



# MATTRESS STEWARDSHIP PROGRAM PLAN

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**SUBMITTED BY:**

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**SUBMITTED TO:**

Oregon Department of Environmental Quality  
Leah Feldon, Director  
700 NE Multnomah St, Suite 600  
Portland, OR 97232

February 26, 2024

Oregon Department of Environmental Quality  
Leah Feldon, Director  
700 NE Multnomah St, Suite 600  
Portland, OR 97232

Dear Director Feldon,

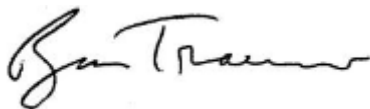
The Mattress Recycling Council Oregon, LLC (MRC) is pleased to submit this Revised Mattress Stewardship Program Plan.

By letter dated December 28, 2023, the Oregon Department of Environmental Quality (DEQ) informed MRC that it had rejected MRC's Program Plan submitted on September 29, 2023. This Revised Program Plan addresses each of the points raised in DEQ's letter. In addition, to help facilitate DEQ's review of this Revised Program Plan, we have added Appendix F, which annotates DEQ's letter to provide a "road map" that identifies where to find in the Plan information responsive to specific points that DEQ has raised.

MRC's parent organization, the Mattress Recycling Council, Inc., is the largest mattress recycling organization in North America. Its state programs in California, Connecticut and Rhode Island have recycled over 13 million mattresses and box springs since 2015. As an organization, our mission has evolved beyond the mechanics of mattress recycling to include collaborating with the mattress industry on circular design and other sustainability initiatives and a variety of research projects to improve mattress recycling processes and expand the markets for recycled mattress materials. We look forward to working with DEQ to implement our program in Oregon.

Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Trainer". The signature is fluid and cursive, with the first name "Ryan" being more prominent than the last name "Trainer".

Ryan Trainer  
MRC President

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# Plan Outline

The Mattress Recycling Council Oregon, LLC (MRC) hereby submits its Mattress Stewardship Program Plan (Plan) to Oregon Department of Environmental Quality (DEQ), following the format specified in DEQ's [Plan Guide for the Mattress Stewardship Program](#), provided to MRC on August 29, 2023.

## Part 1 - Definitions

- a. The plan should state that it uses and incorporates the definitions from the Act and the related administrative rules in Chapter 340, Division 98 of the Oregon Administrative Rules.
- b. Definitions for all other terms used in the plan should be listed in this section.

This Plan uses and incorporates definitions from Section 2 of the Act, including the following (which are quoted verbatim from the Act below):

Section 2(3):

**"Discarded mattress"** means a mattress that has been used, and abandoned or discarded, in this state.

Section 2(4):

**"Environmentally sound management"** includes, but is not limited to, the following management practices, implemented in a manner that is designed to protect public health and safety and the environment:

- (a) Adequate record keeping;
- (b) Keeping detailed documentation of the methods used to:
  - (A) Manage discarded mattresses; and
  - (B) Track and document the fate of discarded mattresses from collection through final disposition within this state and outside this state;
- (c) Performance audits and inspections of recyclers, haulers and other parties as determined by a stewardship organization;
- (d) Compliance with worker health and safety requirements; and
- (e) Maintenance of adequate liability insurance for a stewardship organization and contractors working for the stewardship organization.

Section 2(6):

**"Foundation"** means a ticking-covered structure that is used to support a mattress or sleep surface and that may be constructed of frames, foam, box springs or other materials, used alone or in combination.

Section 2(7):

(a) “**Mattress**” means:

- (A) A resilient material or combination of materials that is enclosed by a ticking, is used alone or in combination with other products and is intended for or promoted for sleeping upon; or
- (B) A foundation.

(b) “**Mattress**” does not mean:

- (A) An unattached mattress pad or unattached mattress topper, with or without resilient filling or ticking, that is intended to be used with or on top of a mattress;
- (B) A sleeping bag;
- (C) A pillow;
- (D) A car bed, crib mattress or bassinet mattress;
- (E) A carriage, basket, dressing table, stroller, playpen, infant carrier, lounge pad, crib bumper or other product manufactured for young children or the pad for a product described in this subparagraph;
- (F) A waterbed, an air mattress or another that contains liquid- or gas-filled ticking and that does not contain upholstery material between the ticking and the mattress core, or
- (G) A foldout sofa bed, futon, futon mattress or upholstered furniture.

Section (2)(15):

“**Producer**” means any person, irrespective of the selling technique used, including that of remote sale, that:

- (A) Manufactures a mattress that is sold, offered for sale or distributed in this state;
- (B) Is the owner of a trademark or brand under which a mattress is sold, offered for sale or distributed in this state, whether or not such trademark or brand is registered in this state; or
- (C) Imports a mattress into the United States that is sold or offered for sale in the state.

Section (2)(16):

- (a) “**Program mattress**” means a discarded mattress that a stewardship organization will provide environmentally sound management for under a mattress stewardship program.
- (b) “**Program mattress**” does not mean a mattress transported from outside this state to be discarded in this state.

Section 2(17):

- (a) “**Renovate**” means to alter a discarded mattress for resale through replacing the ticking or filling, adding additional filling or replacing components of the discarded mattress with new or recycled materials.
- (b) “**Renovate**” does not mean:
  - (A) Stripping a discarded mattress of the ticking or filling without adding new material; or

- (B) The sanitization or sterilization of a discarded mattress without other alteration to the discarded mattress.

Section 2(18):

**"Renovator"** means a person that renovates discarded mattresses.

Section 2(19):

**"Retailer"** means a person that offers new, used or renovated mattresses for retail sale.

Section 2(20):

**"Retail sale"** means sale to a consumer in this state by any means and for any purpose other than resale, including but not limited to sale by remote offerings such as sales outlets, catalogs or the Internet.

Section 2(23):

**"Stewardship organization"** means a nonprofit organization designated by a producer or group of producers to implement a mattress stewardship program.

In addition, the Plan uses and incorporates the following terms defined in Oregon Revised Statutes (ORS):

ORS 174.116(1)(a):

**"Local government"** means all cities, counties and local service districts located in this state, and all administrative subdivisions of those cities, counties and local service districts.

ORS 459.005(3):

**"Collection service"** means a service that provides for collection of solid waste or recyclable material or both but does not include that part of a business operated under a certificate issued under ORS 822.110 (Dismantler certificate).

ORS 459.005(21):

**"Recycling"** means any process by which solid waste materials are transformed into new products in a manner that the original products may lose their identity.

ORS 459.005(24):

**"Reuse"** means the return of a commodity into the economic stream for use in the same kind of application as before without change in its identity.

ORS 459A.085:

**"Collection service franchise holder"** as described under ORS 459A.085.

In addition, for purposes of this Plan:

**“Act”** means the “Mattress Stewardship Act, SB 1576 (2022).”

**“Collection Site”** means a physical location designated by MRC for the purpose of collecting or receiving Discarded Mattresses. Collection sites may include, but are not limited to, Collection Events.

**“Collector”** means a party that collects one or more Mattresses discarded in Oregon and delivers them to a Collection Site or Recycler.

**“DEQ”** refers to the Oregon Department of Environmental Quality.

**“MRC Inc.”** refers to Mattress Recycling Council, Inc., a tax-exempt non-profit corporation incorporated in the state of Delaware.

**“MRC”** refers to Mattress Recycling Council Oregon, LLC, a limited liability company that MRC Inc. created to design and implement the Oregon mattress stewardship program.

**“Plan”** refers to a document filed with DEQ that describes how a stewardship organization will develop and implement a mattress stewardship program in Oregon and that contains the information specified in Section 4(1) of the Act.

**“Program”** refers to the Oregon mattress stewardship program that MRC will implement.

**“Rural areas”** refers to counties that have a population of less than 10,000 people, as described in Section 5(1) of the Act.

**“Unit”** is synonymous with the term “mattress,” and collectively refers to mattresses and foundations.

**“Urban areas”** refers to counties that have a population of 10,000 people or more, as described in Section 5(1) of the Act.

## Part 2 - Background

Describe any relevant information about the stewardship organization, including but limited to, how the organization meets the definition of “stewardship organization” under the Act, its organizational structure, and its history and success with mattress stewardship programs in other jurisdictions and relevant program experience.

Section 2(23) of the Act defines the term “stewardship organization” to mean “a nonprofit organization designated by a producer or group of producers to implement a mattress stewardship program.” MRC meets this definition.

The International Sleep Products Association (ISPA) is the trade association for mattress manufacturers and suppliers of components and services to the mattress industry whose members manufacture mattresses sold in the United States, including Oregon. In 2013, ISPA formed the Mattress Recycling Council Inc. (MRC Inc.) to design, implement and administer stewardship programs in three states that had enacted mattress stewardship laws, California, Connecticut and Rhode Island. MRC Inc. is a tax-exempt non-profit corporation incorporated in the state of Delaware.

Subsequently, MRC Inc. spun off each of these statewide programs into state-specific limited liability company (LLC) affiliates. In 2022, MRC Inc. established another LLC affiliate, the Mattress Recycling Council Oregon, LLC (MRC), as a separate limited liability company to design and implement the Oregon mattress stewardship program (Program) and submit this Plan. Both MRC Inc. and MRC are non-profit entities and MRC is authorized to transact business in Oregon.

Therefore, as required by the Act’s definition of “stewardship organization,” MRC Inc. is a non-profit organization created by ISPA (a group of mattress producers) to implement mattress stewardship programs. MRC is a non-profit affiliate of MRC Inc. created specifically to design and implement the Oregon mattress stewardship program. As such, MRC meets the requirements of Section 2(23) of the Act.

MRC Inc. launched its first program in Connecticut in 2015, followed by the launch of the California program later that year and the Rhode Island program in 2016. Since inception, these state mattress recycling programs have collectively recycled over 13 million mattresses and foundations (collectively Units), and recycled over 500 million pounds of steel, foam, wood, fabric and fiber that can be used to make new products. If landfilled, these units would have consumed over 12.9 million cubic yards of landfill capacity. On average, the existing state-specific programs are recycling over 70% of the weight of each unit collected.

Based on a recently completed study of the California mattress recycling program, each unit recycled saves 500 gallons of water, enough energy to power an average household for three days and the greenhouse gas emissions savings similar to driving 60 fewer miles.

MRC Inc. (including its state-specific affiliates) is internationally recognized as a leader in mattress recycling. We look forward to bringing our experience to implementing the Oregon mattress stewardship Program mandated by the Act.



### Part 3 – Implementation Timeline

Provide an implementation timeline with deliverables and milestones from program initiation through the term of the plan. Per the Act, a stewardship organization must implement a mattress stewardship program as described in its initial plan no later than seven months after the plan is approved by DEQ. The timeline should include dates and deliverables for the first seven months of implementation.

MRC's deliverables and milestones from Plan approval, through Program launch and the end of the Plan term are as follows:

#### Completed Prior to Plan Submission

- In 2015, MRC launched an online registration and reporting portal (MRCreporting.org) for retailers, manufacturers, renovators and other obligated entities to register their company, submit brand/URN information, report units sold and remit collected mattress recycling fees. It is currently used by MRC's California, Connecticut and Rhode Island programs.
  - In 2023, MRC scaled MRCreporting.org to allow obligated Oregon entities to register and comply with the Oregon Act.
- Creation of websites to inform industry and consumer audiences – MattressRecyclingCouncil.org (industry) launched in 2014 and ByeByeMattress.com (consumers) in 2015.
  - ByeByeMattress.com hosts a locator for consumers to find their nearest drop-off location.
  - Upon Oregon enacting its law in 2022, MRC added an Oregon page to the State Programs section on MattressRecyclingCouncil.org.
- In 2022, MRC began gathering contact information from various sources for entities fitting the Act's definition of retailer, producer and renovator in order to build a mailing list. Initial communications were issued once MRCreporting.org's Oregon registration functionality was completed.
- In 2023, MRC hired a program coordinator to prepare for a 2024 Program launch. Completed tasks include:
  - Surveyed all known Oregon solid waste facilities and other potential collection sites to assess interest in becoming a public collection site.
  - Created MRC branded marketing materials to aid the coordinator in conversations and meetings.
  - Released RFP for mattress recycling to assess interest, capabilities and costs for recycling units collected by the Program.
  - Released RFP for transportation to assess interest, capabilities and costs for transporting units collected by the Program.

## Following Plan Approval

### **Within the First 2 weeks of Receiving Plan Approval**

*These activities would start as soon as MRC's Plan is approved:*

- Issue a press release to mattress and home furnishing industry media and related industry associations regarding important Program information including the start date and assessment.
- Issue an email to already registered Oregon participants regarding important Program information and begin preparing a direct mail campaign to identified, unregistered retailers, producers and renovators.
- Publish Program start date and assessment amount on MRCreporting.org and MattressRecyclingCouncil.org and MRC's social media channels.
- Notify and initiate contracting process with collection sites, transporters and mattress recyclers.

### **Within the First 3-4 weeks of Receiving Plan Approval**

*At this point, MRC expects to have completed these activities:*

- Distributed a direct mail letter or postcard to all identified entities not yet registered, but MRC assumes is obligated to do so. This notification would confirm the start date and amount of the assessment and urge them to visit MRCreporting.org.
- Issued RFP for media relations consultant for Oregon communications.

### **Within 2-5 months of Receiving Plan Approval (5-2 Months Prior to Program Launch)**

*At this point, MRC would be engaged in the following activities:*

- Continue negotiating and securing contracts with collection sites, transporters and recyclers.
  - As collection site and recycler contracts are secured, MRC collects information regarding desired signage, confirms information to be posted on ByeByeMattress.com, and engages with city or local officials to prepare for promoting the location's participation. Meanwhile, the program coordinator is sharing resources and conducting site visits to help collection sites understand how to best accept, handle and prepare mattresses for pickup. Recyclers and transporters are being onboarded during this time.
- Creating videos for collection sites, transporters and recyclers that accompany the Program Guidelines.
- Securing a contract with a media relations consultant and developing materials needed to announce the start of the Program.
- Creating Oregon specific point-of-sale materials for retailers to share with their customers.

- Continuing to issue registration reminders to identified, unregistered retailers, producers and renovators.

**Within 6 months of Receiving Plan Approval (One Month Prior to Program Launch)**

*At this point, MRC would be engaged in the following activities:*

- Updating MattressRecyclingCouncil.org’s Resources library with Oregon-specific material including but not limited to Collection Site Guidelines and related videos, point-of-sale materials, publicity toolkits and information sheets.
- Activating Oregon reporting and assessment remittance capabilities in MRCreporting.org.
- Distributing publicity toolkits to collection sites, recyclers, city/county officials and interested community-based organizations.
- Delivering retailer point-of-sale materials to all registered retailers.
- Delivering containers and signage to all contracted collection sites.
- Continuing to finalize contracts with prospective collection sites.
- Continuing to issue registration reminders to identified, unregistered retailers, producers and renovators.
- Establishing internal policies and procedures that outline how MRC will comply with applicable laws and regulations.

**Upon Program Launch (Assuming August 1, 2024)**

Within seven months of Plan approval, MRC will launch the Program.

On an ongoing basis, MRC will communicate with retailers, producers and renovators about their legal obligations and recycling opportunities. MRC will also continue to finalize contracts with interested collection sites and recruit new ones.

MRC will begin updating DEQ monthly on relevant changes (including number, name and address of permanent collection sites, registered retailers and producers, Program recyclers and reuse organizations managing discarded program mattresses).

**Within 2 Weeks After Program Launch (August 1 – August, 15, 2024)**

*At this point, MRC would be focused on the following activities:*

- Publishing Oregon locator listings and Oregon page on ByeByeMattress.com (first day of Program and ongoing as new sites join)
- Issuing another press release announcing the start of the Program to mattress, home furnishings and recycling/solid waste industry media and related industry associations.

- Publishing the Program start announcement on MRC's websites and social media channels.
- Continuing to assist publicity toolkit recipients as needed.
- Beginning to inform registered retailers, producers and renovators of how to complete the reporting and assessment remittance process and recycle.

**Within 6 Months After Program Launch (August 2024 to January 2025)**

*At this point, MRC would be focused on the following activities:*

- Distributing a Public Service Announcement.
- Distributing a press release to Oregon media announcing Program's availability.

**Within 7 to 12 Months After Program Launch (February 2025-August 2025)**

*At this point, MRC would be focused on the following activities:*

- Organizing a media tour/press conference at a collection site or recycler.
- Conducting recycler audits for environmentally sound management practices (2025, and each year thereafter).
- Identifying Earth Day (April 22) and America Recycles Day (November 15) events and researching costs and sponsorship benefits.
- Submitting an annual report, annual fee payment, budget and financial audit to DEQ (annually on July 1)
- Surveying Oregon retailers, producers and renovators regarding awareness of obligations, use of resources including point-of-sale material and satisfaction with MRC's assistance.
- Discussing illegal dumping with Portland Metro and other select communities to learn where additional resources or tactics might be helpful.

**One Year After Program Launch (August 2025 – August 2026)**

*Once the Program has operated for a full year, MRC will:*

- Survey Oregon consumers to collect baseline data regarding Program awareness, mattress purchasing/disposal behavior, recycling attitudes and media habits that will inform future communications strategies and materials (after first full year of Program operations and each year thereafter).
- Begin discussions, research and other activities necessary to accomplish deliverables included in the Act that must be completed before the end of the Plan's term.

## **Before End of Second Year to End of Plan Term (2026 – 2029)**

*Per the Act, MRC will:*

- Propose Program performance goals to DEQ (no later than two years from Program launch)
- Propose Program closure plan to DEQ (no later than two years from Program launch)
- Submit life cycle assessment report to DEQ (include in 2026 annual report to be filed July 1, 2027) (prior to initiating study, submit study scope of work to DEQ for review and comment (no later than 90 days before initiating the study) and respond to DEQ comments (no later than 30 days from the date DEQ sends comments to MRC))
- Submit report on the scope of discarded mattresses that are not being collected as part of the Program with recommendations on how to direct the discarded mattresses to, and include them in the Program (include in 2026 annual report, to be filed by July 1, 2027) (prior to initiating study, submit study scope of work to DEQ for review and comment (no later than 90 days before initiating the study) and respond to DEQ comments (no later than 30 days from the date DEQ sends comments to MRC))
- Conduct study in 2026 on most effective methods of providing discarded mattress collection services to individuals and multifamily housing structures to DEQ (include in 2026 annual report, to be filed by July 1, 2027) (prior to initiating study, submit study scope of work to DEQ for review and comment (no later than 90 days before initiating the study) and respond to DEQ comments (no later than 30 days from the date DEQ sends comments to MRC))
- Complete statewide illegal mattress dumping census (by December 2026)
- Issue request for proposals for illegal mattress dumping pilot project funding (annually from 2027 to 2029)
- Submit a Plan for Program years 2029 – 2034 to DEQ (no later than 180 days before the expiration of the initial Plan)

## Part 4 – Program Operations

- a) **Describe how the stewardship organization will manage a mattress stewardship program that complies with all federal and state laws applicable to the operation of the mattress stewardship program, including the Mattress Stewardship Act and related rules in OAR Chapter 340, Division 98.**

MRC will comply with all applicable federal and state laws, including the Mattress Stewardship Act and OAR rules promulgated pursuant to that statutory authority to implement the Act.

To comply with federal and state laws, MRC will take the following steps:

1. **Understand the Laws:** Familiarize ourselves with all applicable federal and state laws and regulations that apply to mattress recycling.
2. **Stay Updated:** Given that laws and regulations can change over time, MRC will promptly review any updates or amendments that may affect our compliance and where necessary, seek professional advice.
3. **Develop Compliance Policies and Procedures:** MRC will establish internal policies and procedures that outline how we will comply with applicable laws and regulations prior to Program launch.
4. **Train Employees and Contractors:** As needed, MRC will educate employees and contracted parties (collection sites, transporters and recyclers) about their roles and responsibilities related to compliance.
5. **Maintain Proper Documentation:** MRC will maintain records of our compliance efforts, including any licenses, contracts and other relevant documents as required by law.
6. **Conduct Audits and Assessments:** MRC will review and assess our compliance practices annually to identify potential areas of weakness, non-compliance or improvement.

- b) **Describe how program mattresses will be identified.**

Section 2(7) of the Act provides a physical definition of a mattress, and includes “foundations” (defined in Section 2(6) of the Act.) Section 2(16), which defines “program mattresses,” reads as follows:

- (a) “Program mattress” means a discarded mattress that a stewardship organization will provide environmentally sound management for under a mattress stewardship program.
- (b) “Program mattress” does not mean a mattress transported from outside this state to be discarded in this state.

Section 2(3) defines “discarded mattress” to mean “a mattress that has been used, and abandoned or discarded, in this state.”

These provisions are intended to prevent the Program from being burdened by out-of-state free riders. Therefore, consistent with these statutory definitions, MRC will consider program mattresses to be those that are discarded in Oregon, provided they were not transported from outside Oregon for purposes of disposal.

**c) Describe how the program will handle discarded mattresses that are received through collection sites or collection events and that are not program mattresses, including mattresses from outside the state.**

Mattresses are bulky but light weight products that are costly to move long distances. Based on the experience of other mattress recycling programs, non-program mattresses typically originate from neighboring states. The primary source of those units are out-of-state solid waste haulers and other collectors seeking to free ride on no-cost recycling services. Therefore, the most likely sources of non-program mattresses will be from states whose borders are contiguous with Oregon's.

Oregon shares borders with four states. Since California already has its own statewide mattress recycling program, the risk of the Program being potentially burdened by non-program mattresses from California is small. Likewise, the states of Idaho and Nevada, which also share borders with Oregon, are unlikely sources for non-program Mattresses because they lack significant population centers near their border with Oregon. The nearest significant out-of-state population center is in Washington state near Portland.

To prevent out-of-state free riding, MRC intends (as needed) to require:

- A collection site that accepts mattresses from Oregon and non-Oregon sources may not participate in the Program unless it agrees in writing to document which mattresses are Oregon-sourced, segregate those units from all other solid waste that it collects and provide only the Oregon units to the Program.
- A collection site that receives non-program mattresses from out of state sources may reuse, renovate, recycle, landfill or incinerate those units at their discretion. Non-program mattresses are not part of the Program, and MRC will not compensate a collection site for handling non-program mattresses.
- MRC will require that collection sites, transporters and recyclers accept units only from small commercial solid waste haulers that agree in writing to maintain a compliance log indicating the source of the units they receive.
- Commercial entities that provide units to the Program (such as retailers, lodging establishments, etc.) must agree in writing not to provide units discarded outside Oregon or by non-Oregon residents.

- MRC’s contracts with collection sites and recyclers will require them to document that they are accepting units only from in-state Oregon sources and will make clear that MRC will not compensate them for accepting, handling or processing out-of-state units.
- Provide point-of-sale materials to inform purchasers that a mattress transported from another state to be discarded in Oregon is ineligible for MRC-funded recycling through the Program.

**d) Identify each producer, renovator and retailer that is registered with the stewardship organization, as of 30 days before the date of plan submission in an appendix, that includes the business’ name, physical address, contact name, phone number and email address.**

Section 4(1)(d) of the Act requires that the Plan “[i]dentify each producer, renovator and retailer that is registered with the stewardship organization.” Consistent with this provision, MRC will provide the business name, address, contact name, phone number and email address of these businesses. However, some businesses only have a primary address at time of registration and may not have a physical address. If the business does not provide a physical address, the primary address will be provided.

**Appendix A** contains a list of company names, primary or physical addresses and phone numbers of each producer, renovator and retailer that have registered with the Program as of January 31, 2024 (30 days before the revised Plan submittal). This list will continue to grow as important Program milestones are reached, including DEQ’s approval of the Plan, announcement of the assessment and the Program start date.

**e) Identify each of the proposed transporters and recyclers that the stewardship organization will contract with to transport and process program mattresses. In an appendix, please include the business’ name, physical address, contact name and phone number.**

Section 4(1)(e)(A) of the Act requires that the Plan include “[i]dentification of the proposed transporters and recyclers that the stewardship organization will contract with to transport and process program mattresses and the recycling methods that the recyclers will use.”

Given that MRC has not yet entered into contracts with these transporters or recyclers, it would be premature for MRC to require now that they obtain any required licenses or meet other requirements to transport or recycle program mattresses in accordance with relevant laws and regulations at some point in the future. Nevertheless, MRC’s request for proposals, to which each of these businesses responded to with interest in participating in the Program, clearly notified each business that MRC would contractually require compliance with such licensing, environmentally sound management and other requirements. Once DEQ approves this Plan, MRC will seek to formally contract with these businesses and to formalize these requirements in the contract at that time.



**TABLE 1. Proposed Transporters**

| Company   | Address   | Contact Name   | Phone          |
|---|---|----------------|----------------|
| Ally Global Logistics<br>DBA The AGL Group                      | 317 Libbey Industrial Pkwy.,<br>Ste B-200<br>Weymouth, MA 02189 | Jessica Allen  | (781) 544-3970 |
| Ron Lawrence And<br>Son Transport, Inc.                         | 532 Beard Ave.<br>Modesto, CA 95354                             | Kelly Snyder   | (209) 321-4122 |
| Ryder Transportation<br>Solutions                               | 11690 NW 105th St.<br>Miami FL 33178-1103                       | Derek Peterson | (305) 633-7497 |
| Titan Concepts<br>International LLC DBA<br>TCI Global Logistics | 710 S 67th Ave.<br>Phoenix, AZ 85043                            | Dave Mosely    | (773) 218-6852 |
| Total Quality<br>Logistics, LLC                                 | 4289 Ivy Pointe Blvd.<br>Cincinnati, OH 45245                   | Aaron Nodal    | (912) 441-8265 |

**TABLE 2. Proposed Recyclers**

| Company  | Address                                     | Contact Name      | Phone          |
|--|---|-------------------|----------------|
| Environmentally<br>Conscious Recycling                 | 12409 NE San Rafael<br>Portland OR 97230    | Vince Gilbert     | (503) 253-0867 |
| Klamath Works, Inc.                                    | 2350 Maywood Dr.<br>Klamath Falls, OR 97603 | Joy McInnis       | (541) 887-8495 |
| St. Vincent de Paul<br>Society of Lane<br>County, Inc. | 135 N Cleveland St.<br>Eugene, OR 97402     | Bethany Cartledge | (541) 687-5820 |

**f) Describe how the stewardship organization will provide for the environmentally sound management of program mattresses, regardless of the producer, with no charge at the point of collection of discarded mattresses.**

MRC will provide for the environmentally sound management of program mattresses (see Part 4(b), above) at no charge to the consumer at the point of collection, regardless of which company manufactured that unit (provided, however, that MRC may permit a person that provides a “premium service” to charge for that service) as described below.

MRC contracts with third parties and will expressly require that they use environmentally sound management practices as defined in Section 2(4) of the Act to collect, transport and recycle discarded units. They will be contractually obligated to comply with all federal, state and local laws and regulations that apply to their businesses and operations. These laws will include air and water pollution laws, other environmental laws, workplace health and safety requirements, fair labor standards rules and other laws and regulations that can affect the work and natural environment.

The services to be provided by the entities with which MRC will contract will divert thousands of discarded units from Oregon’s solid waste system and landfills annually,

which will generate significant environmental benefits, prolong the life of existing landfills and reduce the cost, fuel and other resources that the state's solid waste system and landfills must expend to handle discarded mattresses. The recyclers will generate recycled steel, foam, fiber and fabric, wood and other mattress materials that can be reused or manufactured into new products. The environmental costs of manufacturing equivalent materials from virgin sources that the recycled materials will displace will be avoided, once again generating significant net environmental benefits.

As the Program is implemented, MRC will work closely with its collection and recycling network to make the process more environmentally and financially efficient and cost-effective, with our overarching goals being to continually improve the Program's operations, conserve resources and increase the net environmental benefits that the Program provides. For example, MRC will continually seek to reduce the per unit cost to transport units from collection sites to the recyclers. These cost savings will come primarily from developing routes, loading/off-loading practices and equipment that will reduce the amount of fuel required to transport each unit (which in turn will generate environmental benefits in the form of reduced greenhouse gas generation).

The collection network will consist of a variety of drop-off locations (solid waste facilities, mattress reuse and renovators, recycling centers, retailers, etc.) and collection events for underserved or rural communities that MRC will provide at no charge to the Oregon consumer. MRC will also provide transportation and recycling services for large volume generators of discarded mattresses (such as hotels, healthcare facilities, universities, military facilities and retailers), again at no charge to the participant. MRC will also accept at no charge units collected by entities that provide premium mattress collection services (like curbside bulky item collection or small commercial haulers).

MRC will contract with mattress recyclers that can establish that they have the ability to use environmentally sound management practices to provide the required mattress recycling services, and that will agree to comply with recordkeeping requirements, documenting the final disposition of discarded mattresses, contractual performance metrics and relevant federal, state and local legal requirements including the Act. To identify recyclers that can meet these criteria, MRC issued a request for proposals (RFP) to recyclers interested in processing discarded mattresses under the Program. Potential recyclers' responses included the processing fee that they propose to charge MRC to recycle units and other important aspects of the recycling contract.

In the RFP, MRC also requests that each respondent list all downstream purchasers to which the respondent intends to sell used mattress materials obtained from the recycling process. This information is useful in confirming that the materials removed from mattresses are recycled when possible, as opposed to being landfilled or incinerated. MRC evaluates all proposals based on a combination of factors, including price, experience, geographic location and completeness of RFP response.

