



# MATTRESS STEWARDSHIP PROGRAM PLAN

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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)(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 ORS 459.005:

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.

In addition, for purposes of this Plan:

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

**“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, as 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.

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

## 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 501(c)(3) 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 12 million mattresses and foundations (collectively Units), and recycled over 450 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 11.9 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 will meet the following deliverables and milestones from Program initiation through the term of the Plan (that is, from Plan approval, through Program launch, through to the end of the Plan term):

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

- Publish MRC contact information and details regarding the Program for the public (upon Plan approval)
- Issue press releases to home furnishings industry media regarding important Program information (upon Plan approval and ongoing as needed)
- Contract with collection sites (ongoing multi-year task (2024-2029))
- Publish Collection Site Guidelines (which are incorporated in the collection site contracts)
- Contract with transporters
- Contract with mattress recyclers
- Notify manufacturers and retailers about Plan approval, assessment amount and Program launch date (to be completed no later than 90 business days before Program launch)
- Contract with Oregon media relations/public affairs specialist (3-6 months before Program launch)
- Publish videos explaining Collection Site Guidelines for collections sites and events (1 month prior to Program launch)
- Provide publicity toolkits to collection sites, recyclers, city/county officials and other relevant community leaders (3 weeks prior to Program launch and ongoing as new sites join the Program)
- Deliver retailer point-of-sale materials (in-hand 1-2 weeks before Program launch, then distributed as requested)

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

- Publish Oregon locator listings and Oregon page on ByeByeMattress.com (day of Program launch, ongoing as new sites join the Program)
- 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)

- Identify America Recycles Day (scheduled for November 15) events and determine level of involvement (by September 2024, and each year thereafter)
- Distribute statewide press release (by year end 2024)
- Organize media tour/press conference at a collection site or recycler (by year end 2024)
- Survey Oregon consumers (by August 2025, and each year thereafter)
- Identify Earth Day (April 22) events and determine level of involvement (by February 2025, and each year thereafter)
- Propose methods for alternative convenient service measurement to DEQ (2025, if necessary)
- Conduct recycler audits for environmentally sound management practices (2025, and each year thereafter)
- 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 low-income 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)

#### **Recurring deliverables during the Plan term:**

- Report to DEQ on relevant changes (including number of permanent collection sites, registered retailers and producers, and Program recyclers and reuse organizations managing discarded Program mattresses) (monthly)
- Submit annual report to DEQ (July 1, 2025, for previous calendar year, and each year thereafter)
- Submit annual fee payment to DEQ (annually on July 1)



- Submit budget and financial audit to DEQ (annually on July 1)
- Distribute public service announcement (each spring and fall following Program launch)

## 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 and regulations, including the Mattress Stewardship Act and rules in OAR Chapter 340, Division 98 that implement the Act. MRC takes its obligations seriously and recognizes that compliance is an ongoing responsibility. MRC is also committed to conducting our business operations ethically and responsibly.

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 the Mattress Stewardship Act.
2. **Stay Updated:** Given that laws and regulations can change over time, MRC will periodically review any updates or amendments that may affect our compliance.
3. **Seek Professional Advice:** If we have any concerns or questions that cannot be answered by internal staff, MRC will consult with a lawyer or other professional with specialties in the relevant area.
4. **Develop Compliance Policies and Procedures:** MRC will establish internal policies and procedures that outline how we will comply with applicable laws and regulations.
5. **Train Employees and Contractors:** As needed, MRC will educate employees and contracted parties (collectors, transporters and recyclers) about their roles and responsibilities related to compliance.
6. **Maintain Proper Documentation:** As required by the Act, MRC will maintain records of our compliance efforts, including any licenses, contracts and other relevant documents as required by law.
7. **Conduct Audits and Assessments:** MRC will regularly review and assess our compliance practices 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.”

Consistent with these terms, MRC will consider Program mattresses to be those mattresses that have been discarded in Oregon by Oregon residents.

**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 units 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 units from California is small. Likewise, the states of Idaho and Nevada, which also share borders with Oregon, are unlikely sources for non-Program units because they lack significant population centers near their border with Oregon.

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

- A solid waste facility 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.
- MRC will require that collectors, transporters and recyclers may accept units only from 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 collectors and recyclers will require them to document that they are accepting units only from in-state Oregon sources and will make clear that they will not be compensated by MRC for accepting, handling or processing out-of-state units.
- Point-of-sale materials to inform non-Oregon residents who buy a mattress from an Oregon retailer that they may not have their discarded mattress recycled through the Program.
- If the number of units collected by a site near the Washington border exceeds historic levels or the number of units that its service area would typically generate, and MRC concludes that this situation is likely caused by the fact that the collector has accepted non-Program units, MRC may limit the number of units it will accept from that collector.

**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.” Providing the name and address of these entities meets this requirement. 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. MRC is, however, prepared to provide the requested information to DEQ confidentially.

**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.

**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.” Providing the name and address of these entities meets this requirement. The purpose of this requirement is to identify for the public which entities MRC proposes to use to transport and recycle discarded mattresses. The Act does not require that the Plan also list the contact name and phone number for those entities. 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. MRC is however, prepared to provide the requested information to DEQ confidentially.

MRC has not yet entered into contracts with any of these transporters or recyclers, pending DEQ’s approval of this Plan.

