



MATTRESS STEWARDSHIP PROGRAM PLAN

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SUBMITTED BY:

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SUBMITTED TO:

Oregon Department of Environmental Quality
Leah Feldon, Director
700 NE Multnomah St, Suite 600
Portland, OR 97232

June 10, 2024

Oregon Department of Environmental Quality
Leah Feldon, Director
700 NE Multnomah St, Suite 600
Portland, OR 97232

Dear Director Feldon,

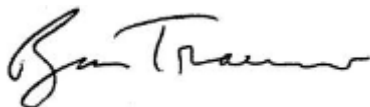
The Mattress Recycling Council Oregon, LLC (MRC) is pleased to submit this Revised Mattress Stewardship Program Plan.

By letter dated April 11, 2024, the Oregon Department of Environmental Quality (DEQ) informed MRC that it had rejected MRC's revised Program Plan submitted on February 26, 2024. This Revised Program Plan addresses each of the points raised in DEQ's letter.

MRC's parent organization, the Mattress Recycling Council, Inc., is the largest mattress recycling organization in North America. Its state programs in California, Connecticut and Rhode Island have recycled over 13 million mattresses and box springs since 2015. As an organization, our mission has evolved beyond the mechanics of mattress recycling to include collaborating with the mattress industry on circular design and other sustainability initiatives and a variety of research projects to improve mattress recycling processes and expand the markets for recycled mattress materials. We look forward to working with DEQ to implement our program in Oregon.

Please contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Trainer". The signature is fluid and cursive, with the first name "Ryan" being more prominent than the last name "Trainer".

Ryan Trainer
MRC President

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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)(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 the state.

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 Oregon Revised Statutes (ORS):

ORS 174.116(1)(a):

"Local government" means all cities, counties and local service districts located in this state, and all administrative subdivisions of those cities, counties and local service districts.

ORS 459.005(3):

"Collection service" means a service that provides for collection of solid waste or recyclable material or both but does not include that part of a business operated under a certificate issued under ORS 822.110 (Dismantler certificate).

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.

ORS 459A.085:

"Collection service franchise holder" as described under ORS 459A.085.

In addition, for purposes of this Plan:

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

“Collection Site” means a physical location designated by MRC for the purpose of collecting or receiving Discarded Mattresses. Collection sites may include, but are not limited to, Collection Events.

“Collector” means a party that collects one or more Mattresses discarded in Oregon and delivers them to a Collection Site or Recycler.

“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, 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.

“Rural areas” refers to counties that have a population of less than 10,000 people, as described in Section 5(1) of the Act.

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

“Urban areas” refers to counties that have a population of 10,000 people or more, as described in Section 5(1) of the Act.

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 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 13 million mattresses and foundations (collectively Units), and recycled over 500 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 12.9 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's deliverables and milestones from Plan approval, through Program launch and the end of the Plan term are as follows:

Completed Prior to Plan Submission

- In 2015, MRC launched an online registration and reporting portal (MRCreporting.org) for retailers, manufactures, renovators and other obligated entities to register their company, submit brand/URN information, report units sold and remit collected mattress recycling fees. It is currently used by MRC's California, Connecticut and Rhode Island programs.
 - In 2023, MRC scaled MRCreporting.org to allow obligated Oregon entities to register and comply with the Oregon Act.
- Creation of websites to inform industry and consumer audiences – MattressRecyclingCouncil.org (industry) launched in 2014 and ByeByeMattress.com (consumers) in 2015.
 - ByeByeMattress.com hosts a locator for consumers to find their nearest drop-off location.
 - Upon Oregon enacting its law in 2022, MRC added an Oregon page to the State Programs section on MattressRecyclingCouncil.org.
- In 2022, MRC began gathering contact information from various sources for entities fitting the Act's definition of retailer, producer and renovator in order to build a mailing list. Initial communications were issued once MRCreporting.org's Oregon registration functionality was completed.
- In 2023, MRC hired a program coordinator to prepare for a 2024 Program launch. Completed tasks include:
 - Surveyed all known Oregon solid waste facilities and other potential collection sites to assess interest in becoming a public collection site.
 - Created MRC branded marketing materials to aid the coordinator in conversations and meetings.
 - Released RFP for mattress recycling to assess interest, capabilities and costs for recycling units collected by the Program.
 - Released RFP for transportation to assess interest, capabilities and costs for transporting units collected by the Program.

Following Plan Approval

Within the First 2 weeks of Receiving Plan Approval

These activities would start as soon as MRC's Plan is approved:

- Issue a press release to mattress and home furnishing industry media and related industry associations regarding important Program information including the start date and assessment.
- Issue an email to already registered Oregon participants regarding important Program information and begin preparing a direct mail campaign to identified, unregistered retailers, producers and renovators.
- Publish Program start date and assessment amount on MRCreporting.org and MattressRecyclingCouncil.org and MRC's social media channels.
- Notify and initiate contracting process with collection sites, transporters and mattress recyclers.

Within the First 3-4 weeks of Receiving Plan Approval

At this point, MRC expects to have completed these activities:

- Distributed a direct mail letter or postcard to all identified entities not yet registered, but MRC assumes is obligated to do so. This notification would confirm the start date and amount of the assessment and urge them to visit MRCreporting.org.
- Issued RFP for media relations consultant for Oregon communications.

Within 2-5 months of Receiving Plan Approval (5-2 Months Prior to Program Launch)

At this point, MRC would be engaged in the following activities:

- Continue negotiating and securing contracts with collection sites, transporters and recyclers.
 - As collection site and recycler contracts are secured, MRC collects information regarding desired signage, confirms information to be posted on ByeByeMattress.com, and engages with city or local officials to prepare for promoting the location's participation. Meanwhile, the program coordinator is sharing resources and conducting site visits to help collection sites understand how to best accept, handle and prepare mattresses for pickup. Recyclers and transporters are being onboarded during this time.
- Creating videos for collection sites, transporters and recyclers that accompany the Program Requirements.
- Securing a contract with a media relations consultant and developing materials needed to announce the start of the Program.
- Creating Oregon specific point-of-sale materials for retailers to share with their customers.

- Continuing to issue registration reminders to identified, unregistered retailers, producers and renovators.

Within 6 months of Receiving Plan Approval (One Month Prior to Program Launch)

At this point, MRC would be engaged in the following activities:

- Updating MattressRecyclingCouncil.org's Resources library with Oregon-specific material including but not limited to Collection Site Requirements and related videos, point-of-sale materials, publicity toolkits and information sheets.
- Activating Oregon reporting and assessment remittance capabilities in MRCreporting.org.
- Distributing publicity toolkits to collection sites, recyclers, city/county officials and interested community-based organizations.
- Delivering retailer point-of-sale materials to all registered retailers.
- Delivering containers and signage to all contracted collection sites.
- Continuing to finalize contracts with prospective collection sites.
- Continuing to issue registration reminders to identified, unregistered retailers, producers and renovators.
- Establishing internal policies and procedures that outline how MRC will comply with applicable laws and regulations.

Upon Program Launch

Within seven months of Plan approval, MRC will launch the Program.

On an ongoing basis, MRC will communicate with retailers, producers and renovators about their legal obligations and recycling opportunities. MRC will also continue to finalize contracts with interested collection sites and recruit new ones. In counties with a population of more than 10,000 where MRC has not located at least one required collection site by Program launch, MRC will schedule at least one collection event as required by Section 5(1)(a)(B) of the Act, to provide convenient collection service.

MRC will begin updating DEQ monthly on relevant changes (including number, name and address of permanent collection sites, registered retailers and producers, Program recyclers and reuse organizations managing discarded program mattresses).

Within 2 Weeks After Program Launch

At this point, MRC would be focused on the following activities:

- Publishing Oregon locator listings and Oregon page on ByeByeMattress.com (first day of Program and ongoing as new sites join)

- Issuing another press release announcing the start of the Program to mattress, home furnishings and recycling/solid waste industry media and related industry associations.
- Publishing the Program start announcement on MRC's websites and social media channels (then used on an ongoing basis to keep consumer and industry audiences informed).
- Continuing to assist publicity toolkit recipients as needed (ongoing as new sites join).
- Beginning to inform registered retailers, producers and renovators of how to complete the reporting and assessment remittance process and recycle.

Within 6 Months After Program Launch

At this point, MRC would be focused on the following activities:

- Distributing a Public Service Announcement to TV and radio stations as described in **Part 11**.
- Distributing a press release to Oregon media announcing Program's availability as described in **Part 11**.

Within 7 to 12 Months After Program Launch

At this point, MRC would be focused on the following activities:

- Organizing a media tour/press conference at a collection site or recycler.
- Conducting recycler audits for environmentally sound management practices (2025, and each year thereafter).
- Identifying Earth Day (April 22) and America Recycles Day (November 15) events and researching costs and sponsorship benefits.
- Submitting an annual report, annual fee payment, budget and financial audit to DEQ (annually on July 1).
- Surveying Oregon retailers, producers and renovators regarding awareness of obligations, use of resources including point-of-sale material and satisfaction with MRC's assistance.
- Discussing illegal dumping with Portland Metro and other select communities to learn where additional resources or tactics might be helpful.

One Year After Program Launch

Once the Program has operated for a full year, MRC will:

- Survey Oregon consumers to collect baseline data regarding Program awareness, mattress purchasing/disposal behavior, recycling attitudes and media habits that will inform future communications strategies and materials (after first full year of Program operations and each year thereafter).

- Begin discussions, research and other activities necessary to accomplish deliverables included in the Act that must be completed before the end of the Plan's term.

Before End of Second Year to End of Plan Term (2026 – 2029)

Per the Act, MRC will:

- 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 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).

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, including the Mattress Stewardship Act and OAR rules promulgated pursuant to that statutory authority to implement the Act.

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 mattress recycling.
2. **Stay Updated:** Given that laws and regulations can change over time, MRC will promptly review any updates or amendments that may affect our compliance and where necessary, seek professional advice.
3. **Develop Compliance Policies and Procedures:** MRC will establish internal policies and procedures that outline how we will comply with applicable laws and regulations prior to Program launch.
4. **Train Employees and Contractors:** As needed, MRC will educate employees and contracted parties (collection sites, transporters and recyclers) about their roles and responsibilities related to compliance.
5. **Maintain Proper Documentation:** MRC will maintain records of our compliance efforts, including any licenses, contracts and other relevant documents as required by law.
6. **Conduct Audits and Assessments:** MRC will review and assess our compliance practices annually 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.”

These provisions are intended to prevent the Program from being burdened by out-of-state free riders. Therefore, consistent with these statutory definitions, MRC will consider program mattresses to be those that are discarded in Oregon, provided they were not transported from outside Oregon for purposes of disposal.

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. Collection sites or collection events may receive mattresses that do not meet the definition of program mattresses and may reject them or discard them as solid waste at their discretion and at the expense of the delivering entity. If a collection site places non-program items into Program trailers, the Recycler will dispose of the items when they are offloaded at the recycling facility. MRC will notify the collection site of the type and quantity of materials that were disposed and retrain their staff on identifying non-program items. If a collection site persists in placing non-program items in a container, MRC may terminate the collection site from the Program.

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 mattresses 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 mattresses from California is small. Likewise, the states of Idaho and Nevada, which also share borders with Oregon, are unlikely sources for non-program Mattresses because they lack significant population centers near their border with Oregon. The nearest significant out-of-state population center is in Washington state near Portland.

To prevent out-of-state free riding, MRC intends (as needed) to require:

- A collection site 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.
- A collection site that receives non-program mattresses from out of state sources may reuse, renovate, recycle, landfill or incinerate those units at their discretion. Non-program mattresses are not part of the Program, and MRC will not compensate a collection site for handling non-program mattresses.

- MRC will require that collection sites, transporters and recyclers accept units from small commercial solid waste haulers that agree in writing to maintain a compliance log indicating the source of the units they receive. Compliance logs can help identify out-of-state mattresses entering Oregon for disposal, which are not program mattresses.
- Commercial entities that provide units to the Program (such as retailers, lodging establishments, etc.) must agree in writing to MRC not to provide units used and discarded outside Oregon.
- MRC's contracts with collection sites and recyclers will require them to document that they are accepting units only from in-state Oregon sources and will make clear that MRC will not compensate them for accepting, handling or processing out-of-state units.
- Provide point-of-sale materials to inform purchasers that a mattress transported from another state to be discarded in Oregon is ineligible for MRC-funded recycling through the Program.

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." Consistent with this provision, MRC will provide the business name, address, contact name, phone number and email address of these businesses. However, some businesses only have a primary address at time of registration and may not have a physical address. If the business does not provide a physical address, the primary address will be provided.

Appendix A contains a list of company names, primary or physical addresses, email addresses and phone numbers of each producer, renovator and retailer that have registered with the Program as of May 31, 2024 (30 days before the revised 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, email address 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."

Given that MRC has not yet entered into contracts with these transporters or recyclers, it would be premature for MRC to require now that they obtain any required licenses or meet other requirements to transport or recycle program mattresses in accordance with relevant laws and regulations at some point in the future. Nevertheless, MRC's request for proposals, to which each of these businesses responded to with interest in participating in the Program, clearly notified each business that MRC would contractually require compliance with such licensing, environmentally sound management and other requirements. Once DEQ approves this Plan, MRC will seek to formally contract with these businesses and to formalize these requirements in the contract at that time.

TABLE 1. Proposed Transporters

Company	Address	Contact Name	Phone	Email
Ally Global Logistics DBA The AGL Group	317 Libbey Industrial Pkwy., Ste B-200 Weymouth, MA 02189	Jessica Allen	(781) 544-3970	jallen@allygloballogistics.com
Ron Lawrence And Son Transport, Inc.	532 Beard Ave. Modesto, CA 95354	Kelly Snyder	(209) 321-4122	kelly@ronlawrenceandson.com
Ryder Transportation Solutions	11690 NW 105th St. Miami FL 33178-1103	Derek Peterson	(305) 633-7497	Derek_w_peterson@ryder.com
Titan Concepts International LLC DBA TCI Global Logistics	710 S 67th Ave. Phoenix, AZ 85043	Dave Mosely	(773) 218-6852	MoseleyD@TCILogistics.com
Total Quality Logistics, LLC	4289 Ivy Pointe Blvd. Cincinnati, OH 45245	Aaron Nodal	(912) 441-8265	ANodal@tql.com

TABLE 2. Proposed Recyclers

Company	Address	Contact Name	Phone	E-mail
Environmentally Conscious Recycling	12409 NE San Rafael Portland OR 97230	Vince Gilbert	(503) 253-0867	Vince@ecrrecycling.com
Klamath Works, Inc.	2350 Maywood Dr. Klamath Falls, OR 97603	Joy McInnis	(541) 887-8495	joy@klamathworks.com
St. Vincent de Paul Society of Lane County, Inc.	135 N Cleveland St. Eugene, OR 97402	Bethany Cartledge	(541) 687-5820	bethany.cartledge@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.