The recyclers with which MRC will contract will be required by contract to comply with Recycling Standards (see **Appendix B**). For these reasons, MRC and its contracted service providers will use environmentally sound management practices at every step in the mattress collection, transport and recycling process. To address noncompliance with the contract or Recycling Standards, each of MRC's contracts with recyclers will contain

a contract compliance/dispute resolution process, as well as contract termination criteria. The goals of these provisions are to encourage regular and positive communications between the contracting parties regarding the fulfillment of their legal obligations, to identify instances when contract compliance problems arise and to gradually escalate the discussions until the problems can be remedied in a constructive manner that avoids rupturing the contractual relationship and resulting in termination. Compliance with the Recycling Standards will be one of the contractual obligations that are subject to these provisions.

We anticipate that the vast majority, if not all, of the contractual compliance issues that MRC and its recyclers will encounter under the Program can and will be resolved through this process. In the event, however, that a material violation of the contract cannot be cured and contract termination becomes necessary, MRC will notify DEQ of that action, as part of its monthly reports to DEQ identifying which recyclers are participating in the Program.

**g) Describe how the stewardship organization will prioritize renovation, reuse or recycling over disposal in providing for the environmentally sound management and final disposition of program mattresses under the mattress stewardship program.**

MRC will use environmentally sound management practices to divert discarded mattresses from the solid waste stream and disposal through landfills and other means. MRC's primary focus will be on dismantling discarded mattresses and making the recycled materials available to use in making new products. The recyclers with which MRC will contract will be required by contract to achieve a recycling rate, thereby disincentivizing disposal. Whole mattresses and mattress materials sent for reuse, renovation or recycling all contribute to and are factored into the recycling rate. Some recyclers separate and supply cleaner uncontaminated used mattresses or their component materials to reuse organizations, used mattress sellers, and renovators of used mattresses. MRC will provide recyclers with a list of renovators in Oregon that comply with applicable federal and state laws governing the sale of used and renovated mattresses.

Based on the experience of other mattress recycling programs, most mattresses can be dismantled and the materials recycled. Nevertheless, in some cases, a mattress is so soiled with bodily fluids, contaminated with putrescible solid waste (for example, from exposure to residential food waste during trash collection), infested with bedbugs or mold, or becomes so mangled (from being loaded into a trash compactor truck), wet or frozen (from being exposed to weather) that attempting to dismantle such a unit may expose a recycler's workforce to unacceptable health and safety risks or make the unit unrecyclable from an environmental or financial perspective. In order to minimize the number of units that cannot be recycled for these reasons, MRC provides collection sites with resources to implement best practices that will reduce the number of units that are ruined because of mishandling or other causes. These will include the Collection Site Guidelines and video tutorials on acceptable and unacceptable mattresses, effective site operations, collection site signage, safe mattress loading and stacking and bedbug identification and training. MRC will also provide information to collection sites, transporters and recyclers that will help them protect their workforce from these health and safety risks.

In addition to recycling and diverting discarded mattresses from waste disposal, the reuse prong of Oregon's waste management hierarchy includes mattresses handed down to friends or family, mattresses donated to charitable organizations, sold in used furniture stores and mattress renovation. As a result, reuse organizations, used mattress sellers and renovators of used mattresses who comply with relevant federal and state laws may also participate in the Program as collection sites. MRC is (and will continue) to communicate with renovators and reuse organizations in Oregon regarding the Program and how they can participate in an environmentally sound manner. As a participating collection site, these entities may receive units that they may cull for reuse, resale, or renovation and may recycle remaining unwanted units through the Program, whether they function as a collection site or not. At present, MRC is only aware of two active renovators in Oregon.

See **Part 4(f)** for additional information about the collection network, including renovation, reuse and recycling.

**h) Describe the recycling methods that the recyclers will use for the processing of mattresses.**

After discarded mattresses arrive at a recycling facility, the recycler will unload the container and (at its discretion) may landfill units heavily contaminated with bedbugs, mold or putrescible solid waste, or that are otherwise in nonrecyclable condition. This may be necessary to minimize facility contamination and worker exposure to health and safety risks. Alternatively, units that are deemed suitable for reuse or resale may be separated at this time. Recyclers will report to MRC the number and weight of mattresses and weight of mattress materials directed to reuse, renovation, and landfill as a result of this triage process.

The recycler will then dismantle the non-contaminated mattresses that are not reused or resold. The outer ticking layer is removed first so that each internal component material layer (typically foam, fiber and steel springs) can then be separated. The dismantling process varies from one recycler to the next, but most use a combination of manual and mechanical processes. Each recyclable material type (e.g., steel, foam, fiber, etc.) is separated and sometimes compressed into bales for shipment to buyers.

## Part 5 – Collection

The Mattress Stewardship Act requires a stewardship organization to operate at least one collection sites in every county with a population of 10,000 or more, plus an additional 25 sites to be distributed throughout the state to extend convenient service to all persons in the state. A stewardship organization must establish and maintain collection sites at permitted solid waste facilities or other suitable site for the collection of discarded mattresses, such as organizations that recycle or renovate mattresses, reuse stores or locations on tribal land. In counties that have a population of less than 10,000 people and that do not have a permanent collection site, at least one collection site per year must be held in that county.

It is preferred that a stewardship organization use Portland State University population data when planning for the convenience standard. <https://www.pdx.edu/population-research/population-estimate-reports>

a) **In an appendix, list all proposed collection sites and events, including location name, physical address, a contact name and phone number.**

MRC consulted with Portland State University (PSU) data when developing the convenience standard. Of Oregon’s 36 counties, PSU’s Certified Population Estimates identify 29 with a population of 10,000 or more and seven with a population of less than 10,000.

See **Appendix C** for a list of the facilities that responded favorably to MRC’s survey or subsequent outreach in serving as a permanent collection site, as further described in subsection (c) below. The facilities that responded favorably to MRC are located in 29 of Oregon’s 36 counties, including 28 of the 29 counties where a permanent collection site is required because their population exceeds 10,000. MRC has not yet entered into contracts with any collection sites, pending DEQ’s approval of this Plan. Once approved, MRC will accelerate our contract review process in an attempt to have as many collection sites operational on the first day of the Program as feasible. MRC’s revised budget reflects these accelerated timeframes and associated costs. See the **Implementation Timeline** for when we expect these arrangements will begin to be formalized. Once DEQ approves the Plan, MRC will provide DEQ monthly updates that will reflect finalized collection site contracts and which collection sites can be operational both in time for Program launch and afterwards.

In counties with fewer than 10,000 people that lack a permanent collection site, MRC will demonstrate a good faith effort to coordinate with the appropriate local government, collection service franchise holder or person who provides collection service to host and promote at least one collection event per year under Section 5(1)(a)(B). If, after such good faith effort, MRC is unable to host a collection event with these entities, MRC shall seek alternate community organizations and entities with whom it may coordinate, host and promote a collection event. Once collection event details have been finalized, MRC will provide the event host and local officials with a publicity toolkit and coordinate an outreach strategy. MRC will

announce the details of the no-cost event in its locator listings, Oregon page of ByeByeMattress.com and Bye Bye Mattress social media. MRC will provide DEQ with the date, location, address, and contact information relevant to the event as part of its monthly reports to DEQ. If MRC determines that holding a collection event in a given geographic area will not be practicable or effective, it will notify DEQ.

- b) If proposing alternative methods to providing convenient service, describe and provide any geographic information systems analysis or additional information sufficient to support how the alternative methods will result in providing service to residents throughout this state at an equivalent level of convenient service compared with the number of collection sites and events required under the Act.**

**A stewardship organization could measure effectiveness of the alternative methods compared to collection by a collection site or event on an annual basis, with a commitment to increasing the level of alternative methods or awareness of the alternative methods if data does not suggest the alternative methods are providing an equivalent level of convenient service.**

**Examples of additional information as mentioned above could include:**

- i) Concurrence by local governments with the proposed alternative method in the areas where residents are underserved by collection sites or events.**
- ii) The determination of any enhanced services needed, to improve equitable access, including historically underserved populations.**

MRC intends to comply with the collection requirements specified in the Act. As DEQ's question implies, whether MRC fully succeeds in accomplishing that goal will depend on whether the various entities that could potentially participate in the Oregon collection network in fact do so, since MRC has no ability to require them to cooperate. Based on the experience of other mattress recycling programs, most relevant entities willingly participate in the mattress collection activities, but others do not. For example, some entities lack the staffing, space, and/or physical assets needed to serve as a collection site. Others may decline for commercial or perceived liability reasons. And others may decline because they do not enter into such relationships as a matter of policy. At this stage, MRC does not know how much cooperation from private and local government parties we can reasonably expect.

The amount of time that it takes for contract negotiation, review, approval and execution varies considerably, depending upon the potential collection site's organizational structure. Local government entities, such as municipalities, often have a lengthy contracting protocol involving the review and approval by numerous departments such as contracting, risk management and legal. Furthermore, these entities often have prescribed contract execution protocols involving approval and signatures by particular governing bodies, such as town or city councils, who may convene only once a month. It has been the experience of other state mattress recycling programs that it often takes six months or more for a contract to move through a municipality's contract process. Although MRC will streamline the

contracting process as much as possible and promptly respond to all potential collection sites, the amount of time that it will take for a municipal collection site to fully execute a contract is out of MRC's control.

In order to mitigate the impact of a lengthy contracting process, MRC will provide collection sites that are unable to fully execute a contract by the Program start date the option of completing a simple online program registration. This program registration will allow these collection sites to receive a collection container and immediately begin providing recycling services to local consumers under the Program. Collection sites opting for this program registration are required to comply with the same environmentally sound management terms and conditions and provide no-cost public drop-off as those operating under our standard collection site contracts, but they waive the compensation that is the standard consideration in collection site contracts. Collection sites may choose to permanently operate under a program registration or only until such time that a collection site contract has passed through their contracting protocol and is fully executed.

In counties whose population exceeds 10,000 that MRC has attempted but not yet been able to contract with a permanent collection site, MRC will demonstrate a good faith effort to identify an appropriate local government, collection service franchise holder, person who provides collection service, as well as reuse organizations, used mattress sellers, and renovators of used mattresses, in the county to coordinate with to establish a permanent collection site under feasible, reasonable and mutually agreeable terms. In addition, until a permanent collection site is established in such a county, MRC will provide convenience by coordinating with the appropriate local government, collection service franchise holder or person who provides collection service to host and promote at least one but no more than two collection events per year. If, after a good faith effort, MRC is unable to coordinate with the appropriate local government, collection service franchise holder or person who provides collection service, MRC shall seek alternate community organizations and entities with whom it may coordinate, host and promote a collection event. Once a permanent collection site or collection event details have been finalized, MRC will announce the details of the no-cost opportunity in its locator listings, Oregon page of ByeByeMattress.com and Bye Bye Mattress social media. MRC will provide DEQ with the date, location, address, and contact information relevant to the event as part of its monthly reports to DEQ. If MRC determines that holding a collection event in a given geographic area will not be practicable or effective, it will notify DEQ.

- c) **Describe how the stewardship organization will establish and maintain collection sites at permitted solid waste facilities and other suitable sites for the collection of discarded mattresses, provided that the stewardship organization ensures the sites do not impose a fee for making space available for storage containers.**

As stated in the Implementation Timeline, establishing the collection network is a multiyear process. In an effort to implement the Program promptly and efficiently, MRC in May 2023 preliminarily contacted 130 Oregon solid waste facilities in both urban and rural areas included on DEQ's online "Active Permitted Facilities" list that were likely to accept discarded mattresses to gauge their potential interest in collecting discarded

mattresses for recycling through the Program. To extend convenient service to residents, MRC additionally identified and surveyed 95 other suitable sites, including existing mattress recycling and renovation organizations, solid waste service providers, reuse organizations and other alternative drop-off options in both urban and rural areas. These additional locations increased the survey pool to 225 locations in all 36 Oregon counties.

See **Appendix C** for a list of the 62 facilities that responded positively to MRC's survey or otherwise indicated interest to serve as a collection site. The facilities that responded favorably to MRC's contacts are located in 29 of Oregon's 36 counties, including 28 of the 29 counties where a permanent collection site is required.

Once DEQ approves the Plan, MRC will seek to quickly formalize collection site contracts with these entities in an effort to have them operational as collection sites once the Program launches. MRC's revised budget reflects an accelerated timeframe for contracting and providing recycling service to these entities. Realistically, some of these entities may decline to contract with MRC despite indicating previously an interest to serve as a collection site.

As part of maintaining and retaining collection sites, MRC will visit established collection sites biennially. During site visits, MRC will answer questions, provide supplemental training and resources and confirm whether the site is following environmentally sound management practices and collection site guidelines that MRC will require each participating site to comply with. See **Appendix B** for examples of collection site resources. MRC will provide information about best practices for improving operational efficiency and stacking and loading units efficiently and safely, as well as offer suggestions to improve the quality and condition of collected mattresses. Based on MRC's assessment of individual collection site improvement needs, MRC may consider offering limited site improvement funding on a case-by-case basis. MRC also provides signage that identifies the mattress collection area and specifies what can and cannot be collected. MRC will also provide information and support to assist collection locations with invoicing and generating public awareness of their participation.

**d) Describe the process for identifying and engaging with permanent collection sites and event sites, including organizations that recycle, reuse or renovate discarded mattresses.**

**i) Include contacts made and information provided to prospective sites.**

As described in the **Part 4(g)** and subsections of **Part 5** above, MRC will make a good faith effort to identify an appropriate local government, collection service franchise holder, person who provides collection service, reuse organization, used mattress seller, and renovators of used mattresses, in the geographic area to coordinate with to establish a permanent collection site. **Appendix D** contains examples of information MRC will provide prospective and active collection sites.

**ii) Describe the process for engagement with tribal governments.**

Mattress recycling programs in other states have worked with tribal governments and solid waste facilities operated on tribal lands. MRC will invite such facilities in Oregon to participate in the Program as part of our ongoing efforts to develop and



expand the collection network. In cases where establishing a permanent collection location on tribal lands is not feasible or practical, MRC may organize collection events in these areas to extend service to their residents.

**e) Describe how collection sites will collect, separate, manage and get rid of program and non- program mattresses.**

MRC's [Collection Site Guidelines](#), included in all collection site and event contracts, define which program mattresses are eligible for recycling and explain how they can efficiently collect, separate and load mattresses into trailers. The contracts and guidelines also require collection sites to provide for the environmentally sound management of mattresses as defined in the Act and to comply with all applicable federal, state and local laws and regulations. MRC will supplement the guidelines with a video series (available on MRC's [Resources Library](#) in Spanish and English) that addresses efficient mattress stacking and loading, effective collection site operations, program and non-program product identification and collection event promotion.

The guidelines also describe non-recyclable mattresses (e.g., those that are mixed with putrescible solid waste, or excessively soiled, etc.). To further assist collection sites in identifying and managing instances of excessive bedbug contamination, MRC offers an informational brochure, identification poster and online training video about bedbugs that collection site staff can access on demand in MRC's [Resources Library](#).

MRC will inform collection sites that they will not be compensated for collecting or handling non-program mattresses and that those units are not eligible for no-cost recycling through the Program. Collectors will be responsible for the cost of recycling or disposing of such non-program mattresses.

Collection sites will be responsible for the cost of disposing of non-recyclable program mattresses. See [Part 5\(g\)](#) for additional discussion of this topic.

**f) Describe how the stewardship organization will provide for storage containers at no charge at, and transportation and recycling of program mattresses from, collection sites. Describe how the stewardship organization will determine storage container options based on the size of site, volumes collected and different weather considerations throughout the state.**

The Program will provide at its cost storage containers that are appropriate for the size and location of each facility. These include 53-, 48- and 28-foot trailers, as well as sea containers and roll-off bins for sites with limited space or other logistical constraints. The 53-foot trailer is preferred because it can hold the most mattress units, resulting in a lower per unit transport cost (and fuel consumption). Roll-off containers, which are the smallest storage option, are the least efficient alternative, but may be the only option for collection sites with small or restricted loading areas. All such containers are covered to reduce contamination of the mattresses and eliminate damage from weather.

To provide mattress transportation in Oregon, MRC will contract with third-party logistics companies, transportation companies and solid waste facilities to pick up and transport

units from collection sites that have a minimum of 100 properly source separated program mattresses at one time for recycling under the Program.

If packed efficiently, approximately 120-150 units can be loaded into a 53-foot trailer. Once a collection site that does not itself transport units to recyclers has accumulated 100 units in a trailer provided by MRC, it will request that a transporter provided by MRC pick up the trailer on site and swap it for an empty one. For sites located in urban areas (where discarded units generally are collected more quickly), MRC transporters will have 48 hours to swap a trailer after receiving a request, and up to five days to do so for sites in rural areas (where units are generally collected more slowly). This response time should be short enough that the collection site will not exceed the capacity of the trailer while waiting for the pickup/swap process to occur.

MRC may assign high-volume locations a regular pickup schedule so that transporters can keep up with the volume. MRC will seek to resolve scheduling and other issues that may arise regarding transportation. Mattresses are bulky and light cargo, and as a result, efficient transportation helps control both financial and environmental costs.

MRC will assign mattress loads to individual recyclers to achieve efficiency throughout the collection network.

**g) Describe how the stewardship organization will calculate and provide financial compensation to collection sites for their reasonable actual costs to collect and manage mattresses.**

MRC will negotiate an agreement to pay reasonable compensation with each collection site that agrees to accept discarded mattresses dropped off free of charge. Compensation will be based on the site's actual costs to collect and manage units. The amount of the compensation varies from site to site since it is based on a number of factors, including the hourly wage rates for general mattress handling labor, forklift operators, as well as the forklift type. It generally takes about three minutes per unit to load a unit on a trailer. The compensation MRC pays also accounts for the costs a collection site will typically incur to dispose of non-recyclable units that it receives. Based on the experience of other state mattress recycling programs, such units typically account for 10% or less of the total units received.

MRC will compensate collection sites for all program mattresses dropped off by Oregon residents, businesses (including mattress retailers) or other entities for which the collection site has not collected a fee and that the collection site loads in a collection container. A collection site's monthly invoices to MRC will quantify the number of units handled and be accompanied by either a bill of lading or report from MRC's designated electronic reporting system. As a check on this information, the recycler that receives a load from a collection site will count the number of units received during the off-loading process. The recycler's count determines the number of units for which MRC will compensate the collection site. MRC will pay properly documented and reconciled invoices within thirty (30) days of receipt by electronic funds transfer or check. MRC staff will verify that the unit counts on each collection site invoice matches the invoice's supporting documentation during the invoice review and approval process.

**h) Describe how the stewardship organization will provide for bulk pickup service at no cost to collect a minimum of 100 properly source separated program mattresses at one time.**

MRC will provide bulk pickup service at no cost to collect a minimum of 100 properly source separated program mattresses at one time from persons including, but not limited to:

- (A) Public bodies as defined in ORS 174.109
- (B) Retailers
- (C) Public or private disposal, transfer or material or energy recovery sites or facilities
- (D) Health care, educational or military facilities
- (E) Hotels, motels, inns and other establishments that provide transient lodging

For the eligible entities with at least 100 discarded units, MRC will provide pick up, transport and recycling at no cost to the participating entity. For collection sites located in urban areas, MRC transporters will have 48 hours to swap a trailer after receiving a request, and up to five days for sites in rural areas. Bulk pickup service is an important component of the Program and is promoted using direct marketing tactics, advertising, industry events and conferences, media coverage and social media.

Transportation service will be provided by proposed third-party transportation companies listed in **Part 4(e)** of this Plan. Our other state programs coordinate the logistics and hauling of over 12,000 loads of discarded mattress annually and we will bring this expertise to Oregon.

**i) Describe how the public will access available collection opportunities as part of the mattress program, including how the stewardship organization's website will meet the requirements of Section 3(4) of the Mattress Stewardship Act and OAR 340-098-0480.**

MRC created [ByeByeMattress.com](http://ByeByeMattress.com) to communicate where consumers (households) and commercial sources (businesses) can drop off discarded mattresses. The website also includes a directory of cities that provide at least one free bulky item collection opportunity each year and those that participate in the Program are noted. Commercial sources can also learn how to work with MRC to have their large volumes of mattresses picked up and transported for recycling.

Per Section 3(4) of the Act, the Oregon collection site and event listings will provide the physical address, phone number, hours of operation and any physical or language accessibility considerations. MRC will use an already established process to implement changes to this information within three business days.

Consumers will learn ByeByeMattress.com exists through a multichannel, multilingual outreach campaign that includes retailers distributing point-of-sale materials, local media airing public service announcements and including information about the Program in their news coverage and local leaders and

community influencers sharing collection opportunity information with residents.

Commercial sources will learn that ByeByeMattress.com exists through advertisements and media coverage in industry news sources. MRC also maintains a consumer and industry hotline and mailbox to provide assistance to residents seeking information. See **Part 11** of this Plan for outreach and education strategy details.

## Part 6 – Performance Goals

Following the schedule described in statute, explain when the stewardship organization will submit proposed performance goals to DEQ for approval, as part of the initial program plan.

Section 8(2) of the Act requires that MRC submit proposed performance goals to DEQ no later than two years after the Program implementation date. The date on which the Program actually launches will depend in part on when DEQ approves this Plan. MRC will comply with this statutory requirement as well as Oregon Administrative Rules promulgated pursuant to that statutory authority to implement the Act, and will use data collected in the Program's initial years to determine baselines that will inform our proposed performance goals.

## Part 7 – Program Administration

Describe how the program's overall daily management will be handled through management of contracts, record keeping, reporting, and compliance oversight of service providers.

- a) **Identify and provide the contact information for key personnel responsible for running various aspects of the program, including the authorized representative.**

MRC will provide the requested contact information for key Program personnel to DEQ separately from the Plan submission.

- b) **Provide a statement that the stewardship organization retains legal responsibility for all plan commitments and any violations of the Mattress Stewardship Act, as well as all federal and state laws applicable to the operation of the mattress stewardship program.**

As the stewardship organization, MRC's legal responsibilities are set forth in the Act, federal statutes and other state statutes. MRC will comply with and fulfill these statutory responsibilities.

- c) **State that all obligations of vendors, collection sites, and other participating entities described in the plan, unless noted specifically, are set forth in contracts enforceable by the stewardship organization.**

Following approval of the Plan, MRC will enter into contracts with collection sites, transporters and recyclers that will set forth their obligations. The obligations of each

vendor will vary, depending on the services they provide to the Program. Each contract will contain a breach clause, including both an escalation and cure process, as well as a termination clause, in the unlikely event that a vendor does not comply with its contractual obligations.

**d) Describe how the program will be consistent with the policies for materials management set forth in ORS 459.015(2) including responding within three business days to requests by DEQ, unless the timeline specifies otherwise in the Act.**

To clarify, neither ORS 459.015 nor the Act contains a requirement that a party must respond to DEQ requests within three business days. Nevertheless, to the extent that MRC has access to relevant information and has the requisite legal authority to respond, MRC intends to be responsive to DEQ requests regarding its obligations under the Act.

Regarding ORS 459.15(2), that provision contains broad general statements to guide Oregon's recycling policy. For example, subparagraph ORS 459.15(2)(a) provides that Oregon's materials management policy should:

Minimize the net negative impacts of materials, across their life cycle, on human well-being and environmental health, including the quality of land, air, water and ecosystems, with consideration of technical and economic feasibility.

Consistent with this policy goal, MRC will prepare "a life cycle assessment report of mattresses sold in this state" in Year 3 of the Program, pursuant to Section 8(4)(B)(b) of the Act.

Pending completion of that report, subparagraph ORS 459.15(2)(c) provides that Oregon's policy is to manage materials with priority given to waste reduction, reuse, recycling, composting, energy recovery and proper disposal. Once again, MRC will implement the Act consistent with this policy goal. Specifically, MRC will focus on reducing waste by recycling discarded mattresses and offering organizations that recycle, reuse or renovate discarded mattresses the opportunity to participate as collection sites in the Program. MRC will also work with mattress manufacturers and component suppliers to identify materials, product designs and manufacturing methods that can mitigate current challenges to the reuse and recycling of mattresses discarded today.

MRC will work with its collection sites, transporters and recyclers to improve the efficiency of their operations, reduce their environmental footprint and reduce the amount of waste generated by the dismantling process. As part of this effort, MRC will regularly analyze which materials cannot be recycled and why, and how to address those challenges, either through market development research, changes in mattress materials, designs or manufacturing methods, better disassembly methods or other tactics.

Likewise, the Act and MRC's intended implementation of those requirements is consistent with other policies set forth in ORS 459.15(2). For example:

- Subparagraph (f) states that Oregon policy should:  
Promote, encourage and develop markets first for reusable material and then for recyclable material.
- Similarly, subparagraph (g) provides that Oregon policy should:  
Promote research, surveys and demonstration projects to encourage material or energy recovery.
- Subparagraph (h) provides that Oregon policy should:  
Promote research, surveys and demonstration projects to aid in developing more sanitary, efficient and economical methods of solid waste management.

MRC will work with solid waste facilities and other collection sites to minimize the improper handling of discarded mattresses (crushing in compactor trucks), contamination (exposure to food and similar wastes) and storage (exposure to weather) prior to recycling. In doing so, MRC can increase the amount of recycling (and reduce the amount of waste) possible from mattress recycling.

- Subparagraph (k) provides that Oregon policy should:  
Provide for the adoption and enforcement of recycling rates and standards as well as performance standards necessary for safe, economic and proper solid waste management.

Consistent with this policy, Section 8(2) of the Act provides that MRC will propose recycling goals no later than two years after the Program's launch, and MRC will contractually require its recyclers to follow practices that comply with state and federal environmental requirements and reduce the environmental impact of each recycler's facility.

- Subparagraph (p) provides that Oregon policy should:  
Provide for recycling collection and recycling processing systems that have adequate capacity and are operated for the purpose of achieving the policy set forth in this section and providing clean, usable materials to industry.

MRC's goal in establishing a used mattress collection and recycling network will be to further this policy. MRC will seek to help its contracted recyclers to be more financially and environmentally sustainable and to develop adequate capacity to efficiently handle the needs of Oregon residents.

- Subsection (q) encourages Oregon to:  
Ensure that all materials collected for waste disposal or recovery shall be managed responsibly through to their final disposition, minimizing impacts that create pollution or harm the quality of air, land, water and ecosystems, or harm human health and welfare.

As the mattress stewardship organization, MRC will implement these policies. For each of these reasons, MRC will administer the Program consistent with Oregon's material management policies.

- e) Describe the auditing, inspection and other procedures that will be used by the stewardship organization and the frequency at which the procedures will be implemented to ensure that all entities the stewardship organization contracts with to implement the mattress stewardship program engage in**

**environmentally sound management practices.**

MRC will follow the process outlined below in Part 7(f).

- f) Describe the stewardship organization's processes for ensuring that the recyclers contracted with by the stewardship organization to process program mattresses and entities handling discarded mattresses through their final disposition will comply with environmentally sound management practices.**

See **Part 4(f)** for a general explanation of how the stewardship organization will provide for the environmentally sound management of program mattresses.

In MRC's recycling contracts, recyclers will be required to achieve minimum recycling targets of at least 70%, provided that there is sufficient market demand for recycled mattress materials and that extenuating circumstances (such as floods, fires or other unforeseen events) do not prevent a recycler from achieving this performance metric. In addition, MRC will employ a variety of inspection and accounting procedures to confirm that collection sites, transporters and recyclers are complying with their contractual obligations, including environmentally sound management practices defined in the Act. The obligations of each vendor will vary depending on the services they provide to the Program. Each contract will contain dispute resolution and termination clauses in the event that a vendor does not comply with its contractual obligations.

This begins with transporters documenting mattress deliveries to recyclers with bills of lading (electronic or paper) that identify the source, quantity and destination of the units. These bills of lading are then used to validate monthly transportation invoices. The number of units recorded on the bill of lading is also important for validating the number of units received from collection sites that invoice MRC for their actual costs to collect and manage those units.

Upon receipt at a recycling facility, recyclers enter data from each bill of lading into an electronic data reporting platform. This database is used for a variety of reporting functions including calculating the number of units received by the Program, the source of those units and the number of pounds of each commodity type recycled by each recycler. Furthermore, recyclers are also contractually bound to adhere to Recycling Standards, which detail material receiving, processing, tracking and downstream due diligence requirements for purchasers of mattress materials used for recycling or renovation. These Standards are attached in **Appendix B**.

MRC will perform monthly desk audits to monitor the compliance of recyclers with data tracking and reporting requirements, inventory verification and the final disposition of deconstructed mattress materials and disposal of non-recyclable waste. Additionally, MRC will conduct quarterly site inspections of recyclers to verify compliance with environmentally sound management practices. Annually, MRC contracts with third-parties to observe and document each recycler's compliance with environmental health and safety requirements, fire safety protocols, recycling standards and contractual obligations. As required under Section 9(2)(m), MRC's annual report to DEQ will include a report on the outcome of these inspections in summary form. MRC will provide specific reports, including their procedures and findings, to DEQ upon request.

**g) Describe the stewardship organization’s record keeping, and how such record-keeping will be adequate to ensure environmentally sound management of program mattresses, as required in Section 11 of the Act.**

Section 11(2) of the Act provides:

A stewardship organization shall retain all records related to implementation of a mattress stewardship program for not less than three years and make the records available for inspection by the department upon request.

Pursuant to this requirement, MRC will retain documents related to implementation of the Program as required by Section 11 of the Act, most if not all of which are generated and/or maintained electronically. Upon request, copies of the relevant records can be provided to DEQ for review in DEQ’s offices.

MRC’s enterprise customer relationship management (CRM) system aggregates information from collectors, collection sites, transporters and recyclers to track and monitor the performance of individual contractors and the Program as a whole. Data and reports extracted from that system provides metrics relevant for annual reporting and internal performance tracking, including units collected, tracking of transportation requests, recyclers’ receipt of loads from collection sites, recycling rates for each recycler, etc.

