Rhode Island Mattress Recycling Plan

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Submitted by:
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Submitted to:
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INTRODUCTION

The Mattress Recycling Council (MRC), a non-profit corporation, is pleased to submit the Rhode Island Mattress Recycling Plan (the Plan) to the Rhode Island Resource Recovery Corporation (RIRRC) pursuant to Chapter 90-23 Rhode Island General Laws, as amended (the Law).

In 2013, Rhode Island enacted legislation to develop a statewide Mattress Recycling Program (the Program). The legislation was the result of collaboration between the mattress industry, led by the International Sleep Products Association (ISPA), and RIRRC, environmental groups, local cities and towns and various other stakeholders. The purpose of the Program is to implement a statewide mattress stewardship program that is funded through a visible fee collected from consumers on all Rhode Island mattress and foundation sales. Through the Plan described here, the Program will establish a network of consolidation locations throughout Rhode Island, from which discarded mattresses will be transported and recycled by MRC-contracted recyclers.

This Program seeks to maximize both the recovery of discarded mattresses and the recycling of mattress components that are readily recyclable and used to manufacture new products.

The Law identifies the following Plan components that will be described in detail throughout this document:

1. Participating Producers – Mattress producers, through MRC, are responsible for developing a sustainable program that meets the statutory obligations of the law. MRC will maintain a publically available list of participating producers.

2. Mattress Fee – MRC will meet its legal obligations while administering the Program in a financially efficient manner that minimizes Program costs. Program costs will be financed by a visible mattress stewardship fee (the Fee) collected on the sale of every mattress sold to Rhode Island consumers. By acting in a financially efficient manner, MRC will minimize the costs paid by Rhode Island purchasers.

3. Performance Goals - The Plan and the associated Fee are based on a number of factors that affect Program costs and the number of mattresses recycled by the Program. The Plan identifies the sources, diversion potential, and anticipated recovery of mattress units across the state. MRC will evaluate and adjust the Program and performance goals over time.

4. Proposed Recycling Facilities – MRC will contract with transporters and recyclers to create and operate a Program that meets the specific needs of the state of Rhode Island.

5. Sources of Mattresses - Discarded mattresses may originate from transfer stations, residences, hotels, health care facilities, schools and other locations. The Plan describes these sources and how to divert these discarded mattresses to an MRC-contracted recycler.
Education Program - Developing a successful public relations program includes targeted messaging to consumers, mattress retailers, producers, municipal solid waste programs and recyclers.

Rhode Island Mattress Recycling Law

In July 2013, Rhode Island enacted Senate bill 261A, codified as Chapter 23-90 of the state’s Health and Safety Code, to encourage the recycling of discarded mattresses. In June 2015, the state amended Chapter 23-90. For these purposes, MRC refers to Chapter 23-90, as amended, as the Law.

Specifically, the Law requires mattress producers to create a statewide mattress recycling program to collect and recycle mattresses and foundations discarded in the state. The Program will be funded by a visible recycling fee collected from consumers and other purchasers on the sale of each mattress and foundation for use in the state. To the extent technologically feasible and economically practical, the Program will:

1. Minimize public sector involvement in the management of discarded mattresses.
2. Provide for the convenient and accessible state-wide collection of mattresses discarded in the state, including from participating covered entities that accumulate and segregate a minimum of fifty (50) discarded mattresses for collection at one time, or a minimum of thirty (30) discarded mattresses for collection at one time in the case of participating municipal transfer stations.
3. Provide for MRC-funded recycling and disposal of discarded mattresses.
4. Provide suitable storage containers at permitted municipal transfer stations, municipal government properties or other solid waste management facilities for segregated, discarded mattresses, or make other mutually agreeable storage and transportation agreements at no cost to such municipalities, provided the municipal transfer stations, municipal government properties or other solid waste management facilities make space available for such purpose and imposes no fee for placement of such storage container on their premises.
5. Set a uniform mattress stewardship fee that is sufficient to cover the costs of operating and administering the Program and that will be collected from purchasers of mattresses for use in Rhode Island.
6. Establish a financial incentive that provides for the payment of a monetary sum, set by MRC, to promote the recovery of mattresses.

