

Nov. 28, 2023

Public Comments for the Mattress Stewardship Program Plan



From: [Carol Alley](#)
To: [HARDING Rachel * DEQ](#)
Subject: Mattress recycling . . .
Date: Saturday, November 18, 2023 4:22:42 PM

You don't often get email from calley172@gmail.com. [Learn why this is important](#)

Hello Ms. Harding,
Someone on the NextDoor app shared the information with your name and email. Please, please approve this program, as soon as possible. I live in Corvallis Oregon and our landfill is an ongoing bone of contention in this area. It's filling up way too fast and I have a mattress/box springs set that needs to be gone. It's unfortunate such large items, like vehicles have a finite life

Thank you for taking comments. Please approve their recycling!
Thank you,
Carol Alley

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“The only time ivory is beautiful is when it’s on the face of an elephant.”



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THE BUREAU OF
**PLANNING &
SUSTAINABILITY**

November 21, 2023

Rachel Harding
Oregon DEQ Materials Management Program
700 NE Multnomah St., Suite 600
Portland, OR 97232

Dear Rachel,

Thank you for providing the opportunity to provide public comment. The City of Portland is home to 625,000 Oregonians. Based on the population of Portland in relation to the state, The City of Portland, Bureau of Planning and Sustainability (BPS) recommends at least 4 of the 25 additional recycling drop-off locations be in Portland. The recycling drop-off locations need to be convenient for both Portland residents and haulers.

Urban density, preferences for active transportation, and the high cost of personal auto or truck transportation present barriers to the use of drop-off locations. As the authority over solid waste collection in Portland, the City of Portland, Bureau of Planning and Sustainability is concerned with the collection of mattresses through this program and drop-off locations for self-hauling mattresses. Mattress collection efforts must be compatible with the city's solid waste collection regulations.

Here are a few areas of concern and pending questions:

- **Local Government Involvement in Outreach.** The City of Portland, Bureau of Planning and Sustainability (BPS) has worked for decades to provide effective outreach to Portland residents and businesses. An emphasis should be put on the relationship between the Mattress Recycling Council (MRC) and local government outreach efforts, including translated outreach materials and interpretation services as needed.
- **Recycling Drop off Locations.** Portland residents and garbage and recycling companies who collect mattresses need convenient access to recycling drop off locations. The City of Portland requests the opportunity to be involved with the process of locating these drop off locations, to ensure equitable access. Two criteria that we recommend are 1) locations at already established transfer or other solid waste facilities and 2) locations in traditionally underserved areas of Portland, including east Portland. Because residential waste collectors already collect mattresses, we recommend that DEQ and MRC engage with BPS and our collectors to support the cost of mattress collection.
- **Mattress Reuse.** BPS recommends that the MRC provide more information about how and when mattresses will be refurbished and/or reused, as Oregon's solid waste hierarchy prioritizes reuse. St. Vincent de Paul of Lane County has made this a program function that both promotes environmental outcomes and low-cost mattresses to their community. BPS would like this programming available to Portland residents.



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- **Point of Sale Fees.** BPS is concerned about the point-of-sale fee being almost double what Californians pay. If this is established to pay for legacy mattresses, BPS recommends that DEQ establish a periodic assessment of this fee, in hopes that as legacy mattresses are recycled through the program the amount decreases over time.
- **Retail Take-back.** As Portland customers purchase new mattresses, retail take-back is an obvious solution to the cost and inconvenience of dropping of mattresses at a recycling drop-off location. BPS strongly recommends this EPR system provide for retail take-back both at a store and via mattress delivery truck.
- **Feedback to Mattress Manufacturers.** It is unclear how the MRC will be providing feedback to mattress manufacturers regarding the costs, challenges of, and opportunities to improve the recycling or reuse of mattresses. Please provide a clear explanation of how this information will reach manufacturers, and how it will encourage manufacturers to produce mattresses that are (a) easier to recycle and (b) have a lower environmental impact.
- **Bed bugs.** In addition to section 5 of the MRC plan, Bed Bug Management, can MRC provide more detail to risk mitigation for bed bugs or an infectious disease in the recovery system at large?

We look forward to working with MRC and the DEQ to implement Oregon's mattress EPR program in coming months.