**TABLE 1. Proposed Transporters**

Company	Address	Website
Ally Global Logistics DBA The AGL Group	317 Libbey Industrial Pkwy., Ste B-200 Weymouth, MA 02189	theaglgroup.com
Ron Lawrence And Son Transport, Inc.	532 Beard Ave. Modesto, CA 95354	ronlawrenceandson.com
Ryder Transportation Solutions	11690 NW 105th St. Miami FL 33178-1103	ryder.com
Titan Concepts International LLC DBA TCI Global Logistics	710 S 67th Ave. Phoenix, AZ 85043	tcitransportation.com
Total Quality Logistics, LLC	4289 Ivy Pointe Blvd. Cincinnati, OH 45245	tql.com

**TABLE 2. Proposed Recyclers**

Company	Address	Website
Environmentally Conscious Recycling (ECR)	12409 NE San Rafael Portland OR 97230	ecrrecycling.com
Klamath Works	2350 Maywood Dr. Klamath Falls, OR 97603	klamathworks.com
St. Vincent de Paul Society of Lane County, Oregon	135 N Cleveland St. Eugene, OR 97402	svdp.us

**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.**

Program mattresses (see Part 4(b), above) are eligible for collection and recycling under the Program at no charge to the consumer, regardless of which company manufactured that unit.

MRC will hire third parties who will use environmentally sound management practices to collect, transport and recycle discarded units. Each of these entities 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 safety requirements, fair labor standards rules and other laws and 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 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 both contractual performance metrics and relevant federal, state and local legal requirements. To identify recyclers that can meet these criteria, MRC issued a request for proposals (RFP) to recyclers interested in processing discarded units 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 processed mattresses are recycled when possible, as opposed to 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.

- 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 units and making the recycled materials available to use in making new products.

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 will work with collectors to implement best practices that will reduce the number of units that are ruined because of mishandling or other causes. MRC will also provide information to collectors, 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 would include mattresses handed down to friends or family, mattresses donated to charitable organizations, sold in used furniture stores and mattress renovation. 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 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. At present, MRC is only aware of one active renovator 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. 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.

The recycler will then dismantle the non-contaminated mattresses. 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.

Some recyclers separate and sell high-quality used mattresses or their component materials to renovators, who use them to renovate mattresses for sale to consumers.

## 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.**

Although the Act requires that the Plan identify certain entities that participate in the Program (see Section 4(1)(d) (requiring list of producers, renovators and retailers registered with the Program) and 4(1)(e)(A) (requiring list of proposed transporters and recyclers with which the stewardship organization intends to contract)), the Act does not require that the Plan identify proposed collection sites and events. Furthermore, MRC has not yet entered into contracts with any collection sites, pending DEQ's approval of this Plan. See the timeline for when we expect these arrangements will begin to be formalized. Once those contracts are in place, MRC will provide DEQ a list of those sites.

Likewise, MRC generally finalizes collection event details weeks before a scheduled event. Therefore, it is premature to provide those details since they do not yet exist. Once those arrangements have been finalized, MRC will also provide DEQ their details.

**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's initial goal will be 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 in large part on whether the various entities that could potentially participate in the Oregon collection network agree to cooperate with MRC, since MRC has no ability to require them to cooperate. Based on the experience of other mattress recycling programs, most entities willingly participate in the mattress collection and recycling activities, but others do not. At this stage, MRC does not know how much cooperation from private and local government parties we can reasonably expect.

For this reason, it is premature to propose alternative means for MRC to provide mattress collection opportunities. MRC will need time to implement the Plan, determine where additional collection sites are needed and design and implement appropriate alternative strategies. For that reason, MRC proposes to evaluate the effectiveness of its collection network no later than two years after the Program launches. At that time, MRC will consider and possibly implement alternative collection methods, based on DEQ's suggestions above and possibly other options.

**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 timeline provided above in Part 3 of this Plan, establishing the collection network is a multi-year process. Even though MRC had not yet filed this Plan or DEQ approved that Plan, MRC began exploratory work in May 2023 to understand what to expect when we eventually build the collection network. MRC preliminarily contacted 130 solid waste facilities located in 34 of Oregon's 36 counties that are likely to accept discarded mattresses. See **Appendix C** for a list of facilities that responded to MRC's survey or otherwise indicated interest, as applicable to Section 5(1)(a)(C) and 5(1)(a)(D).

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. These additional locations increased the survey pool to 225 locations in all 36 Oregon counties.

Once the Plan is approved, MRC will prioritize contracting with respondents in both of these surveys that expressed interest in participating in the Program.

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 D** for examples of collection site resources. 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. 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 will also provide necessary facility signage, invoicing support, etc.

**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**

The Act contains no requirements for such contact information. Furthermore, see response to Part 5(a) and 5(c) above. It is premature to provide that information at this time. **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 products are eligible for recycling and explain how collectors can efficiently collect, separate and load mattresses into trailers. 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 wet, insect-infested, excessively soiled, etc.) and how to identify bedbug-infested units. To further assist collection sites in identifying and managing instances of bedbug contamination, MRC offers an online training video about bedbugs that collection site staff can access on demand in MRC's [Resources Library](#).

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.

- 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.**

Based on the experience of other mattress recycling programs, the program pays for or provides 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 mattresses and will largely follow the experiences learned from other state mattress recycling programs.

Collection sites that do not transport units using their own equipment will contact a transporter provided by MRC when a full container is ready to be picked up and swapped for an empty one. For 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. High-volume locations may be assigned 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 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 each site's actual labor and forklift handling that it incurs to accept discarded units.