The Law states that recycling shall be preferred over any other disposal method to the extent that recycling is technologically feasible and economically practical.

Mattress Recycling Council

In late 2013, the mattress industry, through its trade association, the International Sleep Products Association, formed MRC for the sole purpose of designing, implementing, and administering
recycling programs in states with mattress recycling laws. MRC serves as the responsible party for meeting the industry’s obligations in this regard.

MRC is a non-profit corporation incorporated in the state of Delaware and is a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code. MRC’s Board of Directors is comprised of bedding manufacturers and retailers.

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<thead>
<tr>
<th>MRC Board of Directors</th>
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<tbody>
<tr>
<td>Ryan Trainer</td>
<td>MRC President</td>
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<tr>
<td>Richard Diamondstein</td>
<td>Paramount Industrial Companies, Inc; MRC Chairperson</td>
</tr>
<tr>
<td>Catherine Lyons</td>
<td>MRC Treasurer</td>
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<tr>
<td>Dale Carlsen</td>
<td>MFRM Family of Brands</td>
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<tr>
<td>Doug Guffey</td>
<td>Corsicana Bedding</td>
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<td>Terry Johnson</td>
<td>Tempur-Sealy International, Inc.</td>
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<tr>
<td>Matt Kershner</td>
<td>Select Comfort Corporation</td>
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<td>Kristen McGuffey</td>
<td>Serta Simmons Bedding LLC</td>
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MRC will oversee all aspects of the Program, including:

- Developing and implementing stakeholder outreach efforts.
- Contracting with transporters and recyclers to process discarded mattresses for recycling.
- Setting the Fee that retailers and other mattress sellers will collect from purchasers and remit to MRC.
- Coordinating registration of producers of mattresses sold in Rhode Island, as appropriate.
- Coordinating service to covered entities throughout Rhode Island.

As required by the Law, MRC’s activities will be funded by a visible fee collected from purchasers of mattresses for use in Rhode Island. In addition, MRC implemented a similar program in Connecticut on May 1, 2015. MRC is also the state-approved organization that will develop and implement a statewide mattress recycling program in California in early 2016.

**Definitions**

This document describes the mattress-recycling Program proposed by MRC to implement the requirements of Section 23-90-5(b) of the Law. The following terms defined in Section 23-90-3 of the Law are relevant to the Plan:

Section 23-90-3(2) defines the term “covered entity” as follows:

"Covered entity" means any political subdivision of the state, any mattress retailer, any permitted transfer station, any waste to energy facility, any healthcare facility, any

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Section 23-90-3(9) defines “foundation” as follows:

"Foundation" means any ticking-covered structure that is used to support a mattress and that is composed of one or more of the following: A constructed frame, foam or a box spring.

"Foundation" does not include any bed frame or base made of wood, metal or other material that rests upon the floor and that serves as a brace for a mattress.

Section 23-90-3(10) defines “mattress” as follows:

"Mattress" means any resilient material or combination of materials that is enclosed by ticking, used alone or in combination with other products, and that is intended for or promoted for sleeping upon. "Mattress" includes any foundation, renovated foundation, or renovated mattress.

"Mattress" does not include any of the following:

(i) An unattached mattress pad, an unattached mattress topper, including any item with resilient filling, with or without ticking, that is intended to be used with or on top of a mattress;

(ii) A sleeping bag, pillow;

(iii) A crib or bassinet mattress, car bed;

(iv) Juvenile products including a carriage, basket, dressing table, stroller, playpen, infant carrier, lounge pad, crib bumper, and the pads for those juvenile products;

(v) A product that contains liquid or gaseous filled ticking including any water bed or air mattress that does not contain upholstery material between the ticking and the mattress core;

(vi) Any upholstered furniture that does not contain a detachable mattress; or

(vii) A fold-out sofa bed or futon.