Thank you for your consideration,



Eben Polk
 Solid Waste & Recycling Manager, City of Portland, BPS
eben.polk@portlandoregon.gov
 503-247-6724



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From: [David Wittke](#)
To: [HARDING Rachel * DEQ](#)
Subject: Mattress Stewardship Program
Date: Thursday, October 12, 2023 3:57:41 PM

You don't often get email from dwittke@bedmart.net. [Learn why this is important](#)

Hello Rachel;

My name is David. I'm the mattress buyer for BedMart. We operate 25 mattress stores in Oregon...so this program certainly affects us! We offer removal services and currently handle 300-500 units a month. Hopefully this program will be successful in our state's recycling efforts.

After reading the program plan, I had some questions:

1. Assessment fee: If I'm reading this correctly, I'm pleased there is a mandatory assessment fee on all units sold, and is clearly identified on the invoice. Early versions (and I believe California's) could not charge the customers directly and forced retailers to raise prices to offset the cost. I think the application of this fee is much more transparent. Is my understanding correct?
 - a. The document said how to pass these fees to MCR, but did not mention the time frame or frequency. Monthly? Weekly? Annually? Will any documentation be needed at time of submission or in the event of an audit?
2. Washington Deliveries: We offer in-home delivery and removal in Vancouver and surrounding areas. If we charge our Washington customers the assessment fee, could their mattress be considered a 'program mattress'.
 - a. We don't want out of state residents using the free service, but if they are paying the assessment fee, and the assessment fees are intended to cover the cost, I would see this as a bonus to the amount of mattresses we can recycle until Washington adopts a program.
 - b. As an Oregon retailer whose trucks routes go over state lines, it would be a hardship to monitor which products we took from Washington and which for Oregon. The number of pieces is identifiable but adds complexity to the accounting on non-inventory items.
 - i. If mattresses picked up from Washington cannot be part of the program, are we to take these to a landfill? This feels counterintuitive to the recycling efforts.
 - c. It might be too late to suggest, but I could envision an out-of-state surcharge for this situation for the extra handling and/or encourage customers to find solutions in their own state. Establishing an out-of-state recycling charge (\$35?) could also be the solution if an out of state customer shows up with their mattress at a collection site.

3. "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.**
 - a. How should the assessment fee be described?
4. "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."
 - a. How does our distribution center become and eligible entity? In becoming so, would we become a public collection site?

I plan to attend the web meeting on 17th. Maybe there will be answers to this question then?

Thanks,

DMW

--

David Wittke

Vice President of Merchandising

www.ShopBedMart.com

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November 24, 2023

Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232-4100
Re: Metro comments on proposed mattress stewardship program plan

Greetings,

Metro appreciates this opportunity to provide comments on the proposed mattress stewardship program plan.

The Portland metro region accounts for more than 40 percent of the state's population. We are thrilled to see mattress recycling services expand across the state. We want to ensure recycling is convenient and accessible for all Oregonians. Metro began advocating for legislation to improve the recovery of mattresses in 2019 and has continued to advocate for an effective and equitable implementation of the Oregon mattress stewardship law.

Over a year ago, Metro initiated a project to identify desired outcomes for the stewardship program in the greater Portland area. Metro completed research, interviews and facilitated a group discussion with a wide range of stakeholders, including representatives from local and state government, haulers, retailers, large mattress generators (e.g., universities and hotels), the mattress producer industry, community organizations, and reuse and recycling businesses to create a vision for implementation. The vision prioritizes solutions that achieve outcomes in four areas: 1) equitable collection access 2) ample reuse, renovation, and recycling opportunities 3) culturally responsive and timely education and outreach 4) set and meet ambitious and achievable performance goals.

These comments on the proposed program plan reflect the Metro vision for the greater Portland area and our understanding of the requirements for the program plan set in state statute and administrative rules.

Overall plan clarity on compensation

Throughout the plan it is unclear how reasonable compensation costs are calculated. The plan should be updated to include more detailed information on collection site compensation. More detailed information would also support sufficient review of the budget portion of the program plan. This additional information should include, at a minimum:

1. How a collection site will count mattresses for compensation, including descriptive details and formula for calculating the number of program mattresses. For example, the program plan should provide detailed information that a collection site can use to answer the following question:

Two program covered mattresses arrive at an MRC-collection site transfer station. One mattress is sent for recycling by being placed in the MRC provided trailer. One mattress is so wet that it must be landfilled, so it is placed in the transfer station's mixed load trailer for disposal. Does the transfer station bill MRC for two mattresses?