- 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. 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 will be 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 established process to implement changes to this information within three business days.

Consumers will learn ByeByeMattress.com exists through a multichannel 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 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 intends to comply with this requirement and will use data collected in the Program's initial years to collect baseline data to 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.**

The Act does not require the Plan to include such information. To protect the privacy of MRC staff, MRC has concluded that it is not appropriate to provide personal information in a public document such as the Plan. As the timeline provided in response to **Part 3** of this Plan indicates, once DEQ approves the Plan, MRC will place general public contact details regarding the Program on its website. MRC is prepared to provide the requested personal information for key Program personnel to DEQ confidentially.

- 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.**

The Act does not require a stewardship organization to include such a statement in the Plan. As the stewardship organization, MRC's legal responsibilities are set forth in the Act, federal law and other state law. MRC intends to comply with those 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.**

The Act does not require the Plan to include such information. Nevertheless, MRC will enter into contracts with all parties participating in the Program that set forth their 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 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 collectors of discarded mattresses to minimize the waste generated from improper handling (crushing in compactor trucks), contamination (exposure to food and similar wastes) and storage (exposure to weather) of used mattresses 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 requirements. 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 6(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.

MRC’s contracts with its recyclers will require them to achieve minimum recycling targets. In addition, MRC will employ a variety of auditing and accounting procedures to confirm that collection sites, transporters and recyclers comply with environmentally sound management practices defined in the Act.

This begins with transporters documenting mattress deliveries to recyclers with signed bills of lading that identify the source, quantity and destination of the units. These signed 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 recycling rate including 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 each recycler 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-party auditors to observe and document each recycler’s compliance with environmental health and safety requirements, fire safety protocols, recycling standards and contractual obligations.

- 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.**

The Act does not require the Plan to include such information. Section 11 of the Act only requires the stewardship organization to retain all records for not less than three years and that those records be made available for inspection by the DEQ upon request. MRC will comply with those requirements.

Nevertheless, MRC’s enterprise customer relationship management (CRM) system aggregates information from collectors, 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 provide important metrics for annual reporting and internal performance tracking.

**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.**

The Act does not require the Plan to include such information.

Nevertheless, the process that MRC has already commenced and will continue to pursue is as follows. MRC has compiled a database of potential retailers, manufacturers and renovators from 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 by via certified mail of its potential obligations and follows 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, MRC will refer the party to Oregon DEQ for action.

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 of late fees and associated interest. Each month, MRC will notify Oregon DEQ of all parties that reach the level seven delinquency stage.

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

Delinquency Stage	Late Reporter	Late Remitter
<b>Level 1</b>	Late notice email generated by MRCreporting.org	Late notice email generated by MRCreporting.org
<b>Level 2</b>	Phone call made to verify continued Program participation and provide a verbal reporting reminder	Phone call made regarding outstanding payment and warning of potential interest charges
<b>Level 3</b>	Written notice mailed	Written notice mailed and interest invoice issued
<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



<b>Level 5</b>	Written notice sent by certified mail and late fee invoice issued	Second phone call made warning of accruing interest
<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
<b>Level 7</b>	Late fee invoice issued; OR DEQ notified of delinquent account	Delinquent account sent to collections agency and interest invoice issued; OR DEQ notified of delinquent account
<b>Continued action</b>	Late fee invoices issued monthly until account no longer delinquent	Interest invoices issued monthly until account is no longer delinquent

**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 audits 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 collectors, transporters, recyclers and audits 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 (LLC) 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. Expenses are based on anticipated administrative and marketing costs in order to meet Program objectives. Operational costs, representing the largest Program expense, are based on projected processed units and the costs to collect, transport and process those units. 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.

**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 multi-year 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.

**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 \$19.75 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.

The assessment is collected on the following types of sales:

- Brick-and-mortar retailers (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 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.

To collect the assessment, parties that must remit the Oregon assessment to MRC may access MRC's online remittance portal through [MRCreporting.org](https://mrcreporting.org) (other remitters in the other mattress recycling programs use the same portal.) In addition to facilitating remittances, the portal includes important information about MRC, Program definitions, FAQ's, fee policy, Program and non-Program products, participant agreements and registration instructions.

## 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 multi-family housing are critical prevention measures.

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 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.

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 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, and
- fund pilot projects proposed by Oregon communities and other entities that are designed to discourage illegal dumping in the future.

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 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](http://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 will monitor the effectiveness of its outreach annually and adjust elements of the communications plan as necessary.

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 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 contracted sites and recyclers three weeks before the Program launches. Once the Program begins, toolkits will be distributed as a site or recycler joins the collection network.
- **Participating in community events focused on environmental and recycling education.** MRC's marketing efforts will be emphasized during Earth Day (April 22) and America Recycles Day (Nov. 15) where MRC may either participate as a vendor or provides Program information for distribution to attendees about mattress recycling opportunities in their communities.
- **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.

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. 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. Other demographic information collected will include zip code, ethnicities/races, ages and household income to understand if there is a bias or inequality in Program knowledge. MRC will repeat the survey each year to identify trends and changes.

In future years, based on awareness levels 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) 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 Program 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. 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.

In accordance with Section 8(2) of the Act, the initial Plan does not need to include the information described in section 4(1)(L). MRC will submit this information 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), 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.