MRC will provide for the environmentally sound management of program mattresses (see **Part 4(b)**, above) at no charge to the consumer at the point of collection, regardless of which company manufactured that unit (provided, however, that MRC may permit a person that provides a “premium service” to charge for that service) as described below.

MRC contracts with third parties and will expressly require that they use environmentally sound management practices as defined in Section 2(4) of the Act to collect, transport and recycle discarded units. They 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 health and safety requirements, fair labor standards rules and other laws and regulations 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, 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 (solid waste facilities, mattress reuse and renovators, recycling centers, retailers, etc.) 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, referred to as bulk pickup service (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). Curbside collection haulers may generate enough mattresses to have an MRC trailer in their yard. Small commercial haulers may be able to deliver direct to a collection site or a mattress recycler.

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 recordkeeping requirements, documenting the final disposition of discarded mattresses, contractual performance metrics and relevant federal, state and local legal requirements including the Act. To identify recyclers that can meet these criteria, MRC issued a request for proposals (RFP) to recyclers interested in processing discarded mattresses 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 mattresses are recycled when possible, as opposed to being 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 C**). 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. To address noncompliance with the contract or Recycling Standards, each of MRC's contracts with recyclers will contain a contract compliance/dispute resolution process, as well as contract termination criteria. The goals of these provisions are to encourage regular and positive communications between the contracting parties regarding the fulfillment of their legal obligations, to identify instances when contract compliance problems arise and to gradually escalate the discussions until the problems can be remedied in a constructive manner that avoids rupturing the contractual relationship and resulting in termination. Compliance with the Recycling Standards will be one of the contractual obligations that are subject to these provisions.

We anticipate that the vast majority, if not all, of the contractual compliance issues that MRC and its recyclers will encounter under the Program can and will be resolved through this process. In the event, however, that a material violation of the contract cannot be cured and contract termination becomes necessary, MRC will notify DEQ of that action, as part of its monthly reports to DEQ identifying which recyclers are participating in the Program.

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 mattresses and making the recycled materials available to use in making new products. The recyclers with which MRC will contract will be required by contract to achieve a recycling rate, thereby disincentivizing disposal. Whole mattresses and mattress materials sent for reuse, renovation or recycling all contribute to and are factored into the recycling rate. The

recycling rate is calculated using data reported by mattress recyclers. It is determined by dividing the weight of whole mattresses and materials that are renovated, reused and recycled by the weight of whole mattresses and materials recycled, renovated, reused and disposed. Some recyclers separate and supply cleaner uncontaminated used mattresses or their component materials to reuse organizations, used mattress sellers, and renovators of used mattresses. MRC will provide recyclers with a list of renovators in Oregon that comply with applicable federal and state laws governing the sale of used and renovated mattresses.

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 provides collection sites with resources to implement best practices that will reduce the number of units that are ruined because of mishandling or other causes. These will include the Collection Site Requirements and video tutorials on acceptable and unacceptable mattresses, effective site operations, collection site signage, safe mattress loading and stacking and bedbug identification and training. MRC will also provide information to collection sites, 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 includes mattresses handed down to friends or family, mattresses donated to charitable organizations, sold in used furniture stores and mattress renovation. As a result, reuse organizations, 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. As a participating collection site, these entities may receive units that they may cull for reuse, resale, or renovation and may recycle remaining unwanted units through the Program, whether they function as a collection site or not. At present, MRC is only aware of two active renovators 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 and (at its discretion) may landfill units heavily contaminated with bedbugs, mold or putrescible solid waste, or that are otherwise in nonrecyclable condition. This may be necessary to minimize facility contamination and worker exposure to health and

safety risks. Alternatively, units that are deemed suitable for reuse or resale may be separated at this time. Recyclers will report to MRC the number and weight of mattresses and weight of mattress materials directed to reuse, renovation, and landfill as a result of this triage process. MRC will report this data in the annual report as required in section 9(2) of the Act.

The recycler will then dismantle the non-contaminated mattresses that are not reused or resold. 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.

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 event 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.

MRC consulted with Portland State University (PSU) data when developing the convenience standard. Of Oregon's 36 counties, PSU's Certified Population Estimates identify 29 with a population of 10,000 or more and seven with a population of less than 10,000.

See **Appendix D** for a list of the facilities that responded favorably to MRC's survey or subsequent outreach in serving as a permanent collection site, as further described in subsection (c) below. MRC has not yet entered into contracts with any collection sites, pending DEQ's approval of this Plan. Once approved, MRC will accelerate our contract review process. See the **Implementation Timeline** for when we expect these arrangements will begin to be formalized. Once DEQ approves the Plan, MRC will provide DEQ monthly updates that will reflect finalized collection site contracts and which collection sites can be operational both in time for Program launch and afterwards.

- 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.**

Although MRC will streamline the contracting process as much as possible and will promptly respond to all potential collection sites, the amount of time that a municipal collection site will need to fully execute a collection contract is out of MRC's control. For this reason, it is unlikely that MRC can fully meet the convenience service metrics prescribed in Section 5(1)(a) within seven months of plan approval

Several sections of the law contemplate that MRC will require time to fully develop a collection network that provides convenient service. For example, the legislature recognized that MRC will need time to identify operational challenges, explore solutions and test the Program's potential during the Program implementation process to understand which performance metrics are appropriate and practical. For this reason, Section 4(1)(f) of the law specifically allows MRC up to two years following Program launch to propose Program performance goals to DEQ. Likewise, the legislature understood that MRC would need a reasonable amount of time before it should be graded as meeting the statutory Program requirements. Section 9(5)(B) authorizes DEQ to conduct periodic performance audits of the Program, but specifically provides that DEQ may not request the first such audit "until the third year that a stewardship organization has implemented a mattress stewardship program." Consistent with both of these provisions, allowing MRC two years to negotiate needed relationships and formal contracts, to confirm what works and what does not and to take action needed to adjust to new information and conditions is fully within the legislature's intent in enacting these provisions.

For these reasons, MRC is therefore proposing alternative methods.

Permanent Collection Sites:

Beginning in May 2023, MRC surveyed and contacted all known Oregon SWFs and other potential collection sites to assess their interest in becoming a public collection site for the Program. To date, we have interest from at least one permanent site in 28 of the 29 Oregon counties with populations over 10,000 people. In addition, another 37

locations around the state have expressed interest in becoming MRC collection sites, for a total of 65 interested sites, exceeding the 54-site minimum required by statute.

Upon Plan approval, MRC will notify the interested SWFs, determine whether they remain interested in becoming MRC collection sites and initiate the contracting process. Before and following Program launch, MRC will share resources and conduct virtual and in person visits to recruit additional permanent collection sites.

Although many factors beyond MRC's control influence how and when entities will sign contracts, we estimate that within 12 months of Program implementation that 24 of 29 counties with over 10,000 people will have at least one permanent collection site participating in the Program. Within 24 months of Program launch, MRC anticipates that all 29 counties with over 10,000 people will have a permanent collection site.

If MRC is unable to site a permanent location in a county with over 10,000 people, MRC's alternative convenience method will be to host a collection event within 12 months of Program implementation. MRC will work in good faith with local SWFs and solid waste officials to coordinate these events.

Once a permanent collection site contract has been finalized, MRC will offer to assist the site with outreach to publicize the site to residents of the intended service area. Within five days of MRC receiving a completed site contract, MRC will provide the site a publicity toolkit (described in **Part 11**) and conduct outreach in coordination with the site. If the site is nonresponsive to MRC's offer, MRC will conduct outreach after a container has been delivered to the site. At minimum MRC will send site details to local officials to share with constituents, publish the details of the no-cost collection site in its locator listings, and announce the site on the Oregon page of ByeByeMattress.com and ByeByeMattress social media. MRC will provide DEQ with site details as part of its monthly report to DEQ.

25 Additional Collection Sites:

Although many factors beyond MRC's control influence how and when entities will sign contracts, we estimate that within 12 months of Program implementation, MRC will have executed collection contracts with 21 of the additional 25 collection sites distributed throughout the state in a manner to extend convenient service to residents. Within 24 months of Program launch, MRC anticipates that all 25 additional sites will be under contract.

If MRC is unable to contract with all 25 additional locations within 12 months of the Program launch, MRC's alternative convenience approach will be to add collection events within the first 18 months of the Program so that the total of permanent additional sites plus events equals 25.

Collection Events:

In counties with fewer than 10,000 people that lack a permanent collection site, MRC will demonstrate a good faith effort to coordinate with the appropriate local government, collection service franchise holder or person who provides collection services. We estimate that within 12 months of Program implementation that all counties with under 10,000 people will have had at least one collection event or have a contracted permanent collection site.

If MRC is unable to host a collection event with the appropriate local government, collection service franchise holder or person who provides collection services, MRC will seek alternate community organizations and entities with whom it may coordinate, host and promote a collection event. If MRC determines that holding a collection event in a given geographic area will not be practicable or effective, that will be noted in MRC's monthly collection network update to DEQ.

Once collection event details have been finalized (date, time and location confirmed with service providers and the host has signed the necessary contract or event registration), MRC will post the event on the ByeByeMattress.com recycling locator (not sooner than 30 days before and not less than 1 day before the event), announce the event on social media (not sooner than 30 days before and not less than 1 day before the event). Within five days of an event's details becoming finalized, MRC will provide the event host and local officials with a publicity toolkit (described in **Part 11**) and offer to assist with outreach to publicize the event to residents of the intended service area. MRC will conduct outreach in coordination with the host. If the host is nonresponsive and at least one week remains prior to the event, MRC at minimum will send event details to local officials to share with constituents, announce the details of the no-cost event in its locator listings, Oregon page of ByeByeMattress.com and Bye Bye Mattress social media.

Convenience Network Gaps:

MRC may be unable to contract with some permanent locations or host collection events during the first two years of the Program. Those challenges and MRC's approach to provide access to those communities through events or other means will be noted in MRC's monthly collection network updates to DEQ as required by Section 7(3)(a).

MRC will include a statewide GIS analysis of the permanent collection site and collection event network in the third year of the Program to determine if any service gaps exist in this alternative convenience approach. That analysis will determine the percentage of the population within 15 miles of MRC's collection network after two years of operations. The study will be included in the Program's annual report.

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 **Implementation Timeline**, establishing the collection network is a multiyear process. In an effort to implement the Program promptly and efficiently, MRC in May 2023 preliminarily contacted 130 Oregon solid waste facilities in both urban and rural areas included on DEQ's online "Active Permitted Facilities" list that were likely to accept discarded mattresses to gauge their potential interest in collecting discarded mattresses for recycling through the Program. 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 in both urban and rural areas. These additional locations increased the survey pool to 225 locations in all 36 Oregon counties.

See **Appendix D** for a list of the 62 facilities that responded positively to MRC's survey or otherwise indicated interest to serve as a collection site. The facilities that responded favorably to MRC's contacts are located in 29 of Oregon's 36 counties, including 28 of the 29 counties where a permanent collection site is required.

Once DEQ approves the Plan, MRC will seek to quickly formalize collection site contracts with these entities in an effort to have them operational as collection sites once the Program launches. MRC's revised budget reflects an accelerated timeframe for contracting and providing recycling service to these entities. Realistically, some of these entities may decline to contract with MRC despite indicating previously an interest to serve as a collection site.

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 requirements that MRC will require each participating site to comply with. See **Appendix B** for examples of collection site resources. MRC will 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. 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 also provides signage that identifies the mattress collection area and specifies what can and cannot be collected. MRC will also provide information and support to assist collection locations with invoicing and generating public awareness of their participation.

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.

As described in the **Part 4(g)** and subsections of **Part 5** above, MRC will make a good faith effort to identify an appropriate local government, collection service franchise holder, person who provides collection service, reuse organization, used mattress seller, and renovators of used mattresses, in the geographic area to coordinate with to establish a permanent collection site. **Appendix E** 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 Requirements](#), included in all collection site and event contracts, define which program mattresses are eligible for recycling and explain how they can efficiently collect, separate and load mattresses into trailers. The contracts and requirements also require collection sites to provide for the environmentally sound management of mattresses as defined in the Act and to comply with all applicable federal, state and local laws and regulations. MRC will supplement the requirements 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 requirements also describe non-recyclable mattresses (e.g., those that are mixed with putrescible solid waste, or excessively soiled, etc.). To further assist collection sites in identifying and managing instances of excessive bedbug contamination, MRC offers an informational brochure, identification poster and online training video about bedbugs that collection site staff can access on demand in MRC's [Resources Library](#).

MRC will inform collection sites that they will not be compensated for collecting or handling non-program mattresses 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 non-program mattresses.

Collection sites will be responsible for disposing of non-recyclable program mattresses and will be compensated as part of the per-unit handling rate as described in **Part 5(g)**.

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.

The Program will provide 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 units from collection sites that have properly source separated program mattresses at one time for recycling under the Program.

If packed efficiently, approximately 120-150 units can be loaded into a 53-foot trailer. MRC instructs sites to make a request that a transporter provided by MRC pick up the trailer on site and swap it for an empty one in advance of the on-site trailer reaching

capacity. For sites located in urban areas (where discarded units generally are collected more quickly), MRC transporters will have 48 hours to swap a trailer after receiving a request, and up to five days to do so for sites in rural areas (where units are generally collected more slowly). The collection sites' advance notice paired with the required response time for transporters safeguards against the collection site exceeding the capacity of the trailer while waiting for the pickup/swap process to occur.

MRC may assign high-volume locations 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 collection 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 a number of factors, including the hourly wage rates for general mattress handling labor, forklift operators, as well as the forklift type. It generally takes about three minutes per unit to load a unit on a trailer. The compensation MRC pays also includes the costs a collection site will incur to dispose of non-recyclable units that it receives. Based on the experience of other state mattress recycling programs, such units typically account for 10% or less of the total units received. If a collection site requests separate compensation for the reasonable, actual cost to manage non-recyclable units received from consumers, MRC will negotiate compensation provided the collection site provides photographic evidence to verify the disposal of non-recyclable units and the reason they are not recyclable.

MRC will compensate collection sites for all program mattresses dropped off by all persons as defined in the Act, including individuals, businesses (including mattress retailers) or other entities for which the collection site has not collected a fee and that the collection site loads in a collection container. A collection site's monthly invoices to MRC will quantify the number of units handled and be accompanied by either a bill of lading or report from MRC's designated electronic reporting system. As a check on this information, the recycler that receives a load from a collection site will count the number of units received during the off-loading process. The recycler's count determines the number of units for which MRC will compensate the collection site. MRC will pay properly documented and reconciled invoices within thirty (30) days of receipt by electronic funds transfer or check. MRC staff will verify that the unit counts on each collection site invoice matches the invoice's supporting documentation during the invoice review and approval process.

