

From: Susan Palmer [mailto:susan.palmer@svdp.us]

Sent: Wednesday, February 11, 2015 4:33 PM

To: Mattress EPR

Subject: comments on Proposed Regulations for Used Mattress Recovery and Recycling Program

Attached are comments from St. Vincent de Paul Society of Lane County

Thanks,

Sue Palmer

St. Vincent de Paul

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Comments on proposed mattress stewardship rules:

§18959 Purpose: The purpose of this Article is to clarify existing statute and establish administrative procedures to efficiently and effectively implement the department's responsibilities under the law and to provide a uniform competitive business environment to all mattress manufacturers, renovators, distributors, recyclers, and retailers pursuant to Chapter 21 (commencing with section 42985), Part 3, Division 30 of the Public Resources Code.

Comment: Note California code language Section 42985(1)(b) *...this chapter will not undermine existing used mattress recycling, resale, refurbishing, and reuse operations that are in compliance with state and federal law.*

Suggested revision: The purpose of this Article is to clarify existing statute and establish administrative procedures to efficiently and effectively implement the department's responsibilities under the law **in a manner that does not undermine existing operators**, providing a uniform competitive business environment to all mattress manufacturers, renovators, distributors, recyclers, and retailers pursuant to Chapter 21 (commencing with section 42985), Part 3, Division 30 of the Public Resources Code.

§18962. Used Mattress Recovery and Recycling Plan. (8) Advisory Committee Report. Include the report by the mattress recycling 30 organization advisory committee as required by subdivision (q) of section 42987.1 of the Public Resources Code. The mattress recycling organization **may** include a description of how it addressed the points or recommendations raised in the Advisory Committee Report.

Comment: Note CA code language Section 42987 (B) *The mattress recycling organization **shall consult** the advisory committee at least once during the development and implementation of the plan required pursuant to Section 42987.1, and annually prior to the submittal of both an annual report required pursuant to Section 42990.1 and an annual budget required pursuant to Section 42988.*

Suggested revision: The mattress recycling organization **shall** include a description of how it addressed the points or recommendations raised in the Advisory Committee Report.