**h) Describe how the stewardship organization will ensure that all required program participants are participating, the actions that will be taken to bring required participants into compliance and the process for referring non-compliant entities to DEQ for potential enforcement actions.**

MRC has compiled a database of potential retailers, producers and renovators from various information sources, including ReferenceUSA, Dun & Bradstreet, industry publication subscriber lists, industry event attendee lists, Yellow Pages, Chambers of Commerce, the Better Business Bureau and online searches. MRC will continue to monitor these sources for new entrants into the mattress segment, as well as identifying non-compliant parties.

If MRC identifies a party that should register and participate in the Program, MRC will notify the party via certified mail of its potential obligations and follow up with a phone call or email. If the party does not respond within 30 days, MRC will mail a second certified letter and give the party 30 more days to respond. If the party remains unresponsive after 60 days, MRC’s monthly reports to DEQ will identify the party and request that DEQ take action (if appropriate).

MRC will also monitor whether retailers and other mattress sellers are submitting monthly reports and are remitting collected recycling charges on time. MRC will use the following protocol to alert parties that have missed deadlines for reports and payments. Those more than 90 days delinquent will be notified that they owe MRC late fees and associated interest. MRC assesses late fees and interest to encourage prompt payment from all obligated parties and help compensate MRC for administrative expenses related to non-compliance. Each month, MRC will notify DEQ of all delinquent parties whom MRC has notified that they owe late fees and interest (defined as a Level 7 Delinquency Stage in the chart below).



A registered party may deregister only if it informs MRC that it no longer sells mattresses in Oregon.

**TABLE 3: Notification Protocol for Late Reporters and Charge Remitters**

| Delinquency Stage       | Late Reporter   | Late Remitter  | Timeline (Days since due date missed)                |
|-------------------------|---|--|--|
| <b>Level 1</b>          | Late notice email generated by MRCreporting.org   | Late notice email generated by MRCreporting.org  | Reporter – After 7 days<br>Remitter – After 10 days  |
| <b>Level 2</b>          | Phone call made to verify continued Program participation and provide a verbal reporting reminder | Phone call made and late notice issued regarding outstanding payment and warning of potential interest charges | Reporter – After 15 days<br>Remitter – After 20 days |
| <b>Level 3</b>          | Written notice mailed   | Written notice mailed and interest invoice issued  | Reporter and Remitter – After 30 days                |
| <b>Level 4</b>          | Second phone call made to provide verbal warning of potential penalties                           | Second written notice sent by certified mail and interest invoice issued                                       | Reporter and Remitter - After 60 days                |
| <b>Level 5</b>          | Written notice sent by certified mail and late fee invoice issued                                 | Second phone call made warning of accruing interest  | Reporter and Remitter - After 90 days                |
| <b>Level 6</b>          | Second written notice sent by certified mail and late fee invoice issued                          | Third call made warning of referral to collections agency and interest invoice issued                          | Reporter and Remitter - After 120 days               |
| <b>Level 7</b>          | Late fee invoice issued; DEQ notified of delinquent account                                       | Delinquent account sent to collections agency and interest invoice issued                                      | Reporter and Remitter - After 150 days               |
| <b>Level 8</b>          | Continued action begins   | Interest invoice issued; DEQ notified of delinquent account and continued action begins                        | Reporter and Remitter – After 180 days               |
| <b>Continued action</b> | Late fee invoices issued monthly until account no longer delinquent                               | Interest invoices issued monthly until account is no longer delinquent   | Every 30 day reporting period                        |

i) Describe the stewardship organization’s methods for the following:

i) **Management of discarded mattresses.**

See **Part 4(f)** of the Plan for detail on discarded mattress management.

**ii) Tracking and documenting the fate of discarded mattresses from collection through final disposal within and outside the state.**

See **Part 7(f)** for detail related to tracking and documentation.

**iii) Conducting performance audits and inspections of recyclers, haulers and other parties, including the frequency of such performance audits and inspections.**

See **Part 7(f)** for detail related to audits and inspections.

**iv) Ensuring compliance with work health and safety requirements.**

See **Part 7(f)** for recycler EHS compliance and schedule.

**v) Describe how the stewardship organization will keep detailed documentation for these methods.**

As required by Section 11(2) of the Act, MRC will maintain records related to implementation of the Program for not less than three years with some documentation related to compliance efforts, licenses, contracts and other relevant documents as required by law having longer retention periods. MRC's enterprise customer relationship management (CRM) system aggregates information from collection sites, transporters, and recyclers to track and monitor the performance of individual contractors and the Program as a whole. Data related to management of discarded mattresses, material tracking, audits and inspection, compliance with health and safety is kept in that CRM.

## **Part 8 – Budget**

**a) Describe the financial health of the stewardship organization.**

The International Sleep Products Association, the trade association for the mattress industry, formed the Mattress Recycling Council, Inc. (MRC Inc.) in 2013. MRC Inc. in turn has formed individual limited liability companies (LLCs) as affiliates to serve as the representative stewardship organization for mattress recycling in each state that has enacted a mattress recycling law. MRC Inc. formed Mattress Recycling Council Oregon LLC (MRC) in 2022. To fund MRC's start-up costs prior to Program launch, MRC has borrowed money pursuant to a loan from its parent, MRC Inc. MRC's proposed budget includes revenue from projected assessment collections, paying back the loan to MRC Inc. and funding a financial reserve sufficient to operate the Program over a multiyear period in a prudent and responsible manner. Additional detail is provided in MRC's budget in **Appendix E**.

**b) Describe the stewardship organization's process for establishing the proposed operating budget and why the proposed operating budget will ensure an effective mattress stewardship program that complies with the Act.**

To develop the Oregon budget, MRC relied on the budgeting experience of mattress stewardship programs in other states. Unit sales and revenue forecasts are based on both industry-forecasted sales, as well as historical trends in other states with similar programs. Estimates of units recycled are based on experience of other mattress recycling programs.

**TABLE 4: Forecasted Units Sold and Units Recycled**

| Calendar Year | Units Sold | Units Recycled |
|---------------|------------|----------------|
| 2024          | 171,709    | 68,683         |
| 2025          | 407,508    | 176,993        |
| 2026          | 415,660    | 209,020        |

MRC evaluates actual expenses compared to budget monthly.

To control costs, MRC will periodically conduct an RFP process for several expense areas, including its transportation and processing. Once finalized by management, the budget is approved by MRC Inc.'s Board of Directors. Additional detail is provided in MRC's budget in [Appendix E](#).

- c) **Include an anticipated annual operating budget for the mattress stewardship program for two years of program operations, beginning with the year in which the plan is submitted to the department. Line items should include but are not limited to:**
- i) **The collection, transportation and processing of program mattresses.**
  - ii) **The administrative costs of the mattress stewardship program to the stewardship organization.**
  - iii) **The costs of compensating collection sites for their reasonable actual costs to collect and manage discarded mattresses.**
  - iv) **The anticipated amount of moneys that the stewardship organization will hold in unallocated reserve funds for the mattress stewardship program.**
  - v) **The annual fee to be paid to the department pursuant to section 9(3) of the 2022 Act.**

See [Appendix E](#) for the budget MRC has prepared that includes line items for expenses noted in Part 8(c)(i – v) above.

## Part 9 – Assessment Fee

- a) **Describe the methodology and data used to arrive at the proposed assessment amount.**

As noted in [Part 8\(b\)](#), MRC calculated an assessment fee based on anticipated annual sales in Oregon, the Plan's budgeted costs, and funding a reserve of no more than 75%

of annual expenses that would be sufficient to operate the Program over a multiyear period in a prudent and responsible manner.

**b) Describe a proposed method for collecting the mattress stewardship assessment from retailers.**

Part 9(c) of this Plan describes the proposed method and mechanism for collecting the mattress stewardship assessment from retailers and an example of wording that retailers should use to describe the assessment on the receipt provided to the customer. Parts **7(h)** and **11(b)** describe how MRC will inform retailers of their obligation to collect the assessment from customers and remit that money to MRC. Completed and upcoming activities to inform the industry of Oregon's Program and the obligation to collect the mattress stewardship assessment are included in the **Implementation Timeline**.

**c) Describe the method for ensuring the assessment is remitted to the stewardship organization.**

The following responds to Part 9(b) – (c).

The Program is funded by a visible mattress stewardship assessment collected on all mattresses sold for use in Oregon. MRC is proposing, subject to DEQ's approval, an assessment of \$22.75 per unit, based on its anticipated administrative and operational costs. Retailers and other parties selling mattresses will collect the assessment and remit it directly to MRC, as required by the Act.

As required by Section 3(5) of the Act, the assessment must be stated as a separate line item on the receipt for a mattress provided to a consumer at the point of sale. The assessment may not be described on the receipt as an "Oregon recycling fee." Retailers employ a variety of transactional point-of-sale systems which may have limitations on the number of characters that can be used to describe the assessment. MRC will emphasize that the assessment may not be referred to as an "Oregon recycling fee", but retailers may use a combination of words and abbreviations to convey the purpose of the assessment, including mattress, recycling, stewardship, assessment, or fee and may abbreviate those words as necessary to accommodate their point-of-sale system limitations.

The assessment is collected on the following types of sales:

- Brick-and-mortar retailers must collect the assessment on all sales of mattresses.
- Online retailers must collect the assessment on all mattresses sold for delivery in Oregon, regardless of where the online retailer is located.
- Mattress manufacturers who sell to any consumer in Oregon must collect the assessment on such sales and remit it to MRC.

Parties that collect the assessment must remit those amounts monthly and process their remittances using MRC's online remittance portal, [MRCreporting.org](http://MRCreporting.org). When making their monthly remittances, parties must provide the following information: mattress units sold and returned, foundation units sold and returned, renovated mattress units sold and returned and renovated foundation units sold and returned. Records must be

maintained to provide verification of reporting data upon request.

In addition to facilitating remittances, the portal includes important information about MRC, program definitions, FAQ's, fee policy, examples of program and non-program mattresses, participant agreements and registration instructions. MRC's fee policy on the portal also includes details about verifying remitted fees. All of this information is publicly available and not behind a pay or subscription wall.

## **Part 10 – Illegal Dumping**

Describe the mechanism to mitigate the costs associated with collection and management of discarded mattresses that are illegally dumped and why the proposed mechanism will be effective. The proposed mechanism must take into account the cost of one or more incentives to encourage collectors to properly dispose of discarded mattresses and discourage illegal dumping, and may include but need not be limited to proposals for funding of cleanup activities, for education and outreach or for studies to evaluate the causes of illegal dumping. In describing the mechanism, the plan may address efforts to ensure equitable outcomes such as:

- Understanding barriers
- Geographic differences in the state
- Different housing types

Based on the experience of the California mattress recycling program in mitigating illegal mattress dumping in that state, MRC appreciates that this is a complex and persistent problem that requires involvement from solid waste haulers, municipalities, landlords, consumers, government officials and others to address. For example, the California program has approached the problem in that state by using a range of tactics that have included increased access to mattress recycling at no-cost drop off locations and greater community awareness of mattress recycling as well as the fiscal, health and social problems caused by illegal dumping. MRC has also found that active enforcement of existing illegal dumping laws and updating municipal solid waste contracts to require curbside service to all residents including multifamily housing are critical prevention measures.

To mitigate the costs associated with illegally dumped mattresses, entities may discard these mattresses at no cost at collection events and collection sites that participate in the Program. Based on the experience of other mattress recycling programs, areas that lack proper mattress disposal alternatives tend to experience more illegal dumping. Residents' access to no cost collection sites and events across the state will provide such opportunities to address this problem. But MRC recognizes that each state's illegal dumping problem is different. For that reason, MRC's first priority in Oregon will be to understand the scope of this state's problem, where the illegal mattress dumping is occurring, tactics that Oregon communities have or are using to address the problem, the effectiveness of those tactics and where additional work is needed. Once we have a baseline understanding of the problem, then MRC will work with state and local officials, community leaders and others to develop a fact-based consensus on how to proceed.

In preparation for submitting this Plan, MRC has had preliminary meetings with Portland Metro (Metro) staff who have sought to address this issue for years. Metro has developed and maintains a robust database that captures and analyzes information collected across its jurisdiction about illegally dumped products including mattresses. Metro also deploys well balanced dumping mitigation strategies. Leveraging this valuable experience, MRC will pursue the following three-stage process:

**Stage 1:** Approximately six months after the operational aspects of the Program (that is, mattress collection, transport and recycling) have commenced, MRC will hold in depth discussions with Metro staff and other select communities to learn more about how they collect and analyze illegal dumping data, limitations in their approach and areas where they think that additional resources or tactics might be helpful. This will accomplish two purposes. First, MRC will gain a baseline understanding of the illegal mattress dumping problem in Portland and other regions in Oregon. Second, MRC will learn whether some, or all of the approaches can be replicated in other urban, and possibly rural, areas of Oregon.

**Stage 2:** Understanding how illegal mattress dumping affects the full state will enable MRC to prioritize possible actions and measure whether those actions were effective in mitigating the effects of illegal dumping. To obtain such information, MRC will survey other communities regarding data that they currently collect about illegal dumping and encourage those that do not currently collect that information to do so in the future. MRC's budget will allow it to offer some funding to help share the costs that these communities may incur to gather such information. MRC's goal will be to collect statewide data in a manner that is consistent with the long-term data sets that Metro has already developed. This will allow the statewide data to be compiled and analyzed in a consistent "apples to apples" manner. MRC's goal would be for such data to be collected on a calendar year basis and for the first statewide illegal mattress dumping census to be completed by December 2026.

**Stage 3:** In parallel with the effort in Stage 1 and 2 to design and collect consistent statewide data on illegal mattress dumping, MRC will also meet with Metro officials and other urban and rural communities to learn in depth how their existing dumping mitigation strategies work and the effectiveness of those strategies. MRC will also draw on several approaches that various California communities have developed in coordination with the mattress recycling program in that state to determine if they can be replicated in Oregon. Reports summarizing the results of completed California projects may be accessed at <https://mattressrecyclingcouncil.org/illegal-dumping/>. During this stage, MRC will also develop and publicize criteria for communities or private entities to propose, and for MRC to fund, pilot projects to implement ideas that have the potential to mitigate illegal dumping and associated costs.

With this background information in hand, MRC will then implement its pilot program funding effort annually for the remainder of the Plan term. MRC's goal will be to encourage Oregon communities to try new ideas for addressing this persistent problem of illegal mattress dumping and to make the results of those efforts available publicly to help de-risk the process for other communities in the state to try new and tested concepts.

In short, MRC wants to:

- Understand how Metro and other urban and rural communities collect illegal

dumping data.

- Develop a statewide database that will help define the scope of the illegal mattress dumping problem in Oregon.
- Use that information to establish fact-based priorities.
- Fund pilot projects proposed by Oregon communities and other entities that are designed to discourage illegal dumping in the future and mitigate the costs associated with illegal dumping.

By following this multistep process, MRC will be in a position to be able to make fact-based decisions designed to further the statutory objective of mitigating the fiscal, health and social costs of illegal dumping.

## Part 11 – Public Education, Advertising and Promotion

- a) **Describe how the stewardship organization will provide public education, advertising and promotion of discarded mattress collection opportunities statewide and on a regular basis.**
- i) Explain how education will be enhanced in the first years of the program to grow awareness of the new program.**
  - ii) For each type of outreach, include details such as frequency, reach, languages that will be used and what areas of the state are being targeted.**
  - iii) Ensuring equity in the program is of particular importance to DEQ, including methods that make for equitable outcomes, measuring for equity and making changes as needed.**

MRC's education and outreach efforts will target consumers, the mattress industry, the collection network, state regulators and other stakeholders. To reach these audiences, MRC will use existing industry- and consumer-facing brands.

The primary brand, Mattress Recycling Council, will be used to:

- Educate the mattress industry about program mechanics, Oregon's mattress recycling law and their legal obligations under that law.
- Inform regulators about the Program's performance.
- Encourage mattress collectors and collection sites throughout Oregon to work with MRC to divert mattresses from landfills and combat illegal mattress dumping.
- Inform the collection network and recyclers about MRC's expectations for proper screening, stacking, loading and environmentally sound management of mattresses.
- Share expertise, resources, the results of research projects and outcomes.



MRC will use its consumer-facing sub-brand, Bye Bye Mattress, to inform those looking to dispose of a mattress about their options. Specifically:

- Residents will learn about their nearest drop-off location, as well as available bulky item curbside waste collectors that offer at least one free pickup each year.
- Businesses will learn how to work with MRC to have old mattresses transported and recycled at no-cost.
- The public will learn about the Program, the assessment, eligible and ineligible items, how a mattress is recycled and why recycling is beneficial.
- The Bye Bye Mattress website (ByeByeMattress.com) will include an interactive locator to find important details about the no-cost collection opportunities.

To meet these outreach objectives, MRC will use a comprehensive mix of methods including, but not limited to advertising, public relations, social and digital media, direct marketing and event sponsorships. MRC is committed to educating Oregon residents by following multichannel (print, TV, radio, digital, word of mouth, grassroots, etc.) and multilingual industry best practices. Not only will this approach create multiple opportunities for one person to hear about the Program, but it will allow MRC to inform different people in different types of communities about the Program.

MRC will monitor the effectiveness of this communications strategy through an annual survey (described in more detail in Measuring Impact of Outreach) to collect demographic information that will allow MRC to monitor resident awareness across the state and also among specific segments.

### **Growing Awareness of the New Program (Years 1-3)**

In the initial years of the Oregon Program, MRC will implement tactics that have already proven successful at promoting collection opportunities in other mattress recycling programs. These include:

- **Providing retailers with point-of-sale materials in the five most common spoken languages.** These materials include an information card, poster, digital badge (an image for use on a website or other digital material) and a question-and-answer sheet to help retailers explain the assessment to customers and how to find recycling opportunities. According to the Oregon [Secretary of State's](#) office (which is required to publish the five most common languages spoken in the state other than English), Spanish, Vietnamese, Chinese, Korean and Russian are the current most spoken additional languages. MRC will provide the information card and poster in each of these languages.
- **Offering local media a public service announcement (PSA).** Each spring and fall, MRC will distribute a 30-second PSA to television and radio outlets in three languages – English, Spanish and Chinese (Mandarin). MRC will distribute the PSA in these seasons because behaviors leading to mattress discards – (mattress sales peaks, seasonal cleaning, more home sales and increased moving activity) are higher at those times of year.



- **Seeking media coverage opportunities.** After the Program launches, MRC will issue a press release statewide and encourage media interviews that may include collection sites and a recycler tour. On an ongoing basis, MRC will work with a media consultant to pitch content ideas to influential community news sources and build relationships with journalists in order to be established as the expert source for mattress recycling information and content.
- **Distributing a publicity toolkit to participating collection sites, recyclers and local officials.** MRC's toolkit will allow stakeholders to self-promote the Program in their community using customizable flyers, social media posts and website/newsletter content with specific site details. This toolkit will be made available to all collection sites and recyclers and applicable local officials three weeks before the Program launches. As toolkits are being developed and distributed, MRC will coordinate with those individuals and entities who have expressed interest in using the toolkit.

Once the Program begins, toolkits will be distributed as a site or recycler joins the collection network. MRC will encourage use of the toolkits seasonally (Earth Day and America Recycles Day). As MRC builds relationships, other promotional opportunities may arise as MRC learns more about a site, recycler or local government's needs. In other states with mattress recycling programs, collection sites, recyclers and local officials have taken their own initiative to incorporate MRC's messaging into their communications as they find most appropriate.

- **Engaging and collaborating with community-based groups.** MRC will seek out groups that value community beautification or recycling education, and that assist minority, low-income or other historically underrepresented people. MRC will ask these groups to help promote the Program to these audiences (e.g, publishing our information in their printed materials, on their websites, mentioning us or allowing us to speak during their meetings or events, etc.). MRC will offer community-based groups a set of materials similar to those provided to local officials, and will translate those materials if necessary. MRC is also open to collaborating with a group to create and conduct outreach in a culturally appropriate manner for their audience.
- **Participating in community events focused on environmental and recycling education.** During Earth Day (April 22) and America Recycles Day (Nov. 15), many communities host festivals or environmental- or recycling-themed events. MRC may either participate as a vendor or provide Program information for distribution to attendees about mattress recycling opportunities in their communities. MRC considers event sponsorship/vendor proposals from all communities, and would support appropriate proposals, based on available resources.

If MRC exhibits at a community event, it will use an informative booth similar to what other state mattress recycling programs have used, consisting of a tabletop display with pull up banners (or a tent wrap) that provides an activity to educate the visitor and encourages interaction with MRC. Ultimately the visitor should

walk away knowing a mattress can be recycled and how to recycle it in their immediate area and that they (as well as friends and family) may access ByeByeMattress.com to obtain more information about the Program.



*Booth banners (or tent wrap) and materials promote Bye Bye Mattress and messaging that encourages recycling, a QR code flyer or other printed items (info cards or posters) help booth visitors immediately learn about the local options, show-and-tell clear acrylic boxes of various mattress materials create opportunities for engagement and pique curiosity, a stacking tower game reinforces why mattress recycling is important and how to do it, as well as remembering ByeByeMattress.com.*

This experience is versatile, allowing MRC to fit spaces as small as a 6-foot table or as large as 10-foot by 10-foot space. It does not require electricity and all of the booth elements can be easily transported, making it suitable for indoor or outdoor environments.

MRC would also take advantage of any other advertising or marketing benefits provided as a result of the selected exhibitor/sponsorship level. Based on previous experience this provides MRC extra visibility of the Bye Bye Mattress website URL and logo on event materials, other banners or signage on the event grounds, social media exposure, dedicated email blasts to registered participants, remarks at the event or a short news interview or segment by the event's media sponsor.

If MRC is unable to exhibit or sponsor, we would attempt to use relationships with collection site operators, recyclers, solid waste haulers, etc. who may have a presence at the event as an exhibitor or sponsor in order to distribute information to consumers.

- **Working with other industry associations and industry media to encourage mattress recycling.** Large volume generators of discarded mattresses including mattress retailers, hotels, schools, healthcare facilities and military installations are typically networked in the mattress industry and will have access to no-cost recycling. MRC and ISPA have long-standing-relationships with industry

associations and media covering the home furnishings, lodging and educational sectors. MRC promotes how different businesses can work with MRC to recycle throughout the year via advertisements or editorial opportunities in these associations' member communications and the trade media. MRC will expand the existing industry-facing advertising plan to reach Oregon professionals in these industries and update the ads to include Oregon.

### **Measuring Impact of Outreach**

MRC will collect and analyze metrics to determine the effectiveness of Program launch communications.

On a regular basis, we monitor the number of ByeByeMattress.com visitors accessing the website, the number of impressions and airings of the PSA and the collective impressions of MRC's media outreach and the coverage generated by publicity toolkits. Each social media platform also provides analytics which MRC uses to monitor performance of content and audience growth and engagement.

On an annual basis, MRC will issue a consumer survey to measure the percentage of Oregon consumers aware of mattress recycling being available and free; and whether they know how to access the Program in their area. Like MRC's other state programs, the survey will be conducted online and collect demographic, behavioral and attitudinal data. The sample will be large enough to reach a 90% confidence level and reflect Oregon's population in terms of age, gender, race, ethnicity and household income based on current census data. Collecting this demographic information, along with zip code and county of residence, will allow us to analyze different segments of responses to understand if there is a bias or inequality in Program knowledge (i.e. zip code analysis can identify how knowledge of the Program compares in urban and rural areas). MRC will use the mattress purchasing and disposal behavior questions to guide messaging, hone target audience profiles, adjust timing of outreach, and identify the information sources or life experiences that likely lead to the respondent's knowledge of the Program or need for the Program. This also allows MRC to understand how behaviors and lifestyle choices are affecting knowledge and leading to intended action (i.e., Are those exhibiting certain behaviors learning about the Program? Are changes in disposal behavior occurring?). MRC will use questions about recycling attitudes and intentions to further understand what Oregon residents believe and value so that messaging remains appealing and relevant. MRC will repeat the survey each year to identify trends and changes. MRC's annual reports will include the questionnaire and results.

### **Maintaining/Expanding Awareness of Existing Program (Beyond Year 3)**

In future years, based on awareness levels measured in the annual survey and the Program's financial performance, the following may be implemented to increase awareness in a specific region, to a specific demographic or to a statewide audience:

- Targeted advertising such as Google Search and Display ads, direct mail campaigns, digital geofencing campaigns or social media advertisements.
- Advertising campaigns to a broader general audience. These would use cable or broadcast TV, broadcast radio and other types of media capable of wider reach.
- Sponsoring large community events that have statewide or regional significance.

- b) Describe how the stewardship organization will identify and notify retailers about the mattress stewardship program, and what information will be provided.**
- i) If there are different sets of information for online and physical store fronts, please describe them.**
  - ii) This should include information necessary to comply with the program and should be directed to all retailers selling or offering for sale mattresses in Oregon.**

As explained in **Part 7(h)**, MRC will use a variety of sources to identify retailers selling or offering for sale mattresses in Oregon. MRC will also leverage long-standing relationships that we and ISPA have with other home furnishings associations to notify their members.

Both online and brick-and-mortar mattress retailers will receive direct mail notices and emails about the Program when the Plan is approved and will continue to receive follow up communication as the Program is implemented. Furthermore, MRC will encourage the home furnishings media to report on the Program's development and announce important information necessary to comply with the law. MRC will also advertise the Program in industry news sources and distribute Program information at industry events. MRC will also publish important details on our social media, in our newsletters and on our website ([MattressRecyclingCouncil.org](http://MattressRecyclingCouncil.org)).

Once registered with MRC, retailers will receive Program notices through the registration portal ([MRCreporting.org](http://MRCreporting.org)) and can sign-up to receive additional information through our quarterly retailer newsletter and MRC's monthly Highlights newsletter.

- c) Describe education efforts to participating collection sites and events, including types of information provided and how often.**

MRC will establish an ongoing relationship with participating collection sites and events. A regional program coordinator will be the point of contact to educate these participating locations about available resources including training videos, signage and marketing assistance.

The program coordinator will visit each collection site biennially (at a minimum) to meet with a site's staff and leadership, evaluate adherence to the Collection Site Guidelines, conduct any needed training and collect feedback to help improve the Program's performance.

Participating collection sites and events will receive a quarterly newsletter from the program coordinator and can opt-in to receive MRC's monthly Highlights newsletter. MRC uses these email publications to announce important Program details, milestones and achievements, as well as to continually promote available resources. As Collection sites and events are established, they receive the publicity toolkit described in 11(a).

MRC will also be involved in the regional solid waste community by attending conferences and events, serving on task forces and seeking presentation opportunities to stakeholder groups.

### Part 12 – Closure Plan

Following the schedule described in statute, explain when the stewardship organization will submit a proposed closure plan to DEQ for approval, as part of the initial program plan.

MRC will submit a closure plan to DEQ no later than two years after implementation, as required by Section 8(2).

### Part 13 – Coordination

Describe methods that will be used by the stewardship organization to identify, engage and coordinate activities with existing recycling programs, including existing nonprofit organizations that are mattress recyclers, to further the environmentally sound management of discarded mattresses.

In April 2023, MRC requested proposals from parties interested in providing recycling services to implement MRC's Program in Oregon. In requesting these proposals, MRC directly contacted all existing mattress recyclers in Oregon (including non-profit recyclers), posted the request on MRC's website and visited all active mattress recyclers in Oregon to assess capabilities, interest in participating in the Program, and future plans. See **Part 4(e)** for a list of recyclers that MRC intends to contract with to implement its Program in Oregon. MRC also included existing mattress recyclers in its collection site survey.

Additionally, MRC will explore collaborating with other state and local recycling programs to pool resources on collection events and education strategies to improve Program participation. MRC will draw from its prior experience in California joining multi-material collection events and seeking joint-marketing opportunities with other recycling programs.

### Part 14 – Program Changes

- a) **Describe procedures, including how the stewardship organization will consult with DEQ, regarding changes to the system for collecting discarded mattresses that may require a plan amendment.**

As required by Section 7 of the Act, a Plan amendment is required if there is a material change to the collection system, if MRC proposes a change to the assessment, or if DEQ requests an amendment based on budget-related findings.

As required by Section 7(3) and OAR 340-098-0460, MRC will report monthly to DEQ changes in the location or number of permanent collection sites, a change in the producers, retailers or renovators registered with MRC, or a change in the

recyclers, renovators or reuse facilities managing discarded mattresses under the Program. MRC anticipates these changes will be frequent during the initial years of the Program and will not substantially or materially change the Program's functionality.

- b) Include a description of how the stewardship organization will submit a plan amendment or notification on a timely basis as required by Section 7 of the Mattress Stewardship Act and OAR 340-098-0460.**

Sections 6 and 7 of the Act clearly describe circumstances, timelines and mechanisms that the stewardship organization shall follow to submit Plan amendments. MRC will follow those provisions.

## Part 15 – Contact and Certifying Information

**A stewardship organization should provide a primary contact for the organization managing the mattress stewardship program in Oregon. This should include the contact's name, address, phone number and email address. Please specify when the stewardship organization will notify DEQ if this contact changes (for instance, within two business days of the change).**

Michael LaRussa  
501 Wythe Street  
Alexandria, VA 22314  
(916) 898-9945  
[mlarussa@mrc-us.org](mailto:mlarussa@mrc-us.org)

MRC will notify DEQ within 3 business days if there is a change to the primary contact.