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. For bulk pickup entities 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. 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 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 are 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 already established process to implement changes to this information within three business days.

Consumers will learn ByeByeMattress.com exists through a multichannel, multilingual 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 that 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 will comply with this statutory requirement as well as Oregon Administrative Rules promulgated pursuant to that statutory authority to implement the Act, and will use data collected in the Program's initial years to determine baselines that will 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.**

MRC will provide the requested contact information for key Program personnel to DEQ separately from the Plan submission.

- 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.**

As the stewardship organization, MRC's legal responsibilities are set forth in the Act, federal statutes and other state statutes. MRC will comply with and fulfill these statutory 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.**

Following approval of the Plan, MRC will enter into contracts with collection sites, transporters and recyclers that will set forth their obligations. The obligations of each vendor will vary, depending on the services they provide to the Program. Each contract will contain a breach clause, including both an escalation and cure process,

as well as a termination clause, in the unlikely event that a vendor does not comply with its contractual 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 459.015(2), that provision contains broad general statements to guide Oregon's recycling policy. For example, subparagraph ORS 459.015(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 9(4)(b)(B) of the Act.

Pending completion of that report, subparagraph ORS 459.015(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, reuse 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 459.015(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 collection sites to minimize the improper handling of discarded mattresses (crushing in compactor trucks), contamination (exposure to food and similar wastes) and storage (exposure to weather) 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 policies. 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 7(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.

In MRC's recycling contracts, recyclers will be required to achieve minimum recycling targets of at least 70%, provided that there is sufficient market demand for recycled mattress materials and that extenuating circumstances (such as floods, fires or other unforeseen events) do not prevent a recycler from achieving this performance metric. In addition, MRC will employ a variety of inspection and accounting procedures to confirm that collection sites, transporters and recyclers are complying with their contractual obligations, including environmentally sound management practices defined in the Act. The obligations of each vendor will vary depending on the services they provide to the Program. Each contract will contain dispute resolution and termination clauses in the event that a vendor does not comply with its contractual obligations.

This begins with transporters documenting mattress deliveries to recyclers with bills of lading (electronic or paper) that identify the source, quantity and destination of the units. These 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 number of 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 C**.

MRC will perform monthly desk audits to monitor the compliance of recyclers with data tracking and reporting requirements, inventory verification, recycling rate (monitor progress) and the final disposition of deconstructed mattress materials and disposal of non-recyclable waste. Additionally, MRC will conduct quarterly site inspections of all recyclers to verify compliance with environmentally sound management practices. Annually, MRC contracts with third-parties to observe and document each recycler's compliance with environmental health and safety requirements, fire safety protocols, recycling standards and contractual obligations. As required under Section 9(2)(m), MRC's annual report to DEQ will include a report on the outcome of these inspections in summary form. MRC will provide specific reports, including their procedures and findings, to DEQ upon request.

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.

Section 11(2) of the Act provides:

A stewardship organization shall retain all records related to implementation of a mattress stewardship program for not less than three years and make the records available for inspection by the department upon request.

Pursuant to this requirement, MRC will retain documents related to implementation of the Program as required by Section 11 of the Act, most if not all of which are generated and/or maintained electronically. Upon request, copies of the relevant records can be provided to DEQ for review in DEQ's offices.

MRC's enterprise customer relationship management (CRM) system aggregates information from collectors, collection sites, 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 provides metrics relevant for annual reporting and internal performance tracking, including units collected, tracking of transportation requests, recyclers' receipt of loads from collection sites, recycling rates for each recycler, etc.

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.

MRC has compiled a database of potential retailers, producers and renovators from various 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 via certified mail of its potential obligations and follow 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 after 60 days, MRC's monthly reports to DEQ will identify the party and request that DEQ take action (if appropriate).

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 that they owe MRC late fees and associated interest. MRC assesses late fees and interest to encourage prompt payment from all obligated parties and help compensate MRC for administrative expenses related to non-compliance. Each month, MRC will notify DEQ of all delinquent parties

whom MRC has notified that they owe late fees and interest (defined as a Level 7 Delinquency Stage in the chart below).

A registered party may deregister only if it informs MRC that it no longer sells mattresses in Oregon or has registered with another organization that has a plan approved by DEQ under Section 6 of the Act.

TABLE 3: Notification Protocol for Late Reporters and Charge Remitters

Delinquency Stage	Late Reporter	Late Remitter	Timeline (Days since due date missed)
Level 1	Late notice email generated by MRCreporting.org	Late notice email generated by MRCreporting.org	Reporter – After 7 days Remitter – After 10 days
Level 2	Phone call made to verify continued Program participation and provide a verbal reporting reminder	Phone call made and late notice issued regarding outstanding payment and warning of potential interest charges	Reporter – After 15 days Remitter – After 20 days
Level 3	Written notice mailed	Written notice mailed and interest invoice issued	Reporter and Remitter – After 30 days
Level 4	Second phone call made to provide verbal warning of potential penalties	Second written notice sent by certified mail and interest invoice issued	Reporter and Remitter- After 60 days
Level 5	Written notice sent by certified mail and late fee invoice issued	Second phone call made warning of accruing interest	Reporter and Remitter - After 90 days
Level 6	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	Reporter and Remitter - After 120 days
Level 7	Late fee invoice issued; DEQ notified of delinquent account	Delinquent account sent to collections agency and interest invoice issued	Reporter and Remitter - After 150 days
Level 8	Continued action begins	Interest invoice issued; DEQ notified of delinquent account and continued action begins	Reporter and Remitter – After 180 days
Continued action	Late fee invoices issued monthly until account no longer delinquent	Interest invoices issued monthly until account is no longer delinquent	Every 30 day reporting period

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 compliance 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 collection sites, transporters, and recyclers 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 (LLCs) 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 F**.

- 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. Estimates of units recycled are based on experience of other mattress recycling programs.

TABLE 4: Forecasted Units Sold and Units Recycled

Calendar Year	Units Sold	Units Recycled
2025	410,012	164,097
2026	418,212	210,305

MRC evaluates actual expenses compared to budget monthly.

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. Additional detail is provided in MRC’s budget in **Appendix F**.

- 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 F** 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 multiyear 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 and an example of wording that retailers should use to describe the assessment on the receipt provided to the customer. Parts **7(h)** and **11(b)** describe how MRC will inform retailers of their obligation to collect the assessment from customers and remit that money to MRC. Completed and upcoming activities to inform the industry of Oregon's Program and the obligation to collect the mattress stewardship assessment are included in the **Implementation Timeline**.

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 \$22.50 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." Retailers employ a variety of transactional point-of-sale systems which may have limitations on the number of characters that can be used to describe the assessment. MRC will emphasize that the assessment may not be referred to as an "Oregon recycling fee", but retailers may use a combination of words and abbreviations such as "recycling fee" to convey the purpose of the assessment. Other words that retailers may use include mattress, recycling, stewardship, assessment, or fee and may abbreviate those words as necessary to accommodate their point-of-sale system limitations.

The assessment is collected on the following types of sales:

- Brick-and-mortar retailers must collect the assessment on all sales of mattresses.
- Online retailers must collect the assessment on all mattresses sold for delivery in Oregon, regardless of where the online retailer is located.
- Mattress manufacturers who sell to any consumer in Oregon must collect the

assessment on such sales and remit it to MRC.

Parties that collect the assessment must remit those amounts monthly and process their remittances using MRC's online remittance portal, MRCreporting.org. When making their monthly remittances, parties must provide the following information: mattress units sold and returned, foundation units sold and returned, renovated mattress units sold and returned and renovated foundation units sold and returned. Records must be maintained to provide verification of reporting data upon request.

In addition to facilitating remittances, the portal includes important information about MRC, program definitions, FAQ's, fee policy, examples of program and non-program mattresses, participant agreements and registration instructions. MRC's fee policy on the portal also includes details about verifying remitted fees. All of this information is publicly available and not behind a pay or subscription wall.

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

To mitigate the costs associated with illegally dumped mattresses found in any condition, entities may discard these mattresses at no cost at collection events and collection sites that participate in the Program. Additionally, MRC's public outreach as described in **Part 11** of this plan will reinforce that mattresses in any condition are eligible for drop-off at collection events and collection sites. Based on the experience of other mattress recycling programs, areas that lack proper mattress disposal alternatives tend to experience more illegal dumping. Residents' access to no-cost collection sites and events across the state will provide such opportunities to address this problem. 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 urban and rural 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 to the best of our ability 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 is to gather county or municipal illegal dumping data through an annual survey and for the first statewide illegal mattress dumping census to be completed and shared with DEQ 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 urban and rural 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 related to illegal dumping eradication, education and enforcement 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 and associated costs.

With this background information in hand, MRC will then implement its pilot programs annually for the remainder of the Plan term. MRC will 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 urban and rural 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.
- Fund pilot projects proposed by Oregon communities and other entities that are designed to discourage illegal dumping in the future and mitigate the costs associated with illegal dumping.

MRC will include updates on progress and findings regarding the three-stage illegal dumping plan, pilot studies and final reports or case studies in the annual report. 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 and collection sites 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 discard 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) 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 is committed to educating Oregon residents by following multichannel (print, TV, radio, digital, social media, word of mouth, grassroots, etc.) and multilingual industry best practices. Not only will this approach create multiple opportunities for one person to hear about the Program, but it will allow MRC to inform different people in different types of communities about the Program.

MRC will monitor the effectiveness of this communications strategy through an annual survey (described in more detail in Measuring Impact of Outreach) to collect demographic information that will allow MRC to monitor resident awareness across the state and also among specific segments.

Growing Awareness of the New Program (Years 1-3)

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 with 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 collection sites and recyclers and applicable local officials three weeks before the Program launches. As toolkits are being developed and distributed, MRC will coordinate with those individuals and entities who have expressed interest in using the toolkit.

Once the Program begins, toolkits will be distributed as a site or recycler joins the collection network. MRC will encourage use of the toolkits seasonally (Earth Day and America Recycles Day). As MRC builds relationships, other promotional opportunities may arise as MRC learns more about a site, recycler or local government's needs. In other states with mattress recycling programs, collection sites, recyclers and local officials have taken their own initiative to incorporate MRC's messaging into their communications as they find most appropriate.

- **Engaging and collaborating with community-based groups.** MRC will seek out groups that value community beautification or recycling education, and that assist minority, low-income or other historically underrepresented people. MRC will ask these groups to help promote the Program to these audiences (e.g, publishing our information in their printed materials, on their websites, mentioning us or allowing us to speak during their meetings or events, etc.). MRC will offer community-based groups a set of materials similar to those provided to local officials, and will translate those materials if necessary. MRC is also open to collaborating with a group to create and conduct outreach in a culturally appropriate manner for their audience.
- **Participating in community events focused on environmental and recycling education.** During Earth Day (April 22) and America Recycles Day (Nov. 15), many communities host festivals or environmental- or recycling-themed events. MRC may either participate as a vendor or provide Program information for distribution to attendees about mattress recycling opportunities in their communities. MRC considers event sponsorship/vendor proposals from all communities, and would support appropriate proposals, based on available resources.

If MRC exhibits at a community event, it will use an informative booth similar to what other state mattress recycling programs have used, consisting of a tabletop display with pull up banners (or a tent wrap) that provides an activity to educate the visitor and encourages interaction with MRC. Ultimately the visitor should walk away knowing a mattress can be recycled and how to recycle it in their

immediate area and that they (as well as friends and family) may access ByeByeMattress.com to obtain more information about the Program.



Booth banners (or tent wrap) and materials promote Bye Bye Mattress and messaging that encourages recycling, a QR code flyer or other printed items (info cards or posters) help booth visitors immediately learn about the local options, show-and-tell clear acrylic boxes of various mattress materials create opportunities for engagement and pique curiosity, a stacking tower game reinforces why mattress recycling is important and how to do it, as well as remembering ByeByeMattress.com.

This experience is versatile, allowing MRC to fit spaces as small as a 6-foot table or as large as 10-foot by 10-foot space. It does not require electricity and all of the booth elements can be easily transported, making it suitable for indoor or outdoor environments.

MRC would also take advantage of any other advertising or marketing benefits provided as a result of the selected exhibitor/sponsorship level. Based on previous experience this provides MRC extra visibility of the Bye Bye Mattress website URL and logo on event materials, other banners or signage on the event grounds, social media exposure, dedicated email blasts to registered participants, remarks at the event or a short news interview or segment by the event's media sponsor.

If MRC is unable to exhibit or sponsor, we would attempt to use relationships with collection site operators, recyclers, solid waste haulers, etc. who may have a presence at the event as an exhibitor or sponsor in order to distribute information to consumers.

- **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.

Measuring Impact of Outreach

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. Each social media platform also provides analytics which MRC uses to monitor performance of content and audience growth and engagement.

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. Like MRC's other state programs, the survey will be conducted online and collect demographic, behavioral and attitudinal data. The sample will be large enough to reach a 90% confidence level with a 5% margin of error (approximately 500-1,000 responses) and reflect Oregon's population in terms of age, gender, race, ethnicity and household income based on current census data. Collecting this demographic information, along with zip code and county of residence, will allow us to analyze different segments of responses to understand if there is a bias or inequality in Program knowledge (i.e. zip code analysis can identify how knowledge of the Program compares in urban and rural areas). MRC will use the mattress purchasing and disposal behavior questions to guide messaging, hone target audience profiles, adjust timing of outreach, and identify the information sources or life experiences that likely lead to the respondent's knowledge of the Program or need for the Program. This also allows MRC to understand how behaviors and lifestyle choices are affecting knowledge and leading to intended action (i.e., Are those exhibiting certain behaviors learning about the Program? Are changes in disposal behavior occurring?). MRC will use questions about recycling attitudes and intentions to further understand what Oregon residents believe and value so that messaging remains appealing and relevant. MRC will repeat the survey each year to identify trends and changes. MRC's annual reports will include the questionnaire and results.

Maintaining/Expanding Awareness of Existing Program (Beyond Year 3)

In future years, based on awareness levels measured in the annual survey 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 online search and display ads, direct mail campaigns, digital geofencing campaigns or social media advertisements.
- Advertising campaigns to a broader general audience. These campaigns 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).

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 Collection Site Requirements, 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. As Collection sites and events are established, they receive the publicity toolkit described in 11(a).

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.

MRC will submit a closure plan 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) and OAR 340-098-0460, 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).