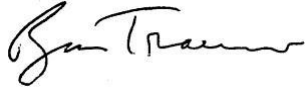
## Part 15 – Contact and Certifying Information

**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)

**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.*

A handwritten signature in black ink, appearing to read "Ryan Trainer". The signature is written in a cursive style with a prominent initial "R".

Ryan Trainer, President ISPA and MRC

# Supplemental Information

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 provided 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 Products 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 Products 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 Products 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 ensure 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 August 30, 2023 (30 days before the plan submittal).

### TABLE 4: 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.

Account	DBA Name
Aaron's, LLC	Aaron's, LLC
American Bedding Mfg. Inc.	American Bedding Mfg. Inc.
Ascion, LLC	Reverie
Ashley Furniture Industries, LLC	Ashley Furniture Industries, LLC
Bedgear, LLC	Bedgear
Bestar Inc.	Bestar Inc.
Boyd Flotation Inc.	Boyd Specialty Sleep
Brentwood Home, LLC	Simply Modern Mattress
Brooklyn Bedding, LLC	Dreamfoam Bedding, Brooklyn Bedding, Helix Sleep, Bear Mattress, Nolah Sleep, Leesa Sleep
Bryte Inc.	Bryte Labs
Casper Sleep Inc.	Casper
Children's Products, LLC	Simmons Juvenile Furniture
Comfort DTC Inc.	Molecule
Consolidated Hospitality Supplies, LLC	Consolidated Hospitality Supplies, LLC
Correctional Technologies Inc.	Cortech USA
Corsicana Acquisition, LLC	Corsicana Mattress Company
Costco Wholesale Corporation	Costco Wholesale Corporation
Custom Mattress Makers Inc.	Custom Mattress Makers Inc.
CVB Inc.	LUCID® MATTRESS, WELLSVILLE®, LINENSPA®
Denver Mattress Company, LLC	Denver Mattress Company
Dishuo Furniture PTE. Ltd	Dishuo Furniture PTE. Ltd
Elements International	Kyvno, LLC

Account	DBA Name
Ergomotion Inc.	Ergomotion Inc.
Feng Ben International (HK) Limited	Feng Ben International (HK) Limited
FXI Inc.	FXI
Gateway Mattress Co. Inc.	Gateway Mattress Co. Inc.
GF Health Products Inc.	GF Health Products Inc.
Golden Well International (HK) Ltd	Golden Well International (HK) Ltd
Heartland Mattress, LLC	Heartland Mattress
Hong Kong Gesin Technology Company Ltd	Hong Kong Gesin Technology Company Ltd
Honor Global Industry PTE. Ltd	Glory
IKEA Supply AG	IKEA
InnoMax Corporation	InnoMax Corporation
Invacare Corporation	Invacare Corporation
Jeffco Fibres Inc.	Jeffco Fibres Inc.
Joerns Healthcare, LLC	Joerns Healthcare
Keeson Technology Corporation LTD	Keeson Technology Corporation LTD
King's Castle HK Import and Export Co. Limited	Deluxe Home of USA Inc.
Kingsdown Inc.	Kingsdown Inc.
Kuka (HK) Trade Co. LTD	Gaim Regiomontana, S.A. De C.V.
Lakewood Candies, LLC	Milliard Bedding
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.
Lull Ventures, LLC	Lull
Mattress Firm Inc.	Mattress Firm Inc.
MTJ American, LLC	MTJ American
Noble House Home Furnishings, LLC	Noble House Home Furnishings
Norix Group Inc.	Norix Group Inc.
Oregon Corrections Enterprises	Oregon Corrections Enterprises
Organic Mattresses Inc.	Organic Mattresses Inc.
Peacelily Sleep	Peacelily Sleep
Pleasant Mattress Inc.	Pleasant Mattress Inc.
Purple Innovation, LLC	Purple
Quality Sleep Shop	My Green Mattress
Resident Home, LLC	Resident
Restwell Mattress Co.	Restwell Mattress Factory
Safe For Home Products, LLC	Naturepedic
SBL, LLC	SBI, LLC
Sealy Mattress Manufacturing Company, LLC	Sealy Mattress Manufacturing Company
Serta Simmons Bedding, LLC	Serta and Simmons
Sferra Fine Linens, LLC	Sferra
Sherwood West, LLC	Sherwood West, LLC
Solstice Sleep Products Inc.	Solstice Sleep Products Inc.
Somnium Inc.	Somnium Inc.
South Bay International Inc.	South Bay International Inc.
Southerland Inc.	Southerland Inc

Account	DBA Name
Stylus Sofas Inc.	Stylus, Made to Order Sofas
Tempur Production USA, LLC	Mountain Top Foam
The Furniture Bank	Houston Furniture Bank
The Original Mattress Factory Inc.	The Original Mattress Factory
University Loft Company	University Loft Company
Ureblock S.A. DE C.V.	Ureblock
Victory Supply, LLC	Victory Supply, LLC
Vien Lam Co. Ltd	Vien Lam Co. Ltd
Vispring Limited	Vispring Limited
VPC Group Inc.	VPC Group
Werner Media Partners, LLC	Ghostbed
Xiamen Moreshire Import and Export Co. LTD	Xiamen Moreshire Import and Export Co. LTD
Zinus Inc.	Zinus Inc.
Zoma Sleep, LLC	Zoma Sleep

**TABLE 5: Registered Renovators**

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

Account	DBA Name
American Mattress Manufacturing	American Mattress Manufacturing
Gateway Mattress Co. Inc.	Gateway Mattress Co. Inc.