**The following certifying statement should be included with the signature of the program's authorized representative: *I, [name of authorized representative], hereby declare under penalty of false swearing (Oregon Revised Statute 162.075 and ORS 162.085) that the above information and all of the statements, documents and attachments submitted with this plan are true and correct.***

*I, Ryan Trainer, hereby declare under penalty of false swearing (Oregon Revised Statute 162.075 and ORS 162.085) that the above information and all of the statements, documents and attachments submitted with this plan are true and correct.*



Ryan Trainer, President ISPA and MRC



# Supplemental Information

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As part of the plan submittal, a stewardship organization should also provide:

**a) Documentation of the stewardship organization’s non-profit status, including:**

**i) 501(c)(3) status in Oregon**

MRC is a wholly owned tax-exempt subsidiary of MRC, Inc., a Delaware nonprofit, nonstock corporation recognized as tax-exempt pursuant to Section 501(c)(3) of the Internal Revenue Code and classified as a public charity. MRC is recognized as an organization exempt from federal income tax under Section 501(c)(3) by virtue of its status as a disregarded entity of MRC, a sole exempt organization owner, pursuant to Treasury Regulation Section 301.7701-2(c)(2)(i) and Announcement 99-102, 1999-43 I.R.B.545. A copy of the IRS determination letter of MRC Inc. has been e-mailed to DEQ per Plan Guidelines.

**ii) Articles of incorporation**

A copy of the Certificate of Formation and Operating Agreement of MRC has been e-mailed to DEQ per Plan Guidelines. The Certificate of Formation and Operating Agreement respectively serve the same functions as the Articles of Incorporation.

**iii) Proof of registration as a charity with the Oregon Department of Justice**

MRC’s Registration for Charitable Organizations was filed with the Oregon Department of Justice on September 14, 2023. A copy has been e-mailed to DEQ per Plan Guidelines.

**iv) If incorporated outside of Oregon, proof of registration as a foreign corporation with the Oregon Secretary of State**

MRC’s 2023 Amended Annual Report to the Oregon Secretary of State has been e-mailed to DEQ per Plan Guidelines.

**b) Proof of adequate liability insurance for a stewardship organization and contractors working for the stewardship organization**

MRC Inc. and MRC carries insurance with the following minimum limits:

- Commercial General Liability – minimum of \$1 million per incident/\$1 million aggregate
- Commercial Automobile Liability – minimum of \$1 million combined single limit

MRC's Evidence of Commercial General Liability and Commercial Automobile Insurance listing MRC as a covered entity has been e-mailed to DEQ per Plan Guidelines. However, MRC intends to rely on its contractors' insurance for activities undertaken by contractors whenever possible as most contracts will require that contractors' insurance coverage be primary to MRC's policies.

#### Contractors Insurance

MRC will require, by contract, that all contractors (collection sites, transporters, recyclers, etc.) carry insurance appropriate to the level of services that they provide for the Program. While the specific amount and terms may vary from contractor to contractor, all contractors will be required to have coverage that the MRC considers to be adequate to address the risk and liability for the activities undertaken by the applicable contractor. MRC will typically require the following minimum insurance coverage in service contracts:

#### Commercial General Liability Insurance

- Collection Sites: require limits of at least \$1 million per occurrence.
- Transportation and/or Recycling Contractors: limits not less than \$1-2 million per occurrence and \$2 million in the aggregate.

#### Commercial Automobile Liability Insurance

- Collection Sites: For sites that will engage in the transportation of program mattresses under the Program, MRC will require that they carry commercial automobile liability insurance (owned, non-owned or hired) written on an occurrence basis with limits not less than \$1 million for each occurrence.
- Transport and/or Recycling Contractors: All Transporters and any Recyclers that will engage in the transportation of program mattresses under the Program, MRC will require that these contractors carry commercial automobile liability insurance (owned, non-owned or hired) written on an occurrence basis with limits not less than \$1 million for each occurrence.

In addition, MRC will typically require the policies of any contractor involved in the transport or recycling of program Mattresses under the Program to contain endorsements to name MRC as an additional insured on both of these required insurance policies, as well as a waiver of subrogation in favor of MRC.

Because contractors have widely different insurance policies (e.g., commercial insurance vs. self-insurance, etc.), MRC will evaluate the insurance terms in each contract on a case-by-case basis to confirm that the contractor maintains insurance of the types and in amounts adequate to address both risk and liability to both MRC and the contractor. In Oregon, this may include alternative self-insurance requirements for municipalities and municipal insurance or retention pools. MRC may seek the opinions of outside counsel and MRC insurance brokers in the evaluation of the adequacy of various insurance policies.

At time of Plan submittal, MRC has not executed any service contracts and therefore cannot provide proof of insurance for those contractors.



# Appendices

## Appendix A: Registered Producers, Renovators and Retailers

Per Section 4(1)(d), these tables identify each producer, renovator and retailer that has registered with MRC as of January 31, 2024 (30 days before the plan submittal). MRC submitted a separate version containing contact names to DEQ and requested confidentiality.

**TABLE 5: Registered Producers**

Section 2(15): “Producer” means any person, irrespective of the selling technique used, including that of remote sale, that:

- (a) Manufactures a mattress that is sold, offered for sale or distributed in this state;
- (b) Is the owner of a trademark or brand under which a mattress is sold, offered for sale or distributed in this state, whether or not such trademark or brand is registered in this state; or
- (c) Imports a mattress into the United States that is sold or offered for sale in this state.

| Company                         | DBA Name                                       | Address                          | City             | State | Zip   | Country | Phone          |
|---------------------------------|--|----------------------------------|------------------|-------|-------|---------|----------------|
| 815 Healthy & Beautiful Co. Ltd | King's Castle HK Import and Export Co. Limited | 78-27, Seodunmul-Gel, Poseungeup | Pyeongtaek-Si    | 31    | 17814 | KOR     | (086) 177-5062 |
| Aaron's, LLC                    | Aaron's, LLC                                   | 400 Galleria Pkwy SE             | Atlanta          | GA    | 30339 | USA     | (678) 402-3325 |
| American Bedding Mfg. Inc.      | American Bedding Mfg. Inc.                     | 2110 Redfern Dr.                 | Athens           | TN    | 37303 | USA     | (423) 745-1512 |
| Anchortex Corporation           | Anchortex Corporation                          | 420 Commerce Ln.                 | West Berlin      | NJ    | 08091 | USA     | (856) 768-5240 |
| Ascion, LLC                     | Reverie  | 750 Denison Ct.                  | Bloomfield Hills | MI    | 48302 | USA     | (248) 409-5656 |

| Company                                | DBA Name  | Address                           | City             | State | Zip     | Country | Phone          |
|--|---|-----------------------------------|------------------|-------|---------|---------|----------------|
| Ashley Furniture Industries, LLC       | Ashley Furniture Industries, LLC  | One Ashley Way                    | Arcadia          | WI    | 54612   | USA     | (608) 323-6789 |
| Bedgear, LLC                           | Bedgear   | 1953 Langston St.                 | Rock Hill        | SC    | 29730   | USA     | (631) 414-7758 |
| Bestar Inc.                            | Bestar Inc.   | 4220 Villeneuve                   | Lac-Mégantic     | QC    | G6B 2C3 | CAN     | (819) 583-1017 |
| Bob Barker Company Inc.                | Bob Barker Company Inc.   | 134 N Main St.                    | Fuquay-Varina    | NC    | 27526   | USA     | 1-800-334-9880 |
| Boyd Flotation Inc.                    | Boyd Specialty Sleep  | 2440 Adie Rd.                     | Maryland Heights | MO    | 63043   | USA     | (314) 997-5222 |
| Brentwood Home, LLC                    | Simply Modern Mattress  | 570 A N Gilbert St.               | Fullerton        | CA    | 92833   | USA     | (562) 949-3759 |
| Brooklyn Bedding, LLC                  | Dreamfoam Bedding, Brooklyn Bedding, Helix Sleep, Bear Mattress, Nolah Sleep, Leesa Sleep | 5301 W Bethany Home Rd.           | Glendale         | AZ    | 85301   | USA     | (888) 213-8967 |
| Bryte Inc.                             | Bryte Labs  | 221 Main St. 570                  | Los Altos        | CA    | 94022   | USA     | (844) 440-9462 |
| Carpenter Co.                          | Carpenter Co.   | 5016 Monument Ave.                | Richmond         | VA    | 23230   | USA     | (804) 359-0800 |
| Casper Sleep Inc.                      | Casper  | 175 Greenwich St.                 | New York         | NY    | 10007   | USA     | (646) 361-2458 |
| Children's Products, LLC               | Simmons Juvenile Furniture  | 114 W 26th St.                    | New York         | NY    | 10001   | USA     | (212) 736-7000 |
| Colchones Wendy SA De CV               | Colchones Wendy   | Calle 3, 1401                     | Guadalajara      | JAL   | 44940   | MEX     | (333) 884-2000 |
| Comfort DTC Inc.                       | Molecule  | 360 N Pacific Coast Hwy Ste. 2000 | El Segundo       | CA    | 90245   | USA     | (833) 365-7378 |
| Comfort Revolution, LLC                | Comfort Revolution, LLC   | One Office Parkway                | Trinity          | NC    | 27370   | USA     | (662) 454-7526 |
| Consolidated Hospitality Supplies, LLC | Consolidated Hospitality Supplies, LLC  | 544 Lakeview Pkwy                 | Vernon Hills     | IL    | 60061   | USA     | (800) 323-5686 |

| Company                             | DBA Name  | Address  | City        | State | Zip        | Country | Phone          |
|-------------------------------------|---|--|-------------|-------|------------|---------|----------------|
| Correctional Technologies Inc.      | Cortech USA   | 7530 Plaza Ct  | Willowbrook | IL    | 60527      | USA     | (630) 455-0811 |
| Corsicana Acquisition, LLC          | Corsicana Mattress Company  | 3001 S US Hwy 287  | Corsicana   | TX    | 75109      | USA     | (800) 323-4349 |
| Costco Wholesale Corporation        | Costco Wholesale Corporation  | Attn Tax Dept  | Seattle     | WA    | 98134-2389 | USA     | (425) 313-8100 |
| Custom Mattress Makers Inc.         | Custom Mattress Makers Inc.   | 13101 56th Ct  | Clearwater  | FL    | 33760      | USA     | (413) 537-8307 |
| CVB Inc.                            | LUCID®<br>MATTRESS,<br>WELLSVILLE®,<br>LINENSPA®  | 1525 W 2960 S  | Logan       | UT    | 84321      | USA     | (435) 232-5369 |
| Denver Mattress Company, LLC        | Denver Mattress Company   | 5651 Broadway  | Denver      | CO    | 80216      | USA     | (303) 566-8700 |
| Direct Supply Inc.                  | Direct Supply;<br>Direct Supply<br>Equipment &<br>Furnishings;<br>Direct Supply of<br>Wisconsin | 6767 N Industrial Rd.  | Milwaukee   | WI    | 53216      | USA     | (414) 760-5895 |
| Dishuo Furniture PTE. Ltd           | Dishuo Furniture PTE. Ltd   | 8 Tuas South Ln #01-51<br>Factory 2  | Singapore   | SG    | 637302     | SGP     | (006) 569-7074 |
| Elements International              | Kyvno, LLC  | PO Box 851601  | Mesquite    | TX    | 75185      | USA     | (877) 575-3888 |
| Ergomotion Inc.                     | Ergomotion Inc.   | 6790 Navigator Dr.   | Goleta      | CA    | 93117      | USA     | (805) 979-3931 |
| Feng Ben International (HK) Limited | Feng Ben International (HK) Limited   | No.15 Xinkang Rd., Xinyang Industrial Area, Haicang, Xiamen, Fujian, China | Xiamen      | 35    | 361000     | CHN     | (861) 895-0057 |
| FXI Inc.                            | FXI   | 100 Matsonford Rd.   | Radnor      | PA    | 19087      | USA     | (908) 675-3925 |
| Gateway Mattress Co. Inc.           | Gateway Mattress Co. Inc.   | 624 S Vail Ave.  | Montebello  | CA    | 90640      | USA     | (323) 725-1923 |
| GF Health Products Inc.             | GF Health Products Inc.   | One Graham-Field Way   | Atlanta     | GA    | 30340      | USA     | (678) 291-3261 |

| Company  | DBA Name                               | Address   | City        | State | Zip    | Country | Phone          |
|--|--|---|-------------|-------|--------|---------|----------------|
| Golden Well International (HK) Ltd             | Golden Well International (HK) Ltd     | Room 2,2/F Tower1, Harbour Centre, 1 Hok Cheung St., Hunghom, HK              | Hongkong    | 34    | 999077 | CHN     | (189) 600-1376 |
| Heartland Mattress, LLC                        | Heartland Mattress                     | 1770 N 500 W  | Shipshewana | IN    | 46565  | USA     | (260) 768-7875 |
| Hong Kong Gesin Technology Company Ltd         | Hong Kong Gesin Technology Company Ltd | 27885 Irma Lee Cir.   | Lake Forest | IL    | 60045  | USA     | (847) 910-1133 |
| Honor Global Industry PTE. Ltd                 | Glory                                  | No. 555 W Kangxing Rd.  | Jiaxing     | 34    | 314113 | CHN     | (086) 057-3846 |
| Honor Home (Laos) Sole Co. Ltd                 | Honor Home (Laos) Sole Co. Ltd         | Vientiane Saysettha Development Zone, YouyiRd.ano Village, Saysettha District | Vientiane   | AT    | 01000  | LAO     | (086) 157-5737 |
| IKEA Supply AG                                 | IKEA                                   | Gruessenweg 15  | Pratteln    | BL    | 4133   | CHE     | (004) 179-7437 |
| InnoMax Corporation                            | InnoMax Corporation                    | 530 W Elk Pl.   | Denver      | CO    | 80216  | USA     | (303) 296-9530 |
| Invacare Corporation                           | Invacare Corporation                   | One Invacare Way  | Elyria      | OH    | 44035  | USA     | (440) 329-6000 |
| Jeffco Fibres Inc.                             | Jeffco Fibres Inc.                     | 12 Park St.   | Webster     | MA    | 01570  | USA     | (800) 225-7352 |
| Joerns Healthcare, LLC                         | Joerns Healthcare                      | 2430 Whitehall Park Dr.   | Charlotte   | NC    | 28273  | USA     | (704) 499-6000 |
| Keeson Technology Corporation LTD              | Keeson Technology Corporation LTD      | No 195 Yuanfeng Rd., Wangjiangjing  | Zhejiang    | 34    | 314016 | CHN     | (805) 979-3931 |
| King's Castle HK Import and Export Co. Limited | Deluxe Home of USA Inc.                | Flat C 23/F Lucky Plaza, 315-321 Lucky Rd.                                    | Hong Kong   | CW    | 999077 | HKG     | (086) 595-2772 |
| Kingsdown Inc.                                 | Kingsdown Inc.                         | 126 W Holt St.  | Mebane      | NC    | 27302  | USA     | (919) 563-3531 |
| Kuka Sleep Inc.                                | Kuka Sleep Inc.                        | 3584 Mountain Creek Pkwy  | Dallas      | TX    | 75236  | USA     | (911) 448-1743 |
| Lakewood Candies, LLC                          | Milliard Bedding                       | 1980 Swarthmore Ave.  | Lakewood    | NJ    | 08701  | USA     | (866) 686-4891 |

| Company  | DBA Name   | Address                                  | City                | State | Zip   | Country | Phone          |
|--|--|--|---------------------|-------|-------|---------|----------------|
| Leggett & Platt Automotive Group de Mexico, S. de R.L. de C.V. | Leggett & Platt Automotive Group de Mexico, S. de R.L. de C.V. | Hermanos Escobar #6640                   | Juarez              | CHH   | 32410 | MEX     | (417) 358-8131 |
| Lippert Components Inc.  | Lippert Components Inc.  | 3501 County Rd. 6                        | Elkhart             | IN    | 46514 | USA     | (574) 891-3243 |
| Lull Ventures, LLC   | Lull   | 3905 State St.                           | Santa Barbara       | CA    | 93105 | USA     | (800) 301-5845 |
| Mattress Firm Inc.   | Mattress Firm Inc.   | 3250 Briarpark, Ste. 400                 | Houston             | TX    | 77042 | USA     | (346) 718-5490 |
| MTJ American, LLC  | MTJ American   | 4276 Helena St.                          | Hudson              | NC    | 28638 | USA     | (828) 396-1537 |
| Noble House Home Furnishings, LLC                              | Noble House Home Furnishings                                   | 21325 Superior St.                       | Chatsworth          | CA    | 91311 | USA     | (845) 558-1730 |
| Norix Group Inc.   | Norix Group Inc.   | 1 Innovation Dr.                         | West Chicago        | IL    | 60185 | USA     | (630) 231-1331 |
| Oregon Corrections Enterprises                                 | Oregon Corrections Enterprises                                 | PO Box 12849                             | Salem               | OR    | 97309 | USA     | (541) 922-6156 |
| Organic Mattresses Inc.  | Organic Mattresses Inc.  | 1335 Harter Pkwy                         | Yuba City           | CA    | 95993 | USA     | (530) 790-6723 |
| Peace Lily Sleep   | Peace Lily   | 58 - 60 Levanswell Rd.                   | Moorabbin           | VIC   | 3189  | AUS     | (888) 420-1467 |
| Pleasant Mattress Inc.   | Pleasant Mattress Inc.   | 375 S West Ave.                          | Fresno              | CA    | 93706 | USA     | (559) 268-6446 |
| Poliuretanos SA De CV  | Poliuretanos SA De CV  | Noble House s/n, Zona Industrial Toluca, | Toluca              | MEX   | 50071 | MEX     | (722) 214-9900 |
| Purple Innovation, LLC   | Purple   | 4100 N Chapel Ridge Rd.                  | Lehi                | UT    | 84043 | USA     | (801) 756-2600 |
| Quality Sleep Shop   | My Green Mattress  | 1519 W 55th St.                          | La Grange Highlands | IL    | 60525 | USA     | (877) 737-8237 |
| Resident Home, LLC   | Resident   | 100 Logistics Ave.                       | Jeffersonville      | IN    | 47130 | USA     | (908) 752-1388 |
| Restwell Mattress Co.  | Restwell Mattress Factory                                      | 9901 W 74th St. #120                     | Eden Prairie        | MN    | 55344 | USA     | (952) 920-7860 |

| Company                                   | DBA Name                             | Address                    | City             | State   | Zip    | Country | Phone          |
|---|--------------------------------------|----------------------------|------------------|---------|--------|---------|----------------|
| Safe For Home Products, LLC               | Naturepedic                          | 16925 Park Circle Dr.      | Chagrin Falls    | OH      | 44023  | USA     | (440) 543-1483 |
| SBL, LLC                                  | SBI, LLC                             | 5645 W 31st St.            | Cicero           | IL      | 60804  | USA     | (800) 777-5282 |
| Sealy Mattress Manufacturing Company, LLC | Sealy Mattress Manufacturing Company | 1000 Tempur Way            | Lexington        | KY      | 40511  | USA     | (614) 629-8056 |
| Serta Simmons Bedding, LLC                | Serta and Simmons                    | 2451 Industry Ave.         | Doraville        | GA      | 30360  | USA     | (404) 534-5000 |
| Sferra Fine Linens, LLC                   | Sferra                               | 15 Mayfield Ave.           | Edison           | NJ      | 08837  | USA     | (646) 822-0473 |
| Sherwood West, LLC                        | Sherwood West, LLC                   | 2830 NE 29th St.           | Ft. Lauderdale   | FL      | 33306  | USA     | (954) 566-9115 |
| Snowwhite Hospitality, LLC                | Boston Interior Solutions            | 476 Brighton Dr.           | Bloomington      | IL      | 60108  | USA     | (978) 562-9988 |
| Solstice Sleep Products Inc.              | Solstice Sleep Products Inc.         | 3720 W Broad St.           | Columbus         | OH      | 43228  | USA     | (614) 670-4655 |
| Somnium Inc.                              | Somnium Inc.                         | PO Box 1804                | Venice           | CA      | 90294  | USA     | (323) 655-6700 |
| South Bay International Inc.              | South Bay International Inc.         | 8570 Hickory Ave. Ste. 150 | Rancho Cucamonga | CA      | 91739  | USA     | (909) 718-5000 |
| Southerland Inc.                          | Southerland Inc.                     | 6050 Dana Way              | Antioch          | TN      | 37013  | USA     | (615) 226-9650 |
| Stylus Sofas Inc.                         | Stylus, Made to Order Sofas          | 7885 Riverfront Gate       | Burnaby          | BC      | V5J5L6 | CAN     | (604) 436-4100 |
| Tempur Production USA, LLC                | Mountain Top Foam                    | 25 Elmwood Rd.             | Mountain Top     | PA      | 18707  | USA     | (570) 715-7200 |
| The Furniture Bank                        | Houston Furniture Bank               | 8220 Mosley Rd.            | Houston          | TX      | 77075  | USA     | (713) 842-9771 |
| The Original Mattress Factory Inc.        | The Original Mattress Factory        | 4930 State Rd.             | Cleveland        | OH      | 44134  | USA     | (216) 661-8388 |
| University Loft Company                   | University Loft Company              | 2588 Jannetides Blvd.      | Greenfield       | IN      | 46140  | USA     | (317) 866-5697 |
| Ureblock S.A. DE C.V.                     | Ureblock                             | Calle 4 Num 300            | Zapopan          | Jalisco | 45134  | MEX     | 52333-836-4000 |

| Company                                    | DBA Name                                   | Address   | City           | State | Zip    | Country | Phone          |
|--|--|---|----------------|-------|--------|---------|----------------|
| Victory Supply, LLC                        | Victory Supply, LLC                        | 7025 Industrial Park Rd.  | Mount Pleasant | TN    | 38474  | USA     | (888) 376-1205 |
| Vien Lam Co. Ltd                           | Vien Lam Co. Ltd                           | Hanh Loc Quarter, Khanh Binh Ward   | Tan Uyen       | 44    | 75412  | VNM     | (008) 427-4380 |
| Vispring Limited                           | Vispring Limited                           | Ernesettle Ln.  | Plymouth       | Devon |        | GBR     | (855) 511-1199 |
| VPC Group Inc.                             | VPC Group                                  | 150 Toro Rd.  | Toronto        | ON    | M3J2A9 | CAN     | (905) 577-3898 |
| Werner Media Partners, LLC                 | Ghostbed                                   | 7143 W Broward Blvd.  | Plantation     | FL    | 33317  | USA     | (855) 855-4499 |
| Xiamen Moreshire Import and Export Co. LTD | Xiamen Moreshire Import and Export Co. LTD | Elevator 304, Block C, Yincheng, Zhigu Building A6, Tong 'an District, Xiamen, Fujian | Xiamen         | 34    | 361000 | CHN     | (861) 380-6062 |
| Zinus Inc.                                 | Zinus Inc.                                 | 5731 Promontory Pkwy  | Tracy          | CA    | 95377  | USA     | (925) 417-2100 |
| Zoma Sleep, LLC                            | Zoma Sleep                                 | 7167 E Rancho Vista Dr.   | Scottsdale     | AZ    | 85251  | USA     | (888) 400-8856 |

**TABLE 6: Registered Renovators**

*Section 2(18): "Renovator" means a person that renovates discarded mattresses.*

| Company                             | DBA Name                        | Address         | City       | State | Zip   | Phone          |
|-------------------------------------|---------------------------------|-----------------|------------|-------|-------|----------------|
| American Mattress Manufacturing     | American Mattress Manufacturing | 4075 W 11th     | Eugene     | OR    | 97402 | (541) 343-2690 |
| Gateway Mattress Co. Inc.           | Gateway Mattress Co. Inc.       | 624 S Vail Ave. | Montebello | CA    | 90640 | (323) 725-1923 |
| St Vincent De Paul of Lane Co. Inc. | St Vinnies                      | 2890 Chad Dr.   | Eugene     | OR    | 97408 | (541) 687-5820 |

**TABLE 7: Registered Retailers**

Section 2(19): “Retailer” means a person that offers new, used or renovated mattresses for retail sale.

| Company                                    | DBA Name                                    | Address                        | City              | State | Zip   | Phone          |
|--|---|--------------------------------|-------------------|-------|-------|----------------|
| A Lava Son, LLC                            | Naturally Nestled                           | 4800 S Kilbourn Ave.           | Chicago           | IL    | 60632 | (773) 254-2800 |
| Aaron's, LLC                               | Aaron's, LLC                                | 400 Galleria Pkwy SE           | Atlanta           | GA    | 30339 | (678) 402-3325 |
| AFM Mattress Company, LLC                  | American Mattress                           | 1300 Pratt Blvd.               | Elk Grove Village | IL    | 60007 | (630) 279-0222 |
| AgilityBed Inc.                            | ShopTherapedic                              | 103 College Rd. E,<br>2nd Fl.  | Princeton         | NJ    | 08540 | (877) 848-5753 |
| Amazon.com Services, LLC                   | Amazon.com Services, LLC                    | PO Box 81207                   | Seattle           | WA    | 98108 | (206) 266-8365 |
| American Mattress Manufacturing            | American Mattress Manufacturing             | 4075 W 11th                    | Eugene            | OR    | 97402 | (541) 343-2690 |
| Arhaus, LLC                                | Arhaus Furniture                            | 51 E Hines Hill Rd.            | Boston Heights    | OH    | 44236 | (440) 439-7700 |
| Ascion, LLC                                | Reverie                                     | 750 Denison Ct.                | Bloomfield Hills  | MI    | 48302 | (248) 409-5656 |
| Ashley Global Retail, LLC                  | Ashley Furniture Home Store                 | 1 Ashley Way                   | Arcadia           | WI    | 54612 | (608) 323-6337 |
| Avocado Mattress, LLC                      | Avocado Green Mattress                      | 12 Hudson Pl. Ste.<br>100-105  | Hoboken           | NJ    | 07030 | (562) 949-3759 |
| Barron's Home Furnishings                  | Barron's Home Furnishings &<br>Sleep Center | 410 Oak St.                    | Brookings         | OR    | 97415 | (541) 412-0250 |
| Beach Trading Co. Inc.                     | www.buydig.com                              | 80 Carter Dr.                  | Edison            | NJ    | 08817 | (732) 424-1100 |
| Bedgear, LLC                               | Bedgear                                     | 1953 Langston St.              | Rock Hill         | SC    | 29730 | (631) 414-7758 |
| Beds For Less Inc.                         | Ashley/Beds For Less                        | 579 Rossanley Dr.              | Medford           | OR    | 97501 | (541) 858-5500 |
| Belnick Retail, LLC                        | BizChair                                    | 4350 Ball Ground Hwy           | Canton            | GA    | 30114 | (800) 924-2472 |
| Best Buy Stores L.P.                       | Best Buy                                    | 7601 Penn Ave. S               | Richfield         | MN    | 55423 | (612) 291-5337 |
| BF Sleep, LLC                              | Big Fig Mattress                            | 3201 Harvard Ave.              | Newburgh Heights  | OH    | 44105 | (888) 344-6547 |
| Big Lots Stores Inc.                       | Big Lots                                    | 4900 E Dublin<br>Granville Rd. | Columbus          | OH    | 43081 | (614) 278-6300 |
| Black Buggy Furniture, LLC                 | Black Buggy Furniture                       | 74447 Larson Rd.               | Rainier           | OR    | 97048 | (360) 775-0325 |
| Blackledge Furniture Company               | Blackledge Furniture                        | 233 SW Second St.              | Corvallis         | OR    | 97339 | (541) 753-4851 |
| BLST Sales Marketing and<br>Servicing, LLC | Fingerhut                                   | 13300 Pioneer Trail            | Eden Prairie      | MN    | 55347 | (952) 656-3700 |