Justine Fallon
501 Wythe Street
Alexandria, VA 22314
(860) 397-4847
jfallon@mrc-us.org

MRC will notify DEQ within three business days if there is a change to the primary contact.

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.



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 provide 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 mattresses 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 mattresses 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 Mattresses 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 confirm 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 May 31, 2024 (30 days before the plan submittal). MRC submitted a separate version containing contact names to DEQ and requested confidentiality.

TABLE 5: 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.

Company	DBA Name	Address	City	State	Zip	Country	Phone
12 Park, LLC	Evaya Organics, Serenia Sleep	12 Park St.	Webster	MA	01570	USA	(508) 943-0440
815 Healthy & Beautiful Co. Ltd	King's Castle HK Import and Export Co. Limited	78-27, Seodunmul-Gel, Poseungeup	Pyeongtaek-Si	31	17814	KOR	(086) 177-5062
Aaron's, LLC	Aaron's, LLC	400 Galleria Pkwy SE	Atlanta	GA	30339	USA	(678) 402-3325
American Bedding Mfg. Inc.	American Bedding Mfg. Inc.	2110 Redfern Dr.	Athens	TN	37303	USA	(423) 745-1512
Ascion, LLC	Reverie	750 Denison Ct.	Bloomfield Hills	MI	48302	USA	(248) 409-5656
Ashley Furniture Industries, LLC	Ashley Furniture Industries, LLC	One Ashley Way	Arcadia	WI	54612	USA	(608) 323-6789

Company	DBA Name	Address	City	State	Zip	Country	Phone
Bedgear, LLC	Bedgear	1953 Langston St.	Rock Hill	SC	29730	USA	(631) 414-7758
Bestar Inc.	Bestar Inc.	4220 Villeneuve	Lac-Mégantic	QC	G6B 2C3	CAN	(819) 583-1017
Bob Barker Company Inc.	Bob Barker Company Inc.	134 N Main St.	Fuquay-Varina	NC	27526	USA	1-800-334-9880
Boyd Flotation Inc.	Boyd Specialty Sleep	2440 Adie Rd.	Maryland Heights	MO	63043	USA	(314) 997-5222
Brentwood Home, LLC	Simply Modern Mattress	570 A N Gilbert St.	Fullerton	CA	92833	USA	(562) 949-3759
Brooklyn Bedding, LLC	Dreamfoam Bedding, Brooklyn Bedding, Helix Sleep, Bear Mattress, Nolah Sleep, Leesa Sleep	5301 W Bethany Home Rd.	Glendale	AZ	85301	USA	(888) 213-8967
Bryte Inc.	Bryte Labs	221 Main St. 570	Los Altos	CA	94022	USA	(844) 440-9462
Carpenter Co.	Carpenter Co.	5016 Monument Ave.	Richmond	VA	23230	USA	(804) 359-0800
Casper Sleep Inc.	Casper	175 Greenwich St.	New York	NY	10007	USA	(646) 361-2458
Children's Products, LLC	Simmons Juvenile Furniture	114 W 26th St.	New York	NY	10001	USA	(212) 736-7000
Colchones Wendy SA De CV	Colchones Wendy	Calle 3, 1401	Guadalajara	JAL	44940	MEX	(333) 884-2000
Comfort DTC Inc.	Molecule	360 N Pacific Coast Hwy Ste. 2000	El Segundo	CA	90245	USA	(833) 365-7378
Comfort Revolution, LLC	Comfort Revolution, LLC	One Office Parkway	Trinity	NC	27370	USA	(662) 454-7526
Consolidated Hospitality Supplies, LLC	Consolidated Hospitality Supplies, LLC	544 Lakeview Pkwy	Vernon Hills	IL	60061	USA	(800) 323-5686
Correctional Technologies Inc.	Cortech USA	7530 Plaza Ct	Willowbrook	IL	60527	USA	(630) 455-0811

Company	DBA Name	Address	City	State	Zip	Country	Phone
Corsicana Acquisition, LLC	Corsicana Mattress Company	3001 S US Hwy 287	Corsicana	TX	75109	USA	(800) 323-4349
Costco Wholesale Corporation	Costco Wholesale Corporation	Attn Tax Dept	Seattle	WA	98134-2389	USA	(425) 313-8100
Custom Comfort Mattress Company Inc.	Custom Comfort Mattress	579 N. Batavia St.	Orange	CA	92868	USA	(714) 693-6169
Custom Mattress Makers Inc.	Custom Mattress Makers Inc.	13101 56th Ct	Clearwater	FL	33760	USA	(413) 537-8307
CVB Inc.	LUCID® MATTRESS, WELLSVILLE®, LINENSPA®	1525 W 2960 S	Logan	UT	84321	USA	(435) 232-5369
Denver Mattress Company, LLC	Denver Mattress Company	5651 Broadway	Denver	CO	80216	USA	(303) 566-8700
Direct Supply Inc.	Direct Supply; Direct Supply Equipment & Furnishings; Direct Supply of Wisconsin	6767 N Industrial Rd.	Milwaukee	WI	53216	USA	(414) 760-5895
Dishuo Furniture PTE. Ltd	Dishuo Furniture PTE. Ltd	8 Tuas South Ln #01-51 Factory 2	Singapore	SG	637302	SGP	(006) 569-7074
Elements International	Kyvno, LLC	PO Box 851601	Mesquite	TX	75185	USA	(877) 575-3888
Ergomotion Inc.	Ergomotion Inc.	6790 Navigator Dr.	Goleta	CA	93117	USA	(805) 979-3931
Feng Ben International (HK) Limited	Feng Ben International (HK) Limited	No.15 Xinkang Rd., Xinyang Industrial Area, Haicang, Xiamen, Fujian, China	Xiamen	35	361000	CHN	(861) 895-0057
Future Foam Inc.	Future Foam Inc.	1610 Ave. N	Council Bluffs	IA	51501	USA	(712) 323-9122
FXI Inc.	FXI	100 Matsonford Rd.	Radnor	PA	19087	USA	(908) 675-3925
Gateway Mattress Co. Inc.	Gateway Mattress Co. Inc.	624 S Vail Ave.	Montebello	CA	90640	USA	(323) 725-1923

Company	DBA Name	Address	City	State	Zip	Country	Phone
GF Health Products Inc.	GF Health Products Inc.	One Graham-Field Way	Atlanta	GA	30340	USA	(678) 291-3261
Golden Well International (HK) Ltd	Golden Well International (HK) Ltd	Room 2,2/F Tower1, Harbour Centre, 1 Hok Cheung St., Hunghom, HK	Hongkong	34	999077	CHN	(189) 600-1376
Grand Life Inc.	Grand Life Inc.	14647 Northam St.	La Mirada	CA	90638	USA	(213) 255-1234
Heartland Mattress, LLC	Heartland Mattress	1770 N 500 W	Shipshewana	IN	46565	USA	(260) 768-7875
Hong Kong Gesin Technology Company Ltd	Hong Kong Gesin Technology Company Ltd	27885 Irma Lee Cir.	Lake Forest	IL	60045	USA	(847) 910-1133
Honor Global Industry PTE. Ltd	Glory	No. 555 W Kangxing Rd.	Jiaxing	34	314113	CHN	(086) 057-3846
Honor Home (Laos) Sole Co. Ltd	Honor Home (Laos) Sole Co. Ltd	Vientiane Saysettha Development Zone, YouyiRd.ano Village, Saysettha District	Vientiane	AT	01000	LAO	(086) 157-5737
IKEA Supply AG	IKEA	Gruessenweg 15	Pratteln	BL	4133	CHE	(004) 179-7437
InnoMax Corporation	InnoMax Corporation	530 W Elk Pl.	Denver	CO	80216	USA	(303) 296-9530
Invacare Corporation	Invacare Corporation	One Invacare Way	Elyria	OH	44035	USA	(440) 329-6000
Joerns Healthcare, LLC	Joerns Healthcare	2430 Whitehall Park Dr.	Charlotte	NC	28273	USA	(704) 499-6000
Keeson Technology Corporation LTD	Keeson Technology Corporation LTD	No 195 Yuanfeng Rd., Wangjiangjing	Zhejiang	34	314016	CHN	(805) 979-3931
King's Castle HK Import and Export Co. Limited	Deluxe Home of USA Inc.	Flat C 23/F Lucky Plaza, 315-321 Lucky Rd.	Hong Kong	CW	999077	HKG	(086) 595-2772
Kingsdown Inc.	Kingsdown Inc.	126 W Holt St.	Mebane	NC	27302	USA	(919) 563-3531
Kuka Sleep Inc.	Kuka Sleep Inc.	3584 Mountain Creek Pkwy	Dallas	TX	75236	USA	(911) 448-1743
Lakewood Candies, LLC	Milliard Bedding	1980 Swarthmore Ave.	Lakewood	NJ	08701	USA	(866) 686-4891

Company	DBA Name	Address	City	State	Zip	Country	Phone
Legends Home	Legends Home	10300 W. Buckeye Rd.	Tolleson	AZ	85353	USA	(801) 837-4826
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.	Hermanos Escobar #6640	Juarez	CHH	32410	MEX	(417) 358-8131
Lippert Components Inc.	Lippert Components Inc.	3501 County Rd. 6	Elkhart	IN	46514	USA	(574) 891-3243
Lull Ventures, LLC	Lull	3905 State St.	Santa Barbara	CA	93105	USA	(800) 301-5845
Mattress Firm Inc.	Mattress Firm Inc.	3250 Briarpark, Ste. 400	Houston	TX	77042	USA	(346) 718-5490
MTJ American, LLC	MTJ American	4276 Helena St.	Hudson	NC	28638	USA	(828) 396-1537
Noble House Home Furnishings, LLC	Noble House Home Furnishings	21325 Superior St.	Chatsworth	CA	91311	USA	(845) 558-1730
Norix Group Inc.	Norix Group Inc.	1 Innovation Dr.	West Chicago	IL	60185	USA	(630) 231-1331
Oregon Corrections Enterprises	Oregon Corrections Enterprises	PO Box 12849	Salem	OR	97309	USA	(541) 922-6156
Organic Mattresses Inc.	Organic Mattresses Inc.	1335 Harter Pkwy	Yuba City	CA	95993	USA	(530) 790-6723
Peace Lily Sleep	Peace Lily	58 - 60 Levanswell Rd.	Moorabbin	VIC	3189	AUS	(888) 420-1467
Pleasant Mattress Inc.	Pleasant Mattress Inc.	375 S West Ave.	Fresno	CA	93706	USA	(559) 268-6446
Poliuretanos SA De CV	Poliuretanos SA De CV	Noble House s/n, Zona Industrial Toluca,	Toluca	MEX	50071	MEX	(722) 214-9900
Purple Innovation, LLC	Purple	4100 N Chapel Ridge Rd.	Lehi	UT	84043	USA	(801) 756-2600
Quality Sleep Shop	My Green Mattress	1519 W 55th St.	La Grange Highlands	IL	60525	USA	(877) 737-8237
Resident Home, LLC	Resident	100 Logistics Ave.	Jeffersonville	IN	47130	USA	(908) 752-1388

Company	DBA Name	Address	City	State	Zip	Country	Phone
Restwell Mattress Co.	Restwell Mattress Factory	9901 W 74th St. #120	Eden Prairie	MN	55344	USA	(952) 920-7860
Safe For Home Products, LLC	Naturepedic	16925 Park Circle Dr.	Chagrin Falls	OH	44023	USA	(440) 543-1483
SBL, LLC	SBI, LLC	5645 W 31st St.	Cicero	IL	60804	USA	(800) 777-5282
Sealy Mattress Manufacturing Company, LLC	Sealy Mattress Manufacturing Company	1000 Tempur Way	Lexington	KY	40511	USA	(614) 629-8056
Serta Simmons Bedding, LLC	Serta and Simmons	2451 Industry Ave.	Doraville	GA	30360	USA	(404) 534-5000
Sferra Fine Linens, LLC	Sferra	15 Mayfield Ave.	Edison	NJ	08837	USA	(646) 822-0473
Sherwood West, LLC	Sherwood West, LLC	2830 NE 29th St.	Ft. Lauderdale	FL	33306	USA	(954) 566-9115
Solstice Sleep Products Inc.	Solstice Sleep Products Inc.	3720 W Broad St.	Columbus	OH	43228	USA	(614) 670-4655
Somnium Inc.	Somnium Inc.	PO Box 1804	Venice	CA	90294	USA	(323) 655-6700
South Bay International Inc.	South Bay International Inc.	8570 Hickory Ave. Ste. 150	Rancho Cucamonga	CA	91739	USA	(909) 718-5000
Southerland Inc.	Southerland Inc.	6050 Dana Way	Antioch	TN	37013	USA	(615) 226-9650
Stylus Sofas Inc.	Stylus, Made to Order Sofas	7885 Riverfront Gate	Burnaby	BC	V5J5L6	CAN	(604) 436-4100
Tempur Production USA, LLC	Mountain Top Foam	25 Elmwood Rd.	Mountain Top	PA	18707	USA	(570) 715-7200
The Furniture Bank	Houston Furniture Bank	8220 Mosley Rd.	Houston	TX	77075	USA	(713) 842-9771
The Original Mattress Factory Inc.	The Original Mattress Factory	4930 State Rd.	Cleveland	OH	44134	USA	(216) 661-8388
Transcosmos America Inc.	Transcosmos America Inc.	879 W. 190 th St., #410	Gardena	CA	90248	USA	(310) 630-0072
University Loft Company	University Loft Company	2588 Jannetides Blvd.	Greenfield	IN	46140	USA	(317) 866-5697

Company	DBA Name	Address	City	State	Zip	Country	Phone
Ureblock S.A. DE C.V.	Ureblock	Calle 4 Num 300	Zapopan	Jalisco	45134	MEX	52333-836-4000
Victory Supply, LLC	Victory Supply, LLC	7025 Industrial Park Rd.	Mount Pleasant	TN	38474	USA	(888) 376-1205
Vien Lam Co. Ltd	Vien Lam Co. Ltd	Hanh Loc Quarter, Khanh Binh Ward	Tan Uyen	44	75412	VNM	(008) 427-4380
Vispring Limited	Vispring Limited	Ernesettle Ln.	Plymouth	Devon		GBR	(855) 511-1199
VPC Group Inc.	VPC Group	150 Toro Rd.	Toronto	ON	M3J2A9	CAN	(905) 577-3898
Werner Media Partners, LLC	Ghostbed	7143 W Broward Blvd.	Plantation	FL	33317	USA	(855) 855-4499
Xiamen Moreshire Import and Export Co. LTD	Xiamen Moreshire Import and Export Co. LTD	Elevator 304, Block C, Yincheng, Zhigu Building A6, Tong 'an District, Xiamen, Fujian	Xiamen	34	361000	CHN	(861) 380-6062
Zinus Inc.	Zinus Inc.	5731 Promontory Pkwy	Tracy	CA	95377	USA	(925) 417-2100
Zoma Sleep, LLC	Zoma Sleep	7167 E Rancho Vista Dr.	Scottsdale	AZ	85251	USA	(888) 400-8856