2. A more detailed explanation for how the proposed compensation amount per mattress fulfills the “reasonable actual cost” requirement.

Implementation Timeline

- The MRC should publish the Oregon-specific Collection Site Guidelines document in the program plan to provide clear, standard expectations across the state for managing discarded mattresses. The current link in the program plan refers to multiple Collection Site Guidelines documents on the MRC’s website. Since none of these plans are specific to Oregon, it is unclear how the MRC is meeting the program plan requirements for Oregon. Oregon has unique conditions, including wet weather for approximately 165 days a year, to address in the Collection Site Guidelines.
- Additionally, publishing the Collection Site Guidelines document in the program plan will give collection sites sufficient advance notice to prepare for program launch. Covered spaces at Metro’s potential collection sites are at a premium and other facilities likely have similar conditions. With time, facilities can be ready to preserve the quality of incoming reusable and recyclable mattresses.

Program Operations

Fulfill requirements for the program plan to identify program mattresses and ongoing program management, tracking and documentation of the fate of discarded mattresses by:

1. In Part C, add detailed information to the program plan describing how a collection site would determine how a program mattress was discarded by an Oregon resident, including how out of state hauling companies can provide program mattresses. Detailed information would include, but not be limited to, exactly how MRC expects collection sites and illegal dumping programs will identify non-program and also out of state mattresses. This information is important for several reasons. Mattress collectors/transporters in Oregon include hauling companies that are registered in Washington and serve customers in Oregon that have mattresses to get rid of. Residents taking their mattress to an Oregon collection site may have license plates from a different state. Additionally, illegally dumped mattresses will be found in Oregon, but the program plan is unclear whether those mattresses would be assessed to determine residency of the discard generator. To correctly identify program mattresses, collection sites need information that covers these scenarios.
2. In Part C, add detailed information to the program plan describing how MRC would calculate, as stated in the program plan, the “historic levels” and the “number of units” that a service area “would typically generate.” Transparency about this methodology is key to MRC fulfilling requirements to provide reasonable compensation and track meaningful data about the fate of discarded mattresses.
3. In Part F and G, provide the list of best practices that the MRC will use to work with collectors to reduce the number of units that are ruined because of mishandling or other causes and reduce the number of units that are sent for incineration. There should be a list of best practices for increasing reuse and a separate list for increasing recycling. Through operating transfer stations and collecting illegally dumped mattresses, Metro is very familiar with how quickly rain can turn a perfectly reusable or recyclable mattress into a mattress that must be landfilled. Metro is concerned that the current lack of details, amount of funding for infrastructure improvements, and timing for

- infrastructure funding for collection sites, means that many mattresses will become wet and consequently not reused or recycled in the first years of program launch.
4. In part G, provide the additional reuse actions or activities proposed to occur as a result of the program plan.
 5. Within the program operations section, provide a formula or other direction so that a collection site knows when they can charge a customer for a load that contains mattresses. For example, the guidance should allow collection sites to understand how to charge a customer for a mixed load with a program mattress within it. If there are calculations that need to be made, those should be included in the PRO plan.

Budget

- The MRC can demonstrate fulfillment of the requirement to provide for the environmentally sound management of mattresses by increasing the amount of “Mattress Collection Facility Improvement Funding” to \$200,000 annually. This increase would make it more likely that at least one site a year would receive a sufficiently large enough grant to improve their environment practices, such as constructing a walled and roofed enclosure to protect mattresses from the estimated 165 days of rain in Oregon.
- The MRC itemization should be more specific in describing how the activities in Part 11 (public education, advertising and promotion) add up to the allotted amount for “Public Education and Advertising” of more than \$650,000. Without itemization, it is unclear why such a significant budget for education, advertising and promotion is needed compared to the budget for compensating collection sites.

Illegal dumping

- Metro appreciates the MRC recognizing our robust illegal dumping mitigation program and interest in consulting Metro and other local governments.
- Does MRC plan to compensate Metro or other select communities for the proposed in-depth discussions in stages 1 and 3 similar to the funding offered in stage 2?