| Company                         | DBA Name  | Address                           | City             | State | Zip   | Phone          |
|---------------------------------|---|-----------------------------------|------------------|-------|-------|----------------|
| Bob Barker Company Inc.         | Bob Barker Company Inc.   | 134 N Main St.                    | Fuquay-Varina    | NC    | 27526 | 1-800-334-9880 |
| Boll & Branch, LLC              | Boll & Branch, LLC  | 1 Prospect St.                    | Summit           | NJ    | 07901 | (908) 473-9920 |
| Boyd Flotation Inc.             | Boyd Specialty Sleep  | 2440 Adie Rd.                     | Maryland Heights | MO    | 63043 | (314) 997-5222 |
| Brenner's Furniture Inc.        | Brenner's Furniture Inc.  | 151 W 8th Ave.                    | Eugene           | OR    | 97401 | (541) 345-4451 |
| Brentwood Home, LLC             | Simply Modern Mattress  | 570 A N Gilbert St.               | Fullerton        | CA    | 92833 | (562) 949-3759 |
| Brooklyn Bedding, LLC           | Dreamfoam Bedding, Brooklyn Bedding, Helix Sleep, Bear Mattress, Nolah Sleep, Leesa Sleep | 5301 W Bethany Home Rd.           | Glendale         | AZ    | 85301 | (888) 213-8967 |
| Bryte Inc.                      | Bryte Labs  | 221 Main St. 570                  | Los Altos        | CA    | 94022 | (844) 440-9462 |
| Carpenter Co.                   | Carpenter Co.   | 5016 Monument Ave.                | Richmond         | VA    | 23230 | (804) 359-0800 |
| Casper Sleep Inc.               | Casper  | 175 Greenwich St.                 | New York         | NY    | 10007 | (646) 361-2458 |
| Central Rent 2 Own              | Central Rent 2 Own  | 490 E Ln.                         | Ontario          | OR    | 97914 | (541) 889-2786 |
| City Liquidators Inc.           | City Liquidators Inc.   | 823 SE 3rd Ave.                   | Portland         | OR    | 97214 | (503) 238-1367 |
| Cocoon International Sales, LLC | Cocoon International Sales, LLC   | 1000 Tempur Way                   | Lexington        | KY    | 40511 | (859) 455-1729 |
| Comfort DTC Inc.                | Molecule  | 360 N Pacific Coast Hwy Ste. 2000 | El Segundo       | CA    | 90245 | (833) 365-7378 |
| Comfort Revolution, LLC         | Comfort Revolution, LLC   | One Office Parkway                | Trinity          | NC    | 27370 | (662) 454-7526 |
| Corsicana Acquisition, LLC      | Corsicana Mattress Company  | 3001 S US Hwy 287                 | Corsicana        | TX    | 75109 | (800) 323-4349 |
| Costco Wholesale Corporation    | Costco Wholesale Corporation  | Attn Tax Dept                     | Seattle          | WA    | 98134 | (425) 313-8100 |
| Courtesy Home Furnishings       | Self Service Furniture  | 1313 Bridge St.                   | Clarkston        | WA    | 99403 | (541) 523-7701 |
| CTR Associates                  | Kelly's Furniture, Paul Schatz Furniture  | 3850 Hagers Grove Rd.             | Salem            | OR    | 97317 | (503) 378-1794 |
| Custom Mattress Makers Inc.     | Custom Mattress Makers Inc.   | 13101 56th Ct                     | Clearwater       | FL    | 33760 | (413) 537-8307 |
| CVB Inc.                        | LUCID® MATTRESS, WELLSVILLE®, LINENSPA®   | 1525 W 2960 S                     | Logan            | UT    | 84321 | (435) 232-5369 |
| Dania Inc.                      | Scandinavian Designs; Dania Furniture   | 390 E Parkcenter Blvd.            | Boise            | ID    | 83706 | (208) 423-8869 |
| Dennis M Rose                   | Plank and Coil  | 2259 NW Raleigh St.               | Portland         | OR    | 97210 | (503) 224-0551 |
| Denver Mattress Company, LLC    | Denver Mattress Company   | 5651 Broadway                     | Denver           | CO    | 80216 | (303) 566-8700 |

| Company                                   | DBA Name                           | Address                 | City           | State | Zip     | Phone          |
|---|------------------------------------|-------------------------|----------------|-------|---------|----------------|
| Direct Mattress and Furniture             | Direct Mattress and Furniture      | 2701 E Wilshire Dr.     | Eugene         | OR    | 97405   | (541) 521-1942 |
| DirectBuy Operations, LLC                 | DirectBuy Operations, LLC          | 1221 Arrowhead Ct       | Crown Point    | IN    | 46307   | (219) 224-6986 |
| Downey Sleep Center, LLC                  | Downey Sleep Center                | 600 E 2nd St.           | The Dalles     | OR    | 97058   | (154) 129-8876 |
| E. Gregg Clemmer Inc.                     | Clemmer's Furniture                | 10070 SE Orient Dr.     | Boring         | OR    | 97009   | (503) 663-4950 |
| East West Bedding, LLC                    | EasyRest                           | 1401 S Edgewood St.     | Baltimore      | MD    | 21227   | (443) 573-1400 |
| Elements International                    | Kyvno, LLC                         | PO Box 851601           | Mesquite       | TX    | 75185   | (877) 575-3888 |
| Emerald City Organic Sleep Solutions Inc. | ECO Sleep Solutions                | 25 E 8th Ave.           | Eugeen         | OR    | 97401   | (541) 343-1022 |
| Emma Mattress Inc.                        | Emma Mattress                      | 1209 Orange St.         | Wilmington     | DE    | 19801   | (310) 736-2504 |
| Encore Home Furnishings, LLC              | Encore Home Furnishings            | 2730 NE Bunn Rd.        | McMinnville    | OR    | 97128   | (503) 474-1937 |
| Engles Furniture Inc.                     | Engles Furniture Inc.              | 2079 Sherman Ave.       | North Bend     | OR    | 97459   | (541) 756-1123 |
| Ergomotion Inc.                           | Ergomotion Inc.                    | 6790 Navigator Dr.      | Goleta         | CA    | 93117   | (805) 979-3931 |
| Ergopedic, LLC                            | Ergopedicsleep.com                 | PO Box 2787             | Indio          | CA    | 92202   | (602) 373-0002 |
| Euromarket Designs Inc.                   | Crate & Barrel                     | 1250 Techny Rd.         | Northbrook     | IL    | 60062   | 847-272-2888   |
| Express Furniture Services, LLC           | Express Furniture Rental           | 2448 Foundry Park Ave.  | Fresno         | CA    | 93706   | (559) 268-3074 |
| Furniture City                            | Furniture City                     | 550 NW Burnside Rd.     | Gresham        | OR    | 97030   | (503) 667-8927 |
| Gates Furniture of Grants Pass Inc.       | Gates Home Furnishings             | 700 SW 6th St.          | Grants Pass    | OR    | 97526   | (541) 476-4627 |
| Gilbert Investments Inc.                  | Edgewater Home Furnishings         | 155 Division Ave.       | Eugene         | OR    | 97404   | (541) 484-1962 |
| Greg's Sleep Center                       | Greg's Sleep Center                | 1725 N 1st St. Ste. D   | Hermiston      | OR    | 97838   | (541) 567-1099 |
| Haven Sleep Products Ltd                  | Haven Sleep Co.                    | 1451 Richter St.        | Kelowna        | BC    | V1Y 2M1 | (844) 694-2836 |
| Hennick's Home Center Inc.                | Hennick's Furniture & Sleep Center | 88296 Hwy 42 S          | Bandon         | OR    | 97411   | (541) 329-1233 |
| Home Depot U.S.A. Inc.                    | Home Depot                         | 2455 Paces Ferry Rd. SE | Atlanta        | GA    | 30339   | (770) 384-4555 |
| Homelife Furniture Inc.                   | Homelife Furniture                 | 301 Main Ave.           | Tillamook      | OR    | 97141   | (503) 842-2005 |
| HSNi, LLC                                 | Home Shopping Network              | 1 HSN Dr.               | St. Petersburg | FL    | 33729   | (727) 872-1000 |
| InnoMax Corporation                       | InnoMax Corporation                | 530 W Elk Pl.           | Denver         | CO    | 80216   | (303) 296-9530 |
| Jeffco Fibres Inc.                        | Jeffco Fibres Inc.                 | 12 Park St.             | Webster        | MA    | 01570   | (800) 225-7352 |

| Company                           | DBA Name                                 | Address                    | City            | State | Zip   | Phone          |
|-----------------------------------|--|----------------------------|-----------------|-------|-------|----------------|
| Joerns Healthcare, LLC            | Joerns Healthcare                        | 2430 Whitehall Park Dr.    | Charlotte       | NC    | 28273 | (704) 499-6000 |
| Kohl's Department Stores Inc.     | Kohl's Department Stores Inc.            | N56W17000 Ridgewood Dr.    | Menomonee Falls | WI    | 53051 | (262) 703-7000 |
| Kuebler's Furniture Inc.          | Kuebler's Furniture Inc.                 | 1894 Churn Creek Rd.       | Redding         | CA    | 96002 | (530) 221-9898 |
| L&M Arnold Enterprises, LLC       | Mattress Land                            | 830 Biddle Rd.             | Medford         | OR    | 97501 | (541) 474-2337 |
| Lakewood Candies, LLC             | Milliard Bedding                         | 1980 Swarthmore Ave.       | Lakewood        | NJ    | 08701 | (866) 686-4891 |
| Lavin Industries                  | European Sleep Works                     | 2966 Adeline St.           | Berkeley        | CA    | 94703 | (510) 841-5340 |
| Layla Sleep Inc.                  | Layla                                    | 157 Church St.             | New Haven       | CT    | 06510 | (203) 606-0526 |
| LeafScore Inc.                    | LeafScore Inc.                           | 970 W Broadway             | Jackson         | WY    | 83001 | (646) 640-7141 |
| Lewis Home Source Inc.            | Roby's Furniture and Appliance           | 1901 Main Ave. N           | Tillamook       | OR    | 97141 | (503) 842-7111 |
| Lifekind Inc.                     | Lifekind Inc.                            | 333 Crown Point Cir.       | Grass Valley    | CA    | 95945 | (530) 477-5395 |
| Lucas & Howard Furniture Inc.     | Ultimate Mattress & Bedroom Company      | 2727 S 6th St.             | Klamath Falls   | OR    | 97603 | (541) 892-6191 |
| Lull Ventures, LLC                | Lull                                     | 3905 State St.             | Santa Barbara   | CA    | 93105 | (800) 301-5845 |
| Macy's Retail Holdings, LLC       | Macy's                                   | 145 Progress Place         | Springdale      | OH    | 45246 | (513) 579-7322 |
| Marpac, LLC                       | Yogabed                                  | 3870 US Hwy 421 N          | Wilmington      | NC    | 28401 | (800) 602-1421 |
| Mattress Firm Inc.                | Mattress Firm Inc.                       | 3250 Briarpark, Ste. 400   | Houston         | TX    | 77042 | (346) 718-5490 |
| Mattress MegaStore, LLC           | Mattress MegaStore                       | 175 Baseline St.           | Hillsboro       | OR    | 97123 | (503) 747-0808 |
| MGOFF, LLC                        | Bedrooms West                            | 590 NE Burnside Rd.        | Gresham         | OR    | 97030 | (503) 666-2376 |
| Morgan's Mattresses               | Morgan's Mattresses                      | 18200 NE Halsey St.        | Portland        | OR    | 97230 | (503) 913-4364 |
| Murray's Auction Center Inc.      | Murray's Furniture, and Ashley Homestore | 4270 Belmont Dr.           | Hood River      | OR    | 97031 | (541) 386-3915 |
| My Livingway, LLC                 | The American Furniture                   | 320 Lancaster Dr. NE       | Salem           | OR    | 97301 | (971) 915-2266 |
| Nest Bedding Inc.                 | Nest Bedding                             | 1811 Concord Ave. Ste. 110 | Chico           | CA    | 95928 | (530) 762-1630 |
| Newton Baby Inc.                  | Newton Baby Inc.                         | 382 NE 191st St.           | Miami           | FL    | 33179 | (646) 383-4597 |
| Noble House Home Furnishings, LLC | Noble House Home Furnishings             | 21325 Superior St.         | Chatsworth      | CA    | 91311 | (845) 558-1730 |
| Northwest Beds Inc.               | Northwest Home Furnishings               | 86203 Franklin Blvd.       | Eugene          | OR    | 97405 | (541) 741-2109 |

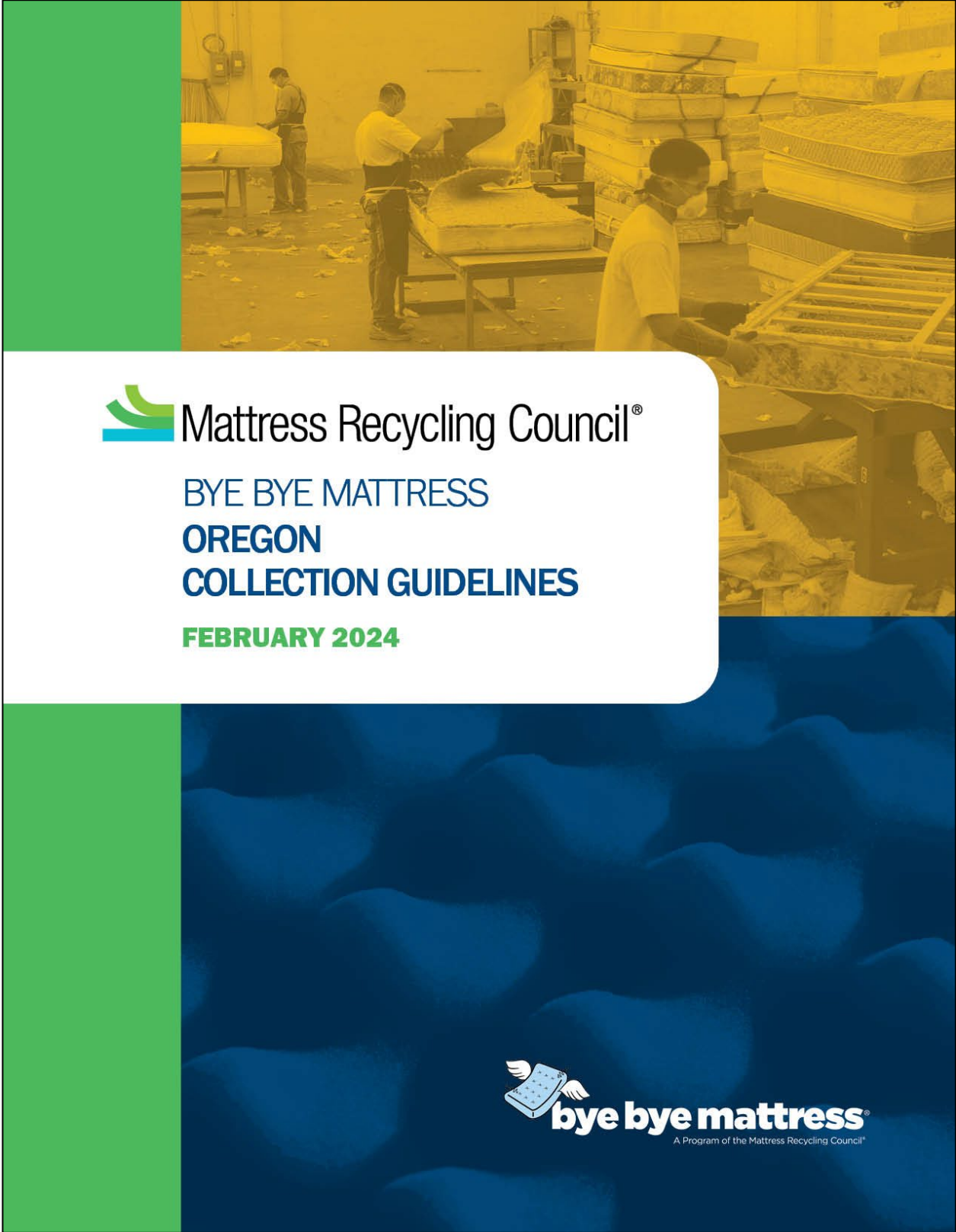
| Company                               | DBA Name                                  | Address                   | City                | State | Zip   | Phone               |
|---------------------------------------|---|---------------------------|---------------------|-------|-------|---------------------|
| Northwest Furniture and Mattress, LLC | Northwest Furniture and Mattress, LLC     | 215 Elm St.               | La Grande           | OR    | 97850 | (541) 963-5440      |
| Northwest Furniture Outlet Inc.       | Northwest Furniture Outlet                | 23300 S Hwy 99E           | Canby               | OR    | 97013 | (503) 266-8800      |
| Northwest RTB9, LLC                   | Relax The Back                            | 2750 SW Cedar Hills Blvd. | Beaverton           | OR    | 97005 | (503) 643-1088      |
| Organic Exchange Inc.                 | Organic Exchange Inc.                     | 200 NE 2nd St.            | Boca Raton          | FL    | 33432 | (561) 571-9800 x223 |
| Organic Grace                         | Organic Grace                             | 11904 E. Alsea Hwy.       | Tidewater           | OR    | 97390 | (541) 528-2655      |
| Organic Mattresses Inc.               | Organic Mattresses Inc.                   | 1335 Harter Pkwy          | Yuba City           | CA    | 95993 | (530) 790-6723      |
| Peace Lily Sleep                      | Peace Lily                                | 58 - 60 Levanswell Rd.    | Moorabbin           | VIC   | 3189  | (888) 420-1467      |
| Penney OpCo, LLC                      | JCPenney                                  | PO Box 10001              | Dallas              | TX    | 75301 | (801) 350-2535      |
| Purple Innovation, LLC                | Purple                                    | 4100 N Chapel Ridge Rd.   | Lehi                | UT    | 84043 | (801) 756-2600      |
| Quality Sleep Shop                    | My Green Mattress                         | 1519 W 55th St.           | La Grange Highlands | IL    | 60525 | (877) 737-8237      |
| QVC Inc.                              | QVC Inc.                                  | 1200 Wilson Dr.           | West Chester        | PA    | 19380 | (484) 701-1000      |
| R.C. Willey Home Furnishings Inc.     | R.C. Willey                               | 2301 S 300 W.             | Salt Lake City      | UT    | 84115 | (801) 461-3900      |
| Rent-A-Center Inc.                    | Rent-A-Center                             | 5501 Headquarters Dr.     | Plano               | TX    | 75024 | (972) 801-1100      |
| Resident Home, LLC                    | Resident                                  | 100 Logistics Ave.        | Jeffersonville      | IN    | 47130 | (908) 752-1388      |
| Rested Development Inc.               | America's Mattress                        | 112 SE Douglas St.        | Newport             | OR    | 97365 | (541) 270-1546      |
| Richardson's Furniture                | Richardson's Furniture & Mattress Gallery | 2015 Columbia Blvd.       | St Helens           | OR    | 97051 | (503) 397-1329      |
| Room & Board Inc.                     | Room & Board                              | 4600 Olson Memorial Hwy   | Golden Valley       | MN    | 55422 | (763) 588-7525      |
| Ruth Murphy Ltd                       | Murphy's Furniture                        | 2962 Baseline St.         | Cornelius           | OR    | 97113 | (503) 640-1124      |
| Safe For Home Products, LLC           | Naturepedic                               | 16925 Park Circle Dr.     | Chagrin Falls       | OH    | 44023 | (440) 543-1483      |
| Salem Building Specialties            | Kelly's Home Center                       | 3850 Hagers Grove Rd.     | Salem               | OR    | 97317 | (503) 378-1793      |
| Scenic Dreams, LLC                    | Mattress Depot USA                        | 32907 Ash Ave. SE         | Black Diamond       | WA    | 98010 | (509) 344-9878      |

| Company                                   | DBA Name                             | Address                  | City           | State | Zip     | Phone          |
|---|--------------------------------------|--------------------------|----------------|-------|---------|----------------|
| Sealy Mattress Manufacturing Company, LLC | Sealy Mattress Manufacturing Company | 1000 Tempur Way          | Lexington      | KY    | 40511   | (614) 629-8056 |
| Sferra Fine Linens, LLC                   | Sferra                               | 15 Mayfield Ave.         | Edison         | NJ    | 08837   | (646) 822-0473 |
| Shepherd Inc.                             | Roseburg Mattress                    | 635 SE Stephens St.      | Roseburg       | OR    | 97470   | (541) 957-8866 |
| Sonu Sleep Corporation                    | Sonu Sleep                           | 7321 Rindge Ave.         | Playa Del Rey  | CA    | 90293   | (844) 444-7668 |
| St Vincent De Paul of Lans Co. Inc.       | St Vinnies                           | 2890 Chad Dr.            | Eugene         | OR    | 97408   | (541) 687-5820 |
| Sterling Furniture Company                | M.Jacobs Furniture                   | 3194 Gateway Loop        | Springfield    | OR    | 97477   | (541) 726-6221 |
| Stumptown Sleep, LLC                      | The Mattress Lot, Stumptown Mattress | 2406 NE Sandy Blvd.      | Portland       | OR    | 97232   | (503) 896-1072 |
| Tempur Retail Stores, LLC                 | Tempur Retail Stores, LLC            | 1000 Tempur Way          | Lexington      | KY    | 40511   | (859) 455-1729 |
| Tempur-Pedic North America, LLC           | Tempur-Pedic North America, LLC      | 1000 Tempur Way          | Lexington      | KY    | 40511   | (859) 455-1000 |
| Thanepohn Corp.                           | Mattress Mill                        | 8383 Huffine Ln.         | Bozeman        | MT    | 59718   | (406) 586-4525 |
| The Furniture Connexion                   | The Furniture Connexion              | 1800 NW Fairview Dr.     | Gresham        | OR    | 97030   | (503) 674-4488 |
| The Furniture Superstore Inc.             | Rife's Home Furniture                | PO Box 25739             | Eugene         | OR    | 97402   | (458) 205-8923 |
| The Original Mattress Factory Inc.        | The Original Mattress Factory        | 4930 State Rd.           | Cleveland      | OH    | 44134   | (216) 661-8388 |
| Thuma Inc.                                | Thuma Inc.                           | 1169 Gorgas Ave.         | San Francisco  | CA    | 94129   | (415) 990-6492 |
| TO & Sons Corp.                           | Michaels Fine Furniture              | 2011 NE 181st Ave.       | Portland       | OR    | 97230   | (503) 674-0414 |
| Tom Busch Home Furnishings Inc.           | Tom Busch Home Furnishings Inc.      | 804 Main St.             | Oregon City    | OR    | 97045   | (503) 656-2621 |
| TradeMango Solutions Inc.                 | Article                              | 1010 Raymur Ave.         | Vancouver      | BC    | V6A 3T2 | (604) 679-3107 |
| Trailhead Ventures Inc.                   | Medley                               | 3519 NE 15th Ave. #590   | Portland       | OR    | 97212   | (323) 801-6892 |
| Tru Furniture, LLC                        | Tru Furniture, LLC                   | 222 S Broadway           | Coos Bay       | OR    | 97420   | (541) 294-3041 |
| Victory Supply, LLC                       | Victory Supply, LLC                  | 7025 Industrial Park Rd. | Mount Pleasant | TN    | 38474   | (888) 376-1205 |
| Walker's Furniture Inc.                   | Walker's Furniture & Mattress        | 3808 N Sullivan Rd.      | Spokane Valley | WA    | 99216   | (509) 535-1995 |
| Wallbeds By Wilding, LLC                  | Wilding Wallbeds                     | 3988 S 1540 E Cir.       | St. George     | UT    | 84790   | (909) 680-4141 |

| Company                    | DBA Name             | Address                 | City          | State | Zip    | Phone          |
|----------------------------|----------------------|-------------------------|---------------|-------|--------|----------------|
| Werner Media Partners, LLC | Ghostbed             | 7143 W Broward Blvd.    | Plantation    | FL    | 33317  | (855) 855-4499 |
| Williams-Sonoma Inc.       | Williams-Sonoma Inc. | 3250 Van Ness Ave.      | San Francisco | CA    | 940109 | (415) 421-7900 |
| Wilson's of Redmond        | Wilson's of Redmond  | 2071 S Hwy 97           | Redmond       | OR    | 97756  | (541) 548-2066 |
| Zinus Inc.                 | Zinus Inc.           | 5731 Promontory Pkwy    | Tracy         | CA    | 95377  | (925) 417-2100 |
| Zoma Sleep, LLC            | Zoma Sleep           | 7167 E Rancho Vista Dr. | Scottsdale    | AZ    | 85251  | (888) 400-8856 |

# Appendix B: Collection Site Guidelines and Recycling Standards

## Collection Site Guidelines





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## **About the Guidelines**

Staff at all participating collection sites must be knowledgeable regarding these guidelines before accepting mattresses. For purposes of these guidelines, the term "mattress" or "unit" means the same thing as mattresses and foundations (or box springs) as defined in Section 2 of Senate Bill 1576 and Section 1 of MRC's Oregon Program Plan. These guidelines describe the program and what is required to participate.

## **About the Mattress Recycling Council**

In 2022, Oregon enacted Senate Bill 1576 which requires mattress manufacturers to create a recycling program for mattresses discarded in the state. The bedding industry established the Mattress Recycling Council (MRC) to develop and operate the mattress recycling program known as Bye Bye Mattress.

## **What MRC Provides**

MRC provides the following to participating collection sites:

- A collection container to store mattresses that is appropriate for the number of mattresses that the collection site expects to generate and the site's available space
- Transportation from the collection site to a contracted recycler
- No-cost mattress recycling services



# PROGRAM MATERIALS

## INCLUDED PRODUCTS

As defined in Senate Bill 1576 and in MRC's Oregon Program Plan:

**Mattresses:** Defined as any sleep surface covered with ticking or fabric that contains resilient material such as steel innersprings, foam, fiber or other filling or upholstery materials, used alone or in combination, regardless of size or shape. This definition includes foam mattresses.

**Foundation (also commonly called box springs):** A ticking-covered structure that is used to support a mattress or sleep surface and that may be constructed of frames, foam, box springs or other materials, used alone or in combination, regardless of whether the product is stationary or adjustable.



All items accepted for recycling by MRC must have been used and discarded in the state of Oregon.

# PROGRAM MATERIALS

## EXCLUDED PRODUCTS

- Severely wet, damaged, twisted, frozen or soiled mattresses
- Adjustable bases not covered in ticking or fabric
- Air mattresses that contain no upholstery material (such as camping beds)
- Car beds
- Collapsible roll-away beds
- Fold-out sofa beds
- Futon mattresses, frames and bases
- Juvenile products including crib mattresses, carriages, baskets, dressing tables, strollers, playpens, infant carriers, lounge pad, crib bumpers
- Loose bedding, blankets or sheets
- Mattresses infested with bed bugs or other living organisms
- Mattress pads and toppers
- Metal bed frames
- Out-of-state mattresses
- Pillows and cushions
- Sleeping bags
- Water beds



# PROGRAM MATERIALS

## MATTRESS INSPECTION AND EXAMINATION

Collection site staff should screen incoming mattresses to determine whether they are suitable for recycling and should remove mattresses that are:

- Excessively wet or frozen
- Severely twisted, punctured or crushed
- Infested with bed bugs or other living organisms
- Exceptionally soiled or moldy

Mattresses not suitable for recycling should be disposed of through your existing solid waste stream.

### Bed Bug Identification

Mattresses and box springs infested with bed bugs are unacceptable for recycling and should be disposed of through your existing solid waste stream. Staff at collection sites should evaluate program materials for evidence of bed bug infestation. A training webinar focused on dispelling health related myths, identifying bed bugs and offering best practices for protecting staff can be found here: <https://mattressrecyclingcouncil.org/resources/for-collectors>



Bed bugs are tan to brown in color, but may appear redder if they have fed.

**Adult Bed Bugs** are dorsally flat insects, broadly oval and the size of an apple or melon seed (1/4").

**Nymphs** look like adults in shape but are smaller.

**Eggs** are white and barrel-shaped.

Signs of bed bug activity may be more obvious than the insects themselves. Look for clusters of dark spots or smudges on mattresses (fecal spots), especially along seams. Eggs, shed skins and all life stages of bed bugs may also be present in these 'soiled' areas.



For more information on bed bugs, please refer to the resources made possible by the **Connecticut Coalition Against Bed Bugs** at [www.ct.gov/caes/CCABB](http://www.ct.gov/caes/CCABB)



# QUALITY STANDARDS

## Acceptable Quality

**IMPORTANT:** Only units used and discarded in Oregon are accepted by the program.

Shown here are examples of acceptable units.



## Unacceptable Quality

Shown here are examples to illustrate severe damage, heavy soiling and infestation.

### Other Conditions:

- Out-of-state mattresses
- Severely damaged or soiled mattresses
- Mattress that have been stripped of padding components.
- Pillows and cushions
- Fold-out sofa beds
- Futon mattresses, frames, bases
- Loose mattress pads, toppers
- Loose bedding, blankets, or sheets
- Water beds
- Fire damaged units



# MATERIALS COLLECTION & HANDLING

Each collection site will have unique operational considerations. Participating sites must make their own decisions about how to best manage their operations in the safest manner possible in accordance with applicable local, state and federal laws. At a minimum, each participating site must meet these requirements:

| MINIMUM PROGRAM REQUIREMENTS            |   |
|---|---|
| <b>SITE</b>                             | Each collection site must be secure with adequate space and staffing to handle and store acceptable mattresses.   |
| <b>PERMITS</b>                          | Each collection site must have knowledge of and comply with all applicable federal, state and local laws. These may include, but are not limited to, zoning requirements, state permit requirements and OSHA or other workplace requirements.   |
| <b>INSURANCE</b>                        | Each collection site must maintain general liability insurance of at least \$1,000,000 per occurrence.  |
| <b>TRAINING</b>                         | Staff at each collection site must be trained and knowledgeable regarding these guidelines before accepting mattresses for recycling.   |
| <b>STORING &amp; LOADING MATTRESSES</b> | <p>Collection sites must keep mattresses dry by storing in weatherproof containers or under cover to maximize their recyclability. In addition, all collection sites must:</p> <ul style="list-style-type: none"> <li>• Make every effort to place mattresses in MRC-designated storage containers immediately upon acceptance.</li> <li>• Do not store units on the ground for prolonged periods of time and make every effort to keep container doors closed.</li> <li>• Keep mattresses intact and not intentionally crush or puncture them.</li> <li>• Efficiently stack mattresses to maximize the number of units loaded in each storage container.</li> <li>• Provide oversight to keep unacceptable items out of MRC-designated storage containers.</li> <li>• Remove any non-program materials from MRC-designated storage containers before transport to MRC recyclers.</li> <li>• Practice good housekeeping standards and keep storage containers and program materials in a neat and orderly condition.</li> </ul> |
| <b>SITE ACCESS</b>                      | Collection sites must allow MRC access to confirm compliance with these guidelines.   |

See page 8 for photos and guidelines

# MATERIALS COLLECTION & HANDLING

## LOADING MATTRESSES IN STORAGE CONTAINERS

Expected number of mattresses that should fit in various container sizes:

| Container Type             | Number of Mattresses |
|----------------------------|----------------------|
| 20-foot sea container      | 30-45                |
| 40-foot sea container      | 75-95                |
| 40-yard roll-off container | 35-50                |
| 48-foot trailer            | 100-120              |
| 53-foot trailer            | 120-150              |

### Acceptable Loading

- 1. Begin each stack with a queen or full size box spring.**  
This acts as a base pallet to create a secure stack and makes unloading of mattresses quick and efficient.
- 2. Mattresses should be stacked horizontally** to the top of the trailer to maximize space.
- 3.** In small quantities, king size mattresses can be placed vertically next to a stack of horizontal mattresses.
- 4.** If there are more than 10 king size units, stack horizontally.