TABLE 6: Registered Renovators

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

Company	DBA Name	Address	City	State	Zip	Phone
American Mattress Manufacturing	American Mattress Manufacturing	4075 W 11th	Eugene	OR	97402	(541) 343-2690
Gateway Mattress Co. Inc.	Gateway Mattress Co. Inc.	624 S Vail Ave.	Montebello	CA	90640	(323) 725-1923
St Vincent De Paul of Lane Co. Inc.	St Vinnies	2890 Chad Dr.	Eugene	OR	97408	(541) 687-5820

TABLE 7: Registered Retailers

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

Company	DBA Name	Address	City	State	Zip	Phone
12 Park, LLC	Evaya Organics, Serenia Sleep	12 Park St.	Webster	MA	01570	(508) 943-0440
A Lava Son, LLC	Naturally Nestled	4800 S Kilbourn Ave.	Chicago	IL	60632	(773) 254-2800
Aaron's, LLC	Aaron's, LLC	400 Galleria Pkwy SE	Atlanta	GA	30339	(678) 402-3325
AFM Mattress Company, LLC	American Mattress	1300 Pratt Blvd.	Elk Grove Village	IL	60007	(630) 279-0222
AgilityBed Inc.	ShopTherapedic	103 College Rd. E, 2nd Fl.	Princeton	NJ	08540	(877) 848-5753
Amazon.com Services, LLC	Amazon.com Services, LLC	PO Box 81207	Seattle	WA	98108	(206) 266-8365
American Bedding Mfg. Inc.	American Bedding Mfg. Inc.	2110 Redfern Dr.	Athens	TN	37303	(423) 745-1512
American Mattress Manufacturing	American Mattress Manufacturing	4075 W 11th	Eugene	OR	97402	(541) 343-2690
Anchortex Corporation	Anchortex Corporation	420 Commerce Ln.	West Berlin	NJ	08091	(856) 768-5240
Arhaus, LLC	Arhaus Furniture	51 E Hines Hill Rd.	Boston Heights	OH	44236	(440) 439-7700
Ascion, LLC	Reverie	750 Denison Ct.	Bloomfield Hills	MI	48302	(248) 409-5656
Ashley Global Retail, LLC	Ashley Furniture Home Store	1 Ashley Way	Arcadia	WI	54612	(608) 323-6337
Avocado Mattress, LLC	Avocado Green Mattress	12 Hudson Pl. Ste. 100-105	Hoboken	NJ	07030	(562) 949-3759
Barron's Home Furnishings	Barron's Home Furnishings & Sleep Center	410 Oak St.	Brookings	OR	97415	(541) 412-0250
Beach Trading Co. Inc.	www.buydig.com	80 Carter Dr.	Edison	NJ	08817	(732) 424-1100
Bedgear, LLC	Bedgear	1953 Langston St.	Rock Hill	SC	29730	(631) 414-7758
Beds For Less Inc.	Ashley/Beds For Less	579 Rossanley Dr.	Medford	OR	97501	(541) 858-5500
Belnick Retail, LLC	BizChair	4350 Ball Ground Hwy	Canton	GA	30114	(800) 924-2472
Best Buy Stores L.P.	Best Buy	7601 Penn Ave. S	Richfield	MN	55423	(612) 291-5337
BF Sleep, LLC	Big Fig Mattress	3201 Harvard Ave.	Newburgh Heights	OH	44105	(888) 344-6547
Big Lots Stores Inc.	Big Lots	4900 E Dublin Granville Rd.	Columbus	OH	43081	(614) 278-6300
Black Buggy Furniture, LLC	Black Buggy Furniture	74447 Larson Rd.	Rainier	OR	97048	(360) 775-0325

Company	DBA Name	Address	City	State	Zip	Phone
Blackledge Furniture Company	Blackledge Furniture	233 SW Second St.	Corvallis	OR	97339	(541) 753-4851
BLST Sales Marketing and Servicing, LLC	Fingerhut	13300 Pioneer Trail	Eden Prairie	MN	55347	(952) 656-3700
Bob Barker Company Inc.	Bob Barker Company Inc.	134 N Main St.	Fuquay-Varina	NC	27526	1-800-334-9880
Boll & Branch, LLC	Boll & Branch, LLC	1 Prospect St.	Summit	NJ	07901	(908) 473-9920
Boring Mattress Company, LLC	Boring Mattress Co.	315 W Elliot Rd. #107-430	Tempe	AZ	85284	(602) 753-0256
Boyd Flotation Inc.	Boyd Specialty Sleep	2440 Adie Rd.	Maryland Heights	MO	63043	(314) 997-5222
Brenner's Furniture Inc.	Brenner's Furniture Inc.	151 W 8th Ave.	Eugene	OR	97401	(541) 345-4451
Brentwood Home, LLC	Simply Modern Mattress	570 A N Gilbert St.	Fullerton	CA	92833	(562) 949-3759
Brooklyn Bedding, LLC	Dreamfoam Bedding, Brooklyn Bedding, Helix Sleep, Bear Mattress, Nolah Sleep, Leesa Sleep	5301 W Bethany Home Rd.	Glendale	AZ	85301	(888) 213-8967
Bryte Inc.	Bryte Labs	221 Main St. 570	Los Altos	CA	94022	(844) 440-9462
Carpenter Co.	Carpenter Co.	5016 Monument Ave.	Richmond	VA	23230	(804) 359-0800
Casper Sleep Inc.	Casper	175 Greenwich St.	New York	NY	10007	(646) 361-2458
Central Rent 2 Own	Central Rent 2 Own	490 E Ln.	Ontario	OR	97914	(541) 889-2786
City Liquidators Inc.	City Liquidators Inc.	823 SE 3rd Ave.	Portland	OR	97214	(503) 238-1367
Cocoon International Sales, LLC	Cocoon International Sales, LLC	1000 Tempur Way	Lexington	KY	40511	(859) 455-1729
Comfort DTC Inc.	Molecule	360 N Pacific Coast Hwy Ste. 2000	El Segundo	CA	90245	(833) 365-7378
Comfort Revolution, LLC	Comfort Revolution, LLC	One Office Parkway	Trinity	NC	27370	(662) 454-7526
Consolidated Hospitality Supplies, LLC	Consolidated Hospitality Supplies, LLC	544 Lakeview Pkwy.	Vernon Hills	IL	60061	2247861308
Correctional Technologies Inc.	Cortech USA	7530 Plaza Ct.	Willowbrook	IL	60527	(630) 455-0811
Corsicana Acquisition, LLC	Corsicana Mattress Company	3001 S US Hwy 287	Corsicana	TX	75109	(800) 323-4349
Costco Wholesale Corporation	Costco Wholesale Corporation	Attn Tax Dept	Seattle	WA	98134	(425) 313-8100
Courtesy Home Furnishings	Self Service Furniture	1313 Bridge St.	Clarkston	WA	99403	(541) 523-7701
CTR Associates	Kelly's Furniture, Paul Schatz Furniture	3850 Hagers Grove Rd.	Salem	OR	97317	(503) 378-1794

Company	DBA Name	Address	City	State	Zip	Phone
Custom Comfort Mattress Company Inc.	Custom Comfort Mattress	579 N Batavia St.	Orange	CA	92868	(714) 693-6169
Custom Mattress Makers Inc.	Custom Mattress Makers Inc.	13101 56th Ct	Clearwater	FL	33760	(413) 537-8307
CVB Inc.	LUCID® MATTRESS, WELLSVILLE®, LINENSPA®	1525 W 2960 S	Logan	UT	84321	(435) 232-5369
Dania Inc.	Scandinavian Designs; Dania Furniture	390 E Parkcenter Blvd.	Boise	ID	83706	(208) 423-8869
Dennis M Rose	Plank and Coil	2259 NW Raleigh St.	Portland	OR	97210	(503) 224-0551
Denver Mattress Company, LLC	Denver Mattress Company	5651 Broadway	Denver	CO	80216	(303) 566-8700
Direct Mattress and Furniture	Direct Mattress and Furniture	2701 E Wilshire Dr.	Eugene	OR	97405	(541) 521-1942
Direct Supply Inc.	Direct Supply; Direct Supply Equipment & Furnishings; Direct Supply of Wisconsin	6767 N Industrial Rd.	Milwaukee	WI	53216	(920) 207-0032
DirectBuy Operations, LLC	DirectBuy Operations, LLC	1221 Arrowhead Ct	Crown Point	IN	46307	(219) 224-6986
Downey Sleep Center, LLC	Downey Sleep Center	600 E 2nd St.	The Dalles	OR	97058	(154) 129-8876
E. Gregg Clemmer Inc.	Clemmer's Furniture	10070 SE Orient Dr.	Boring	OR	97009	(503) 663-4950
East West Bedding, LLC	EasyRest	1401 S Edgewood St.	Baltimore	MD	21227	(443) 573-1400
Elements International	Kyvno, LLC	PO Box 851601	Mesquite	TX	75185	(877) 575-3888
Emerald City Organic Sleep Solutions Inc.	ECO Sleep Solutions	25 E 8th Ave.	Eugeen	OR	97401	(541) 343-1022
Emma Mattress Inc.	Emma Mattress	1209 Orange St.	Wilmington	DE	19801	(310) 736-2504
Encore Home Furnishings, LLC	Encore Home Furnishings	2730 NE Bunn Rd.	McMinnville	OR	97128	(503) 474-1937
Engles Furniture Inc.	Engles Furniture Inc.	2079 Sherman Ave.	North Bend	OR	97459	(541) 756-1123
Ergomotion Inc.	Ergomotion Inc.	6790 Navigator Dr.	Goleta	CA	93117	(805) 979-3931
Ergopedic, LLC	Ergopedicsleep.com	PO Box 2787	Indio	CA	92202	(602) 373-0002
Euromarket Designs Inc.	Crate & Barrel	1250 Techny Rd.	Northbrook	IL	60062	847-272-2888
Express Furniture Services, LLC	Express Furniture Rental	2448 Foundry Park Ave.	Fresno	CA	93706	(559) 268-3074
Furniture City	Furniture City	550 NW Burnside Rd.	Gresham	OR	97030	(503) 667-8927
Future Foam Inc.	Future Foam Inc.	1610 Ave. N	Council Bluffs	IA	51501	(712) 323-9122 x223

Company	DBA Name	Address	City	State	Zip	Phone
Gates Furniture of Grants Pass Inc.	Gates Home Furnishings	700 SW 6th St.	Grants Pass	OR	97526	(541) 476-4627
Gateway Mattress Co. Inc.	Gateway Mattress Co. Inc.	624 S Vail Ave.	Montebello	CA	90640	(323) 725-1923
GF Health Products Inc.	GF Health Products Inc.	One Graham-Field Way	Atlanta	GA	30340	(678) 291-3261
Gilbert Investments Inc.	Edgewater Home Furnishings	155 Division Ave.	Eugene	OR	97404	(541) 484-1962
Greg's Sleep Center	Greg's Sleep Center	1725 N 1st St. Ste. D	Hermiston	OR	97838	(541) 567-1099
Harvest Green Mattress, LLC	Harvest Green Mattress	3535 W 47th St.	Chicago	IL	60632	(630) 204-5136
Haven Sleep Products Ltd	Haven Sleep Co.	1451 Richter St.	Kelowna	BC	V1Y 2M1	(844) 694-2836
Hennick's Home Center Inc.	Hennick's Furniture & Sleep Center	88296 Hwy 42 S	Bandon	OR	97411	(541) 329-1233
Home Depot U.S.A. Inc.	Home Depot	2455 Paces Ferry Rd. SE	Atlanta	GA	30339	(770) 384-4555
Homelife Furniture Inc.	Homelife Furniture	301 Main Ave.	Tillamook	OR	97141	(503) 842-2005
HSNi, LLC	Home Shopping Network	1 HSN Dr.	St. Petersburg	FL	33729	(727) 872-1000
InnoMax Corporation	InnoMax Corporation	530 W Elk Pl.	Denver	CO	80216	(303) 296-9530
Invacare Corporation	Invacare Corporation	One Invacare Way	Elyria	OH	44035	(440) 329-6787
Joerns Healthcare, LLC	Joerns Healthcare	2430 Whitehall Park Dr.	Charlotte	NC	28273	(704) 499-6000
Kohl's Department Stores Inc.	Kohl's Department Stores Inc.	N56W17000 Ridgewood Dr.	Menomonee Falls	WI	53051	(262) 703-7000
Kuebler's Furniture Inc.	Kuebler's Furniture Inc.	1894 Churn Creek Rd.	Redding	CA	96002	(530) 221-9898
L&M Arnold Enterprises, LLC	Mattress Land	830 Biddle Rd.	Medford	OR	97501	(541) 474-2337
Lakewood Candies, LLC	Milliard Bedding	1980 Swarthmore Ave.	Lakewood	NJ	08701	(866) 686-4891
Lavin Industries	European Sleep Works	2966 Adeline St.	Berkeley	CA	94703	(510) 841-5340
Layla Sleep Inc.	Layla	157 Church St.	New Haven	CT	06510	(203) 606-0526
LeafScore Inc.	LeafScore Inc.	970 W Broadway	Jackson	WY	83001	(646) 640-7141
Lewis Home Source Inc.	Roby's Furniture and Appliance	1901 Main Ave. N	Tillamook	OR	97141	(503) 842-7111
Lifekind Inc.	Lifekind Inc.	333 Crown Point Cir.	Grass Valley	CA	95945	(530) 477-5395
Lippert Components Inc.	Lippert Components Inc.	3501 County Rd. 6	Elkhart	IN	46514	(574) 584-7330