**TABLE 6: Registered Retailers**

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

Account	DBA Name
A Lava Son, LLC	Naturally Nestled
Aaron's, LLC	Aaron's, LLC
AgilityBed Inc.	ShopTherapedic
Amazon.com Services, LLC	Amazon.com Services, LLC
American Bedding Mfg. Inc.	American Bedding Mfg. Inc.
American Mattress Manufacturing	American Mattress Manufacturing
Anchortex Corporation	Anchortex Corporation
Apollo Mattress Inc.	Luma Sleep
Arhaus, LLC	Arhaus Furniture
Ascion, LLC	Reverie
Ashley Global Retail, LLC	Ashley Furniture Home Store
Avocado Mattress, LLC	Avocado Green Mattress
Barron's Home Furnishings	Barron's Home Furnishings & Sleep Center
Beach Trading Co. Inc.	www.buydig.com
Bedgear, LLC	Bedgear



Account	DBA Name
Beds For Less Inc.	Ashley/Beds For Less
Belnick Retail, LLC	BizChair
Best Buy Stores L.P.	Best Buy
BF Sleep, LLC	Big Fig Mattress
Big Lots Stores Inc.	Big Lots
Black Buggy Furniture, LLC	Black Buggy Furniture
Blackledge Furniture Company	Blackledge Furniture
BLST Sales Marketing and Servicing, LLC	Fingerhut
Boll & Branch, LLC	Boll & Branch, LLC
Boyd Flotation Inc.	Boyd Specialty Sleep
Brenner's Furniture Inc.	Brenner's Furniture Inc.
Brentwood Home, LLC	Simply Modern Mattress
Brooklyn Bedding, LLC	Dreamfoam Bedding, Brooklyn Bedding, Helix Sleep, Bear Mattress, Nolah Sleep, Leesa Sleep
Bryte Inc.	Bryte Labs
Casper Sleep Inc.	Casper
Central Rent 2 Own	Central Rent 2 Own
City Liquidators Inc.	City Liquidators Inc.
Cocoon International Sales, LLC	Cocoon International Sales, LLC
Comfort DTC Inc.	Molecule
Consolidated Hospitality Supplies, LLC	Consolidated Hospitality Supplies, LLC
Correctional Technologies Inc.	Cortech USA
Corsicana Acquisition, LLC	Corsicana Mattress Company
Costco Wholesale Corporation	Costco Wholesale Corporation
Courtesy Home Furnishings	Self Service Furniture
CTR Associates	Kelly's Furniture, Paul Schatz Furniture
Custom Mattress Makers Inc.	Custom Mattress Makers Inc.
CVB Inc.	LUCID® MATTRESS, WELLSVILLE®, LINENSPA®
Dania Inc.	Scandinavian Designs; Dania Furniture
Dennis M Rose	Plank and Coil
Denver Mattress Company, LLC	Denver Mattress Company
Direct Mattress and Furniture	Direct Mattress and Furniture
Direct Supply Inc.	Direct Supply; Direct Supply Equipment & Furnishings; Direct Supply of Wisconsin
DirectBuy Operations, LLC	DirectBuy Operations, LLC
Downey Sleep Center, LLC	Downey Sleep Center
E. Gregg Clemmer Inc.	Clemmer's Furniture
East West Bedding, LLC	EasyRest
Elements International	Kyvno, LLC
Emerald City Organic Sleep Solutions Inc.	ECO Sleep Solutions
Encore Home Furnishings, LLC	Encore Home Furnishings
Engles Furniture Inc.	Engles Furniture Inc.
Ergomotion Inc.	Ergomotion Inc.
Ergopedic, LLC	Ergopedicsleep.com

Account	DBA Name
Euromarket Designs Inc.	Crate & Barrel
Express Furniture Services, LLC	Express Furniture Rental
Furniture City	Furniture City
Gates Furniture of Grants Pass Inc.	Gates Home Furnishings
Gateway Mattress Co. Inc.	Gateway Mattress Co. Inc.
GF Health Products Inc.	GF Health Products Inc.
Gilbert Investments Inc.	Edgewater Home Furnishings
Greg's Sleep Center	Greg's Sleep Center
Haven Sleep Products Ltd	Haven Sleep Co.
Hennick's Home Center Inc.	Hennick's Furniture & Sleep Center
Home Depot U.S.A. Inc.	Home Depot
Homelife Furniture Inc.	Homelife Furniture
HSNi, LLC	Home Shopping Network
InnoMax Corporation	InnoMax Corporation
Invacare Corporation	Invacare Corporation
Jeffco Fibres Inc.	Jeffco Fibres Inc.
Joerns Healthcare, LLC	Joerns Healthcare
Kohl's Department Stores Inc.	Kohl's Department Stores Inc.
Kuebler's Furniture Inc.	Kuebler's Furniture Inc.
L&M Arnold Enterprises, LLC	Mattress Land
Lakewood Candies, LLC	Milliard Bedding
Lavin Industries	European Sleep Works
Layla Sleep Inc.	Layla
LeafScore Inc.	LeafScore Inc.
Lewis Home Source Inc.	Roby's Furniture and Appliance
Lifekind Inc.	Lifekind Inc.
Lucas & Howard Furniture Inc.	Ultimate Mattress & Bedroom Company
Lull Ventures, LLC	Lull
Marpac, LLC	Yogabed
Mattress Firm Inc.	Mattress Firm Inc.
Mattress MegaStore, LLC	Mattress MegaStore
MGOFF, LLC	Bedrooms West
Morgan's Mattresses	Morgan's Mattresses
MTJ American, LLC	MTJ American
Murray's Auction Center Inc.	Murray's Furniture, and Ashley Homestore
My Livingway, LLC	The American Furniture
Nest Bedding Inc.	Nest Bedding
Newton Baby Inc.	Newton Baby Inc.
Noble House Home Furnishings, LLC	Noble House Home Furnishings
Nook Sleep Systems, LLC	Nook Sleep
Norix Group Inc.	Norix Group Inc.
Northwest Beds Inc.	Northwest Home Furnishings
Northwest Furniture and Mattress, LLC	Northwest Furniture and Mattress, LLC
Northwest Furniture Outlet Inc.	Northwest Furniture Outlet