Sincerely,

Sabrina Gogol
Senior Solid Waste Planner, Metro



OREGON REFUSE & RECYCLING ASSOCIATION

November 22, 2023

Oregon DEQ Materials Management Program

Attention: Rachel Harding

700 NE Multnomah St., Suite 600

Portland, Oregon 97232

via email only to: Rachel.Harding@deq.oregon.gov

Re: Comments on Mattress Recycling Council's Initial Program Plan

Dear Ms. Harding:

Thank you for this opportunity to comment on the Mattress Recycling Council's (MRC) Initial Program Plan. As I serve on the DEQ's Mattress Stewardship Program Advisory Committee, I have made many of these comments in the committee meetings; I thought it would be helpful to send you these comments in writing for further clarity.

Oregon Refuse and Recycling Association (ORRA) is the statewide trade association representing solid waste management companies in Oregon. ORRA members collect and process most of Oregon's residential and commercial refuse and recyclables, as well as operate material recovery facilities, compost facilities, and many of Oregon's municipal solid waste transfer stations and landfills. Many ORRA members have expressed interest in serving as Collection Sites for the mattress stewardship program.

While ORRA appreciates MRC's effort to submit the initial plan, there are many sections that require more detail and clarification. **I have attached ORRA's comments organized by Part/page, and I incorporate that document by this reference into ORRA's comments.**

Budget Concerns: In particular, ORRA would stress that the budget does not provide sufficient background to justify the budget as presented – please see the Excel spreadsheet attached for more detail. One example of that is the \$2.25 suggested collection site fee for program mattresses. This fee should be broken down by costs for accepting, staging, transfer, and final disposition of mattress (either to recovery, or to disposal). ORRA members that have reviewed this fee doubt it is sufficient to cover the true costs of managing the mattresses. I have asked for the underlying assumptions for this fee, and I reiterate that request here. Is there relevant data from other programs managed by MRC for comparison of this fee?

Another budget concern is the high reserves number, which doubles in Year 2 of the program. What is the justification for this level of reserves? And as asked by other Advisory Committee members, why is the Oregon program almost twice the cost of the neighboring program in California?

Thank you again for this opportunity to comment on the Initial Plan.

Sincerely,

Kristan S. Mitchell
Executive Director and CEO

C: ORRA Mattress Plan Workgroup

Mattress Recycling Council's (MRC) Initial Mattress Stewardship Plan
ORRA Comments/Questions
November 22, 2023
Organized By Part and Page of Initial Plan

A. Part 1 – Definitions, and; Appendix D: Collection Site Information Examples

p. 4, Section 2(7) – there should be more detail on how to recognize mattresses that are program mattresses, and how collectors deal with mattresses that are not program mattresses, such as futons and sofa beds.

p. 51, Appendix D - tying into the definition concerns, p. 51, Appendix D, is an information sheet for collection sites that has a heading for a section on Acceptable and Unacceptable Items.

- Under that heading, it starts with a statement, “Mattresses and box springs discarded by Oregon residents or collected in curbside bulky waste pickup are eligible for the program.” This leaves out premium service from residential customers (likely unintentionally since bulky waste is included). It also appears to exclude mattresses that are illegally dumped, which is one of the important reasons for this program. Illegally dumped mattresses, when collected, should be a part of this program from the onset, not delayed while MRC studies illegal dumping issues. This needs to be addressed in the plan.
- This section goes on to state, “Mattresses recyclers are unable to accept: Severely damaged, wet, twisted, frozen or soiled mattress or box springs; Items infested with bed bugs...” Many mattresses are likely to arrive at collection sites damaged, wet, twisted, or frozen, why are those reasons for exclusion? In addition to bed bugs, there should also be protocols for how to manage other hazardous or bio-contaminated mattresses, most particularly from the health and safety of the collection site employees, and then as to how to avoid contamination of mattresses that are recoverable. What are the collectors to do with these mattresses? Is there a “right to refuse?” They are still program mattresses, so it seems they must be accepted, but how are they to be managed?

B. Part 4 – Program Operations

p. 9, Part 4 a) - Most Oregon cities and counties offer solid waste and recycling services via franchise or other regulated programs. The Plan should include how MRC will manage a program that complies with federal, state, and local laws – such as franchise or other regulation. For example, premium service and bulky waste programs are part of franchised solid waste and recycling collection.