Company	DBA Name	Address	City	State	Zip	Phone
Lucas & Howard Furniture Inc.	Ultimate Mattress & Bedroom Company	2727 S 6th St.	Klamath Falls	OR	97603	(541) 892-6191
Lull Ventures, LLC	Lull	3905 State St.	Santa Barbara	CA	93105	(800) 301-5845
Macy's Retail Holdings, LLC	Macy's	145 Progress Place	Springdale	OH	45246	(513) 579-7322
Marpac, LLC	Yogabed	3870 US Hwy 421 N	Wilmington	NC	28401	(800) 602-1421
Mattress Firm Inc.	Mattress Firm Inc.	3250 Briarpark, Ste. 400	Houston	TX	77042	(346) 718-5490
Mattress MegaStore, LLC	Mattress MegaStore	175 Baseline St.	Hillsboro	OR	97123	(503) 747-0808
MGOFF, LLC	Bedrooms West	590 NE Burnside Rd.	Gresham	OR	97030	(503) 666-2376
Morgan's Mattresses	Morgan's Mattresses	18200 NE Halsey St.	Portland	OR	97230	(503) 913-4364
MTJ American, LLC	MTJ American	4276 Helena St.	Hudson	NC	28638	(828) 396-1537
Murray's Auction Center Inc.	Murray's Furniture, and Ashley Homestore	4270 Belmont Dr.	Hood River	OR	97031	(541) 386-3915
My Livingway, LLC	The American Furniture	320 Lancaster Dr. NE	Salem	OR	97301	(971) 915-2266
Nest Bedding Inc.	Nest Bedding	1811 Concord Ave. Ste. 110	Chico	CA	95928	(530) 762-1630
Newton Baby Inc.	Newton Baby Inc.	382 NE 191st St.	Miami	FL	33179	(646) 383-4597
Noble House Home Furnishings, LLC	Noble House Home Furnishings	21325 Superior St.	Chatsworth	CA	91311	(845) 558-1730
Norix Group Inc.	Norix Group Inc.	1 Innovation Dr.	West Chicago	IL	60185	(630) 231-1331
Northwest Beds Inc.	Northwest Home Furnishings	86203 Franklin Blvd.	Eugene	OR	97405	(541) 741-2109
Northwest Furniture and Mattress, LLC	Northwest Furniture and Mattress, LLC	215 Elm St.	La Grande	OR	97850	(541) 963-5440
Northwest Furniture Outlet Inc.	Northwest Furniture Outlet	23300 S Hwy 99E	Canby	OR	97013	(503) 266-8800
Northwest RTB9, LLC	Relax The Back	2750 SW Cedar Hills Blvd.	Beaverton	OR	97005	(503) 643-1088
Oregon Corrections Enterprises	Oregon Corrections Enterprises	PO Box 12849	Salem	OR	97309	(541) 922-6156
Organic Exchange Inc.	Organic Exchange Inc.	200 NE 2nd St.	Boca Raton	FL	33432	(561) 571-9800 x223
Organic Grace	Organic Grace	11904 E. Alsea Hwy.	Tidewater	OR	97390	(541) 528-2655

Company	DBA Name	Address	City	State	Zip	Phone
Organic Mattresses Inc.	Organic Mattresses Inc.	1335 Harter Pkwy	Yuba City	CA	95993	(530) 790-6723
Patriot Mattress & More, LLC	Patriot Mattress & More, LLC	11119 Los Olivos Dr.	Moreno Valley	CA	92557	(951) 318-9469
Peace Lily Sleep	Peace Lily	58 - 60 Levanswell Rd.	Moorabbin	VIC	3189	(888) 420-1467
Penney OpCo, LLC	JCPenney	PO Box 10001	Dallas	TX	75301	(801) 350-2535
Pleasant Mattress Inc.	Pleasant Mattress Inc.	375 S West Ave.	Fresno	CA	93706	(559) 264-6446
Purple Innovation, LLC	Purple	4100 N Chapel Ridge Rd.	Lehi	UT	84043	(801) 756-2600
Quality Sleep Shop	My Green Mattress	1519 W 55th St.	La Grange Highlands	IL	60525	(877) 737-8237
QVC Inc.	QVC Inc.	1200 Wilson Dr.	West Chester	PA	19380	(484) 701-1000
R.C. Willey Home Furnishings Inc.	R.C. Willey	2301 S 300 W.	Salt Lake City	UT	84115	(801) 461-3900
Relief Products, LLC	Relief Products, LLC	3500 20th St. E	Fife	WA	98424	(253) 312-0653
Rent-A-Center Inc.	Rent-A-Center	5501 Headquarters Dr.	Plano	TX	75024	(972) 801-1100
Resident Home, LLC	Resident	100 Logistics Ave.	Jeffersonville	IN	47130	(908) 752-1388
Rested Development Inc.	America's Mattress	112 SE Douglas St.	Newport	OR	97365	(541) 270-1546
Richardson's Furniture	Richardson's Furniture & Mattress Gallery	2015 Columbia Blvd.	St Helens	OR	97051	(503) 397-1329
Room & Board Inc.	Room & Board	4600 Olson Memorial Hwy	Golden Valley	MN	55422	(763) 588-7525
Ruth Murphy Ltd	Murphy's Furniture	2962 Baseline St.	Cornelius	OR	97113	(503) 640-1124
Safe For Home Products, LLC	Naturepedic	16925 Park Circle Dr.	Chagrin Falls	OH	44023	(440) 543-1483
Salem Building Specialties	Kelly's Home Center	3850 Hagers Grove Rd.	Salem	OR	97317	(503) 378-1793
Scenic Dreams, LLC	Mattress Depot USA	32907 Ash Ave. SE	Black Diamond	WA	98010	(509) 344-9878
Sealy Mattress Manufacturing Company, LLC	Sealy Mattress Manufacturing Company	1000 Tempur Way	Lexington	KY	40511	(614) 629-8056
Serta Simmons Bedding, LLC	Serta and Simmons	2451 Industry Ave.	Doraville	GA	30360	(470) 509-1643
Sferra Fine Linens, LLC	Sferra	15 Mayfield Ave.	Edison	NJ	08837	(646) 822-0473
Shepherd Inc.	Roseburg Mattress	635 SE Stephens St.	Roseburg	OR	97470	(541) 957-8866

Company	DBA Name	Address	City	State	Zip	Phone
Snowwhite Hospitality, LLC	Boston Interior Solutions	476 Brighton Dr.	Bloomington	IL	60108	(978) 562-9988
Solstice Sleep Products Inc.	Solstice Sleep Products Inc.	3720 W Broad St.	Columbus	OH	43228	(614) 279-8850
Sonu Sleep Corporation	Sonu Sleep	7321 Rindge Ave.	Playa Del Rey	CA	90293	(844) 444-7668
South Bay International Inc.	South Bay International Inc.	8570 Hickory Ave., Ste. 150	Rancho Cucamonga	CA	91739	(909) 718-5000
St Vincent De Paul of Lane Co. Inc.	St Vinnies	2890 Chad Dr.	Eugene	OR	97408	(541) 687-5820
Sterling Furniture Company	M.Jacobs Furniture	3194 Gateway Loop	Springfield	OR	97477	(541) 726-6221
Stumptown Sleep, LLC	The Mattress Lot, Stumptown Mattress	2406 NE Sandy Blvd.	Portland	OR	97232	(503) 896-1072
Tempur Retail Stores, LLC	Tempur Retail Stores, LLC	1000 Tempur Way	Lexington	KY	40511	(859) 455-1729
Tempur-Pedic North America, LLC	Tempur-Pedic North America, LLC	1000 Tempur Way	Lexington	KY	40511	(859) 455-1000
Thanepohn Corp.	Mattress Mill	8383 Huffine Ln.	Bozeman	MT	59718	(406) 586-4525
The Furniture Connexion	The Furniture Connexion	1800 NW Fairview Dr.	Gresham	OR	97030	(503) 674-4488
The Furniture Superstore Inc.	Rife's Home Furniture	PO Box 25739	Eugene	OR	97402	(458) 205-8923
The Original Mattress Factory Inc.	The Original Mattress Factory	4930 State Rd.	Cleveland	OH	44134	(216) 661-8388
Thuma Inc.	Thuma Inc.	1169 Gorgas Ave.	San Francisco	CA	94129	(415) 990-6492
TO & Sons Corp.	Michaels Fine Furniture	2011 NE 181st Ave.	Portland	OR	97230	(503) 674-0414
Tom Busch Home Furnishings Inc.	Tom Busch Home Furnishings Inc.	804 Main St.	Oregon City	OR	97045	(503) 656-2621
TradeMango Solutions Inc.	Article	1010 Raymur Ave.	Vancouver	BC	V6A 3T2	(604) 679-3107
Trailhead Ventures Inc.	Medley	3519 NE 15th Ave. #590	Portland	OR	97212	(323) 801-6892
Tru Furniture, LLC	Tru Furniture, LLC	222 S Broadway	Coos Bay	OR	97420	(541) 294-3041
University Loft Company	University Loft Company	2588 Jannetides Blvd.	Greenfield	IN	46140	(317) 866-5657
Victory Supply, LLC	Victory Supply, LLC	7025 Industrial Park Rd.	Mount Pleasant	TN	38474	(888) 376-1205
Walker's Furniture Inc.	Walker's Furniture & Mattress	3808 N Sullivan Rd.	Spokane Valley	WA	99216	(509) 535-1995

Company	DBA Name	Address	City	State	Zip	Phone
Wallbeds By Wilding, LLC	Wilding Wallbeds	3988 S 1540 E Cir.	St. George	UT	84790	(909) 680-4141
Werner Media Partners, LLC	Ghostbed	7143 W Broward Blvd.	Plantation	FL	33317	(855) 855-4499
Williams-Sonoma Inc.	Williams-Sonoma Inc.	3250 Van Ness Ave.	San Francisco	CA	940109	(415) 421-7900
Wilson's of Redmond	Wilson's of Redmond	2071 S Hwy 97	Redmond	OR	97756	(541) 548-2066
Zinus Inc.	Zinus Inc.	5731 Promontory Pkwy	Tracy	CA	95377	(925) 417-2100
Ziwi, LLC	Ziwi	801 S 1230 E	Alpine	UT	84004	(801) 234-0038
Zoma Sleep, LLC	Zoma Sleep	7167 E Rancho Vista Dr.	Scottsdale	AZ	85251	(888) 400-8856

Appendix B: Collection Site Requirements

Collection Site Requirements



 **Mattress Recycling Council®**

**BYE BYE MATTRESS
OREGON COLLECTION SITE
REQUIREMENTS**

JUNE 2024



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About the Requirements

Staff at all participating collection sites must be knowledgeable regarding these requirements before accepting mattresses. For purposes of these requirements, the term "mattress" or "unit" means the same thing as mattresses and foundations (or box springs) as defined in Section 2 of Senate Bill 1576 and Section 1 of MRC's Oregon Program Plan. These requirements describe the program and what is required to participate.

About the Mattress Recycling Council

In 2022, Oregon enacted Senate Bill 1576 which requires mattress manufacturers to create a recycling program for mattresses discarded in the state. The bedding industry established the Mattress Recycling Council (MRC) to develop and operate the mattress recycling program known as Bye Bye Mattress.

What MRC Provides

MRC provides the following to participating collection sites:

- A collection container to store program mattresses that is appropriate for the number of mattresses that the collection site expects to generate and the site's available space.
- Transportation from the collection site to a contracted recycler.
- No-cost mattress recycling services.

PROGRAM MATERIALS

INCLUDED PRODUCTS

As defined in Senate Bill 1576 and in MRC's Oregon Program Plan:

Mattresses: Defined as any sleep surface covered with ticking or fabric that contains resilient material such as steel innersprings, foam, fiber or other filling or upholstery materials, used alone or in combination, regardless of size or shape. This definition includes foam mattresses.

Foundation (also commonly called box springs): 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, regardless of whether the product is stationary or adjustable.



All units accepted for recycling by MRC must have been used and discarded in the state of Oregon.

EXCLUDED MATERIALS

EXCLUDED FROM RECYCLING CONTAINER

Participating collection sites must allow free drop-off of program mattresses in any condition. However, units in these conditions cannot be placed in the MRC-designated storage container:

- Program mattresses that are severely wet/moldy, damaged, twisted, frozen or soiled
- Program mattresses infested with bed bugs or other living organisms



EXCLUDED FROM NO-COST DROP-OFF (NON-PROGRAM PRODUCTS)

As defined in Senate Bill 1576 and in MRC's Oregon Program Plan, these products are excluded from the definition of mattress and foundation:

- Adjustable bases not covered in ticking or fabric
- Air mattresses that contain no upholstery material (such as camping beds)
- Car beds
- Collapsible roll-away beds
- Fold-out sofa beds
- Futon mattresses, frames and bases
- Juvenile products including crib mattresses, carriages, baskets, dressing tables, strollers, playpens, infant carriers, lounge pad, crib bumpers
- Loose bedding, blankets or sheets
- Mattress pads and toppers
- Mattresses stripped of padding components (partial units)
- Metal bed frames
- Out-of-state mattresses
- Pillows and cushions
- Sleeping bags
- Water beds



To learn more about included and excluded products, view videos in our **Resources Library** at www.mattressrecyclingcouncil.org/resources/for-collectors

MATERIAL SCREENING

MATTRESS INSPECTION AND EXAMINATION

Program mattresses shall be accepted for drop off at no cost, regardless of their condition. Collection site staff should screen incoming mattresses to determine whether they are suitable for recycling and should remove mattresses that are:

- Excessively wet or frozen
- Severely twisted, punctured or crushed
- Infested with bed bugs or other living organisms
- Exceptionally soiled or moldy

Mattresses not suitable for recycling should be disposed of through your existing solid waste stream.

Bed Bug Identification

Mattresses and box springs infested with bed bugs are unacceptable for recycling and should be disposed of through your existing solid waste stream. Staff at collection sites should evaluate program mattresses for evidence of bed bug infestation. A training webinar focused on dispelling health related myths, identifying bed bugs and offering best practices for protecting staff can be found here: <https://mattressrecyclingcouncil.org/resources/for-collectors>



Signs of bed bug activity may be more obvious than the insects themselves. Look for clusters of dark spots or smudges on mattresses (fecal spots), especially along seams. Eggs, shed skins and all life stages of bed bugs may also be present in these 'soiled' areas.



Bed bugs are tan to brown in color, but may appear redder if they have fed.

Adult Bed Bugs are dorsally flat insects, broadly oval and the size of an apple or melon seed (1/4").

Nymphs look like adults in shape but are smaller.

Eggs are white and barrel-shaped.



For more information on bed bugs, please refer to the resources made possible by the **Connecticut Coalition Against Bed Bugs** at www.ct.gov/caes/CCABB

QUALITY STANDARDS

Acceptable Quality

IMPORTANT: Only units used and discarded in Oregon are accepted by the program.

Shown here are examples of units suitable for recycling.



Unacceptable Quality

Shown here are examples to illustrate severe damage, heavy soiling and infestation. While a collection site must allow units in these conditions to be dropped off at no cost, these units would not be suitable for recycling and cannot be placed in the MRC-designated storage container.

