

OREGON EPR: Turn Packaging Compliance Fees into Ecomodulation Savings

Reduce Your EPR Packaging Fees by Up to \$200,000

THE PROBLEM

Oregon's EPR program charges packaging-intensive brands **\$50K-\$200K+ annually** in compliance fees. Most companies are paying these fees without realizing they can **reduce them by 10% or \$20K per SKU batch** through ecomodulation bonuses.

You need **third-party reviewed Life Cycle Assessments (LCAs)** covering 16 environmental impact metrics (acidification, eutrophication, plastic leakage—not just carbon), **submitted to CAA by May 31, 2026. Realize these savings in 2027.**

THE SOLUTION

Planet FWD delivers ISO 14040/44-compliant LCAs in 6 weeks

with built-in third-party verification—so you qualify for maximum ecomodulation bonuses while building reusable sustainability data infrastructure.

50% lower than average consultant price for verified ISO compliance LCAs.

WHAT YOU GET:

- **ROI:** Up to \$20K fee reduction per SKU batch (up to 10 batches annually = \$200K total)
- **Multi-Use Data:** Same LCA powers Scope 3 reporting, customer requests, and marketing claims, benchmarking
- **Future-Proof:** Ready for California, Colorado, and other states as programs roll out
- **Speed:** Delivered in 4-6 weeks with third-party review included

ONE LCA, MULTIPLE STRATEGIC USES



INVESTMENT

\$16,000 PER SKU BATCH: Includes third-party verification and review required for ecomodulation bonuses

YOUR SCENARIO	INVESTMENT (2026)	INVESTMENT (2027)	NET SAVINGS
3 SKU batches	\$48,000	\$60,000	+\$12,000
5 SKU batches	\$80,000	\$100,000	+\$20,000
10 SKU batches	\$160,000	\$200,000	+\$40,000

PLUS ONGOING VALUE: Use the same data for Scope 3, customer reports, and future state ecomodulation bonuses

HOW PLANET FWD LCAS WORKS FOR ECOMODULATION BONUSES

We focus on reducing fees through fast, verified, Oregon-compliant LCAs

- 01. Rapid LCA Delivery:** 4-6 weeks from kickoff to submission-ready (vs. 6+ months with traditional consultants)
- 02. Vetted Partner Ecosystem:** We work with verified third-party reviewers to ensure ISO compliance
- 03. Platform Access:** Continuous access to model packaging changes, track improvements, and generate reports on demand
- 04. Multi-State Ready:** One assessment structure works across Oregon now, California/Colorado/Maryland/Maine/Minnesota/Washington and as new states' programs launch

WHO THIS IS FOR

- **Oregon Top Producers:** Regulatory requirement to submit LCAs
- **Oregon Mid-Market:** Companies looking to reduce fees through voluntary ecomodulation
- **Multi-State Operators:** Brands selling in OR/CA/CO who want one system for all EPR compliance
- **Common Packaging Profiles:** Food & beverage, beauty, apparel, consumer goods with standardized packaging across product lines

WHY ACT NOW

May 31, 2026

Deadline:

Submit qualified LCAs to capture bonuses for 2027 fee year

4-6 Week

Delivery:

Start by late March to meet deadline comfortably

First-Mover

Advantage:

Build infrastructure now, optimize year-over-year for additional Bonus B incentives

Most companies don't know this opportunity exists.

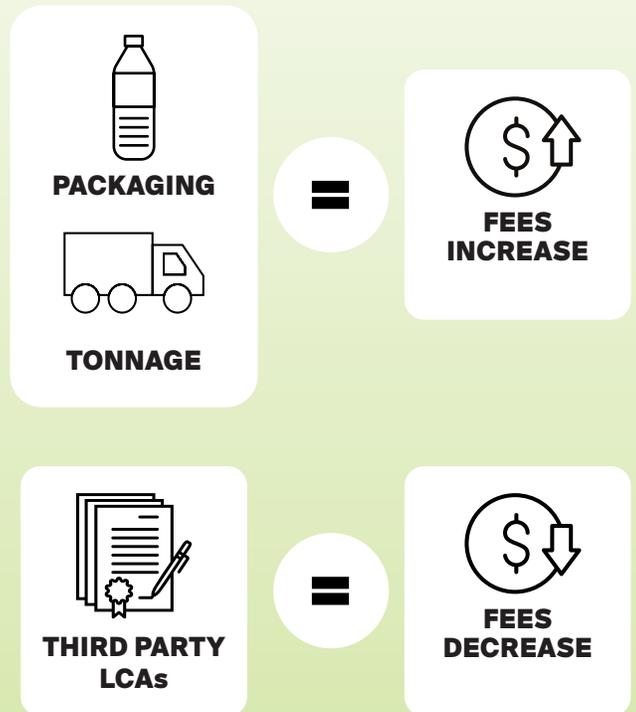
By the time they find out, it's too late to meet the deadline.

