

From: Chris Hudgins [mailto:CHudgins@sleepproducts.org]

Sent: Tuesday, February 10, 2015 4:58 PM

To: Mattress EPR

Cc: Harley, Ashley@CalRecycle; Castagneto, Nicole@CalRecycle; Mike O'Donnell

Subject: ISPA Comments on Proposed Regulations to Implement the Used Mattress Recovery and Recycling Act

Please see attached comments from the International Sleep Products Association.

Chris Hudgins

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February 11, 2015

Caroll Mortensen
Director
Department of Resources Recycling and Recovery (CalRecycle)
1001 I Street
Sacramento, CA 95812-4025

Dear Director Mortensen:

The International Sleep Products Association (ISPA) is the trade association for mattress manufacturers and suppliers and has served as the voice of the mattress industry for 100 years. ISPA submits the following comments in response to the Department of Resources Recycling and Recovery's (CalRecycle) proposed regulations to implement the Used Mattress Recovery and Recycling Act (the Act) as published in the December 26, 2014 California Regulatory Notice Register, No. 52-Z at 2070.

In 2013, ISPA created the Mattress Recycling Council (MRC), a Section 501(c)(3) non-profit, to develop, implement and administer state mattress recycling programs in California, Connecticut and Rhode Island. On November 5, 2014, CalRecycle certified MRC as a mattress recycling organization to implement the California mattress recycling program required by the Act, codified in the California Resources Code, at Sections 42985 - 42994.

On February 20, 2014, CalRecycle released informal draft regulatory text of proposed regulations to implement the Act. ISPA submitted written comments on the informal draft and discussed potential changes to the draft during CalRecycle's public workshop on March 13, 2014. Following the comment period, CalRecycle staff revised the informal draft, incorporating input from ISPA and other stakeholders. The proposed regulations issued on December 26, 2014, closely reflect the revised informal draft.

As a result of this process, we believe the proposed regulations capture the legislature's intent when crafting and adopting the Act and provide clear direction to MRC on its obligations under the Act. Therefore, ISPA requests no changes to the proposed regulations at this time, and urges CalRecycle to adopt them in their current form.

Thank you for the opportunity to comment. Please contact the undersigned if you have any questions.

Sincerely,

Ryan Trainer
President
International Sleep Products Association