Look for:

- Mattresses that are severely twisted, punctured or crushed
- Signs of bed bugs or other living organisms
- Severe mold
- Excessive staining from bodily fluids
- Fire damage



MATERIALS COLLECTION & HANDLING

Each collection site will have unique operational considerations. Participating sites must make their own decisions about how to best manage their operations in the safest manner possible in accordance with applicable local, state and federal laws. At a minimum, each participating site must meet these requirements:

MINIMUM PROGRAM REQUIREMENTS	
SITE	Each collection site must be secure with adequate space and staffing to handle and store acceptable mattresses.
PERMITS	Each collection site must have knowledge of and comply with all applicable federal, state and local laws. These may include, but are not limited to, zoning requirements, state permit requirements and OSHA or other workplace requirements.
INSURANCE	Each collection site must maintain general liability insurance of at least \$1,000,000 per occurrence.
TRAINING	Staff at each collection site must be trained and knowledgeable regarding these requirements before accepting mattresses for recycling.
STORING & LOADING MATTRESSES	<p>Collection sites must keep mattresses dry by storing in weatherproof containers or under cover to maximize their recyclability. In addition, all collection sites must:</p> <ul style="list-style-type: none"> • Make every effort to place mattresses in MRC-designated storage containers immediately upon acceptance. • Do not store units on the ground for prolonged periods of time and make every effort to keep container doors closed. • Keep mattresses intact and not intentionally crush or puncture them. • Efficiently stack mattresses to maximize the number of units loaded in each storage container. • Provide oversight to keep unacceptable items out of MRC-designated storage containers. • Remove any non-program products from MRC-designated storage containers before transport to MRC recyclers. • Make a swap request through MRC's electronic reporting platform in advance of the onsite container reaching capacity. • Practice good housekeeping standards and keep storage containers and program mattresses in a neat and orderly condition.
SITE ACCESS	Collection sites must allow MRC access to confirm compliance with these requirements.

See page 8 for photos and more information

MATERIALS COLLECTION & HANDLING

LOADING MATTRESSES IN STORAGE CONTAINERS

Expected number of mattresses that should fit in various container sizes:

Container Type	Number of Mattresses
20-foot sea container	30-45
40-foot sea container	75-95
40-yard roll-off container	35-50
48-foot trailer	100-120
53-foot trailer	120-150

Acceptable Loading

- 1. Begin each stack with a queen or full size box spring.**
This acts as a base pallet to create a secure stack and makes unloading of mattresses quick and efficient.
- 2. Mattresses should be stacked horizontally** to the top of the trailer to maximize space.
- 3.** In small quantities, king size mattresses can be placed vertically next to a stack of horizontal mattresses.
- 4.** If there are more than 10 king size units, stack horizontally.



Unacceptable Loading

IMPORTANT: Do not load units vertically or in an unsafe manner.

Please contact your Program Coordinator to learn more about acceptable/non-acceptable units and appropriate stacking and loading techniques.



To learn more about screening, stacking and loading mattresses, view videos in our **Resources Library** at www.mattressrecyclingcouncil.org/resources/for-collectors

TRANSPORTATION & PROCESSING

Collection sites, transporters and recyclers must use the MyMRC electronic reporting platform (<https://mrc-us.my.site.com>) for requesting pickups, managing cancellations, coordinating deliveries and reporting issues and data to MRC.

TRANSPORTERS

MRC will assign each collection site a transporter to provide a storage container and transport services.

- MRC-contracted transporters will provide participating locations with evidence of automobile insurance coverage of at least \$1,000,000 per occurrence.
- The assigned transporter will pick up full containers and drop off an empty container at the same time.
- On the scheduled pickup day, the collection site must make the collection container readily accessible to the transporter.
- At the time of the pick up, the transporter may request collection site staff to sign a Bill of Lading (BOL) supplied by the transporter documenting collection site location details and the quantity of mattresses in the container.

A collection site may choose to provide its own storage containers and transportation. Such locations may only send mattresses to recyclers contracted by MRC and participating in the Program, and must schedule a drop-off time with the recycler through MRC's electronic reporting platform.

RECYCLERS

Recyclers under contract with MRC will meet environmentally sound management requirements and established recycling standards to accurately account for all mattresses received, the mattress components recycled (e.g., foam, steel, wood, fiber, etc.) and any residual disposal. Collection sites will be assigned an MRC recycler to best service your facility.



ENVIRONMENTALLY SOUND MANAGEMENT

MRC's contracts require that program participants use environmentally sound management practices to collect, transport and recycle discarded units.

For collection sites, required environmentally sound management practices include:

- Maintaining adequate record keeping. Program participants are required to maintain records related to implementation of the Program for not less than three years.
- Tracking and documenting the fate of discarded mattresses from collection through final disposition within and outside Oregon.
- Complying with all federal, state and local laws and regulations that apply to their business and operations, including air and water pollution laws, other environmental laws, worker health and safety requirements, fair labor standards rules and other laws that can affect the work and natural environment.
- Maintaining adequate liability insurance.



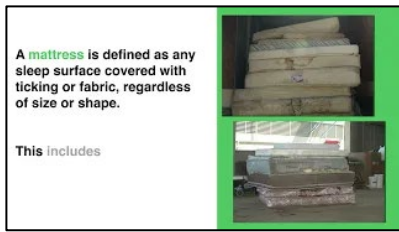
PROGRAM WITHDRAWAL & TERMINATION

A collection site's participation in MRC's Bye Bye Mattress program in Oregon is voluntary. Either party may withdraw from participation in accordance with the terms in your contract. Written notice to the other party is required. MRC reserves the right to remove any collection site not in compliance with these requirements from further participation in the program.



Video Series

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



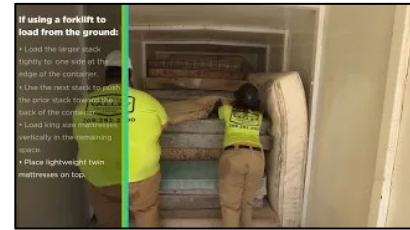
Included & Excluded Products

[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 C: Recycling Standards

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

For purposes of these Standards, the term “Mattress” or “unit” means the same thing as Mattresses and Foundations (or box springs) as defined in Section 2 of the Act and Section 1 of this Plan.

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 and in accordance with Environmentally Sound Management practices as defined in Section 2 of the Act.

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 violate 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 its 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 70% 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. For all in-bound shipments, track and document each shipment using bills of lading or other equivalent shipping documents.
- 3.2. Maintain in-house or third-party annually calibrated and certified scales to weigh all in-bound loads.
- 3.3. For all out-bound shipments, track and document the fate of recyclable mattress materials and solid waste shipments using bills of lading or other equivalent shipping documents through final disposition within Oregon and outside of Oregon.
- 3.4. Outbound shipment loads must be weighed using in-house or third-party annually calibrated and certified scales.
- 3.5. Separately track Non-Program Mattresses received, processed and discarded or recycled by the facility through final disposition within Oregon and outside of Oregon.
- 3.6. 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 purchasers of recycled materials.
- 3.7. Train employees on how to prepare and maintain all necessary records and other documentation related to the receipt, processing, inventory and disposition of Mattresses and Mattress materials.
- 3.8. 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 in accordance with Environmentally Sound Management practices as defined in Section 2 of the Act. 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.
- 4.2. A summary of the audit results must be provided to MRC upon request and DEQ may view the results at their offices upon request.

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 workplace locations 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.

Certificate of Recycling, Employment and Inventory

To: Mattress Recycling Council Oregon, LLC

From: [Name of Recycler]

Date: _____

Month Covered by This Certificate (the Month): _____

Number of Unprocessed Units in Inventory at the Close of the Month: _____

I, [name of person signing the certificate], serving as [insert individual's company title] of [Name of Recycler] (Recycler), being duly authorized to provide this certificate on behalf of Recycler, hereby certify to the Mattress Recycling Council Oregon, LLC under penalties of perjury that the following statements are truthful and accurate:

1. The quantities and weights of Mattresses reported by Recycler in the electronic reporting platform specified by MRC were recycled in strict compliance with the requirements of Recycler's contract with MRC and all applicable federal, State and local laws and regulations,
2. The data reported by Recycler in the electronic reporting platform specified by MRC are based on this company's internal books and records and are to the best of my knowledge accurate, and
3. Recycler's inventory of unprocessed Mattresses (including both Program and Non-Program Materials) as of the date of this certification, stored either at Recycler's premises (including Storage Containers and truck trailers on its premises) or with previously granted permission by MRC, at off-premises locations under Recycler's control, did not exceed a combined ___ Units, and
4. At the close of the Month, Recycler employed _____ full-time workers (that is, working 30 or more hours/week) and _____ part-time workers (that is, working fewer than 30 hours /week).

Authorized Signature

Print Name

Title

Date

Appendix D: 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 8: 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
Clatsop	Astoria	Astoria 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, Inc.
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

County	City	Facility Name
Lincoln	Lincoln City	Schooner Creek Private Transfer Station
Lincoln	Newport	Thompson's Transfer And Disposal Inc.
Lincoln	Toledo	Toledo Transfer Station
Lincoln	Waldport	South Lincoln Recycle & Transfer Station
Linn	Albany	St. Vincent de Paul Society of Lane County - Albany Thrift Store
Malheur	Ontario	Ontario Sanitary Service Transfer Station
Marion	Salem	St. Vincent de Paul Society of Lane County - Salem Thrift Store
Marion	Woodburn	Woodburn Recycle Center & Transfer Station - Republic Services
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
Multnomah	Portland	Suttle Road Material Recovery Facility - Recology
Polk	Monmouth	Brandt's Sanitary Service
Tillamook	Manzanita	Manzanita Transfer Station
Tillamook	Pacific City	Pacific City Transfer Station
Tillamook	Tillamook	Tillamook Transfer Station
Umatilla	Milton-Freewater	Milton-Freewater Recycling Center
Union	La Grande	Waste Pro Recovery Transfer Station
Wasco	The Dalles	The Dalles Transfer Station + Tri-County HHW Collection Facility
Washington	Forest Grove	Forest Grove Transfer Station
Washington	Hillsboro	Far West Recycling
Washington	Hillsboro	Tualatin Valley Waste Recovery
Washington	Sherwood	Pride Disposal
Washington	Tualatin	Community Warehouse
Washington	Wilsonville	Republic Services Wilsonville
Wheeler	Fossil	Fossil Solid Waste Transfer Station And Recycling Station
Yamhill	Newberg	Newberg Transfer And Recycling Center

Appendix E: Prospective 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

bye bye mattress
A Program of the Mattress Recycling Council

Available online: <https://mattressrecyclingcouncil.org/wp-content/uploads/2022/10/MRC-OR-Collection-Sites-Info-Sheet-FINAL.pdf>

Publicity Toolkits for Collection Sites and Collection Events

MRC's publicity toolkits help a collector promote their site or event. The toolkits:

- Describe the on-site signage MRC offers and how to reorder.
- Explain how to request an update to locator and directory listings.
- Provide ready to use information for a collector to implement in a variety of communications or marketing materials such as their website, social media, newsletters or presentations.
- Include customizable templates for a press release and flyer.
- Describe how to work with MRC on a custom project such as a direct mail campaign or local advertising.
- Include details about MRC's outreach booth and where to send event sponsorship proposals.

Per the **Implementation Timeline**, an Oregon version of the publicity toolkits will be created in the months following Plan approval.



View or download these documents: [MRC's Publicity Toolkits](#)

Appendix F: 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 actual 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 Program over a multiyear period in a prudent and responsible manner.

MRC will review the budget monthly, comparing actuals to budget. Should the assessment be insufficient or excessive to fund the Program, MRC will submit a Plan amendment pursuant to Section 7 of the Act proposing a change to the mattress stewardship assessment.

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 the Plan is approved. For purposes of preparing the budget, MRC has assumed a January 1, 2025 launch date. This budget covers (A) start-up costs through 2024 and (B) full operations for calendar years 2025 and 2026.

Revenue

Funding for Program implementation and ongoing operations comes from a mattress stewardship assessment collected at the point of sale (retail or otherwise). Retailers must report the number of units sold each month and submit all assessments collected to MRC by the end of the following month in which the sale occurred.

MRC is budgeting Program assessment revenue \$9,225,270 for 2025 and \$9,409,770 for 2026. In calculating revenue, MRC has used (A) a per unit assessment of \$22.50, 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 calendar year. In estimating the number of units that Oregon consumers will buy, MRC considered 2023 and Q1 2024 actuals in other state mattress recycling programs and the ISPA Industry Forecast for 2025, and then adjusted for Oregon's population. The 2025 budgeted sales are expected to be 2.5% above 2024 projected levels and 2026 is expected to be 2% above 2025. Based on this information, MRC estimates that revenue will be collected on 410,012 and 418,212 units for

2025 and 2026, respectively.

Based on these assumptions, MRC’s budgeted assessment revenue for 2025 to 2026 is based on the following units sold in Oregon and a per unit assessment of \$22.50:

TABLE 9: Revenue Calculation

Category	2025 Budget	2026 Budget	Total
Assessment Revenue	\$9,225,270	\$9,409,770	\$18,635,040
Units Sold	410,012	418,212	828,224

Expenses

Operational Costs

Based on our experience operating other statewide mattress recycling programs and factoring in Oregon’s population, MRC has estimated the number of units that recyclers will process in 2025 and 2026 to be 374,402.

TABLE 10: Units Sold and Units Recycled

Units	2025 Budget	2026 Budget	Total
Number of Units Sold	410,012	418,212	828,224
Number of Units Recycled	164,097	210,305	374,402

Operational costs to recycle program mattresses include collection, transportation, processing, efforts to mitigate illegal mattress dumping, various program studies (including life cycle analysis, convenience, etc.), compliance audits, and field visits to collection sites, recyclers, and transporters. Note that there will always be a differential between units sold and units recycled. This is due to several factors including a significant time differential between when a unit is purchased and discarded. During the usable life of a mattress, it is common for consumers to pass a used mattress along to a friend or relative or sell them on local marketplace sites like Craigslist, Facebook Marketplace or OfferUp. In 2022, MRC conducted a study to estimate the average time between when units are manufactured and then discarded through the program. That study concluded the average age for all discarded units was 13.9 years.

TABLE 11: Operational Costs

Category	Start-Up Costs 2022-2024	2025 Budget	2026 Budget	Total
Collection	\$ 0	\$ 829,725	\$ 1,033,214	\$ 1,862,939
Transportation	\$ 0	\$ 1,255,342	\$ 1,657,206	\$ 2,912,548
Processing	\$ 0	\$ 2,591,355	\$ 3,434,504	\$ 6,025,859
Illegal Dump Mitigation	\$ 0	\$ 150,000	\$ 150,000	\$ 300,000
Program Studies (Life Cycle, Convenience, etc.)	\$ 3,400	\$ 130,000	\$ 128,000	\$ 261,400
Program Compliance Audits	\$ 0	\$ 10,000	\$ 30,000	\$ 40,000
Field Visits	\$ 20,000	\$ 13,700	\$ 18,800	\$ 52,500
Total Operational Costs	\$ 23,400	\$ 4,980,122	\$ 6,451,724	\$ 11,455,246

Collection

Collection costs are comprised of handling fees, container rental, mattress recycling signage and collection site improvement funding. For the purposes of preparing this budget, MRC estimates that approximately 75% of the units collected will be subject to a handling fee paid to collection sites. MRC anticipates the costs of compensating collection sites for their reasonable actual costs to manage discarded mattresses will \$377,300 and \$456,515 in 2025 and 2026 respectively. The remaining 25% of the units are expected to come directly from retailers, commercial volume sources and special community collection events that will not incur handling fees.