Under this section, the language in **bold** should be added: To comply with federal, state, **and local laws**, MRC will take the following steps:

1. Understand the Laws: Familiarize ourselves with all applicable federal, state, **and local** laws and regulations that apply to the Mattress Stewardship Act.

p. 10 c) - How are collection sites to document the origin of mattresses? For example, use Oregon driver's license for compliance log? What other methods of documentation? How will MRC confirm commercial solid waste haulers maintain a compliance log indicating the source of units? What role, if any, do collection sites have in that?

p. 12 – Environmentally sound management practices (ESMP) are defined in the Definitions section on page 3, Section 2(4). Does MRC confirm proposed transporters/recyclers meeting environmentally sound management by audit, and if not, how? What happens if they don't meet ESMP? Also, there is only one recycler proposed for the entire Portland area. That does not seem to provide the needed resources in the event the only recycler cannot accept mattresses, for any reason. One recycler for the entire Portland area, which likely will receive mattresses from much of the rest of the state, is insufficient. What are MRC's plans for adding additional recyclers?

p. 14 – MRC will work with collectors to avoid loss due to mishandling/other causes, as well as provide info to protect health and safety of workforce. How? (See related comments under A. Part 1, above on page 1).

C. Part 5 - Collection; Appendix C: Interested Collection Site Participants, and; Appendix D: Collection Site Information Examples

Appendix D, Interested Collection Site Participants, p. 49 - there are only four interested collection site participants listed for the City of Portland, and one of them is also the proposed recycler in the Portland region. We did not discuss Performance Goals, and ORRA does not recall discussions surrounding Convenience Standard in the meetings on the Plan. When would the need for more sites in the Portland area be discussed, and what is MRC's plan to add more sites to the Portland area?

Part 5, p. 15 -Training: Determine at point of pick up if the mattress is acceptable for program – who trains the sites, who trains the public, when to decide, customers will not want to pay if collection sites decide the mattress is not a program mattress.

Part 5, p. 16 – last paragraph, what are the required ESMP and collection site guidelines? P. 52, Appendix D shows pictures of examples from Northeast Guidelines, but when will they be developed for Oregon?

Part 5, p. 17, 5 e) – collection site guidelines will define what programs products are eligible for recycling, and describe non-recyclable mattresses (See related comments under A. Part 1, above on page 1). Collectors are not compensated for non-program units – training for collectors and the public on this, what is the practical effect of this?

- Not a mattress defined as part of the program (sofa/futon) - what does a collector tell the customer? Charge the customer to accept it? What if we accept it at no charge because we don't recognize it as non-program?
- What if it is a program mattress, but not suitable for recycling? Who pays for disposal?
- What if collector sends it for recycling but recycler determines it must be disposed of. Who pays?

ORRA's understanding, from rulemaking, is that collection sites must take all program mattresses, the sites cannot charge customers, and the fee that collection sites receive is supposed

to be sufficient to cover that disposal based on other states' experience. Training will teach where the mattress will go, either for recycling or disposal.

- Per budget, the fee estimate to be paid by consumer is \$19.75/unit and fee estimate paid to collection sites per unit is \$2.25. Is there a formula that provides the underlying assumptions to prove the fee is sufficient to cover all collection site costs of the program mattresses, including disposal, and if so, please provide it. This fee should be broken down by costs for accepting, staging, transfer, and final disposition of mattress (either to recovery, or to disposal). ORRA members that have reviewed this fee doubt it is sufficient to cover the true costs of managing the mattresses. Is there relevant data from other programs managed by MRC for comparison of this fee?
- When is there a "true up" to confirm that collection site is not losing money on this?

Part 5, p. 18 - Large volume (hospitals/hotels) of 100 mattresses or more – for partial loads (less than 100), transporting the load to a collection site is subject to any existing local laws and regulations regarding collection service, generally via a franchise. This would be premium service, or might be via bulky waste, both of which could require payment by the customer pursuant to franchise terms.

Appendix D, Collection Site Guidelines, p. 51 – when will Oregon collection site contract drafts be ready for review? Should include, among other things:

- Set fee based on individual collection site, not a statewide pre-determined fee
- Timelines for when can contract be terminated by either side, and notice required/timelines for termination, who notifies customer
- Whether termination must be for cause (safety/financial), or for any reason
- Hold harmless/liability protection on acceptance of mattress
- Include clauses on premium service for loads less than 100, and for bulky waste

D. Part 8 – Budget, and; Table 11: Proposed Budget

p. 26 a) – in describing the financial health of the stewardship organization, why is 75% of annual expenses required in order “to operate the Program over a multi-year period in a prudent and responsible manner.”?

