B	A x C	A x D	A x E
ABOM Sub-group	Weighted - Corrugated Cardboard - Sample SKU (lbs)	Weighted Polystyrene - Sample SKU (lbs)	Weighted Other Printed Paper - Sample SKU (lbs)	Weighted LDPE/HDPE Film - Sample SKU (lbs)
Small	0.44	0.17	0.06	0.00
Medium	1.32	0.44	0.11	0.00
Large	1.38	0.28	0.06	0.03
Weighted Average (lbs)	3.14	0.88	0.22	0.03

Step five: Calculate the total weight supplied for each material reporting category

The final step in the process is to multiply the weighted average (lbs.) of each material reporting category by the total number of units within the ABOM. This yields the total weight (lbs.) supplied for each material reporting category found in the ABOM.

	Weighted Average (lbs)	Total units in ABOM	Total weight (lbs)
Corrugated Cardboard	3.14	40,000	125,400
Expanded Polystyrene	0.88	40,000	35,200
Other Printed Paper	0.22	40,000	8,800
LDPE/HDPE Film	0.03	40,000	1,320

3.4.3 Component Threshold Rule

A "packaging component" refers to any individual part or material that, when combined with others, forms the complete primary packaging system for a product. Examples of packaging components include items such as bottles, jugs, jars, trays, pouches, cans, caps, labels, seals, pumps, dispensers, tape, and staples. When packaging is used to collate or bundle multiple units, it should be reported separately and is not covered under the component threshold rule.

Separable Components
Separable components are those that can be removed from the main packaging by the end user, either after opening or after the product is consumed. All separable components should be reported in the appropriate material category that best fits their material type and form.

- **Example**: A clear PET bottle with a screw-on spray pump applicator and a perforated heat shrink sleeve label, which the consumer can remove.
    - The **PET bottle** should be reported under "PET (#1) - Bottles, Jugs, and Jars (Clear/Natural)."
    - The **spray pump applicator**, made entirely of PET (#1), should be reported under "PET (#1) - Other Rigid Items."
    - The **perforated heat shrink sleeve label** should be reported in the appropriate flexible plastic category, such as "Plastic Laminates and Other Flexible Plastic Packaging" if made of PET.

Non-Separable Components
Non-separable components are designed to remain attached to the packaging after the product is consumed and discarded. If a component, like a cap or lid, is intended to stay with the package when discarded, or there are on-pack instructions directing the consumer to replace the cap prior to disposal, it is considered a non-separable component for reporting purposes. Non-separable components should be reported in the category representing the material type that makes up the majority of their combined weight.

- **Example**: A colored HDPE shampoo bottle with a plastic pressure-sensitive label.
    - Report the combined weight of the HDPE bottle and the pressure-sensitive label under "HDPE (#2) - Bottles, Jugs, and Jars (Pigmented/Color)."

This approach ensures clear reporting for all parts of the packaging system, separating components that can be independently discarded from those that remain attached.

3.4.4 Substantiation Requests

As previously described, when reporting to CAA, producers must submit all methodologies used for data preparation. Upon request, producers may be asked to provide additional calculations, substantiation for updates, or estimates to confirm the data's reasonability. This practice promotes fairness and supports accurate fee-setting across all producers.

3.5 Final Review and Support

Before submitting your data, producers are encouraged to conduct a thorough review to ensure accuracy and completeness. Accurate reporting is crucial for compliance with state EPR regulations and helps maintain the integrity of the reporting process.

3.5.1 Report Validation

Again, when reporting to CAA, producers must submit all methodologies used for data preparation. Upon request, producers may be asked to provide additional calculations, substantiation for updates, or estimates to confirm the data's reasonability. This practice promotes fairness and supports accurate fee-setting across all producers.

CAA will ultimately perform report validations and may contact producers for clarification or to verify additional data. This step ensures that all reported information meets the required standards and aligns with program guidelines.

3.5.2 Producer Support and Resources

CAA is available to support producers throughout the reporting process. If you have questions or need assistance at any stage, please do not hesitate to reach out to CAA's Producer Services team by emailing Producer.Support@circularaction.org. Our goal is to help you prepare and submit accurate and compliant reports.

3.5.3 Internal budgeting of your total fee payment

This step is not required to submit your producer report to CAA, but CAA is providing this specific guidance to support producers within their own companies during this report preparation phase.

How can producers use the Program Plan fee rate estimates for internal budgeting purposes in Oregon in 2025?

The final draft of the Oregon program plan includes a high and low fee estimate. CAA offers these estimates to producers to aid in budgeting for their 2025 obligations. CAA guidance for budgeting is as follows.

For the first six months of the program, July 1 – December 31, 2025, producers can estimate their total fees payable using the following formula:

A x B = C

- A = The material-specific fee rates for a given category, high scenario recommended, provided in the fee rate schedule in the program plan
- B = The **annual (12 month) total** of producer's material weight in pounds for that same category (i.e., 12 months of supply data using 2024 as the data year, same data that will be reported to CAA on March 31, 2025).
- C = Estimated total fees for the given category for the Program period July 1 – December 31, 2025

This approach will allow producers to estimate their total fees for 2025 budgeting purposes, by adding together all categories for which a producer has supply volume.

To budget for 2026 total fees payable, a similar approach can be taken, multiplying CAA's 2026 fee rates for a given category, which will be announced in Q4-2025, by the annual total of their material weight in pounds in that same category (i.e. supply data using 2024 as the data year, same data that will be reported to CAA on March 31, 2025), and adding together all categories that the producer has supply volume.

4 Conclusion

CAA recognizes and appreciates the diligence and effort producers invest in preparing their annual reports. Your dedication to accurate and thorough reporting contributes to the overall success of EPR programs and ensures your company remains compliant with regulatory requirements. Thank you for your cooperation and attention to detail throughout this critical process.