### Unacceptable Loading

**IMPORTANT: Do not load units vertically or in an unsafe manner.**

Please contact your Program Coordinator to learn more about acceptable/non-acceptable units and appropriate stacking and loading techniques.



To learn more about screening, stacking and loading mattresses, view videos in our **Resources Library** at [www.mattressrecyclingcouncil.org/resources/for-collectors](http://www.mattressrecyclingcouncil.org/resources/for-collectors)



# TRANSPORTATION & PROCESSING

Collection sites, transporters and recyclers must use the MyMRC portal (<https://mrc-us.my.site.com>) for requesting pickups, managing cancellations, coordination deliveries and reporting issues and data to MRC.

## **TRANSPORTERS**

MRC will assign each collection site a transporter to provide a storage container and transport services.

- MRC-contracted transporters will provide participating locations with evidence of automobile insurance coverage of at least \$1,000,000 per occurrence.
- The assigned transporter will pick up full containers and drop off an empty container at the same time.
- On the scheduled pickup day, the collection site must make the collection container readily accessible to the transporter.
- At the time of the pick up, the transporter may request collection site staff to sign a Bill of Lading (BOL) supplied by the transporter documenting collection site location details and the quantity of mattresses in the container.

A collection site may choose to provide its own storage containers and transportation. These locations must contact the recycler directly to arrange for a convenient drop-off time.

## **RECYCLERS**

Recyclers under contract with MRC will meet environmentally sound management requirements and established recycling standards to accurately account for all mattresses received, the mattress components recycled (e.g., foam, steel, wood, fiber, etc.) and any residual disposal. Collection sites will be assigned an MRC recycler to best service your facility.



# ENVIRONMENTALLY SOUND MANAGEMENT

MRC's contracts require that program participants use environmentally sound management practices to collect, transport and recycle discarded units.

For collection sites, required environmentally sound management practices include:

- Maintaining adequate record keeping. Program participants are required to maintain records related to implementation of the Program for not less than three years.
- Tracking and documenting the fate of discarded mattresses from collection through final disposition within and outside Oregon.
- Complying with all federal, state and local laws and regulations that apply to their business and operations, including air and water pollution laws, other environmental laws, worker health and safety requirements, fair labor standards rules and other laws that can affect the work and natural environment.
- Maintaining adequate liability insurance.





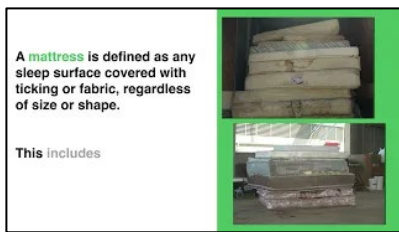
# PROGRAM WITHDRAWAL & TERMINATION

A collection site's participation in MRC's Bye Bye Mattress program in Oregon is voluntary. Either party may withdraw from participation in accordance with the terms in your contract. Written notice to the other party is required. MRC reserves the right to remove any collection site not in compliance with these guidelines from further participation in the program.



## Guideline Video Series

To complement the written guidelines and assist facilities with training staff, MRC develops short videos on specific topics. The examples here accompany the Northeast Guidelines and MRC will develop similar videos for Oregon once the Plan is approved.



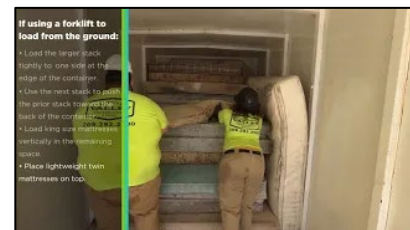
### Included & Excluded Products

[English](#)  
[Spanish](#)



### Effective Collection Site Operations

[English](#)  
[Spanish](#)



### Stacking and Loading Properly

[English](#)  
[Spanish](#)

There are additional videos in the series. View more here: [Northeast Guidelines Playlist](#)

# Oregon Mattress Recycling Standards

The Mattress Recycling Standards (Standards) define the minimum requirements to be an approved Recycler for the Mattress Recycling Council Oregon, LLC (MRC). Under these Standards, Mattresses must be managed and recycled in a manner that adequately safeguards the environment, industry employees and consumers. The Standards also includes data tracking and reporting requirements.

For purposes of these Standards, the term “Mattress” or “unit” means the same thing as Mattresses and Foundations (or box springs) as defined in Section 2 of the Act and Section 1 of this Plan.

## Background

MRC was formed to administer Oregon’s Mattress Recycling Program.

Recyclers must comply with Environmentally Sound Management practices and have transparent operations, clear and documented recycling procedures and accurate tracking of all Mattresses and components (including non-recyclable waste). All Recyclers will be audited under these Standards.

## Disclaimer

MRC does not intend for these Standards to constitute or provide legal guidance of any kind. The Recycler must be aware of and abide by all local, state, or federal laws and regulations applicable to the management of post-consumer Mattresses or the business operation of the Recycler. In the event that these Standards are inconsistent with any such laws or regulations, the laws or regulations take precedence, and the Recycler must inform MRC of such inconsistency.

## 1. General Requirements

Each Recycler shall:

- 1.1. Possess current and valid business licenses, insurance and meet all applicable local, state and federal requirements for providing the type of recycling services required by the MRC including but not limited to:
  - Occupational Safety and Health Administration (OSHA) and applicable local and state health and safety regulations
  - Local and state fire department regulations, fire and building codes and other applicable building and occupancy safety requirements
- 1.2. Maintain all records for a minimum of 4 years, including but not limited to shipping documents (both for goods received and shipped), processing, material disposal and sales records.
- 1.3. Develop and keep current a written plan that assures that:
  - 1.3.1. inventory of unprocessed Mattresses (including both Program and Non-Program Materials), stored either at Recycler’s premises (including storage containers and truck trailers on its premises) or at off-premises locations under Recycler’s control, will not exceed [number to be determined] Units at any time;

- 1.3.2. Recycler's facility or site will be properly closed in the event of sale, closure, abandonment, bankruptcy, any form of dissolution of the Recycler, or for any other reason, in compliance with all applicable local, state and federal laws and regulations;
- 1.3.3. any Mattresses, Mattress materials, or other products or materials processed by the Recycler will not be abandoned in the event of closure;
- 1.3.4. any contamination to the Recycler's facility or site will be properly remediated in accordance with all applicable local, state and federal laws and regulations;
- 1.3.5. Recycler will provide written notice of closure to MRC with a minimum of 90-days advance notice; and
- 1.3.6. Recycler will maintain adequate funds or other resources that will be used to fulfill these assurances should the need for such funds arise.
- 1.4. Maintain a consistent operating schedule and provide MRC with a written notice of its holiday closures on an annual basis.
- 1.5. Provide written notice to MRC of any incidents that required the assistance of first responders (fire, ambulance, police) within 12 hours of the occurrence.
- 1.6. Provide written notice to MRC of any regulatory orders, fines or other governmental or administrative actions taken within 2 business days of receiving such orders or fines.
- 1.7. Maintain a documented health and safety plan to record and track accidents, injuries or violations and any corresponding corrective and/or preventive actions taken.
- 1.8. Maintain a documented process to identify and communicate physical, mechanical, biological or pathogenic hazards and severity of such hazard to employees, and any corresponding corrective and/or preventive actions taken.
- 1.9. Maintain a documented process to identify and communicate potential fire hazards and severity of such hazards to employees, and any corresponding corrective and/or preventive actions taken.

## **2. Material Processing**

Each Recycler shall implement and maintain a documented plan for deconstructing Mattresses, which shall at a minimum require the Recycler to:

- 2.1. Fully disassemble each unit.
- 2.2. Recycle at least 70% by weight of the Mattresses it processes by selling such material through end markets that use the commodities in making new materials or products.

- 2.3. Minimize the quantity of material disposed of through landfills, incineration, waste to energy facilities or other non-recycling avenues.
- 2.4. Maintain a written policy describing how each Mattress type and material (including pocket coils) will be processed.
- 2.5. Process all Mattresses within 30 days of receipt at deconstruction facilities.
- 2.6. List criteria applied in determining when a given Mattress cannot be processed.

### **3. Material Tracking**

Each Recycler shall implement and maintain a documented plan to track and control Mattresses entering its processing facilities and the flow of recyclable and non-recyclable materials generated through the Mattress deconstruction process. Under the plan, the Recycler shall at minimum:

- 3.1. For all in-bound shipments, track and document each shipment using bills of lading or other equivalent shipping documents.
- 3.2. Maintain in-house or third-party annually calibrated and certified scales to weigh all in-bound loads.
- 3.3. For all out-bound shipments, track and document the fate of recyclable mattress materials and solid waste shipments using bills of lading or other equivalent shipping documents through final disposition within Oregon and outside of Oregon.
- 3.4. Outbound shipment loads must be weighed using in-house or third-party annually calibrated and certified scales.
- 3.5. Separately track Non-Program Mattresses received, processed and discarded or recycled by the facility through final disposition within Oregon and outside of Oregon.
- 3.6. Maintain a list of all purchasers of recycled materials and notify MRC of any changes to that list at least 10 business days in advance (the MRC will treat this information as confidential). Recycler must obtain written approval from MRC for new purchasers of recycled materials.
- 3.7. Train employees on how to prepare and maintain all necessary records and other documentation related to the receipt, processing, inventory and disposition of Mattresses and Mattress materials.
- 3.8. Complete the provided Certificate of Recycling, Employment and Inventory on a monthly basis.

### **4. Downstream Due Diligence**

Each Recycler shall have processes in place to identify, audit and approve all purchasers of recycled materials. The processes shall at a minimum require:

- 4.1. Annual desk audits to verify each purchaser's compliance with all applicable local, state and federal environmental and other requirements, and review of

each purchaser's operating permits, environmental compliance permits, business licenses, insurance and certifications.

## **5. Bed Bug Management**

Each Recycler shall implement and maintain a documented plan to identify and mitigate bed bug infestation in the facility. Components of the plan shall, at minimum, address the following provisions:

- 5.1. Document that all employees attended bed-bug identification and mitigation training.
- 5.2. Post bed bug identification posters in prominent workplace locations to encourage proactive identification and isolation of contaminated Mattresses.
- 5.3. Clearly identify how infested Mattresses will be isolated and either decontaminated or disposed.
- 5.4. Track the number and if possible, source of contaminated Units.

# Certificate of Recycling, Employment and Inventory

To: Mattress Recycling Council Oregon, LLC

From: [Name of Recycler]

Date: \_\_\_\_\_

Month Covered by This Certificate (the Month): \_\_\_\_\_

Number of Unprocessed Units in Inventory at the Close of the Month: \_\_\_\_\_

I, [name of person signing the certificate], serving as [insert individual's company title] of [Name of Recycler] (Recycler), being duly authorized to provide this certificate on behalf of Recycler, hereby certify to the Mattress Recycling Council Oregon, LLC under penalties of perjury that the following statements are truthful and accurate:

1. The quantities and weights of Mattresses reported by Recycler in the electronic reporting platform specified by MRC were recycled in strict compliance with the requirements of Recycler's contract with MRC and all applicable federal, State and local laws and regulations,
2. The data reported by Recycler in the electronic reporting platform specified by MRC are based on this company's internal books and records and are to the best of my knowledge accurate, and
3. Recycler's inventory of unprocessed Mattresses (including both Program and Non-Program Materials) as of the date of this certification, stored either at Recycler's premises (including Storage Containers and truck trailers on its premises) or with previously granted permission by MRC, at off-premises locations under Recycler's control, did not exceed a combined \_\_\_\_ Units, and
4. At the close of the Month, Recycler employed \_\_\_\_\_ full-time workers (that is, working 30 or more hours/week) and \_\_\_\_\_ part-time workers (that is, working fewer than 30 hours /week).

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date



## Appendix C: Interested Collection Site Participants

In preparation for this Plan, MRC surveyed 225 collection opportunity locations across the state. The following facilities responded to MRC as indicating interest and have not entered into any contract with MRC. Upon Plan approval, MRC will take steps to secure each facility's participation as a site and issue a formal contract. No facility listed here is obligated/guaranteed to become a site. MRC will keep DEQ informed as the collection network is established.

**TABLE 8: Interested Collection Site Participants**

| County     | City          | Facility Name  |
|------------|---------------|--|
| Baker      | Baker City    | Baker Sanitary Landfill  |
| Benton     | Corvallis     | Coffin Butte Landfills   |
| Clackamas  | Clackamas     | KB Recycling   |
| Clackamas  | Oregon City   | Metro South Transfer Station   |
| Clackamas  | Sandy         | Sandy Transfer Station   |
| Clatsop    | Astoria       | Astoria Transfer Station   |
| Columbia   | St. Helens    | Columbia County HHW & Transfer Station                                       |
| Coos       | Coos Bay      | Beaver Hill Solid Waste Facility   |
| Crook      | Prineville    | Crook County Landfill  |
| Crook      | Prineville    | Prineville Disposal Reload Station   |
| Deschutes  | Bend          | Deschutes County Transfer Station & Household Hazardous Waste Facility       |
| Deschutes  | Bend          | Furnish Hope   |
| Deschutes  | La Pine       | Southwest Transfer Station   |
| Deschutes  | Redmond       | Negus Transfer Station   |
| Deschutes  | Sisters       | Northwest (Fryrear) Transfer Station   |
| Douglas    | Camas Valley  | Camas Valley Transfer Station  |
| Hood River | Cascade Locks | Emerald Systems  |
| Hood River | Hood River    | Hood River Recycling & Transfer Station + Tri-County HHW Collection Facility |
| Jackson    | Ashland       | Valley View Transfer Station   |
| Jackson    | Medford       | Rogue Transfer Station & MRF   |
| Jackson    | Medford       | Southern Oregon Goodwill Industries  |
| Jefferson  | Madras        | Box Canyon Transfer Station  |
| Josephine  | Grants Pass   | Redwood Transfer Station   |
| Klamath    | Klamath Falls | Klamath Works, Inc.  |
| Lane       | Cottage Grove | Cottage Grove Transfer Station   |
| Lane       | Cottage Grove | St. Vincent de Paul Society of Lane County - Cottage Grove Store             |
| Lane       | Eugene        | Glenwood Central Receiving Station   |
| Lane       | Eugene        | St. Vincent de Paul Society of Lane County - Garfield Store                  |
| Lane       | Florence      | Florence Transfer Station  |
| Lane       | Junction City | St. Vincent de Paul Society of Lane County - Junction City Thrift Store      |
| Lane       | Oakridge      | St. Vincent de Paul Society of Lane County - Oakridge Thrift Store           |
| Lane       | Springfield   | St. Vincent de Paul Society of Lane County - Main Street Thrift Store        |



| County     | City             | Facility Name  |
|------------|------------------|--|
| Lincoln    | Lincoln City     | Schooner Creek Private Transfer Station                          |
| Lincoln    | Newport          | Thompson's Transfer And Disposal Inc.                            |
| Lincoln    | Toledo           | Toledo Transfer Station  |
| Lincoln    | Waldport         | South Lincoln Recycle & Transfer Station                         |
| Linn       | Albany           | St. Vincent de Paul Society of Lane County - Albany Thrift Store |
| Malheur    | Ontario          | Ontario Sanitary Service Transfer Station                        |
| Marion     | Salem            | St. Vincent de Paul Society of Lane County - Salem Thrift Store  |
| Marion     | Woodburn         | Woodburn Recycle Center & Transfer Station - Republic Services   |
| Morrow     | Boardman         | North Morrow County Transfer Station                             |
| Morrow     | Lexington        | South Morrow Transfer Station                                    |
| Multnomah  | Portland         | Community Warehouse  |
| Multnomah  | Portland         | Environmentally Conscious Recycling                              |
| Multnomah  | Portland         | Far West Recycling   |
| Multnomah  | Portland         | Metro Central Transfer Station                                   |
| Multnomah  | Portland         | Suttle Road Material Recovery Facility - Recology                |
| Polk       | Monmouth         | Brandt's Sanitary Service  |
| Tillamook  | Manzanita        | Manzanita Transfer Station                                       |
| Tillamook  | Pacific City     | Pacific City Transfer Station                                    |
| Tillamook  | Tillamook        | Tillamook Transfer Station                                       |
| Umatilla   | Milton-Freewater | Milton-Freewater Recycling Center                                |
| Union      | La Grande        | Waste Pro Recovery Transfer Station                              |
| Wasco      | The Dalles       | The Dalles Transfer Station + Tri-County HHW Collection Facility |
| Washington | Forest Grove     | Forest Grove Transfer Station                                    |
| Washington | Hillsboro        | Far West Recycling   |
| Washington | Hillsboro        | Tualatin Valley Waste Recovery                                   |
| Washington | Sherwood         | Pride Disposal   |
| Washington | Tualatin         | Community Warehouse  |
| Washington | Wilsonville      | Republic Services Wilsonville                                    |
| Wheeler    | Fossil           | Fossil Solid Waste Transfer Station And Recycling Station        |
| Yamhill    | Newberg          | Newberg Transfer And Recycling Center                            |

# Appendix D: Collection Site Information Examples

MRC's [Resources Library](#) contains additional items. The most relevant to the Program were selected for this appendix.

## Information Sheet: How to Become a Collection Site

**OREGON**

# BECOMING A NO-COST MATTRESS COLLECTION SITE

In March 2022, Oregon passed the Mattress Stewardship Act (SB 1576), establishing a statewide mattress recycling program administered by the bedding industry.

The industry created the Mattress Recycling Council (MRC), a nonprofit organization, to administer this program. Bye Bye Mattress is the consumer-facing brand MRC created to promote the program.

By joining MRC's Bye Bye Mattress program, you'll provide your community a no-cost option for diverting valuable material from the waste stream, support local green jobs and help reduce illegal dumping.

### Overview

MRC's Bye Bye Mattress program has recycled more than 12 million mattresses from California, Connecticut and Rhode Island.

This is made possible by a stewardship assessment that is collected when mattresses and box springs are sold to consumers in these states.

MRC is submitting a plan to Oregon's Department of Environmental Quality proposing to start a program in 2024 that operates like those MRC currently administers.

### Acceptable and Unacceptable Items

Mattresses and box springs discarded by Oregon residents or collected in curbside bulky waste pickup are eligible for the program.

**Mattress recyclers are unable to accept:**

- Severely damaged, wet, twisted, frozen or soiled mattresses or box springs
- Items infested with bed bugs
- Mattress pads or toppers
- Sleeping bags
- Pillows
- Infant carriers, lounge pads or crib bumpers
- Juvenile products such as carriages, baskets, cribs, bassinets, dressing tables, strollers and playpens or their pads
- Water beds or camping air mattresses
- Car beds
- Fold-out sofa beds
- Futons and furniture

### What We Provide

- Collection containers at your site
- Compensation for handling and loading mattresses into the provided containers
- Transportation from your site to the contracted recycler
- Mattress recycling services
- Assistance with residential education

### Participant Benefits

Participating facilities no longer incur mattress disposal costs. MRC uses the collected stewardship assessments to pay for the transportation and recycling of the mattresses.

Program participants divert mattresses from waste-to-energy facilities and landfills and allow materials like steel, foam, fiber and wood to be reused.

### Participation Requirements

- Must register with MRC Program Coordinator for no-cost recycling services
- Provide a secure site for the collection container
- Keep mattresses dry and segregated
- Pack mattresses efficiently to maximize container capacity
- Complete required paperwork to track outgoing shipments

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www.MattressRecyclingCouncil.org

A Program of the Mattress Recycling Council

## Publicity Toolkits for Collection Sites and Collection Events

MRC's publicity toolkits help a collector promote their site or event. The toolkits:

- Describe the on-site signage MRC offers and how to reorder.
- Explain how to request an update to locator and directory listings.
- Provide ready to use information for a collector to implement in a variety of communications or marketing materials such as their website, social media, newsletters or presentations.
- Include customizable templates for a press release and flyer.
- Describe how to work with MRC on a custom project such as a direct mail campaign or local advertising.
- Include details about MRC's outreach booth and where to send event sponsorship proposals.

Per the **Implementation Timeline**, an Oregon version of the publicity toolkits will be created in the months following Plan approval.



View or download these documents: [MRC's Publicity Toolkits](#)

## Appendix E: Budget

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The Act requires that on or before October 1, 2023, and on or before July 1 annually thereafter, MRC prepare and submit to DEQ a proposed mattress stewardship Program operating budget that includes:

- a) Anticipated revenues from the assessment collected on mattress sales
- b) Costs of implementing the Program, including:
  - 1. Collection, transportation and processing of program mattresses
  - 2. Collection site compensation for reasonable actual costs to collect and manage discarded mattresses
  - 3. Administrative costs of the mattress stewardship Program
  - 4. Annual fee to be paid to the Oregon DEQ pursuant to Section 9(3) of the 2022 Act
  - 5. Anticipated unallocated reserve funds

The Act also provides that MRC will budget and report on a calendar year basis.

Pursuant to these provisions, MRC has calculated an assessment sufficient to cover the Plan's budgeted costs and to accumulate a reserve sufficient to operate the Program over a multiyear period in a prudent and responsible manner.

MRC will review the budget monthly, comparing actuals to budget. Should the assessment no longer be sufficient to support the Program, MRC will submit a Plan amendment pursuant to Section 7 of the Act proposing a change to the mattress stewardship assessment.

The Act requires that the budget cover revenue and costs for the first two years of Program operations. The exact date on which the Program will launch and operations commence, however, will depend in part on when the Plan is approved. For purposes of preparing the budget, MRC has assumed an August 1, 2024 launch date. Therefore, revenue and costs for 2024 will cover operations for only part of 2024. To submit a budget for two full years of operations (as the Act requires) and to budget on a calendar year basis, this budget covers operations for both (A) part of calendar year 2024 and (B) calendar years 2025 and 2026.

### Revenue

Funding for Program implementation and ongoing operations comes from a mattress stewardship assessment collected at the point of sale (retail or otherwise). Retailers must report the number of units sold each month and submit all assessments collected to MRC by the end of the following month in which the sale occurred.

MRC is budgeting Program assessment revenue of \$3,906,380 for partial year 2024, \$9,270,807 for 2025, and \$9,456,265 for 2026. In calculating revenue, MRC has used (A) a per unit assessment of \$22.75, which MRC has budgeted as the per unit amount needed to fund the Program over a multiyear period in a prudent and responsible manner, and (B) an estimate of the number of units that Oregon consumers will buy during the relevant calendar year. In estimating the number of units that Oregon consumers will buy, MRC considered 2023 actuals in other state mattress recycling programs and the ISPA Industry Forecast for 2024 and 2025, and then adjusted for Oregon's population. Specifically, sales

are expected to be flat in 2024 compared to 2023. 2025 budgeted sales are expected to be 3% above 2024 levels and 2026 is 2% above 2025. Based on this information, MRC estimates that for the partial year 2024, MRC will collect revenue on 171,709 units, and 407,508 and 415,660 for 2025 and 2026, respectively.

Based on these assumptions, MRC’s budgeted assessment revenue for 2024 to 2026 is based on the following units sold in Oregon and a per unit assessment of \$22.75:

**TABLE 9: Revenue Calculation**

| Category           | 2024 Budget | 2025 Budget | 2026 Budget | Total        |
|--------------------|-------------|-------------|-------------|--------------|
| Assessment Revenue | \$3,906,380 | \$9,270,807 | \$9,456,265 | \$22,633,452 |
| Units Sold         | 171,709     | 407,508     | 415,660     | 994,877      |

## Expenses

### Operational Costs

Based on our experience operating other statewide mattress recycling programs and factoring in Oregon’s population, MRC has estimated the number of units that recyclers will process in 2024, 2025 and 2026 to be 454,696.

**TABLE 10: Units Sold and Units Recycled**

| Units                    | 2024 Budget | 2025 Budget | 2026 Budget | Total   |
|--------------------------|-------------|-------------|-------------|---------|
| Number of Units Sold     | 171,709     | 407,508     | 415,660     | 994,877 |
| Number of Units Recycled | 68,683      | 176,993     | 209,020     | 454,696 |

Operational costs to recycle program mattresses include collection, transportation, processing, efforts to mitigate illegal mattress dumping, various program studies (including life cycle analysis, convenience, etc.), compliance audits, and field visits to collection sites, recyclers, and transporters. Note that there will always be a differential between units sold and units recycled. This is due to several factors including a significant time differential between when a unit is purchased and discarded. During the usable life of a mattress, it is common for consumers to pass a used mattress along to a friend or relative or sell them on local marketplace sites like Craigslist, Facebook Marketplace or OfferUp. In 2022, MRC conducted a study to estimate the average time between when units are manufactured and then discarded through the program. That study concluded the average age for all discarded units was 13.9 years.



**TABLE 11: Operational Costs**

| Category  | 2024 Budget         | 2025 Budget         | 2026 Budget         | Total                |
|---|---------------------|---------------------|---------------------|----------------------|
| Collection                                      | \$ 350,638          | \$ 845,346          | \$ 1,030,532        | \$ 2,226,516         |
| Transportation                                  | \$ 525,426          | \$ 1,353,995        | \$ 1,647,076        | \$ 3,526,497         |
| Processing                                      | \$ 1,082,169        | \$ 2,900,257        | \$ 3,528,032        | \$ 7,510,458         |
| Illegal Dump Mitigation                         | \$ 5,000            | \$ 150,000          | \$ 150,000          | \$ 305,000           |
| Program Studies (Life Cycle, Convenience, etc.) | \$ 23,400           | \$ 110,000          | \$ 148,000          | \$ 281,400           |
| Program Compliance Audits                       | \$ 5,000            | \$ 10,000           | \$ 30,000           | \$ 45,000            |
| Field Visits                                    | \$ 18,800           | \$ 13,700           | \$ 18,800           | \$ 51,300            |
| <b>Total Operational Costs</b>                  | <b>\$ 2,010,433</b> | <b>\$ 5,383,298</b> | <b>\$ 6,552,440</b> | <b>\$ 13,946,171</b> |

**Collection**

Collection costs are comprised of handling fees, container rental, mattress recycling signage and collection site improvement funding. For the purposes of preparing this budget, MRC estimates that approximately 75% of the units collected will be subject to a handling fee paid to collection sites. MRC anticipates the costs of compensating collection sites for their reasonable actual costs to manage discarded mattresses will be \$146,588 in partial year 2024, \$375,916 and \$453,833 in 2025 and 2026 respectively. The remaining 25% of the units are expected to come directly from retailers, commercial volume sources and special community collection events that will not incur handling fees.

Container rental costs are based on the estimated number and type of storage containers needed to handle units from a variety of collectors. This budget includes an accelerated timeline to contract with collection sites by the Program launch date. Subsequent years will see more collection sites and growth from commercial volume sources. Therefore, container costs increase each year. The collection facility improvement funding is discussed further in **Part 5** of this Plan.

**TABLE 12: Collection Costs**

| Collection                                       | 2024 Budget       | 2025 Budget       | 2026 Budget         | Total               |
|--|-------------------|-------------------|---------------------|---------------------|
| Collection Site Handling Fees                    | \$ 146,588        | \$ 375,916        | \$ 453,833          | \$ 976,337          |
| Collection Container and Storage                 | \$ 154,050        | \$ 419,430        | \$ 526,699          | \$ 1,100,179        |
| Mattress Collection Facility Improvement Funding | \$ 50,000         | \$ 50,000         | \$ 50,000           | \$ 150,000          |
| <b>Total Collection Costs</b>                    | <b>\$ 350,638</b> | <b>\$ 845,346</b> | <b>\$ 1,030,532</b> | <b>\$ 2,226,516</b> |

**Transportation and Recycling**

MRC uses third parties to transport mattresses from collection sites to recyclers for processing units. Transport costs vary considerably depending on the transport distance, geographic location of the collection site and the container type used to hold the discarded mattresses. Transportation costs are affected by the number of units the container can hold, the distance the transporter travels to the recycling facility and fuel costs.

Recycling costs, paid to third party contracted recyclers on a per unit basis, are for the dismantling and processing of program mattresses. These costs are directly related to the

number of program mattresses collected.

### *Illegal Dump Mitigation*

MRC has allocated funds to mitigate the costs of illegal dumping as discussed in **Part 10** of this Plan. This includes costs associated with meetings, community surveys, data collection and pilot projects.

### *Program Studies*

In future years, MRC is also required to conduct a life cycle analysis, report on the scope of discarded mattresses that are not being collected as part of the Program and study effective methods for providing discarded mattress collection services to low-income individuals and multifamily housing structures. Costs for these studies will be incurred in 2025 and 2026. The budget also includes convenience analysis studies in 2024 and 2026.

### *Program Compliance*

Recycler performance audits and inspections for environmentally sound management practices will be conducted annually for contracted recyclers as discussed in **Part 7** of this Plan. In 2026, the budget also includes \$20,000 for a third party to perform a program audit.

### *Field Visits*

This budget includes staff travel expenses associated with regular meetings and inspections of recyclers and collection sites. In 2024, this cost is slightly higher as we have accelerated the process for recruiting collection sites.

## **Public Education, Advertising and Promotion**

MRC’s comprehensive education and communication efforts targeting retailers, producers, renovators and consumers is described in detail in **Part 11** of this Plan. Oregon shares costs for hosting and maintaining the consumer- and industry-facing websites (ByeByeMattress.com, MattressRecyclingCouncil.org and MRCreporting.org) with our other state recycling programs. Shared costs are based on each state’s population. In order to achieve its objectives with the state, MRC’s marketing team will also prepare an annual report in compliance with the Act. All of these activities through year-end 2026 are included in the \$756,889 budget listed below.