BACKGROUND: OREGON'S ECOMODULATION PROGRAM

Oregon's PRO, Circular Action Alliance (CAA) administers EPR fees based on packaging material and tonnage.

Companies can reduce fees by submitting third-party reviewed LCAs that demonstrate:

- 16 environmental impact categories (beyond carbon)
- ISO 14040/44 compliance methodology
- Detailed material inventories and supply chain data
- Third-party critical review



ECOMODULATION BONUS A:

Up to \$20K reduction per SKU batch (due May 31, 2026)

BONUS A EXAMPLE

- Producer A supply = 100,000 lbs PET
- Fee rate = 75 c/lb
- Total payable base fees = \$75,000
- Fee rate breakdown of 75 c/lb:
 - 60 c = cost of managing PET and program administration
 - 15 c = program reserves including ecomodulation funds
- Discount will only apply to 60 c, the portion of base fees excluding reserves

SCENARIO 1

- LCA for a soap SKU (primarily PET)
- SKU supply weight = 25,000 lbs
- Bonus award = $60\text{ c} \times 10\% \times 25,000\text{ lbs} = \$1,500$
- Net fees payable is \$73,500

SCENARIO 2

- LCA for a soap SKU and condiment SKU (primarily PET)
- Soap SKU supply weight = 25,000 lbs
- Condiment SKU supply weight = 50,000 lbs
- Bonus award = $60\text{ c} \times 10\% \times 75,000\text{ lbs} = \$4,500$
- Net fees payable is \$70,500

ECOMODULATION BONUS B:

Additional reductions for demonstrating packaging improvements year-over-year (criteria below - starts in 2027)

BONUS B EXAMPLE 1

Producer A supply weight and fee rates:

- 860,000 lbs HDPE container at 19 ¢/lb
- 90,000 lbs PP cap at 35 c/lb
- 50,000 lbs PE label at 55 c/lb

Total payable base fees = \$222,400

- HDPE container base fees = \$163,400
- PP cap base fees = \$31,500
- PE label base fees \$27,500
- Discount will only apply to base fees excluding reserves

BONUS B EXAMPLE 2

Producer A supply weight and fee rates:

- 850,000 lbs paperboard at 3 c/lb
- 100,000 lbs HDPE film pouch at 55 c/lb
- 50,000 plastic laminate at 79 c/lb

Total payable base fees = \$120,000

- HDPE container base fees = \$25,500
- HDPE film pouch base fees = \$55,000
- Plastic laminate base fees = \$39,500
- Discount will only apply to base fees excluding reserves

SCENARIO: PACKAGING SWITCH

- Packaging switch for detergent pods from HDPE container, PP cap and PE label to HDPE film pouch
- HDPE film pouch fee rate = 55 c/lb
- SKU supply weight = 180,000 lbs (82% reduction or Tier 3 improvement)
- Paperboard base fees = \$99,000 (55.5% lower base fees)
- Bonus A award = \$7,920
- Bonus B Tier 3 award = $2.5 \times \text{Bonus A} = \$19,800$
- Net paperboard base fees after Bonus B award = \$79,200*

*Only larger Bonus B applies.

SCENARIO: PACKAGING IMPROVEMENT

- Packaging improvement for a cereal SKU paperboard package by increasing PCR content
- Producer A increased PCR content, performed an LCA that showed improvement of 51% in impact (Tier 2 improvement)
- Bonus A award = \$9,600
- Bonus B Tier 2 award = $2.25 \times \text{Bonus A} = \$21,600$
- Net base fees after Bonus B award = \$98,400*

*Only larger Bonus B applies.

NEXT STEPS

CALCULATE YOUR POTENTIAL SAVINGS:

Schedule a 30-minute discovery call to review your packaging profile and estimate your ecomodulation opportunity.