Account	DBA Name
Northwest RTB9, LLC	Relax The Back
Oregon Corrections Enterprises	Oregon Corrections Enterprises
Organic Exchange Inc.	Organic Exchange Inc.
Organic Grace	Organic Grace
Organic Mattresses Inc.	Organic Mattresses Inc.
Peacelily Sleep	Peacelily Sleep
Penney OpCo, LLC	JCPenney
Pleasant Mattress Inc.	Pleasant Mattress Inc.
Purple Innovation, LLC	Purple
Quality Sleep Shop	My Green Mattress
QVC Inc.	QVC Inc.
R.C. Willey Home Furnishings Inc.	R.C. Willey
Rent-A-Center Inc.	Rent-A-Center
Resident Home, LLC	Resident
Rested Development Inc.	America's Mattress
Richardson's Furniture	Richardson's Furniture & Mattress Gallery
Room & Board Inc.	Room & Board
Ruth Murphy Ltd	Murphy's Furniture
Safe For Home Products, LLC	Naturepedic
Salem Building Specialties	Kelly's Home Center
Scenic Dreams, LLC	Mattress Depot USA
Sealy Mattress Manufacturing Company, LLC	Sealy Mattress Manufacturing Company
Serta Simmons Bedding, LLC	Serta and Simmons
Sferra Fine Linens, LLC	Sferra
Shepherd Inc.	Roseburg Mattress
Snowwhite Hospitality, LLC	Boston Interior Solutions
Solstice Sleep Products Inc.	Solstice Sleep Products Inc.
Sonu Sleep Corporation	Sonu Sleep
South Bay International Inc.	South Bay International Inc.
Sterling Furniture Company	M.Jacobs Furniture
Stumptown Sleep, LLC	The Mattress Lot, Stumptown Mattress
Tempur Retail Stores, LLC	Tempur Retail Stores, LLC
Tempur-Pedic North America, LLC	Tempur-Pedic North America, LLC
Thanepohn Corp.	Mattress Mill
The Furniture Connexion	The Furniture Connexion
The Furniture Superstore Inc.	Rife's Home Furniture
The Original Mattress Factory Inc.	The Original Mattress Factory
Thuma Inc.	Thuma Inc.
TO & Sons Corp.	Michaels Fine Furniture
Tom Busch Home Furnishings Inc.	Tom Busch Home Furnishings Inc.
Trailhead Ventures Inc.	Medley
Tru Furniture, LLC	Tru Furniture, LLC
University Loft Company	University Loft Company
Victory Supply, LLC	Victory Supply, LLC

Account	DBA Name
Walker's Furniture Inc.	Walker's Furniture & Mattress
Wallbeds By Wilding, LLC	Wilding Wallbeds
Werner Media Partners, LLC	Ghostbed
Williams-Sonoma Inc.	Williams-Sonoma Inc.
Wilson's of Redmond	Wilson's of Redmond
Zinus Inc.	Zinus Inc.
Zoma Sleep, LLC	Zoma Sleep

## Appendix B: Recycling Standards

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### 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 processed in a manner that adequately safeguards the environment, industry employees and consumers. The Standard also includes data tracking and reporting requirements.

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

For purposes of these Standards, the term “Mattress” or “unit” should be interpreted to include both Mattresses and Foundations (or box-springs).

#### 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 it 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 75% 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. Weigh and count all inbound Mattresses.
- 3.2. Maintain in-house or third party annually calibrated and certified scale to weigh all in-bound and outbound materials on-site or document all out-bound shipments are using third party calibrated and certified scales.
- 3.3. Maintain daily records of all loads received, inventories and off-site shipments of commodities or solid waste
- 3.4. Accurately record Units received. Separately track Non-Program Units received at the facility.
- 3.5. 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 facilities.
- 3.6. Train employees on how to prepare and maintain all necessary records and other documentation related to the receipt, processing, inventory and disposition of Mattress and Mattress materials.
- 3.7. 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 work place location 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.



