



August 17, 2021

CalRecycle Mattress Stewardship Program
1001 I Street
Sacramento, CA 95814

Dear CalRecycle Mattress Team:

On July 1, 2021, the Mattress Recycling Council California, LLC (MRC) submitted to CalRecycle its 2020 annual report (the Report) and 2022 proposed budget (the Budget) concerning its management of the statewide mattress recycling program authorized by SB 254 (the Program).

On July 23, 2021, the California Mattress Recycling Advisory Committee (the Committee) submitted by email a letter to CalRecycle commenting on the Annual Report and the Budget (the Letter).

Section 42987(a)(3)(C) of the California Public Resources Code requires that MRC respond to recommendations that have been approved by a majority of the Committee by a rollcall vote held at a public meeting that is memorialized in the Committee's minutes.¹ MRC's response to the Committee's comments are as follows (the Committee's recommendations are quoted verbatim and in the order in which they appear in the Committee's letter):

1. *Looking at the consumer incentive program, how will MRC determine impact and success? What factors will be considered in that determination?* (Letter at page 4)

MRC Response:

On page 62 and in Table 17 of the Report, MRC reports the number of units dropped off through the collection incentive program (CIP) and expresses its concerns with expanding the existing CIP network. Factors we will consider moving forward is whether expanding the program to include offering CIP at sites other than recyclers include the potential harm such expansion might cause existing renovators, whether the additional sites can properly document the incentives paid to residents and whether the CIP site can establish satisfactory audit controls. MRC will report on the experience of expanding CIP to a permanent collection site in Oakland in its 2021 annual report, taking these (and perhaps other) factors into account.

¹ PRC 42987(a)(3)(C) provides as follows:

- (i) The mattress recycling organization shall consult the advisory committee at least once during the development and implementation of the plan required pursuant to Section 42987.1, and annually prior to the submission of both an annual report required pursuant to Section 42990.1 and an annual budget required pursuant to Section 42988.
- (ii) For purposes of being consulted pursuant to this subparagraph, the advisory committee shall prepare specific written recommendations at a publicly scheduled and noticed meeting of the advisory committee that are approved by a majority of the advisory committee's members pursuant to a rollcall vote and included in the official approved minutes of the meeting. The organization shall consider and respond to those written recommendations in writing.

2. *Invite renovators to participate in temporary events, and the program at large, to receive mattresses. Some recyclers are not selling to renovators because they receive an incentive from MRC to recycle, and they don't get paid handling costs to separate for reuse. MRC does not pay recyclers to divert usable mattresses to renovation. (Letter at page 4)*

Collection events hosted by MRC are typically one-day opportunities for local residents to drop off discarded mattresses and foundations (collectively units) for recycling. MRC schedules vendors that adhere to fixed time windows for arrival and departure to comply with the event sponsor's time constraints. The vendor will position one or more trailers at these events and staff the handling and loading of the units. At the end of the event, the load is transported directly to a recycler.

Unlike recyclers, which are required by contract to process all recyclable units that they receive, renovators are very selective, wanting units of only a specific type (mattresses vs foundations), size and condition. To perform this culling operation at an event would require that at least two trailers and two vendors be stationed at each event, one to hold the units that a renovator selects and the second to hold rejects to be sent to a recycler. MRC's current practice of using one vendor to staff and equip collection events, and then simply hauling the collected units directly to a recycler's facility is environmentally responsible and cost efficient. Nonetheless, MRC has invited a renovator to attend an event to better understand the process and logistical constraints.

Regarding the point about the compensation MRC pays to recyclers, MRC does not pay recyclers to divert usable mattresses to renovation. They are compensated to handle, store, fully dismantle units, prepare the reclaimed commodities for sale to buyers and report this information to MRC. This payment is required because mattress recycling is not a financially self-sustaining activity. By comparison, selling a unit to a renovator in itself is a profitable activity that requires little to no labor or handling by the recycler. As a result, no compensation from MRC is necessary to encourage recyclers to sell units to renovators.

As discussed at length in the Report (and also noted above), seven renovators serve as drop off points and we promote their participation on the Bye Bye Mattress Locator. Furthermore, mattress renovators purchased 32,312 units from recyclers in 2020. These data demonstrate that renovators are in fact well engaged in, and substantially benefit from the Program.