In interpreting this definition, MRC considers the following products to be included or excluded from the scope of the term “mattress”:

Included Products:

- Any mattress, innerspring or specialty except those listed below
• Mattress box springs (foundations)
• Any renovated mattress or box spring (foundation)

Excluded Products:
• Mattress pads
• Mattress toppers
• Sleeping bags
• Pillows
• Car beds
• Water beds
• Air mattresses
• Sofa beds and futons
• Juvenile products including, carriages, baskets, dressing tables, strollers, playpens, infant carriers, lounge pad, and crib bumpers
• Crib and bassinet mattresses

In addition, unless stated otherwise, the word “mattress” or “unit” refers to either a mattress, a foundation, or combination of both.

Section 23-90-3(18) defines the term “recycling” as follows:

"Recycling" means any process in which discarded mattresses, components and by-products may lose their original identity or form as they are transformed into new, usable or marketable materials. "Recycling" does not include as a primary process the use of incineration for energy recovery or energy generation by means of combustion.

Section 23-90-3(17) defines the term “producer” as follows:

"Producer" means any person who manufactures or renovates a mattress that is sold, offered for sale or distributed in the state under the manufacturer’s own name or brand. "Producer" includes:

(i) 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; and
(ii) any person who imports a mattress into the United States that is sold or offered for sale in this state and that is manufactured or renovated by a person who does not have a presence in the United States.

Section 23-90-3(19) defines the term “renovate” as follows:

"Renovate" or "renovation" means altering a mattress for the purpose of resale and includes any one, or a combination of, the following: Replacing the ticking or filling, adding additional filling, rebuilding a mattress, or replacing components with new or recycled materials. "Renovate" or "renovation" does not include the:

(i) stripping of a mattress of its ticking or filling without adding additional material;
(ii) Sanitization or sterilization of a mattress without otherwise altering the mattress; or
(iii) altering of a mattress by a renovator when a person retains the altered mattress for personal use, in accordance with regulations of the department of business regulation.

Section 23-90-3(20) defines the term “renovator” as follows:

"Renovator" means a person who renovates discarded mattresses for the purpose of reselling such mattresses in a retail store.

Section 23-90-3(21) defines the term “retailer” as follows:

"Retailer" means any person who sells mattresses in this state or offers mattresses in this state to a consumer through any means, including, but not limited to, remote offerings such as sales outlets, catalogs or the Internet.

**STATUTORY REQUIREMENTS**

Section 23-90-5(b) provides:

The Plan submitted pursuant to subsection (a) of this section shall, to the extent it is technologically feasible and economically practical will:

1. identify each producer's participation in the Program;

2. describe the Fee structure for the Program and propose a uniform stewardship fee that is sufficient to cover the costs of operating and administering the Program;
3. establish performance goals for the first two (2) years of the Program;

4. identify proposed recycling facilities to be used by the Program, such facilities shall not require a solid waste management facilities license;

5. detail how the Program will promote the recycling of discarded mattresses;

6. include a description of the public education program;

7. describe Fee disclosure language that retailers will be required to prominently display that will inform consumers of the amount and purpose of the Fee; and

8. identify the methods and procedures to facilitate implementation of the mattress stewardship Program in coordination with the corporation director and municipalities.

We address each of these elements in order:

**Participating Producers**

Section 23-90-4(a) of the Law requires that all producers selling mattresses for use in the state join MRC. As noted above, the term “producer” for these purposes includes “renovators,” as well as “importers” of mattresses produced outside the United States.

To facilitate this process, MRC established an online registration portal that participating entities may use to join MRC. The address for this portal is:

http://www.mrcreporting.org/

Participating producers that have registered with MRC as of June 30, 2015 are listed in Attachment A. MRC will provide RIRRC with updates to this list periodically as needed.

**Fee Structure**

The Program will be funded by a visible recycling fee collected on all mattresses sold for use in the state. Retailers and other parties selling mattresses will collect this fee and remit it directly to MRC.

As required by Section 23-90-4(b), MRC is a nonprofit organization with a fee structure that covers, but does not exceed, the costs of developing the Plan and operating and administering the Program in accordance with the requirements of the Law, and maintaining a financial reserve sufficient to operate the Program over a multi-year period of time in a fiscally prudent and responsible manner.

Pursuant to Section 23-90-5(h), an independent auditor will review the reasonableness of this Fee
within 60 days after July 1, 2015. The Fee is calculated based on the assumption that the Program will commence on February 1, 2016, in accordance with the timelines established in the Law.