TIMELINE TO MEET MAY 31 DEADLINE:

WEEK 1-2: Packaging audit and data collection

WEEK 3-5: LCA modeling and analysis

WEEK 6: Third-party review and submission prep

Submit by May 31, 2026

QUESTIONS WE'LL ANSWER:

- How many SKU batches do you qualify for?
- What's your estimated fee reduction?
- Do you have the packaging data we need?
 - Packaging materials and masses
 - Production energy
 - Production waste generated
 - Optional: Sourcing info and distribution (to refine estimates)
- How can you use these LCAs beyond EPR compliance?

CONTACT

Schedule Discovery Call



Questions? Email steven@planetfwd.com

Planet FWD is a climate data platform specializing in EPR-compliant LCAs for packaging-intensive brands. We've helped companies like Horizon Organic capture ecomodulation bonuses while building scalable sustainability data infrastructure.

REFERENCE 01

“ We feel that among the five factors there in the statute, this is the one that most solidly correlates to actual adjustment in environmental impacts,” said Nicole Portley, a program plan lead at the Oregon Department of Environmental Quality. ”

Oregon’s DEQ on LCA

REFERENCE 02

LCA Bonus Type	Purpose	Bonus Award and Apportioning	Funding Source	Incentives for Impact Reduction	Avoids Cross-subsidization
A (evaluation and disclosure only)	Granted to producers for conducting and disclosing LCAS	Set at 10% of base fees for all materials in the SKU, up to a cap of \$20,000.	Funding provided through proportionate base fees of all materials in the SKU.	Bonus is applied to all primary sales packaging. Magnitude of bonus is reasonably set to incentivize producers to evaluate their SKU impacts and then take further action to reduce impacts to achieve Bonus B.	Bonus grants are funded by producers in the same material category in the SKU (material specific).
Bonus B- Changes to existing packaging	Granted to producers for conducting and disclosing LCAS AND demonstrating significant impact reductions	Indexed to Bonus A. Increases based on 3 graduated impact reduction tiers, using a multiplier associated with the level of reduction. Capped at \$50,000 per SKU or batch	Funding provided through proportionate base fees of all materials in the SKU.	Offers escalating multiplier for granting the bonus based on impact reduction tier. Bonus B set at least twice as much as Bonus A.	Bonus grants are funded by producers in the same material category in the SKU (material specific)
Bonus B- Packaging switch	Granted to producers for conducting and disclosing LCAS AND demonstrating significant impact reductions	Indexed to Bonus A applied to the new packaging materials. Increases based on 3 graduated impact reduction tiers, using a multiplier associated with the level of reduction. Capped at \$50,000 per SKU or batch.	Funding provided through pooled contributions from all producers of packaging material categories.	Offers escalating multiplier for granting the bonus, based on impact reduction tier. Bonus B set at least twice as much as Bonus A.	Not a primary requirement for ecomodulation in this case.

Bonus A is set at 10% discount of base fees (excluding the portion of reserves in the base fees, which is estimated at approximately 20%). This results in a net reduction of approximately 8% and not approximately 10% of base fees, after the application of Bonus A.

SEE 16 LCA INDICATORS BELOW

A producer must calculate and disclose life cycle impact assessment indicators provided below (A-P) to comply with ORS 459A.944(2) for Bonus A.

Life cycle impact indicators within the LCE rules are defined as:

- | | |
|---|--|
| A. Climate Change (PEFCR EF 3.1, kg CO2 eq.) | I. Eutrophication, terrestrial (PEFCR EF 3.1, mol N eq.) |
| B. Ozone depletion (PEFCR EF 3.1, kg CFC-11 eq.) | J. Eutrophication, freshwater (PEFCR EF 3.1, kg P eq.) |
| C. Human toxicity, cancer (PEFCR EF 3.1, CTUh) | K. Eutrophication, marine (PEFCR EF 3.1, kg N eq.) |
| D. Human toxicity, non-cancer (PEFCR EF 3.1, CTUh) | L. Ecotoxicity, freshwater (PEFCR EF 3.1, CTUe) M. Land use (PEFCR EF 3.1, pt) |
| E. Particulate matter (PEFCR EF 3.1, disease incidences) | N. Water use (PEFCR EF 3.1, m3 water eq) |
| F. Ionizing radiation, human health (PEFCR EF 3.1, kBq U-235 eq.) | O. Resource use, minerals and metals (PEFCR EF 3.1, kg Sb eq) |
| G. Photochemical ozone formation, human health (PEFCR EF 3.1, kg NMVOC eq.) | P. Resource use, fossils (PEFCR EF 3.1, MJ) |
| H. Acidification (PEFCR EF 3.1, mol H+ eq.) | |