

# Gateway Mattress Co., Inc.

MANUFACTURERS OF QUALITY SLEEP PRODUCTS

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California Department of Resources, Recycling and Recovery  
P.O. Box 4025  
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Subject: Comments on Mattress Recycling Plan

1. The plan calls for a single recycling fee of 11.00 per unit. Having a single fee will negatively affect the business of promotional manufacturers and retail stores. Many lower income individuals buy twins and fulls based on price. Many people who buy the smaller beds are buying for a child's first bed, bunk beds, live in apartments or rooms with multiple beds in one room, or are people living on fixed incomes that "just need something to sleep on". In many cases they are buying a twin to use for the interim because they are sleeping on the floor. With some twins sets retailing for 100.00 or less this will equate to a 22% per set recycle fee. This high of a fee will make twins and fulls out of reach for lower income individuals and will force many to put off buying a new mattress until they can afford to purchase a higher quality mattress or a larger mattress avoiding paying the recycle fee twice. **There should be two different fees as the Act allows. 1 lower fee for twins and fulls and 1 fee for queens and king would be beneficial to all manufacturers and retailers.**

2. Section 1, Chapter 21 42985 (b) of the Act states "it is the intent of the Legislature.....that this chapter will not undermine existing....refurbishing, and reuse operations....." This language is quoted in the Plan on page 16, item 2, bullet point 3. On page 7 of the Plan under the term **REUSE** it is stated that the "plan will not interfere with reuse or compliant renovation activity...." In addition, the Act calls for the Waste Hierarchy to be followed and according to the hierarchy, REUSE is a priority above recycle. Beginning on page 5 of the Plan under Program Objectives and in several other instances, when describing or referring to the waste management hierarchy, the word "reuse" is either absent or listed in the incorrect order. Renovation is REUSE and renovators will accept, and in many cases pay for used bedding from recyclers, collectors, and retailers. In addition, the beds a renovator cannot reuse are recycled by that

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renovator. This provides the MRC a FREE source for a mattress or foundation to be kept out of the landfills without having to pay a processing fee to a recycler. The more bedding that is sent to compliant renovators means less payout by the MRC and will lead to a lower recycle fee charged in the future. **Throughout the Plan all used bedding from all sources is being directed to recyclers only with no mention of renovators as an additional destination. It should be stated in the Plan how the MRC intends to ensure compliant renovation activity is not interfered with and how the California Waste Hierarchy will be followed ensuring reuse before recycling.**

3. Page 14, #2 Foam: The Plan states that the MRC intends to explore other uses for post-consumer foam in addition to carpet padding. The MRC is aware of renovation as an alternative market. The MRC stated to the Advisory Committee they would allow recyclers to sell foam and other components to renovators for reuse. Also, the question of recyclers selling components to renovators was asked and answered in question 13 of the MRC RFP Question and Answers dated April 10, 2015. Post consumer foam is a valuable material to the renovation industry and can be reused without recycling. In most cases a renovator will pay a recycler a higher amount for the foam and other components than carpet rebounders. Therefore, selling the foam and other components to renovators for reuse will increase revenue to recyclers, allow recyclers to reduce the amount they charge the MRC, and help reduce the recycle fee charged to consumers. **This option of recyclers selling components to renovators should be included in the plan and encouraged.**

3. Once the Program starts new recycling companies are bound to emerge. When and how often new proposals are to be accepted for recycling should be included in the plan as well as the contract duration for current accepted recyclers.

4. Page 16 of the Plan estimates that the used and renovated markets sold approximately 277,000 pieces in 2014. In my opinion and based on my knowledge that estimate is severely understated. I estimate the total closer to 750,000 in 2014 and increasing annually.