Table 11: Proposed Budget, p. 56 - ORRA has reviewed the Proposed Budget and attached a spreadsheet to these comments asking for more clarification and underlying assumptions. A few of the related questions include:

1. Reserves – how do projected reserves compare to other Oregon EPR programs, such as e-cycling or PaintCare? How do they compare to other mattress EPR programs?
2. Administrative fees as percentage and comparison to other EPR/other mattress EPR?

3. Why is Illegal Dump Mitigation such a small cost?
4. Why is Collection Site Improvement Funding such a small cost? For example, one area of concern that ORRA has heard and this funding might address is storage.

E. Part 10 – Illegal Dumping

p. 28 – ORRA believes there is available information statewide on illegal dumping issues, at least sufficient to begin work on the problem instead of spending time, money, and effort engaging in more studies. The initial Plan focuses very heavily on studies of the Portland-metro region, via the Metropolitan Regional Government (Metro). While Metro has done a great deal of work on illegal dumping, the issue affects all Oregonians, and is prevalent in rural areas, forest lands, and remote locations. There is sufficient information to begin offering solutions for the problem – as noted above in A. Part 1, page 2 above, illegally dumped mattresses, when collected, should be a part of this program from the onset, not delayed while MRC studies illegal dumping issues. In addition, as noted above in D. Part 8, p. 3 above, the proposed budget seems very inadequate to take on this effort.

Mattress Recycling Council Oregon LLC	First Full Year	Second Year			
	2025	2026	var \$	var %	Notes/Questions
REVENUE					
Revenue	\$ 8,666,932	\$ 8,840,337	\$ 173,405	2.0%	This seems like a reasonable increase Revenue is a function of units sold in Oregon This increase does not align with the large increases in expenses Are they planning to collect significantly more mattresses in 2026 vs. 2025?
EXPENSES					
Operational Costs					
Collection					
Collection Site Handling Fees	\$ 381,508	\$ 450,092	\$ 68,584	18.0%	Please explain this increase
Collection Container & Storage Costs	\$ 315,910	\$ 416,763	\$ 100,853	31.9%	Please explain this increase
Mattress Collection Facility Improvement Funding	\$ 50,000	\$ 50,000	\$ -	0.0%	Why so little spent here? Not expecting to fund many improvements?
<i>Total Collection Costs</i>	<i>\$ 747,418</i>	<i>\$ 916,855</i>	<i>\$ 169,437</i>	<i>22.7%</i>	
Transportation	\$ 1,375,142	\$ 1,585,256	\$ 210,114	15.3%	Please explain this increase
Processing	\$ 2,832,255	\$ 3,265,009	\$ 432,754	15.3%	Please explain this increase
Illegal Dump Mitigation	\$ 150,000	\$ 150,000	\$ -	0.0%	Why is this such a small number? What are the underlying assumptions?
Program Studies (Life Cycle, Convenience, etc.)	\$ 110,000	\$ 148,000	\$ 38,000	34.5%	Please explain this increase
Program Compliance Audits	\$ 10,000	\$ 30,000	\$ 20,000	200.0%	Please explain this increase
Total Operational Costs	\$ 5,224,815	\$ 6,092,120	\$ 867,305	16.6%	
Public Education, Advertising and Promotion					
Public Education and Advertising	\$ 225,085	\$ 191,157	\$ (33,928)	-15.1%	Please explain this decrease. Receive significantly more mattresses with less advertising?
Conferences and Events	\$ 18,573	\$ 20,583	\$ 2,010	10.8%	
Annual Report	\$ 15,000	\$ 15,000	\$ -	0.0%	
Total Public Education, Advertising and Promotion	\$ 258,658	\$ 226,740	\$ (31,918)	-12.3%	
Oregon Government Oversight Fees	\$ 200,000	\$ 200,000	\$ -	0.0%	
Program Administration					
Management & Administrative Expenses	\$ 618,599	\$ 641,364	\$ 22,765	3.7%	
Annual Financial Audit and Tax Filings	\$ 25,000	\$ 25,000	\$ -	0.0%	
Industry and Government Relations	\$ 60,000	\$ 60,000	\$ -	0.0%	
Legal Expenses	\$ 26,000	\$ 6,000	\$ (20,000)	-76.9%	
Field Visits and Program Travel	\$ 20,700	\$ 27,804	\$ 7,104	34.3%	Please explain this increase
Interest Expense	\$ 7,848	\$ -	\$ (7,848)	-100.0%	
Total Administration	\$ 758,147	\$ 760,168	\$ 2,021	0.3%	
Total Expenses	\$ 6,441,620	\$ 7,279,028	\$ 837,408	13.0%	
Net Operating Assets	\$ 2,225,312	\$ 1,561,309	\$ (664,003)	-29.8%	
Net Investment Return	\$ 5,627	\$ 57,001	\$ 51,374	913.0%	What is the Investment Return? Interest on Reserve Funds?
Net Assets	\$ 2,230,939	\$ 1,618,310	\$ (612,629)	-27.5%	
Cumulative Net Assets	\$ 3,040,478	\$ 4,658,788			
Reserve Funds					