**Program Budget**

Based on a multi-year budget prepared by MRC to establish and manage the Program, MRC has set the Fee at $10.00 per mattress unit. In accordance with Section 23-90-5(h) of the Law, MRC has retained the independent auditing firm of Lydon Fetterolf Corydon, P.A. to render an opinion as to “whether the proposed mattress stewardship fee is reasonable to achieve the goals set forth in this section.” This firm will render its opinion on the “reasonableness” of the proposed Fee directly to RIRRC within 60 days of July 1, 2015, the date on which MRC proposed the $10.00 per mattress unit Fee set forth in the Plan.

MRC has developed a multi-year budget to finance the development and long-term sustainability of the Rhode Island mattress recycling. In preparing the budget, MRC considered revenues and costs based on the items below.

**Revenue**

The number of mattress units sold for use in Rhode Island will directly influence MRC’s Program revenue, since the Fee will be collected on each such unit. The Program has no other sources of revenue. Based on national and regional mattress sales statistics, MRC has calculated for budgeting purposes that approximately 135,000 mattress units will be sold in Rhode Island in calendar year 2016.

**Operating Costs**

Transportation and recycling costs will be the Program’s most significant expenses. Because the Program is designed to service the entire state, transportation costs will vary based on the distance from the consolidation point and recycler. The budget accounts for projected volumes from each region and related transportation costs.

MRC-contracted recyclers will be expected to recycle not less than 85% by weight of the mattress components dismantled, including, but not limited to, metal, foam, fabric, and wood. To qualify for payment, mattress components must be recycled through approved scrap dealers or other appropriate intermediaries that will facilitate the use of such components in a manner that they will “lose their original identity or form as they are transformed into new, usable or marketable materials,” as required by Section 23-90-3(18) of the Law. Non-recyclable scrap will be disposed of through the solid waste system using appropriate means (waste-to-energy facilities or landfills).

The Program budget assumes that contracted recycling will commence on February 1, 2016.

**Public Education Program Costs**

MRC has developed retailer and consumer educational materials that are available on MRC’s
consumer and industry targeted websites. Design, printing and distribution costs for these materials and other public education program costs are included as part of the budget. The program will monitor the effectiveness of these materials over time. See Section 6 below for details regarding the proposed public education program.

**Administrative Costs**

The Program has incurred pre-launch costs for financing, personnel, administrative costs, and other expenses necessary to develop the Program, including Fee-related audit expenses, logistical support, website-development, professional support, financing, and miscellaneous overhead costs.

**Program Surplus/Deficit**

Section 23-90-5(h) requires that the recycling fee allow MRC to “maintain a financial reserve sufficient to operate the Program over a multi-year period of time in a fiscally prudent and responsible manner.” MRC has budgeted to achieve a reserve over the next five (5) years that is sufficient to fund from three to six months of operating expenses.

**Recycling Fee**

Section 23-90-5(i)(A) of the Law states that “On and after the implementation of the mattress stewardship program, the fee established pursuant to subsection (b) of this section, and described in subsection (h) of this section, shall be added to the cost of all mattresses sold to retailers and distributors in this state by each producer. On and after such implementation date, each retailer or distributor, as applicable, shall add the amount of such the fee established pursuant to subsection (b) of this section and described in subsection (h) of this section to the purchase price of all mattresses sold in this state. The fee shall be remitted by the retailer to the council.”

The recycling Fee must be stated separately on the sales receipt or invoice for all units sold to Rhode Island consumers. The Fee description on the sales receipt or invoice shall read “Recycle Fee $10.00.” The description may be displayed in upper or lower case letters and is not required to be displayed in a specific font, provided the description is prominently displayed in English and is readable.

If MRC concludes that in the future, it is necessary to raise or lower the recycling Fee to maintain the Program’s financial viability, MRC will follow the relevant provisions of the Law, including seeking the required auditor approval as prescribed in the Law. As required by the Law, the Fee will go into effect not less than 90 days after the auditor notifies the RIRRC Director that the Fee is reasonable.