Container rental costs are based on the estimated number and type of storage containers needed to handle units from a variety of collectors. This budget includes an accelerated timeline to contract with collection sites in the first year of the program. Subsequent years will see more collection sites and growth from commercial volume sources. Therefore, container costs increase each year. The collection facility improvement funding is discussed further in **Part 5** of this Plan.

TABLE 12: Collection Costs

Collection	2025 Budget	2026 Budget	Total
Collection Site Handling Fees	\$ 377,300	\$ 456,515	\$ 833,815
Collection Container and Storage	\$ 402,425	\$ 526,699	\$ 929,124
Mattress Collection Facility Improvement Funding	\$ 50,000	\$ 50,000	\$ 100,000
Total Collection Costs	\$ 829,725	\$ 1,033,214	\$ 1,862,939

Transportation and Recycling

MRC uses third parties to transport mattresses from collection sites to recyclers for processing units. Transport costs vary considerably depending on the transport distance, geographic location of the collection site and the container type used to hold the discarded mattresses. Transportation costs are affected by the number of units the container can hold, the distance the transporter travels to the recycling facility and fuel costs. Recycling costs, paid to third party contracted recyclers on a per unit basis, are for the

dismantling and processing of program mattresses. These costs are directly related to the number of program mattresses collected.

Illegal Dump Mitigation

MRC has allocated funds to mitigate the costs of illegal dumping as discussed in **Part 10** of this Plan. This includes costs associated with meetings, community surveys, data collection and pilot projects.

Program Studies

In future years, MRC is also required to conduct a life cycle analysis, report on the scope of discarded mattresses that are not being collected as part of the Program and study effective methods for providing discarded mattress collection services to low-income individuals and multifamily housing structures. Costs for these studies will be incurred in 2025 and 2026. The budget also includes a convenience analysis study in 2025.

Program Compliance

Recycler performance audits and inspections for environmentally sound management practices will be conducted annually for contracted recyclers as discussed in **Part 7** of this Plan. In 2026, the budget also includes \$20,000 for a third party to perform a program audit.

Field Visits

This budget includes staff travel expenses associated with regular meetings and inspections of recyclers and collection sites.

Public Education, Advertising and Promotion

MRC’s comprehensive education and communication efforts targeting retailers, producers, renovators and consumers is described in detail in **Part 11** of this Plan. Oregon shares costs for hosting and maintaining the consumer- and industry-facing websites (ByeByeMattress.com, MattressRecyclingCouncil.org and MRCreporting.org) with our other state recycling programs. Shared costs are based on each state’s population. In order to achieve its objectives with the state, MRC’s marketing team will also prepare an annual report in compliance with the Act. All of these activities through year-end 2026 are included in the \$640,771 budget listed below.

TABLE 13: Public Education, Advertising and Promotion Costs

Category	Start-Up Costs 2022-2024	2025 Budget	2026 Budget	Total
Advertising and Consumer Education	\$ 119,513	\$ 142,260	\$ 94,345	\$ 356,118
3 rd Party PR Agencies	\$ 2,965	\$ 82,750	\$ 82,750	\$ 168,465
Industry and Stakeholder Outreach	\$ 26,403	\$ 16,990	\$ 14,065	\$ 57,458
Conferences and Events	\$ 4,650	\$ 18,500	\$ 20,580	\$ 43,730
Annual Report	\$ -	\$ -	\$ 15,000	\$ 15,000
Total Costs	\$ 153,531	\$ 260,500	\$ 226,740	\$ 640,771

DEQ Oversight Fees

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

Program Administration Costs

MRC administration costs include management and administrative expenses, professional services (e.g., financial audit), government relations, legal and other administrative expenses required to manage the Program. Administration 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, similar mattress recycling programs operate 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 four states. That means that for purposes of this budget, 8.8% of shared expenses have been allocated to the Oregon Program. Total administration costs for the Program for the period 2025-2026 plus start-up costs from 2022-2024 represent 15% of total Program costs.

Start-Up Costs

From 2022 to 2024, MRC incurred various start up expenses. These include legal expenses incurred to form MRC, staff administrative costs and professional services required to prepare this Plan and contact mattress sellers in Oregon (as well as to prepare and review RFP's for recycling and transportation services), travel and other necessary expenses incurred to prepare to launch the Program. MRC funded these start-up expenses by borrowing money from MRC Inc. MRC will incur additional start-up costs in 2024 until the Program launches in 2025. In total, MRC anticipates borrowing \$1.8 million. MRC has budgeted \$205,591 in interest expense on its loan and anticipates that the loan can be repaid by the end of 2025.

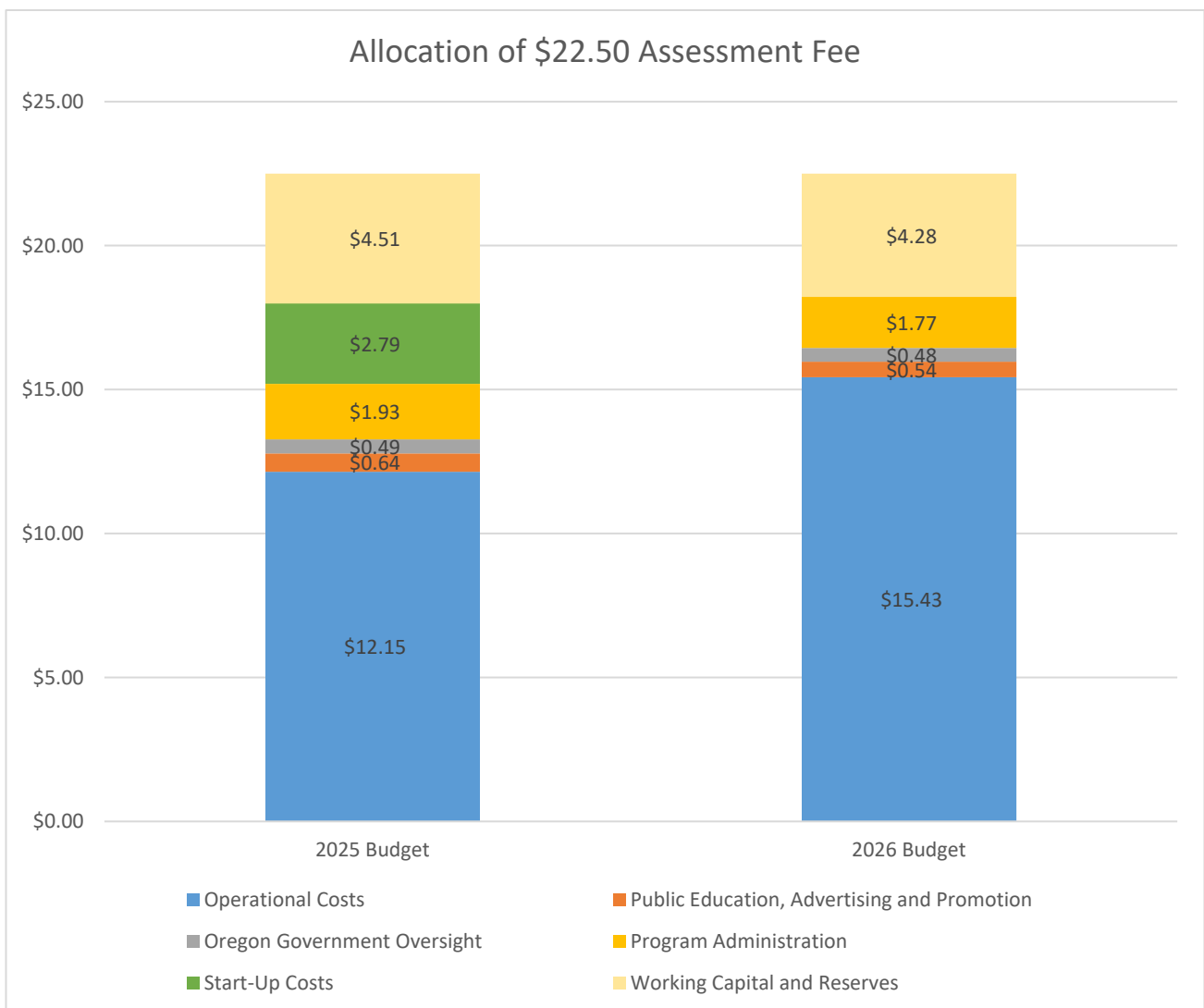
TABLE 14: DEQ Oversight and MRC Administration Costs

Category	Start-Up Costs 2022-2024	2025 Budget	2026 Budget	Total
DEQ Government Oversight Fees	\$ 205,000	\$ 200,000	\$ 200,000	\$ 605,000
Program Administration				
Management and Administrative	\$ 426,290	\$ 569,019	\$ 631,456	\$ 1,626,765
Annual Audit/Tax Filings	\$ -	\$ 2,000	\$ 25,000	\$ 27,000
Industry and Government Relations	\$ 150,000	\$ 60,000	\$ 60,000	\$ 270,000
Legal Expenses	\$ 49,131	\$ 51,000	\$ 16,000	\$ 116,131
Program Travel	\$ 31,743	\$ 7,000	\$ 9,000	\$ 47,743
Interest Expense	\$ 104,364	\$ 101,227	\$ -	\$ 205,591
Total Administration	\$ 761,528	\$ 790,246	\$ 741,456	\$ 2,293,230

All costs for this Program, including the start-up costs, are shown in the following table:

TABLE 15: 2022-2026 Expenses

Category	Start-Up Costs 2022-2024	2025 Budget	2026 Budget	Total
Operational Costs	\$ 23,400	\$ 4,980,122	\$ 6,451,724	\$ 11,455,246
Public Education, Advertising and Promotion	\$ 153,531	\$ 260,500	\$ 226,740	\$ 640,771
DEQ Oversight	\$ 205,000	\$ 200,000	\$ 200,000	\$ 605,000
Program Administration	\$ 761,528	\$ 790,246	\$ 741,456	\$ 2,293,230
Total Program Costs	\$ 1,143,459	\$ 6,230,868	\$ 7,619,920	\$ 14,994,247



In 2025, the \$22.50 assessment collected on each mattress or boxspring sold will include:

- \$12.15 for Program operational costs
- \$2.79 for start-up costs incurred prior to Program launch
- \$1.93 for Program administration

- \$0.49 for DEQ Oversight
- \$0.64 for public education and advertising
- \$4.51 allocated to build MRC’s reserves and working capital

Once MRC repays the money it has borrowed to fund Program start-up costs, a larger percentage of the collected assessment (\$15.43) will cover Program operations in 2026 and MRC will continue to allocate funds to build reserves.

Calculating the Per Unit Assessment

Total budgeted expenses through 2026 (including start-up costs) are \$14,994,247. We add targeted reserve funding through December 31, 2026 of \$1,755,019, as well as three months working capital of \$1,904,980 to cover short term cash flow requirements. From this, we deduct budgeted investment revenue earned during the period of \$19,206. That leaves a total of \$18,635,040 that must be funded by the per unit assessment. MRC anticipates that during the period from January 1, 2025 through December 31, 2026, Oregon consumers will buy 828,224 mattresses and foundations. Based on this information, MRC calculates the per unit assessment of \$22.50 by dividing the sum of total costs, unallocated reserves and working capital (less investment revenue¹) by total units sold (\$18,635,040 / 828,224 = \$22.50). Any delay in the Program launch beyond January 1, 2025, will change expenses and the assessment calculation illustrated below:

TABLE 16: Per Unit Assessment Calculation

Stewardship Assessment	
Total Expenses (A)	\$ 14,994,247
Working Capital + Target Unallocated Reserve (B)	\$ 3,659,999
Less Investment Income (C)	\$ (19,206)
Amount to Cover (D = A + B - C)	\$ 18,635,040
Projected Unit Sales 2025-2026 (E)	828,224
Per Unit Assessment (F = D/E)	\$ 22.50

Unallocated Reserve Funds

As with the other states, the MRC Board has established a reserve policy that directs MRC management to have sufficient operating cash to fund operations (e.g., cash on hand equal to approximately three months of expenses), and a prudent level of unallocated reserves (Board Designated Financial Reserve) that allows MRC to be prepared in case its operational expenses increase or planned revenues decrease as a result of external factors. The amount that MRC sets aside in this reserve is influenced by several factors.

First, the Program must be able to adjust to unforeseen circumstances that can have a substantial impact on MRC’s expenses. These circumstances could include accidents and natural disasters, or operational or financial disruptions. Significant or sudden changes in market dynamics that affect costs (e.g., fuel) or failure of secondary markets for recycled components, political uncertainties, or any combination of the above could also significantly affect the Program and its budget. As an example, the COVID-19 pandemic and subsequent inflation significantly disrupted budgets, eventually resulting in unpredicted cost increases beyond MRC’s control.

¹ MRC anticipates earning investment revenue on its unallocated reserves beginning 1st quarter of 2026.

Second, the reserve protects the long-term viability of the Program by setting aside money that can fund budget deficits without necessitating frequent adjustments in the assessment. Third, MRC's ability to operate prudently over a multiyear period depends in part on MRC's forecasted operating and administrative expenses for several years into the future. For the next few years, MRC expects to increase its expenditure as it continues to develop the Program's collection network and increase the number of units collected and recycled. This growth will result in MRC's annual expenses increasing in the future.

Finally, MRC must be prepared in case its revenue stream (that is, assessment collected on the sale of mattresses) is significantly or suddenly disrupted. This could include a downturn in the U.S. economy or mattress sales (as experienced recently) or other events that are external to the Program itself, like legislative or regulatory initiatives that disrupt sales.

For these reasons, MRC has budgeted to build a reasonable unallocated reserve of \$1,755,019 by December 2026. The unallocated reserves at the end of 2026 represents 23% (2.8 months) of annual Program expenses. MRC is committed to maintaining financial stability and sustainability. To ensure this, MRC will continue to allocate funds to its reserves annually. However, the total reserve amount will not exceed 75% of MRC's annual expenses.

The details of the anticipated budget are as follows on the next page:

