

January 29, 2018

The Honorable Al Muratsuchi
Chair, Joint Legislative Audit Committee
California State Capitol, Room 2179
Sacramento, CA 95814

RE: SUPPORT OF AUDIT REQUEST OF MATTRESS RECYCLING COUNCIL

Dear Chair Muratsuchi:

The California Product Stewardship Council (CPSC) is a non-profit organization formed in 2006 in response to the State of California repeatedly implementing disposal bans without any funding or management plan. CPSC educates and advocates for producers to have a significant share of the responsibility in the waste management of their products. Extended Producer Responsibility (EPR) is a policy approach where producers of targeted products with significant end-of-life impacts are asked to contribute their fair share of responsibility of the end-of-life management of those products thereby “extending” their responsibility beyond just the sale of their products.

CPSC supports the request for an audit of the Mattress Recycling Council (MRC) for the following key reasons:

- 1) *MRC has not fully implemented the program, resulting in underperformance in several key areas and failing to stop illegal dumping of mattresses; yet, in December of 2017, MRC requested and obtained from CalRecycle a reduction of the fee to perform the work, against the advice of the entire Advisory Committee, of which I am a member;*
- 2) *Despite claims to MRC that mattress refurbishers are losing mattresses to recycling, which goes against the intent of the bill, MRC has done nothing yet to correct that situation, despite the fact that refurbishing is higher on the waste hierarchy than recycling;*
- 3) *Despite the Advisory Committee asking for changes to the program that would increase convenience for consumers and increase source reduction and recycling, they are not being implemented in a timely fashion.*

These three things are exactly what the legislature intended for the program to achieve per the law and are just a few of the issues that we would like addressed. CalRecycle outlined a long list of issues in the [Conditional Approval of their 2016 Annual Report](#) as well. While MRC was off to a good start with the roll-out, they quickly began losing credibility when refusing to listen to the Advisory Committee and getting a rollback of the fee before the program was not meeting legislative intent. Not implementing the program to save money, and then claiming that there is too much money to justify a fee reduction, seems disingenuous to our state’s goals of reducing waste and ensuring recycling of mattresses is convenient in California.

Thank you for the opportunity to provide our comments for consideration. We look forward to being very involved in the discussions to ensure the mattress stewardship program works for California stakeholders and fee payers.

Sincerely,



Heidi Sanborn, Executive Director, California Product Stewardship Council

Cc: Members and Consultants, Joint Legislative Audit Committee