Board Designated Financial Reserve (Unallocated)	\$ 1,430,073	\$ 2,839,031	\$ 1,408,958	98.5%	Please explain the basis for the 2025 amount as well as the almost-double increase in 2026
Reserves as a % of Annual Operating Budget	22.2%	39.0%			
Undesignated Net Assets (Working Capital)	\$ 1,610,405	\$ 1,819,757	\$ 209,352	13.0%	
25% (3 months) of Annual Operating Budget	25%	25%			

From: [Bethany Cartledge](#)
To: [HARDING Rachel * DEQ](#)
Cc: [Terry McDonald](#)
Subject: Public Comment
Date: Friday, November 24, 2023 9:33:44 AM
Attachments: [image001.png](#)

Good morning,

Terry and I connected first thing and wanted to share the below for public comment to the plan:

1. One of the failures of the CA program is that while it is stated that reuse and recycling is prioritized, however there is no incentive for the recycler to do so. The CA program has taken the stance that if a recycler doesn't deconstruct a product, they are not paid, the result is there is no incentive to sell the product to a third party. Those sales are lower than the deconstruction fee but are highest use of the material. A solution is to incentivize reuse, by saying every mattress that is reused will still receive a payment, albeit a lower one, same with rebuilding. In both circumstances, the higher and better use is incentivized, with a higher flat fee for deconstruction. Finding a way for the recyclers to prioritize the hierarchy.
2. Terry McDonald created the mattress recycling industry, SVdP is the pioneer in mattress recycling. It seems foolish to not take advantage of that expertise on the advisory committee. He has been on the advisory committee in CA since it's inception and there is no similar issue with him being on it.
3. The industry does not assume it's proper role in terms of product stewardship. We know that pocket coils are a national problem for recycling, and yet the solution has been to push the problem down to recyclers and ask them to fix it. This is not moving the discussion forward. Either the program creates a statewide takeback program as has been done in CA, or the industry takes on the research and presents the solution, making it available for all recyclers, versus burdening recyclers with problems created by the industry which they should be solving.

Best,

Bethany Cartledge
Deputy Director
Pronouns: *She/Her/Hers*
St. Vincent de Paul Society of Lane County, Inc.

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From: [Daven Stetson](#)
To: [HARDING Rachel * DEQ](#)
Cc: [Bethany Cartledge](#); [Terry McDonald](#); [Aleks Mousaian](#); [Morena Gomez](#); [Brent Heller](#)
Subject: Public comment
Date: Friday, November 24, 2023 2:07:47 PM

Hi Rachel,

I hope this message finds you well. I wanted to weigh in with a comment on the unintended consequences of the specific due diligence requirements.

I think it is worth mentioning how the requirements for “4. Downstream Due Diligence” would actually make it more difficult to find markets for the items that are the most difficult to recycle. Buyers of mattress components have many choices of materials from brand new, to post-industrial, and imported vs domestic. Our materials are used, dirty, and generally less consistent in nature vs post-industrial and new.

The only competitive advantages we can currently offer to purchasers are service and convenience. This applies to both buyers of 100 pounds of materials and buyers of 1 million pounds of materials. Buyers will choose brand-new product, or cleaner post-industrial product if our post-consumer product is not only dirtier, but also requires additional work and reduced privacy by being forced to provide business documents to multiple parties.

A more reasonable requirement for recyclers' due diligence would be to obtain verification of recycling or reuse from each buyer. It is industry standard in many markets for purchasers to provide a simple certificate of recycling.

Sincere regards,

Daven Stetson
Recycling and Logistics Manager
St. Vincent de Paul Society of Lane County, Inc.

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[Mattress Stewardship Program](#)



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