**TABLE 13: Public Education, Advertising and Promotion Costs**

| Category                           | Start-Up Costs<br>2022-2023 | 2024<br>Budget    | 2025<br>Budget    | 2026<br>Budget    | Total             |
|------------------------------------|-----------------------------|-------------------|-------------------|-------------------|-------------------|
| Advertising and Consumer Education | \$ 22,963                   | \$ 152,272        | \$ 125,345        | \$ 94,345         | \$ 394,925        |
| 3 <sup>rd</sup> Party PR Agencies  | \$ 2,965                    | \$ 45,750         | \$ 82,750         | \$ 82,750         | \$ 214,215        |
| Industry and Stakeholder Outreach  | \$ 10,043                   | \$ 19,425         | \$ 16,990         | \$ 14,062         | \$ 60,520         |
| Conferences and Events             | \$ -                        | \$ 18,073         | \$ 18,573         | \$ 20,583         | \$ 57,229         |
| Annual Report                      | \$ -                        | \$ -              | \$ 15,000         | \$ 15,000         | \$ 30,000         |
| <b>Total Costs</b>                 | <b>\$ 35,971</b>            | <b>\$ 235,520</b> | <b>\$ 258,658</b> | <b>\$ 226,740</b> | <b>\$ 756,889</b> |

## DEQ Oversight Fees

The Act requires that MRC pay DEQ an annual fee that is reasonably calculated to cover the costs to the department to administer, implement and enforce the Act. The budget reflects the annual fee that MRC understands DEQ will charge MRC.

## Program Administration Costs

MRC administration costs include management and administrative expenses, professional services (e.g., financial audit), government relations, legal and other administrative expenses required to manage the Program. Administration costs also include corporate expenses incurred by MRC Inc. which are shared among other state mattress recycling programs to provide general administrative support. At present, similar mattress recycling programs operate in California, Connecticut, and Rhode Island. These expenses are allocated to each state program based on its relative population. At the time of Plan submission, Oregon represents 8.8% of the total population of the four states. That means that for purposes of this budget, 8.8% of shared expenses have been allocated to the Oregon Program. Total administration costs for the Program for the period 2024-2026 plus start-up costs from 2022-2023 represent 14% of total Program costs.

### Start-Up Costs

From 2022 to 2024, MRC incurred various start up expenses. These included legal expenses incurred to form MRC, staff administrative costs and professional services required to prepare this Plan and contact mattress sellers in Oregon (as well as to prepare and review RFP's for recycling and transportation services), travel and other necessary expenses incurred to prepare to launch the Program. MRC funded these start-up expenses by borrowing money from MRC Inc. MRC will incur additional start-up costs in 2024 until the Program launches. In total, MRC anticipates borrowing \$1.6 million. MRC has budgeted \$118,420 in interest expense on its loan and anticipates that the loan can be repaid by mid-2025.

**TABLE 14: DEQ Oversight and MRC Administration Costs**

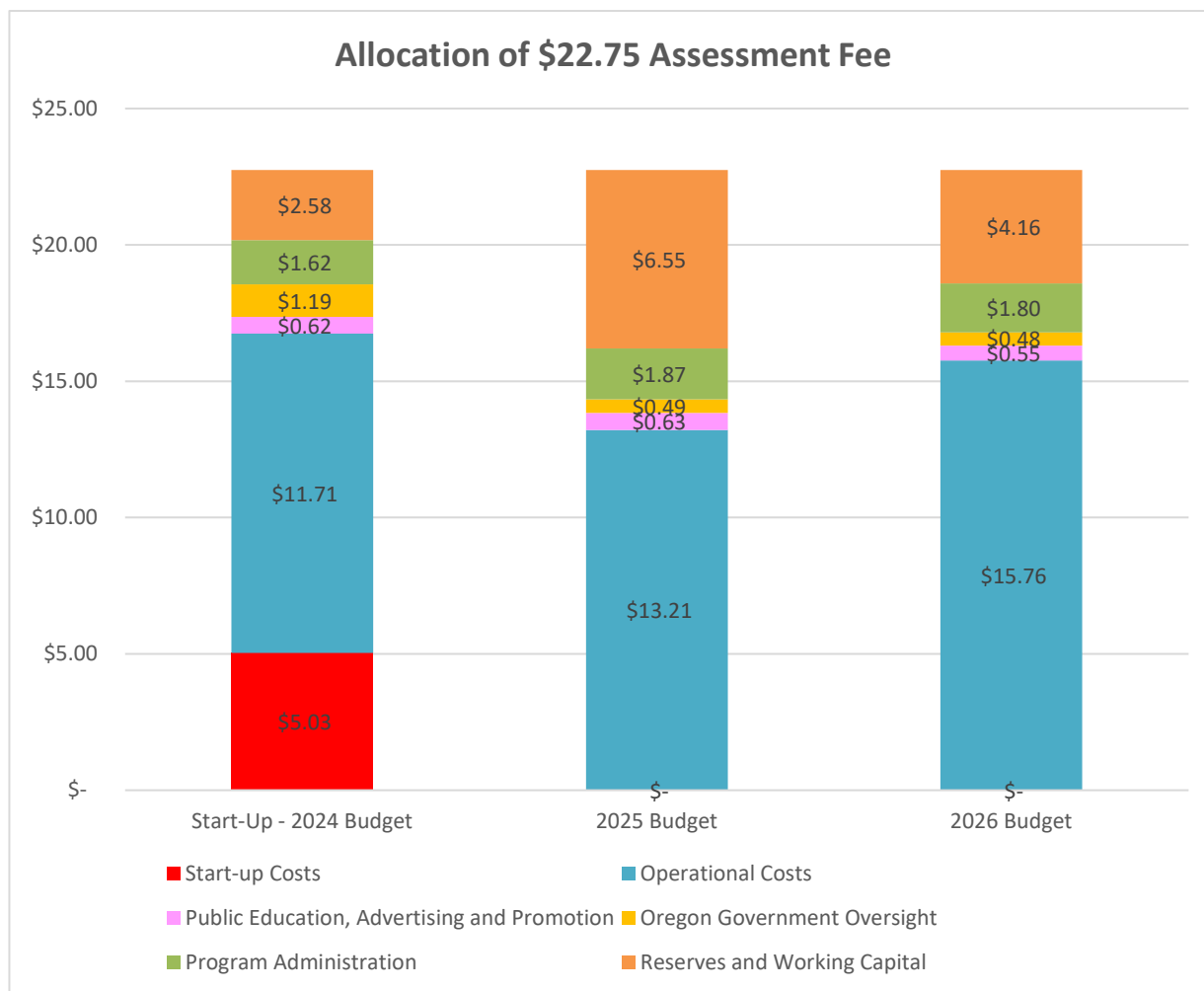
| Category                             | Start-Up Costs<br>2022-2023 | 2024<br>Budget    | 2025<br>Budget    | 2026<br>Budget    | Total               |
|--------------------------------------|-----------------------------|-------------------|-------------------|-------------------|---------------------|
| <b>DEQ Government Oversight Fees</b> | \$ -                        | \$ 205,000        | \$ 200,000        | \$ 200,000        | \$ 605,000          |
| <b>Program Administration</b>        |                             |                   |                   |                   |                     |
| Management and Administrative        | \$ 221,136                  | \$ 388,340        | \$ 614,844        | \$ 637,602        | \$ 1,861,922        |
| Annual Audit/Tax Filings             | \$ -                        | \$ 10,000         | \$ 25,000         | \$ 25,000         | \$ 60,000           |
| Industry and Government Relations    | \$ 90,000                   | \$ 60,000         | \$ 60,000         | \$ 60,000         | \$ 270,000          |
| Legal Expenses                       | \$ 9,131                    | \$ 51,000         | \$ 51,000         | \$ 16,000         | \$ 127,131          |
| Program Travel                       | \$ 22,704                   | \$ 9,000          | \$ 7,000          | \$ 9,000          | \$ 47,704           |
| Interest Expense                     | \$ 24,420                   | \$ 90,019         | \$ 3,981          | \$ -              | \$ 118,420          |
| <b>Total Administration</b>          | <b>\$ 367,391</b>           | <b>\$ 608,359</b> | <b>\$ 761,825</b> | <b>\$ 747,602</b> | <b>\$ 2,485,177</b> |



All costs for this Program, including the start-up costs, are shown in the following table:

**TABLE 15: 2022-2026 Expenses**

| Category                                       | Start-Up Costs<br>2022-2023 | 2024<br>Budget      | 2025<br>Budget      | 2026<br>Budget      | Total                |
|--|-----------------------------|---------------------|---------------------|---------------------|----------------------|
| Operational Costs                              | \$ -                        | \$ 2,010,433        | \$ 5,383,298        | \$ 6,552,440        | \$ 13,946,171        |
| Public Education,<br>Advertising and Promotion | \$ 35,971                   | \$ 235,520          | \$ 258,658          | \$ 226,740          | \$ 756,889           |
| DEQ Oversight                                  | \$ -                        | \$ 205,000          | \$ 200,000          | \$ 200,000          | \$ 605,000           |
| Program Administration                         | \$ 367,391                  | \$ 608,359          | \$ 761,825          | \$ 747,602          | \$ 2,485,177         |
| <b>Total Program Costs</b>                     | <b>\$ 403,362</b>           | <b>\$ 3,059,312</b> | <b>\$ 6,603,781</b> | <b>\$ 7,726,782</b> | <b>\$ 17,793,237</b> |



In 2024, the \$22.75 assessment collected on each mattress or boxspring sold will include:

- \$11.71 for Program operational costs
- \$5.03 for start-up costs incurred prior to Program launch
- \$2.58 allocated to build MRC’s reserves and working capital
- \$1.62 for program administration
- \$1.19 for DEQ Oversight
- \$0.62 for public education and advertising

Once MRC repays the money it has borrowed to fund Program start-up costs, a larger percentage of the collected assessment will cover Program operations, \$13.21 and \$15.76 in 2025 and 2026 respectively.

### Calculating the Per Unit Assessment

Total budgeted expenses through 2026 (including start-up costs) is \$17,793,237. We add targeted reserve funding through December 31, 2026 of \$2,935,203, as well as three months working capital of \$1,931,696 to cover short term cash flow requirements. From this, we deduct budgeted investment revenue earned during the period of \$26,684. That leaves a total of \$22,633,452 that must be funded by the per unit assessment. MRC anticipates that during the period from August 1, 2024 through December 31, 2026, Oregon consumers will buy 994,877 mattresses and foundations. Based on this information, MRC calculates the per unit assessment of \$22.75 by dividing the sum of total costs, unallocated reserves and working capital (less investment revenue<sup>1</sup>) by total units sold ( $\$22,633,452 / 994,877 = \$22.75$ ). Any delay in the Program launch beyond August 1, 2024 will change expenses and the assessment calculation illustrated below:

**TABLE 16: Per Unit Assessment Calculation**

| Stewardship Assessment                           |               |
|--|---------------|
| Total Expenses (A)                               | \$ 17,793,237 |
| Working Capital + Target Unallocated Reserve (B) | \$ 4,866,899  |
| Less Investment Income (C)                       | \$ (26,684)   |
| Amount to Cover (D = A + B - C)                  | \$ 22,633,452 |
| Projected Unit Sales 2024-2026 (E)               | 994,877       |
| Per Unit Assessment (F = D/E)                    | \$ 22.75      |

### Unallocated Reserve Funds

As with the other states, the MRC Board has established a reserve policy that directs MRC management to have sufficient operating cash to fund operations (e.g., cash on hand equal to approximately three months of expenses), and a prudent level of unallocated reserves (Board Designated Financial Reserve) that allow MRC to be prepared in case its operational expenses increase or planned revenues decrease as a result of external factors. The amount that MRC sets aside in this reserve is influenced by several factors.

First, the Program must be able to adjust to unforeseen circumstances that can have a substantial impact on MRC's expenses. These circumstances could include accidents and natural disasters, or operational or financial disruptions. Significant or sudden changes in market dynamics that affect costs (e.g., fuel) or failure of secondary markets for recycled components, political uncertainties, or any combination of the above could also significantly affect the Program and its budget. As an example, the COVID-19 pandemic and subsequent inflation significantly disrupted budgets, eventually resulting in unpredicted cost increases beyond MRC's control.

Second, the reserve protects the long-term viability of the program by setting aside money that can fund budget deficits without necessitating frequent adjustments in the assessment.

<sup>1</sup> MRC anticipates earning investment revenue on its unallocated reserves beginning 4<sup>th</sup> quarter of 2025.

Third, MRC's ability to operate prudently over a multiyear period depends in part on MRC's forecasted operating and administrative expenses for several years into the future. For the next few years, MRC expects to increase its expenditure as it continues to develop the Program's collection network and increase the number of units collected and recycled. This growth will result in MRC's annual expenses increasing in the future.

Finally, MRC must be prepared in case its revenue stream (that is, assessment collected on the sale of mattresses) is significantly or suddenly disrupted. This could include a downturn in the U.S. economy or mattress sales (as experienced recently) or other events that are external to the Program itself, like legislative or regulatory initiatives that disrupt sales.

For these reasons, MRC has budgeted to build a reasonable unallocated reserve of \$2,935,203, not to exceed 75% of annual expenses, by 2026. The unallocated reserves at the end of 2026 represents 4.5 months (38%) of annual program expenses.

The details of the anticipated budget are as follows on the next page:

**TABLE 17: Proposed Budget**

| Mattress Recycling Council Oregon LLC                     |                |              |              |              |               |                    |
|---|----------------|--------------|--------------|--------------|---------------|--------------------|
| Assessment Fee  | \$             | 22.75        |              |              |               |                    |
|   | Start-Up Costs | 2024 Budget  | 2025 Budget  | 2026 Budget  | Total         | Expense Allocation |
| <b>REVENUE:</b>   |                |              |              |              |               |                    |
| Assessment Revenue  | \$ -           | \$ 3,906,380 | \$ 9,270,807 | \$ 9,456,265 | \$ 22,633,452 |                    |
| <b>Total Revenue</b>                                      | \$ -           | \$ 3,906,380 | \$ 9,270,807 | \$ 9,456,265 | \$ 22,633,452 |                    |
| <b>EXPENSES:</b>  |                |              |              |              |               |                    |
| <b>Operational Costs</b>                                  |                |              |              |              |               |                    |
| Collection  |                |              |              |              |               |                    |
| Collection Site Handling Fees                             | \$ -           | \$ 146,588   | \$ 375,916   | \$ 453,833   | \$ 976,337    |                    |
| Collection Container and Storage Costs                    | \$ -           | \$ 154,050   | \$ 419,430   | \$ 526,699   | \$ 1,100,179  |                    |
| Mattress Collection Facility Improvement Funding          | \$ -           | \$ 50,000    | \$ 50,000    | \$ 50,000    | \$ 150,000    |                    |
| Total Collection Costs                                    | \$ -           | \$ 350,638   | \$ 845,346   | \$ 1,030,532 | \$ 2,226,516  |                    |
| Transportation  | \$ -           | \$ 525,426   | \$ 1,353,995 | \$ 1,647,076 | \$ 3,526,497  |                    |
| Processing  | \$ -           | \$ 1,082,169 | \$ 2,900,257 | \$ 3,528,032 | \$ 7,510,458  |                    |
| Illegal Dump Mitigation                                   | \$ -           | \$ 5,000     | \$ 150,000   | \$ 150,000   | \$ 305,000    |                    |
| Program Studies (Life Cycle, Convenience, etc.)           | \$ -           | \$ 23,400    | \$ 110,000   | \$ 148,000   | \$ 281,400    |                    |
| Program Compliance Audits                                 | \$ -           | \$ 5,000     | \$ 10,000    | \$ 30,000    | \$ 45,000     |                    |
| Field Visits  | \$ -           | \$ 18,800    | \$ 13,700    | \$ 18,800    | \$ 51,300     |                    |
| <b>Total Operational Costs</b>                            | \$ -           | \$ 2,010,433 | \$ 5,383,298 | \$ 6,552,440 | \$ 13,946,171 | 78.4%              |
| <b>Public Education, Advertising, and Promotion</b>       |                |              |              |              |               |                    |
| Public Education and Advertising                          | \$ 35,971      | \$ 217,447   | \$ 225,085   | \$ 191,157   | \$ 669,660    |                    |
| Conferences and Events                                    | \$ -           | \$ 18,073    | \$ 18,573    | \$ 20,583    | \$ 57,229     |                    |
| Annual Report   | \$ -           | \$ -         | \$ 15,000    | \$ 15,000    | \$ 30,000     |                    |
| <b>Total Public Education, Advertising, and Promotion</b> | \$ 35,971      | \$ 235,520   | \$ 258,658   | \$ 226,740   | \$ 756,889    | 4.2%               |
| <b>Oregon Government Oversight Fees</b>                   | \$ -           | \$ 205,000   | \$ 200,000   | \$ 200,000   | \$ 605,000    | 3.4%               |
| <b>Program Administration</b>                             |                |              |              |              |               |                    |
| Management and Administrative Expenses                    | \$ 221,136     | \$ 388,340   | \$ 614,844   | \$ 637,602   | \$ 1,861,922  |                    |
| Annual Financial Audit and Tax Filings                    | \$ -           | \$ 10,000    | \$ 25,000    | \$ 25,000    | \$ 60,000     |                    |
| Industry and Government Relations                         | \$ 90,000      | \$ 60,000    | \$ 60,000    | \$ 60,000    | \$ 270,000    |                    |
| Legal Expenses  | \$ 9,131       | \$ 51,000    | \$ 51,000    | \$ 16,000    | \$ 127,131    |                    |
| Program Travel  | \$ 22,704      | \$ 9,000     | \$ 7,000     | \$ 9,000     | \$ 47,704     |                    |
| Interest Expense  | \$ 24,420      | \$ 90,019    | \$ 3,981     | \$ -         | \$ 118,420    |                    |
| <b>Total Administration</b>                               | \$ 367,391     | \$ 608,359   | \$ 761,825   | \$ 747,602   | \$ 2,485,177  | 14.0%              |
| <b>Total Expenses</b>                                     | \$ 403,362     | \$ 3,059,312 | \$ 6,603,781 | \$ 7,726,782 | \$ 17,793,237 | 100.0%             |
| <b>Net Operating Assets</b>                               | \$ (403,362)   | \$ 847,068   | \$ 2,667,026 | \$ 1,729,483 | \$ 4,840,215  |                    |
| <b>Net Investment Return</b>                              | \$ -           | \$ -         | \$ 2,176     | \$ 24,508    | \$ 26,684     |                    |
| <b>Net Assets</b>   | \$ (403,362)   | \$ 847,068   | \$ 2,669,202 | \$ 1,753,991 | \$ 4,866,899  |                    |
| <b>Cumulative Net Assets</b>                              | \$ (403,362)   | \$ 443,706   | \$ 3,112,908 | \$ 4,866,899 |               |                    |
| <b>Reserve Funds</b>                                      |                |              |              |              |               |                    |
| Board Designated Financial Reserve (Unallocated Reserves) | \$ -           | \$ -         | \$ 1,461,963 | \$ 2,935,203 |               |                    |
| Reserves as a % of Annual Operating Budget                | 0.0%           | 0.0%         | 22.1%        | 38.0%        |               |                    |
| Undesignated Net Assets (Working Capital)                 | \$ -           | \$ 443,706   | \$ 1,650,945 | \$ 1,931,696 |               |                    |
| 25% (3 months) of Annual Operating Budget                 | 25.0%          | 25.0%        | 25.0%        | 25.0%        |               |                    |

## Appendix F: MRC's Responses to DEQ's Comments

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By letter dated December 28, 2023, DEQ informed MRC that it had rejected MRC's Program Plan submitted on September 29, 2023. To help facilitate DEQ and other stakeholder review of this Revised Program Plan, we have added this Appendix which annotates DEQ's letter to provide a "road map" that identifies where to find in the Plan information responsive to specific points that DEQ has raised.

Each of DEQ's comments are italicized and quoted verbatim below and in the order in which they appear in the December 28, 2023, letter.

### 1. Overall Plan Formatting

- a. *For readability, DEQ suggests that MRC remove plan guide language contained at the beginning of each new part, throughout the Plan. For example, in Part 5:*

#### **Part 5 – Collection**

~~The Mattress Stewardship Act requires a stewardship organization to operate at least one collection sites in every county with a population of 10,000 or more, plus an additional 25 sites to be distributed throughout the state to extend convenient service to all persons in the state. A stewardship organization must establish and maintain collection sites at permitted solid waste facilities or other suitable site for the collection of discarded mattresses, such as organizations that recycle or renovate mattresses, reuse stores or locations on tribal land. In counties that have a population of less than 10,000 people and that do not have a permanent collection site, at least one collection site per year must be held in that county.~~

~~It is preferred that a stewardship organization use Portland State University population data when planning for the convenience standard. <https://www.pdx.edu/population-research/population-estimate-reports>~~

- b. *Similarly, DEQ suggests that MRC remove the plan guide language at the beginning of each subpart, and instead summarize the topic of the subpart. For example, in Part 5(b):*  
*"b) If proposing alternative methods to providing convenient service..." could be shortened to "b) alternative methods to providing convenience service."*

**MRC Response:** Stakeholders reading the Plan would have a difficult time understanding responses that do not directly respond to Plan sections required by statute. Responses throughout this revised Plan include important reference points from the DEQ Plan Guidelines issued on September 1, 2023 and DEQ's Plan rejection letter dated December 28, 2023. For those reasons, MRC is retaining the guide text boxes inserted in the Plan.

- c. *When listing multiple items, consider organizing them under subheadings and/or numbering, instead of bulleting the list. This will make it easier to reference.*

**MRC Response:** MRC considered this request and where appropriate, assigned numbers to lists to either emphasize priority or to organize a sequential process. Bullets are used in lists where items are not related or not describing a sequence of events.

### **Part 3 – Implementation Timeline**

2. *Please reformat the current information in Part 3 into a timeline layout for better clarity. As an example, DEQ suggests a table with tasks listed in sequential order, including when deliverables will occur and how long they will take to complete. DEQ understands that MRC may not be able to provide exact dates or that some tasks may be ongoing.*

**MRC Response:** The Implementation Timeline has been reformatted to comply with this request. We introduced more subheadings to give a better indication of when a deliverable will occur and how long it would take to complete.

3. *In the From Plan approval to Program Launch timeline, DEQ suggests revising as follows for clarity:*

*Deliver retailer point-of-sale materials to all retailers registered with MRC (for receipt by all retailers 1-2 weeks before Program launch, then distributed as requested).*

**MRC Response:** The Implementation Timeline has been revised to consider this suggestion for stakeholder clarity.

4. *Section 18(2) of the Act requires a stewardship organization to implement a mattress stewardship program no later than seven months after the date that the initial Plan is approved. Please revise the timeline and other parts of the Plan to describe how MRC will meet the required convenience standard through collection sites and events within seven months of plan approval, as described at Section 5(1)(a) of the Act, or actions that will provide an equivalent level of convenient service throughout the state as provided at Section 5(1)(b) of the Act. Revisions should demonstrate how MRC will complete all tasks needed to start collecting and managing discarded mattresses, including providing the public-facing website, container delivery, signage and commitment from all participating collection sites, recyclers and other entities to meet program requirements within seven months of plan approval.*

*For example, the following bullets on page 7 of the Plan suggest that the Program will not be ready to receive program mattresses within seven*

*months of plan approval:*

*From Plan approval to Program Launch (which will occur within seven months of DEQ's Plan approval):*

- *Contract with collection sites (ongoing multi-year task (2024-2029))*

*From Program launch to end of the Plan term:*

- *Deliver containers to collection sites (first week of Program launch, ongoing as new sites join the Program)*
- *Deliver recycler and collection site signage (first week of Program launch, ongoing as new sites join the Program)*
- *Activate Oregon reporting and assessment remittance capabilities in the reporting portal (within first two weeks of Program launch)*

**MRC Response:** The **Implementation Timeline** has been reformatted to comply with this request. A description of how MRC will provide convenient service can also be found in **Part 5(a-b)**.

5. *Please provide more information about the survey proposed on page 8 of the Plan, including the method of delivery, the sample sizes, the related margins of error and confidence intervals, the level of disaggregation, whether the survey will take into account urban and rural areas, racial demographics, low-income individuals and people living in multifamily housing structures, and the methodology to ensure an accurate representation of different demographic and geographic groups in Oregon.*

- *Survey Oregon consumers (by August 2025, and each year thereafter)*

**MRC Response:** **Part 11(a) - Measuring Impact of Outreach** includes more information regarding the survey.

6. *A stewardship organization, if seeking DEQ approval for alternative convenient services, should propose such services in its plan, per Section 5 of the Act.*

*Additionally, if proposing alternative methods to providing convenient service, the stewardship organization should describe and provide information sufficient to support how the alternative methods will result in providing service to residents throughout this state at an equivalent level of convenient service compared with the number of collection sites and events required under the Act.*

*On page 8 of the Plan, please revise the following task to reflect the timeframe of this requirement if MRC determines the need for proposing alternative methods for convenient service:*

- *Propose methods for alternative convenient service measurement to DEQ (2025, if necessary)*



**MRC Response:** MRC will not propose alternative convenient services per Section 5 of the Act. The language has been removed from the Program Plan submittal. A description of how MRC will provide convenient service can be found in **Part 5(a-b)**.

7. *At the bottom of page 8, the following bullet should have these additional details:*
- *Report to DEQ on relevant changes (including number, **name, and address** of permanent collection sites, registered retailers and producers, and Program recyclers and reuse organizations managing discarded Program mattresses) (monthly)*

**MRC Response:** The **Implementation Timeline - Upon Program Launch** section is revised to add more details.

#### **Part 4 – Program Operations**

8. *On page 9, please include the following clarification, if accurate:*
- To comply with federal and state laws, MRC will take the following steps:*
- 2. Stay Updated: Given that laws and regulations can change over time, MRC will **promptly** review any updates or amendments that may affect our compliance.*

**MRC Response:** See edits to **Part 4(a)(2)**.

9. *Please clarify when MRC will establish the internal policies and procedures specified on page 9 to ensure that the mattress stewardship program will operate in accordance with the Act beginning the day of Program launch:*
- 4. Develop Compliance Policies and Procedures: MRC will establish internal policies and procedures that outline how we will comply with applicable laws and regulations.*

**MRC Response:** **Part 4(a)(3)** is revised to clarify that MRC will establish internal policies and procedures prior to Program launch.

10. *Please clarify whether MRC will review and assess compliance practices at least monthly, quarterly, or on some other recurring schedule; to “regularly review” does not provide enough information (as seen on page 9):*
- 7. Conduct Audits and Assessments: MRC will regularly review and assess our compliance practices to identify potential areas of weakness, non-compliance or improvement.*

**MRC Response:** MRC has revised **Part 4(a)(6)** to clarify that compliance practices will undergo annual reviews.



11. *In Part 4(b), on page 10, in describing how program mattresses will be identified, please describe how mattresses will be screened to determine whether they are program mattresses, as required at Section 4(1)(b) of the Act. Please include this information in Part 5(e) of the Plan as needed, to explain collection site guidelines and requirements.*

**MRC Response:** Part 4(b) clarifies how program mattresses are identified. The Oregon Collection Site Guidelines found in Appendix B also describe how collectors should screen mattresses. Part 5(e) has also been updated to include more details on the Collection Site Guidelines.

12. *In Part 4(b), on page 10, MRC proposes to limit program mattresses to those discarded by Oregon residents. Section 2 of the Act defines “discarded mattress” and “program mattress” without reference to Oregon residency. Please make changes throughout the Plan to remove state residency as a criterion for accepting mattresses into the program and ensure consistency with the definitions of “discarded mattress” and “program mattress” at Section 2 of the Act. For example: Consistent with these terms, MRC will consider Program mattresses to be those mattresses that have been discarded in Oregon by Oregon residents.*

**MRC Response:** Part 4(b) is revised as well as other sections throughout the Plan.

13. *In Part 4(c) please add details to describe how the program will handle discarded mattresses that are received through collection sites or collection events and that are not program mattresses. This should explain how mattresses received through the program, which do not meet the definition of program mattresses, will be handled. Please include this information in Part 5(e) of the Plan as needed, to explain collection site guidelines and requirements.*

**MRC Response:** Part 4(c) and Part 5(e) have been revised to clarify how collection sites may handle non-program mattresses.

14. *The Plan should clarify how the Program will work to prevent acceptance of out-of-state mattresses generally, not only at the Washington border. For example, on page 10 in Part 4(c), the Plan could be revised as follows:*

*The nearest significant out-of-state population center is in Washington state near the Oregon border. The mitigation tools that MRC **will use** ~~intends to use (as needed)~~ to prevent non-Program units from ~~Washington~~ **outside the state** from entering the Program include:*

**MRC Response:** Part 4(c) is revised to clarify how the Program will prevent out-of-state mattresses from entering the Program.

15. On page 11, in the third paragraph of Part 4(c) the below bullet should be edited to be more consistent with statutory language:
- Point-of-sale materials to inform residents who buy a mattress from an Oregon retailer that they may not have their discarded mattress recycled through the Program. For example:*
- Point-of-sale materials to inform consumers that mattresses may not be transported from outside of Oregon to be discarded in this state.***

**MRC Response:** Part 4(c) has been revised to be more consistent with statutory language.

16. The last bullet in Part 4(c) on page 11, as shown below, should be removed as an option to address the issue of non-program mattresses. As written, the option may result in MRC, at its discretion, excluding program mattresses from the program.

**MRC Response:** Part 4(c) is edited to remove the last bullet point.

17. Please remove the legal analysis offered on page 11 in Part 4(d) and elsewhere in the Plan regarding the purpose of plan requirements. DEQ is open to accepting the contact name, phone number, and address of producers, renovators and retailers through a separate submission with a claim of confidentiality. However, DEQ can only provide confidentiality to the extent allowed by law.

~~The purpose of this requirement is to identify for the public which entities are registered for the Program. The Act does not require that the Plan also list each registrant's contact name, phone number and e-mail address. To protect the privacy of those individuals, MRC has concluded that it is not appropriate to provide such personal information in a public document such as the Plan.~~

~~For example:~~

~~Appendix A contains a list of company names and addresses of each producer, renovator and retailer that have registered with the Program as of August 30, 2023 (30 days before Plan submittal). This list will continue to grow as important Program milestones are reached, including DEQ's approval of the Plan, announcement of the assessment and the Program start date.~~

**MRC will provide the contact name, phone number and address to DEQ and request confidentiality.**

**MRC Response:** The legal analysis regarding the purpose of Plan requirements has been removed in Part 4(d) and elsewhere. MRC has reviewed Oregon privacy laws and determined that they do not apply to business contact information. Appendix A has been revised.

18. *Pertaining to the proposed transporters and recyclers listed in tables 1 and 2 on page 12, please clarify:*

- a. *Whether MRC confirmed that the proposed transporters and recyclers hold the required licenses and meet the other requirements to transport and recycle program mattresses in accordance with all applicable laws and regulations.*
- b. *Whether the proposed transporters and recyclers have indicated interest in participating in the proposed program.*

**MRC Response:** Part 4(e) is revised to address DEQ's requested information.

19. *Either in Part 4(f), or a new subpart based on MRC's organizational preferences, please re-locate all program recycling standards and requirements from Appendix B, into Part 4 of the Plan.*

**MRC Response:** The page count and non-conforming file types of these documents makes integrating them into the text of a Word document complex, difficult to format and disruptive to the reader and flow of Part 4. Including them as Appendices in no way diminishes their importance to the Program. They are listed in the Appendices as a document design best practice.

20. *In Part 4(f) on page 12, the Plan states, Program mattresses are eligible for collection and recycling under the Program at no charge to the consumer, regardless of which company manufactured that unit. "Eligible" suggests, but does not clarify, under what circumstances a consumer may be charged for collection and recycling. Please revise this statement to clarify that MRC will provide for the environmentally sound management of program mattresses, regardless of the producer, with no charge at the point of collection of discarded mattresses, except that MRC may allow for a person that provides a premium service under the mattress stewardship program to charge for the additional cost of that premium service.*

**MRC Response:** Part 4(f) is revised to incorporate the suggested language.

21. *Throughout Part 4(f) MRC mentions 'environmentally sound management practices' but also references Appendix B's 'Recycling Standards'. Please clarify the relationship between MRC's Recycling Standards and 'environmentally sound management' as set forth in the Act.*

*For example, are environmentally sound management practices as required by the Act fulfilled in part, through the incorporation and required adherence to the requirements of MRC's Recycling Standards?*

**MRC Response:** Part 4(f) is revised to clarify the recycler's requirements to adhere to environmentally sound management practices.

22. *Please revise Part 4(f) to more clearly describe how MRC, as the stewardship organization, will provide for the environmentally sound management of program mattresses. For example, on page 12:*

*MRC will ensure that all entities it contracts with to implement the mattress stewardship program will ~~hire third parties who~~ will use environmentally sound management practices to collect, transport and recycle discarded units.*

**MRC Response:** Part 4(f) is revised to describe how MRC will provide for the environmentally sound management of program mattresses.

23. *Pertaining to the third to the last paragraph in Part 4(f) on page 13, please include the underlined language and please describe whether the performance metrics mentioned will be listed in the Recycling Standards:*

*MRC will contract with mattress recyclers that can establish that they have the ability to use environmentally sound management practices to provide the required mattress recycling services, and that will agree to comply with both contractual performance metrics and relevant federal, state and local legal requirements, including the Mattress Stewardship Act.*

**MRC Response:** Part 4(f) is revised to include the requested language.

24. *On page 13 in the last paragraph of Part 4(f) MRC states the following; please clarify when DEQ will be notified of a failure to comply with such standards, and what steps, including terminating the use of a recycler or collection site, MRC will take to remedy non-compliance.*

*The recyclers with which MRC will contract will be required by contract to comply with Recycling Standards (see Appendix B).*

**MRC Response:** Part 4(f) has been to address the remediation of non-compliance and the notification process to DEQ.

25. *Please describe in Part 4(g) of the Plan, how MRC is prioritizing renovation or recycling over disposal, as required at Section 5(2)(e) of the Act.*

**MRC Response:** Part 4(g) has been revised to further describe how renovation and recycling are prioritized over disposal.

26. *On page 14 in the second paragraph, please provide examples of best practices referenced: In order to minimize the number of units that cannot be recycled for these reasons, MRC will work with collectors to implement best practices.*

**MRC Response:** Part 4(g) has been revised to include examples of best practices for mattress handling.

27. Please revise the third paragraph on page 14, to state that reuse organizations may also participate as collection sites.

*As a result, used mattress sellers and renovators of used mattresses who comply with relevant federal and state laws may also participate in the Program as collection sites.*

**MRC Response:** Part 4(g) has been revised to include reuse organizations.

28. In either Part 4(g) or (h), please clarify at what stage mattresses in the mattress program are evaluated and identified for reuse and renovation.

**MRC Response:** Part 4(h) has been revised.

29. In Part 4(h) on page 14, please confirm that contaminated landfill units will be reported. For example:

*After discarded mattresses arrive at a recycling facility, the recycler will unload the container. At its discretion, a recycler may landfill units contaminated with bedbugs or putrescible solid waste, or that may not otherwise be in recyclable condition, to minimize facility contamination and worker exposure to health and safety risks. **These mattresses will be reported in the annual report as required at Sections 9(2)(f) and (g) of the Act.***

**MRC Response:** Part 4(h) has been revised to state that recyclers will report to MRC the number and weight of mattresses sent to landfill.

## Part 5 – Collection

30. Please revise Parts 5(a) and (b) of the Plan to describe how MRC will provide convenient collection service to all areas of the state, as required by Section 5 of the Act, within seven months of plan approval. If MRC does not anticipate being able to establish the minimum number of collection sites required by statute by Program launch, MRC may, as set forth at Section 5 of the Act, propose in the Plan alternative methods to providing convenience. If MRC proposes alternative services, the Plan should describe how MRC will provide for the environmentally sound management of program mattresses under these alternative methods.

**MRC Response:** See edits to Part 5(a-b). MRC will not propose alternative convenient services per Section 5 of the Act.

31. In Part 5(c), please describe MRC's process for identifying and gauging interest of prospective collection sites and event sites, including organizations that recycle, reuse or renovate discarded mattresses.

**MRC Response:** See edits to **Part 5(c)** and **Appendix C** for detail about this process.

32. *In Part 5(c) please describe whether and how MRC will consider communities traditionally underserved by convenient waste collection services when locating a collection site to extend convenient service.*

**MRC Response:** See edits to **Part 5(c)**. MRC will provide convenient service by establishing collection sites or collection events in accordance with the Act in both urban and rural communities across Oregon. MRC will conduct a study in 2026 on the most effective methods of providing discarded mattress collection services to low-income individuals and multifamily housing structures.

33. *In Part 5(c), at the top of page 17, MRC states the following; please describe circumstances that MRC considers as “necessary and appropriate.”*  
*MRC will as necessary and appropriate provide information about best practices for improving operational efficiency and stacking and loading units efficiently and safely, as well as offer suggestions to improve the quality and condition of collected mattresses and recycled materials.*

*In the same paragraph, please describe what MRC considers as “necessary” as shown here:*

*MRC will also provide necessary facility signage, invoicing support, etc.*

**MRC Response:** **Part 5(c)** has been edited. See **Appendix B** for examples of collection site resources.

34. *All requirements and guidelines of a collection site or event should be clearly stated in the Plan. Either in Part 5(e), or a new subpart, based on MRC’s organizational preferences, please include these collection site requirements.*

**MRC Response:** See edits to Part 5(e). Additionally, Oregon Collection Site Guidelines have been added as **Appendix B**.

35. *As part of collection site requirements in Part 5 of the Plan, please describe the collection site standards that MRC will require of participating collection sites to ensure the environmentally sound management of program mattresses and compliance with all applicable federal, state, local and other laws and regulations.*

*For example, the Plan can address how MRC will require collection sites to identify, track, collect, manage, and report program mattresses for recycling and program mattresses for landfilling or other disposition.*

**MRC Response:** See edits to **Part 5(e)**. MRC’s collection site guidelines will require collection sites to provide for the environmentally sound management

of mattresses as defined in the Act and to comply with all applicable federal, state and local laws and regulations.

36. *DEQ received multiple public comments asking MRC to provide more information as it pertains to risk mitigation for bed bugs and infectious disease in the recovery system. Please include this information in Part 5 of the revised Plan, as part of collection site guidelines and requirements.*

**MRC Response:** See edits to **Part 5(e)** providing clarity on free resources available in MRC's Resources Library. <https://mattressrecyclingcouncil.org/all-resources/>

37. *In Part 5 as part of collection site requirements, please describe in more detail the environmentally sound management practices that collection sites will be required to use for program mattress collection.*

**MRC Response:** MRC defined environmentally sound management in **Part 1** and addressed how collection sites, collectors, transporters and recyclers must comply with the environmentally sound management of mattresses in Parts **4(e)**, **4(f)**, **5(b)**, **5(e)**, **7(f)** and **7(g)**.

38. *In Part 5(e), please describe whether MRC's collection site guidelines for Oregon will be consistent and compliant with the Mattress Stewardship Act, including the requirements for environmentally sound management of program mattresses, and all applicable federal, state, local and other laws and regulations.*

**MRC Response:** **Part 5(e)** has been revised.

39. *In Part 5(e), MRC's Plan states, The guidelines also describe non-recyclable mattresses (e.g., those that are wet, insect-infested, excessively soiled, etc.) and how to identify bedbug-infested units. [...] MRC will inform collectors that they will not be compensated for collecting or handling non-Program units and that those units are not eligible for no-cost recycling through the Program. Collectors will be responsible for the cost of recycling or disposing of such units outside the Program.*

- a. *Please revise, both here and throughout the Plan, terms such as "Program units" and "Program products" to "program mattresses" to align with the terms used in Act.*
- b. *In addition, please clarify whether MRC will compensate collection sites for handling non-recyclable program mattresses, such as program mattresses that are wet, insect-infested or excessively soiled.*



*In a phone call with MRC and DEQ on Dec. 19, 2023, MRC explained that the costs associated with handling these type of program mattresses is worked into the actual reasonable cost compensated to collection sites. MRC said that these types of mattresses make up roughly 10% of all mattresses collected. These pieces of information should be included in the Plan to help clarify the compensation process.*

**MRC Response:** MRC has revised Plan terminology to align with the Act. **Part 5(g)** has been revised to clarify how collection sites will be compensated for non-recyclable program mattresses that must be disposed of as solid waste.

40. *In the third paragraph of Part 5(f), DEQ suggests allowing a collection site to contact a transporter before a container is completely full so there is no gap in convenience service. For example:  
Collection sites that do not transport units using their own equipment will contact a transporter provided by MRC ~~when~~ **before** a full container is ready to be picked up and swapped for an empty one **to prevent a gap in convenient service.***

*And for better clarity, DEQ suggests rewriting this portion of the paragraph:  
For sites located in urban areas, MRC transporters will swap a trailer **within 48 hours** after receiving a request, and **within five days after receiving a request** for sites in rural areas.*

**MRC Response:** **Part 5(f)** has been revised to include more details on when collection sites should notify MRC transporters about a full container.

41. *In Part 5(g), please describe how MRC will calculate compensation for reasonable actual costs to collect and manage mattresses. This should include the factors MRC takes into consideration (for example, handling time per mattress), and types of information a collection site provides to MRC (for example, wage information).*

**MRC Response:** **Part 5(g)** has been revised to include more details on calculating compensation to collection sites.

42. *In Part 5(g) please describe how MRC will provide compensation, including:*

- a. *How payment will be remitted to a collection site.*
- b. *What information or data a collection site needs to provide MRC to calculate a site's compensation.*
- c. *How often compensation will be remitted to a site.*
- d. *Description of any true up process that MRC will use to reconcile numbers throughout the year.*

**MRC Response:** **Part 5(g)** has been revised to describe how MRC provides compensation to collection sites.

43. *In Part 5(h), please clarify the timeframe and procedure for the proposed transporters to fulfill a request for bulk pick-up service.*

**MRC Response:** Part 5(f) provides details on the timeframe and procedures for bulk pick-up service.

## **Part 6 – Performance Goals**

44. *Please clarify that MRC will comply with the requirements at Section 8(2) of the Act as well as Oregon Administrative Rule 340-098-0440.*

*For example:*

*MRC will submit proposed performance goals to DEQ no later than two years after implementation, as required by Section 8(2) of the Act. In submitting goals, MRC will comply with this requirement and Oregon Administrative Rule 340-098-0440 and will use data collected in the Program's initial years, including data from consumer surveys described in Part 11 of this Plan, as baseline data to inform proposed performance goals.*

**MRC Response:** See edits to Part 6.

## **Part 7 – Program Administration**

45. *Similar to previous comments in this letter, Part 7 of the Plan contains legal analysis; please remove these instances throughout the Plan. Additionally, DEQ is open to accepting the contact information for key personnel responsible for running various aspects of the program through a separate submission with a claim of confidentiality. However, DEQ can only provide confidentiality to the extent allowed by law.*

**MRC Response:** See edits to Part 7(a). Legal analysis has been removed.

46. *The stewardship organization is required to comply with the Act. A suggested statement that is more consistent with that requirement is shown below, for use in Part 7(b) of the Plan:*

*As the stewardship organization, MRC's legal responsibilities are set forth in the Act, federal law and other state law. **MRC will comply with and fulfill** these responsibilities.*

**MRC Response:** See edits to Part 7(b).

47. *In Part 7(c), MRC does not clarify which obligations of vendors, collection sites, and other participating entities, as described in the Plan, are enforceable through contracts. If there are obligations not set forth through contracts, then describe how MRC can ensure its vendors and participating entities fulfill these obligations.*

**MRC Response:** See edits to **Part 7(c)**.

48. *Part 7(e) directs the reader to Part 6(f) for information on MRC's proposed auditing, inspection and other procedures. If MRC intended to direct the reader to Part 7(f), please revise.*

**MRC Response:** Part 7(e) now refers the reader to Part 7(f).

49. *In Part 7(f) on page 23, please describe what the minimum recycling targets are based on, as mentioned in the second paragraph.*

**MRC Response:** Detail is discussed in a few sections of the Plan including Parts **4(f)**, **7(f)** and **Appendix B**.

50. *In Part 7(f), the following language should be included, as part of the last paragraph that discusses auditing:  
Auditor reports, including their procedures and findings, will be included in the annual reports.*

**MRC Response:** See edits to the last paragraph of **Part 7(f)**.

51. *In Part 7(f), please describe what steps MRC will take if an entity is not using environmentally sound management practices, including whether MRC will terminate a contract with a recycler, transporter or other entity for the collection, transportation, or processing of program mattresses.*

**MRC Response:** See edits to **Part 7(f)**. This topic is also addressed in **Part 7(c)**.

52. *In Part 7(g), please clarify how, upon request, MRC will make such records available for inspection by DEQ, including whether MRC will provide such records for DEQ to review at DEQ's office.*

**MRC Response:** See edits to **Part 7(g)**.

53. *For DEQ’s understanding, please describe the “metrics” MRC mentions in the second paragraph of Part 7(g):  
Data and reports extracted from that system provide important metrics for annual reporting and internal performance tracking.*

**MRC Response:** See edits to **Part 7(g)**.

54. *In Part 7(h) in the second paragraph, it is unclear how much time will elapse between the first certified letter and when DEQ will be notified of the unresponsive party; please revise this paragraph for clarification.*

**MRC Response:** See edits to **Part 7(h)** and the associated **Table 3**.

55. *Please describe what the late fees and associated interest are used for, as mentioned in the last paragraph of Part 7(h).*

**MRC Response:** See edits to **Part 7(h)**.

56. *In table 3 on pages 24-25, please clarify where in the process a producer, renovator or retailer is no longer registered. Please also clarify how much time is allowed for each step in the notification protocol. Add an additional column if needed.*

**MRC Response:** See edits to **Part 7(h)** and the associated **Table 3**.

57. *In Part 7(i), please describe MRC’s process for ensuring compliance with worker health and safety standards. The Act lists compliance with worker health and safety requirements as part of environmentally sound management.*

**MRC Response:** See **Parts 4(f)** and **7(f)**.

## **Part 8 - Budget**

58. *In Part 8, please explain how the proposed budget for ‘Collection Site Handling Fees’ is calculated. This should include the factors, numbers and metrics that go into calculating the reasonable actual cost of collection sites to collect and manage discarded mattresses.*

**MRC Response:** See edits to **Part 5(g)**.

59. *In Part 8(b), please include how many program mattresses MRC projects will be both sold and disposed of in Oregon, for each year of the budget.*

**MRC Response:** Added Table 4 and see edits to Appendix E.

60. *In Part 8(b), please describe if and when MRC will evaluate actual expenditures against its proposed budget and propose a change to the assessment fee, if necessary.*

**MRC Response:** See edits to Appendix E.

61. *In a phone call with MRC and DEQ on Dec. 19, 2023, MRC explained helpful facets about the proposed budget, including lower participation upon program start up and a higher reserve to keep the assessment stable. Please include this and other background information pertaining to the development of the budget for this new program, as it is helpful to DEQ and the public for an understanding of the overall Plan.*

**MRC Response:** See edits to Appendix E.

62. *DEQ received several comments from both the public and the Committee as it pertains to the proposed program budget. MRC's revisions to the Plan should consider these comments, which can be found on DEQ's Mattress Stewardship website.*

**MRC Response:** See edits to Appendix E.

## **Part 9 – Assessment Fee**

63. *In Part 9(b), please describe how MRC will inform all retailers of their requirements, and whether MRC will provide an example to retailers of how to describe the assessment on a receipt.*

**MRC Response:** Informing retailers of their requirements is addressed in multiple sections of the Plan. See additional edits and details in Parts 7(h), 9(b), 9(c) and 11(b).

64. *In Part 9(b), please describe how often retailers will remit assessment fees to MRC.*

**MRC Response:** See Part 9(c) and Appendix E - Revenue.

65. *In Part 9(c), please describe what information or documentation a retailer needs to provide at the time of remitting assessment fees to MRC.*

**MRC Response:** See edits to **Part 9(c)**.

66. *In Part 9(c), please describe how MRC will audit retailer records to ensure that program mattresses sold is equal to assessment fees remitted.*

**MRC Response:** See edits to **Part 9(c)**.

67. *In Part 9(c), the following language should be updated to align with the Act; as an example:*

- *Brick-and-mortar retailers in Oregon (~~regardless of physical location~~) must collect the assessment on all sales of mattresses ~~and foundations to Oregon consumers or for delivery in Oregon.~~*
- *Online retailers must collect the assessment on all mattresses ~~and foundations~~ sold for delivery in Oregon, regardless of where the online retailer is located.*
- *Manufacturers of mattresses ~~and foundations~~ who sell to any consumer in Oregon sold to ~~Oregon commercial entities, such as hotels, motels and other hospitality establishments, dormitories, nursing homes, hospitals, and prisons (also known as “contract” or “institutional” customers),~~ must collect the assessment on such sales and remit it to MRC.*

**MRC Response:** See edits to **Part 9(c)**. The additional text included in the original Plan submittal was added intentionally to help guide readers that are not familiar with details of the Act.

## **Part 10 – Illegal Dumping**

68. *Part 10 of the Plan does not describe a mechanism to mitigate the costs associated with illegal dumping. If MRC determines that the 3-stage process is needed to help inform a mechanism, please include it in the revised Plan, however, it is not sufficient on its own; a mechanism for mitigating the costs associated with collection and management of discarded mattresses that are illegally dumped is required in the Plan, as listed at Section 4(1)(j) of the Act. In a phone call with MRC and DEQ on Dec. 19, 2023, MRC explained that illegally dumped mattresses will be accepted at any collection site or event after the program launches. If this is intended to be MRC’s mechanism while studies are being conducted to inform a more permanent approach, please state this in the Plan.*

**MRC Response:** **Part 10** has been revised to clarify the mechanism to mitigate the costs associated with illegal dumping.

69. *In providing a mechanism for meeting the requirement at Section 4(1)(j) of the Act, please describe how the mechanism applies throughout Oregon, including how MRC will obtain existing data on illegal dumping that is already available outside of the Metro area, to create a mechanism in all regions of Oregon.*

**MRC Response:** Part 10 - Stage 2, describes how MRC will collect illegal dumping data outside of the Metro area.

70. *Describe how illegally dumped mattresses are to be handled through the program until a mitigation mechanism is in place. Please refer to comment 64 as needed.*

**MRC Response:** Part 10 has been revised to include the requested information.

### **Part 11 – Public Education, Advertising and Promotion**

71. *In Part 11(a), explain how education will be enhanced in the first three years of the program to grow awareness of the new program.*

**MRC Response:** See Part 11(a) - Growing Awareness of the New Program (Years 1-3).

72. *In Part 11(a), please describe how MRC will deploy and measure its public education, advertising and promotion to ensure that such outreach methods are reaching the public statewide and on a regular basis.*

**MRC Response:** See Part 11(a) - Measuring Impact of Outreach.

73. *Regarding education and surveying, please explain what steps MRC will take to ensure education and outreach includes efforts to reach minority, lower-income, rural and other historically underrepresented populations throughout Oregon. Please describe how MRC will engage with historically underserved communities to ensure equitable access to and awareness of the mattress stewardship program in these communities; the timeline for such engagement, and how MRC will use such engagement to inform strategies to foster public awareness in historically underserved communities.*

*Examples of engagement may include the use of webinars, surveys, and community listening sessions, and outreach to community-based organizations. Note that webinars and online surveys require technological access that may be a barrier to historically underserved communities; accordingly, a range of opportunities for engagement should be provided.*



**MRC Response:** In **Part 11(a)** MRC describes a multilingual, multichannel strategy to reach the public. **Growing Awareness of the New Program (Years 1-3)** mentions multilingual materials (point-of-sale, PSA) and using community-based groups to engage with minority, low-income, rural and other historically underrepresented/underserved populations. MRC will also engage with media sources trusted by these populations and seek out events to be visible in these communities. **Measuring Impact of Outreach** mentions MRC's annual survey will collect demographic data in order to analyze segments of responses. This data, in combination with insight gained from establishing collaborative relationships with community-based groups and local leaders will inform MRC's strategies to foster public awareness.

74. *In Part 11(a) at the bottom of page 30, please describe how MRC will monitor the effectiveness of its outreach and how MRC will adjust the elements of its communications plan.*

*MRC will monitor the effectiveness of its outreach annually and adjust elements of the communications plan as necessary.*

**MRC Response:** See **Part 11(a) - Measuring Impact of Outreach**.

75. *In Part 11(a), describe what types of education, aside from signage, will be provided to consumers at collection sites.*

**MRC Response:** See descriptions of publicity toolkits in **Part 11(a)** and **Appendix D**.

76. *In Part 11(a) on page 31, please describe whether there is a minimum number of community events per year that will MRC participate in as a vendor. What types of events does MRC think would be best to focus on? Will these be in both urban and rural areas of the state?*

**MRC Response:** See **Part 11(a)**. The information needed to make these decisions is not yet available. Communities that are organizing Earth Day and America Recycles Day events in 2025 need to first release their event details and sponsorship information. The **Implementation Timeline** notes when MRC anticipates the ability to collect and review event information and make selections.

77. *Part 11(a) of the Plan states that MRC's marketing efforts will be emphasized during Earth Day (April 22) and America Recycles Day (Nov. 15). Please describe what measurable steps MRC will take to emphasize marketing efforts during these events, including what techniques and materials will be developed and utilized for event promotion and participation.*

**MRC Response:** See **Part 11(a) - Growing Awareness of the New Program (Years 1-3)** for additional detail.

78. *In Part 11(a), please describe if and how MRC will coordinate with local governments to provide consumer education, as part of MRC's education and outreach efforts.*

**MRC Response:** See Part 11(a) - Growing Awareness of the New Program (Years 1-3).

79. *At the top of page 31, the Plan states, In the initial years [...] MRC will implement tactics that have already proven successful [...]. Please revise to clarify what MRC considers to be the "initial years" of the Oregon program. For example, "In the first two years of the program..."*

**MRC Response:** See edits to Part 11(a) - Growing Awareness of the New Program (Years 1-3).

80. *In Part 11(a) on page 32, the Plan states: On an annual basis, MRC will issue a consumer survey; please include the following details in the Plan:*

- a. *Specify if this survey will distinguish between and collect responses from both rural and urban areas.*
- b. *Describe the parameters of the survey, including but not limited to, how the survey will be administered, what the sample size will be, how MRC will ensure the survey captures a representative sample of the state.*

**MRC Response:** See Part 11(a) - Measuring Impact of Outreach.

81. *DEQ would find it helpful if these survey results were included in the annual report that MRC submits each year; is it possible for MRC to do this?*

**MRC Response:** MRC will include results in the annual report and edited Part 11(a) to state this.

82. *On page 32 in the last paragraph of Part 11(a), the Plan states, In future years, based on awareness levels and the Program's financial performance, the following [additional outreach tactics] may be implemented to increase awareness in a specific region, to a specific demographic or to a statewide audience [...].*

- a. *Please revise to clarify this time frame. For example: "In the third year of the program, based on [...]."*
- b. *Regarding public awareness levels, please clarify whether the awareness levels will be measured through the annual survey or other methods. At what awareness levels will MRC take action to implement*

*the additional outreach tactics? Or will MRC take action depending on factors other than awareness levels?*

**MRC Response:** Awareness is measured in the annual survey, however, MRC cannot commit to actions to adjust awareness levels without first understanding baseline consumer awareness and Program performance. See **Measuring Impact of Outreach** and **Maintaining/Expanding Awareness of Existing Program (Beyond Year 3)** and other edits to **Part 11(a)**.

83. *In addition to what is mentioned in Part 11(c), describe what type of information MRC will provide to collection sites, in order to help them explain program elements to the public, especially in the first several years of the program, when a consumer might have purchased a mattress before POS retailer education was being distributed.*

*For example, could the same hard-copy retailer education also be made available to collection sites?*

**MRC Response:** Publicity toolkits described in **Part 11(a) - Growing Awareness of the New Program (Years 1-3)** describe site materials to help explain the Program to the public. A site can request MRC's assistance with outreach that fits their needs at any time.

## **Part 12 – Closure Plan**

84. *To reduce confusion and questions about what is an “initial Plan,” DEQ recommends deleting the first sentence in this Part of the Plan and revising the second sentence as follows:*

*MRC will submit a closure plan to DEQ no later than two years after implementation, as required by Section 8(2) of the Act.*

**MRC Response:** See edits to **Part 12**.

## **Part 14 – Program Changes**

85. *Please clarify that MRC will also follow the provisions of OAR 340-098-0460.*

**MRC Response:** See edits to **Part 14**.

## **Appendices**

86. *To reiterate comment 18, please relocate all program recycling standards and requirements listed in Appendix B into Part 4 of the Plan.*

**MRC Response:** The page count and non-conforming file types of these documents makes integrating them into the text of a Word document

complex, difficult to format and disruptive to the reader and flow of Part 4. Including them as Appendices in no way diminishes their importance to the Program. They are listed in the Appendices as a document design best practice.

87. *The opening paragraphs of the Standards in the current Appendix B should be updated for accuracy and clarity:*

*The Standards also includes data tracking and reporting requirements.*

*MRC reserves the right at its discretion to review and revise these Standards.*

*This language should be revised; as an example:*

*MRC will seek DEQ approval to revise the standards.*

*For purposes of these Standards, the term “Mattress” or “unit” ~~should be interpreted to include both~~ means the same thing as Mattresses and Foundations (or box-springs), as defined in Section 2 of the Act and section 1 of this plan.*

**MRC Response:** See edits to Appendix B – Recycling Standards.

88. *In 2.6 of the current Appendix B, please add that a recycler will also document and provide MRC with weight/percentage of materials that were not processed.*

**MRC Response:** See Appendix B – Recycling Standards - subsection 3.3

89. *Either in section 3 or 4 of the Recycling Standards, please state that a recycler will maintain and provide MRC with a chain of custody for all materials and require of any subcontractor or purchaser, that the chain of custody be maintained through final disposition of materials within this state and outside the state, per Section 4(1)(e) of the Act, as defined in Section 2(4)(b)(B) and Section 2(5).*

**MRC Response:** See Appendix B – Recycling Standards – subsection 3.1 to 3.8. MRC uses Bills of Lading or other equivalent shipping documents to track mattresses and mattress materials.

90. *Please provide a copy of the certificate mentioned Section 3.7 of the current Appendix B.*

**MRC Response:** The copy of the certificate was added to Appendix B.

91. *The language in Appendix E, part b) 2. should be updated to reflect the Act: 2. Collection site compensation for reasonable actual costs to collect and manage discarded mattresses*

**MRC Response: See Appendix E – Expenses – Operational Costs – Collection.**