## 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 7: 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
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
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
Lincoln	Lincoln City	Schooner Creek Private Transfer Station

County	City	Facility Name
Lincoln	Newport	Thompson's Transfer And Disposal Inc.
Lincoln	Toledo	Toledo Transfer Station
Linn	Albany	St. Vincent de Paul Society of Lane County - Albany Thrift Store
Malheur	Ontario	Ontario Sanitary Service Transfer Station
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
Polk	Monmouth	Brandt's Sanitary Service
Tillamook	Manzanita	Manzanita Transfer Station
Tillamook	Pacific City	Pacific City Transfer Station
Tillamook	Tillamook	Tillamook Transfer Station
Umatilla	Athens	Humbert Landfill
Wasco	The Dalles	The Dalles Transfer Station + Tri-County HHW Collection Facility
Washington	Hillsboro	Far West Recycling
Washington	Hillsboro	Tualatin Valley Waste Recovery
Washington	Sherwood	Pride Disposal
Washington	Tualatin	Community Warehouse
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

## Collection Site Guidelines

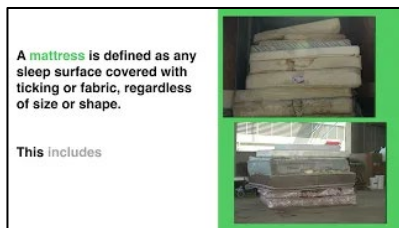
MRC's Collection Site Guidelines include descriptions and examples of Program materials, quality standards, materials handling and loading, transportation information, record keeping and how to withdraw from the Program. The images here are an example from the Northeast Guidelines and MRC would develop a similar document for Oregon once the Plan is approved.



View or download this document: [MRC's Northeast Guidelines](#)

## Guideline Video Series

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



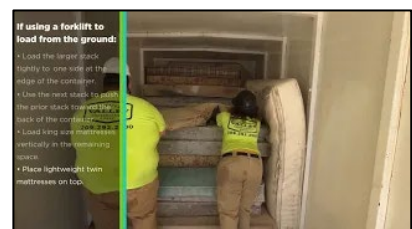
**Included & Excluded Products**

[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](#)

## Appendix E: Budget

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 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 mattress recycling Program over a multiyear period in a prudent and responsible manner.

### Revenue

Funding for Program implementation comes from a mattress stewardship assessment collected at the point of sale (retail or otherwise) and remitted to MRC. In calculating revenue, MRC has used (A) a per unit assessment of \$19.75, 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 year.

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 DEQ approves the Plan and this budget. For purposes of preparing the budget, MRC has assumed a July 1, 2024 launch date. Therefore, the revenue and costs for 2024 will cover operations only for the last half 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) the last half of calendar year 2024 and (B) calendar years 2025 and 2026.

Based on these assumptions, MRC’s budgeted revenue for 2024 to 2026 is based on the following units sold in Oregon and a per unit assessment of \$19.75:

**TABLE 8: Revenue Calculation**

Category	2024 Budget	2025 Budget	2026 Budget	Total
Assessment Revenue	\$4,457,259	\$8,666,932	\$8,840,337	\$21,964,528
Unit Sales	225,684	438,832	447,612	1,112,128



## Expenses

### Operational Expenses

Based on the experiences of other statewide mattress recycling programs, MRC has estimated the number of units that recyclers will process in 2024, 2025 and 2026.

Operational costs to process those units include collection, container rental, transportation and processing expenses. The budgeted operational costs also include expenses on efforts to mitigate illegal mattress dumping and various studies (including life cycle, performance, etc.) that MRC will conduct during this period.

### Public Education, Advertising and Promotion

MRC's comprehensive education and communication efforts will inform the industry and consumers about how and where to recycle mattresses in Oregon, why recycling is beneficial, and the positive impact mattress recycling can make.

### Oregon DEQ Government Oversight Fees

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

### Administrative Expenses

MRC administrative costs include staff expenses, professional services, legal and other administrative expenses required to manage the Program. Administrative 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, these other programs are operating 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 existing three states with mattress stewardship programs plus Oregon. That means that for purposes of this budget, 8.8% of shared expenses have been allocated to the Oregon Program.

### Start-Up Expenses

In 2022 and 2023, MRC incurred various start up expenses. These included legal expenses incurred to form MRC, staff costs and professional services required to prepare this Plan, travel and other necessary expenses incurred to prepare to launch the Program. MRC funded these start-up expenses by borrowing money from MRC Inc. These expenses are shown in the far left column in the following table:

**TABLE 9: 2022-2026 Expenses**

Category	Start-Up Costs 2022-2023	2024 Budget	2025 Budget	2026 Budget	Total
Operational Costs	\$ -	\$ 2,213,629	\$ 5,224,815	\$ 6,092,120	\$ 13,530,564
Public Education, Advertising and Promotion	\$ 33,211	\$ 235,520	\$ 258,658	\$ 226,740	\$ 754,129
Oregon Oversight	\$ -	\$ 205,000	\$ 200,000	\$ 200,000	\$ 605,000
Program Administration	\$ 349,918	\$ 610,442	\$ 758,147	\$ 760,168	\$ 2,478,675
<b>Total Program Costs</b>	<b>\$ 383,129</b>	<b>\$ 3,264,591</b>	<b>\$ 6,441,620</b>	<b>\$ 7,279,028</b>	<b>\$ 17,368,368</b>

**Anticipated Program Budget**

The budget assumes a launch date of July 1, 2024. The budget includes:

- 1) Start-up costs MRC incurred in 2022 and 2023
- 2) Start-up costs for the first half of 2024 and operating costs for the last half of the year
- 3) Operating costs for 2025 and 2026

**Calculating the Per Unit Assessment**

The total budgeted expenses through 2026 (including start-up costs) is \$17,368,368. We add reserve funding through December 31, 2026 of \$4,658,788. From this, we deduct budgeted investment revenue earned during the period of \$62,628. That leaves a total of \$21,964,528 that must be funded by the per unit assessment. MRC anticipates that during the period from July 1, 2024 until December 31, 2026, Oregon consumers will buy 1,112,128 mattresses and foundations. Based on this information, MRC calculated the per unit assessment of \$19.75 by dividing total costs and reserves (less investment revenue) by total units sold ( $\$21,964,528 / 1,112,128 = \$19.75$ ). The calculation of the assessment is illustrated in the table as follows:

**TABLE 10: Per Unit Assessment Calculation**

Stewardship Assessment	
Start-up costs 2022-2023	\$ 383,129
2024 Budgeted Expenses	\$ 3,264,591
2025 Budgeted Expenses	\$ 6,441,620
2026 Budgeted Expenses	\$ 7,279,028
Total Expenses (A)	\$ 17,368,368
Target Reserve by 12/31/2026 (B)	\$ 4,658,788
Less Investment Income (C)	\$ (62,628)
Amount to Cover (D = A + B - C)	\$ 21,964,528
Projected Unit Sales 2024-2026 (E)	\$ 1,112,128
Per Unit Assessment (F = D/E)	\$ 19.75

The details of the anticipated budget are as follows:

**TABLE 11: Proposed Budget**

<b>Mattress Recycling Council Oregon LLC</b>						
Assessment Fee	\$ 19.75					Expense
	Start-Up Costs	2024 Budget	2025 Budget	2026 Budget	Total	Allocation
<b>REVENUE:</b>						
Assessment Revenue (\$19.75 / unit)	\$ -	\$ 4,457,259	\$ 8,666,932	\$ 8,840,337	\$21,964,528	
<b>Total Revenue</b>	\$ -	\$ 4,457,259	\$ 8,666,932	\$ 8,840,337	\$21,964,528	
<b>EXPENSES:</b>						
<b>Operational Costs</b>						
Collection						
Collection Site Handling Fees	\$ -	\$ 166,693	\$ 381,508	\$ 450,092	\$ 998,293	
Collection Container and Storage Costs	\$ -	\$ 131,900	\$ 315,910	\$ 413,763	\$ 861,573	
Mattress Collection Facility Improvement Funding	\$ -	\$ 50,000	\$ 50,000	\$ 50,000	\$ 150,000	
<b>Total Collection Costs</b>	\$ -	\$ 348,593	\$ 747,418	\$ 913,855	\$ 2,009,866	
Transportation	\$ -	\$ 601,398	\$ 1,375,142	\$ 1,585,256	\$ 3,561,796	
Processing	\$ -	\$ 1,233,638	\$ 2,832,255	\$ 3,265,009	\$ 7,330,902	
Illegal Dump Mitigation	\$ -	\$ 5,000	\$ 150,000	\$ 150,000	\$ 305,000	
Program Studies (Life Cycle, Convenience, etc.)	\$ -	\$ 20,000	\$ 110,000	\$ 148,000	\$ 278,000	
Program Compliance Audits	\$ -	\$ 5,000	\$ 10,000	\$ 30,000	\$ 45,000	
<b>Total Operational Costs</b>	\$ -	\$ 2,213,629	\$ 5,224,815	\$ 6,092,120	\$13,530,564	77.9%
<b>Public Education, Advertising, and Promotion</b>						
Public Education and Advertising	\$ 33,211	\$ 217,447	\$ 225,085	\$ 191,157	\$ 666,900	
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>	\$ 33,211	\$ 235,520	\$ 258,658	\$ 226,740	\$ 754,129	4.3%
<b>Oregon Government Oversight Fees</b>	\$ -	\$ 205,000	\$ 200,000	\$ 200,000	\$ 605,000	3.5%
<b>Program Administration</b>						
Management and Administrative Expenses	\$ 212,222	\$ 419,430	\$ 618,599	\$ 641,364	\$ 1,891,615	
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	\$ 7,000	\$ 26,000	\$ 26,000	\$ 6,000	\$ 65,000	
Field Visits and Program Travel	\$ 22,200	\$ 27,800	\$ 20,700	\$ 27,804	\$ 98,504	
Interest Expense	\$ 18,496	\$ 67,212	\$ 7,848	\$ -	\$ 93,556	
<b>Total Administration</b>	\$ 349,918	\$ 610,442	\$ 758,147	\$ 760,168	\$ 2,478,675	14.3%
<b>Total Expenses</b>	\$ 383,129	\$ 3,264,591	\$ 6,441,620	\$ 7,279,028	\$17,368,368	100.0%
<b>Net Operating Assets</b>	\$ (383,129)	\$ 1,192,668	\$ 2,225,312	\$ 1,561,309	\$ 4,596,160	
<b>Net Investment Return</b>	\$ -	\$ -	\$ 5,627	\$ 57,001	\$ 62,628	
<b>Net Assets</b>	\$ (383,129)	\$ 1,192,668	\$ 2,230,939	\$ 1,618,310	\$ 4,658,788	
<b>Cumulative Net Assets</b>	\$ (383,129)	\$ 809,539	\$ 3,040,478	\$ 4,658,788		
<b>Reserve Funds</b>						
Board Designated Financial Reserve (Unallocated Reserves)	\$ -	\$ -	\$ 1,430,073	\$ 2,839,031		
Reserves as a % of Annual Operating Budget	0.0%	0.0%	22.2%	39.0%		
Undesignated Net Assets (Working Capital)	\$ -	\$ 809,539	\$ 1,610,405	\$ 1,819,757		
25% (3 months) of Annual Operating Budget	25.0%	25.0%	25.0%	25.0%		