3. *Can MRC find out from CalRecycle specifics on how much staff time is billed for inspections and what were the results of those inspections? (Letter at page 4)*

MRC Response:

This question is more appropriately directed to CalRecycle.

4. *PFAS- how will MRC adapt to the new regulatory framework? (Letter at page 4)*

MRC Response:

MRC will comply with all laws and regulations pertaining to PFAS as they relate to mattresses handling, storage and recycling. We are not aware of current requirements that apply to our recycling operations.

5. *Expanding outreach and reviewing incentives for participation, and including metrics discussed above, especially with illegal dumping efforts, outreach with renovators, and tribal communities.* (Letter at page 5)

MRC Response:

As discussed on page 82 of the Report, MRC promotes the Illegally Dumped Mattress Collection Initiative (the Initiative) using a variety of methods and in coordination with many groups and task forces. Also, as stated in the Report (and discussed with the Advisory Committee in multiple meetings), MRC is focused on actively recruiting additional counties to participate in the Initiative. For example, we have increased the payment for rural counties to \$20 per unit. We survey current and previous participants to continually improve our resources and support. Furthermore, three illegal dumping pilot studies are underway that we expect will provide insights on how the program might be improved. Finally, MRC funded a white paper in which experts on illegal dumping causes and consequences from California and elsewhere offer concrete and creative policy proposals that the state and local governments can implement to address the root causes of this important problem.

MRC also responds to feedback from Initiative participants (collected through surveys and informal feedback) about obstacles to participating in the effort. For example, MRC sends participants reminders to enter their data each month, which we have noted has improved the quality of reported data and overall participation.

MRC will continue to promote the Initiative to eligible participants at conferences, in-person and email communications with municipalities, direct mail and with the Illegal Dumping Technical Advisory Committee and Environmental Services Joint Powers Authority members.

Regarding MRC's outreach to renovators, MRC works with renovators that are compliant with SB 254 and federal bedding requirements. Page 35 of the Report explains how renovators become MRC collection locations that MRC then includes on the Bye Bye Mattress locator and in advertising campaigns. As described on page 36, renovators also receive MRC's communications (i.e., monthly newsletter, portal notices, quarterly updates from the program coordinator in their area).

As also discussed in the Report, MRC's outreach includes promoting the Program at tribal conferences and using tribal community connections that MRC has made at Environmental Justice conferences and through referrals from our collection network participants and stakeholders to educate tribal community contacts about collection sites, collection events and the Initiative. MRC would appreciate any introductions to

leaders of tribal communities that the Advisory Committee can facilitate.

6. *More research efforts on textiles, wood, and foam in the same direction as reported in the Annual Report, but also looking to new markets and opportunities.* (Letter at page 5)

MRC Response:

As discussed on pages 102-105 of the Report, MRC is actively working to develop solutions for post-consumer mattress textiles through innovative approaches, including research on enzymatic depolymerization and modifying textiles to create possible battery and supercapacitor components.

Page 101 of the Report discusses challenges with finding markets for foundation wood and MRC's plans to explore alternative uses. MRC will summarize results from these studies in our monthly highlights and post reports on our website. A summary will appear in MRC's 2021 annual report.

Page 104 of the Report discusses ongoing work to vitrimerize post-consumer foam into new consumer products as well as the addition of polyurethane foam to zeolite cements that have the potential to make a wide variety of building products with unique characteristics. Circular recycling of post-consumer foam back into new foam is discussed on page 106.

In addition to these active projects, MRC is in regular contact with the scientific and industry community to learn about innovative ideas that could be relevant to our on-going efforts to identify new and better uses for post-consumer mattress materials. Finally, MRC is receptive to considering unsolicited research ideas. Interested applicants may submit their ideas through MRC's Recycled Materials Market Development RFP process, which MRC regularly promotes.

7. *The Committee will look for continued engagement with Legislators and the Governor's Office on regarding the \$1.1 billion initiative to beautify CA funds.* (Letter at page 5)

MRC Response:

California recently launched the [Clean California website](#), which describes how the state will improve awareness, expand litter clean-up, implement beautification projects and create new green jobs. As discussed during the Advisory Committee meeting on July 21, 2021, MRC is in contact with CalTrans, which is responsible for coordinating litter and illegal dump clean-up projects, to determine how MRC can best contribute to this effort.

Please contact me should you have any questions.

Sincerely,



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