For purposes of collecting the Fee, each mattress and foundation is counted as an individual unit. The Fee is a flat rate, regardless of the size, type, composition, or brand of mattress or foundation purchased. Each retailer shall add the amount of the Fee to the sales transaction for all mattresses sold in this state. In accordance with this requirement:

- Retailers must collect the Fee on all sales of mattresses and foundations that take place in Rhode Island.
Online retailers must collect the Fee on all mattresses and foundations sold for delivery in Rhode Island, regardless of where the online retailer is located.

The Fee does not apply to mattresses or foundations sold by brick-and-mortar stores located outside of Rhode Island for delivery in Rhode Island.

Manufacturers of mattresses and foundations sold to large Rhode Island consumers, such as members of the hospitality industry, dormitories, hospitals, and prisons, must collect the Fee on such sales (also known as “contract” or “institutional” customers) and remit it to MRC.

Retailers and other sellers must register through the online reporting system at www.mrcreporting.org in order to report and remit fees. Within 30 days following the end of a month, each retailer and other seller will report the amount of fees it collected during the month to MRC through a secure online self-reporting system. The retailer or other seller may also use the online system to remit collected Fees directly to MRC, or may make payments directly to MRC electronically or by check. Fees are due 30 calendar days following the last day of the reporting month.

Performance Goals and Program Mechanics

As provided in the Law, “Covered Entity” means any political subdivision of the state, mattress retailer, permitted transfer station, waste-to-energy facility, health care facility, educational facility, correctional facility, military base or commercial or non-profit lodging establishment, which possesses a discarded mattress that was discarded in the state. The Program intends to fund the management of discarded mattresses from these and other entities, as described in this section.

Because there is little historical data on which to base a mattress recovery or recycling goal, MRC’s goal for the initial years of the Program will be to develop a statewide program that is convenient for all covered entities to access. MRC will pursue these goals through targeted education and outreach to each covered entity.

Municipal Transfer Stations – Discarded mattresses consolidated at municipal transfer stations may receive at MRC’s expense the placement of a container for storing discarded mattresses, transporting the mattresses to an MRC-contracted recycler and recycling those mattresses. MRC will assign a specific transporter and recycler to serve the needs of each participating municipal transfer station.

MRC has contacted all 39 municipalities in Rhode Island. As of the Plan submission, the following 29 have expressed interest in participating in the Program, each of which MRC will visit to evaluate their specific storage and transport needs:
Interested Transfer Station Locations

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<thead>
<tr>
<th>Location</th>
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<tr>
<td>Bristol</td>
<td>New Shoreham</td>
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<td>Burrillville</td>
<td>Newport</td>
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<tr>
<td>Central Falls</td>
<td>North Kingstown</td>
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<tr>
<td>Coventry</td>
<td>North Providence</td>
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<tr>
<td>East Greenwich</td>
<td>Portsmouth</td>
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<tr>
<td>Exeter</td>
<td>Providence</td>
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<tr>
<td>Foster</td>
<td>Richmond</td>
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<tr>
<td>Glocester</td>
<td>Smithfield</td>
</tr>
<tr>
<td>Hopkinton</td>
<td>South Kingstown-Narragansett</td>
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<tr>
<td>Jamestown</td>
<td>Tiverton</td>
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<tr>
<td>Lincoln</td>
<td>Warren</td>
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<tr>
<td>Little Compton</td>
<td>West Greenwich</td>
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<tr>
<td>Middletown</td>
<td>West Warwick</td>
</tr>
<tr>
<td>Narragansett</td>
<td>Westerly-Hopkinton</td>
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<td></td>
<td>Woonsocket</td>
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MRC will offer storage container options or make other arrangements to best service each location. For these purposes, storage containers may include, but are not limited to trailers, sea containers or roll-off containers. In all cases, the container must keep the mattresses dry and will consolidate the maximum number of mattress units in the container. MRC will work with municipalities and RIRRC to provide storage and transport to one-day collection events through the Eco-Depot program, or stand-alone municipal collections.

MRC recognizes that many mattresses received through municipal sources may be dirty, cut, ripped or damp. These conditions typically do not prevent a mattress from being recycled. But as noted below, certain mattresses are not appropriate for recycling.

The following factors will apply when a transfer station agrees to send its discarded mattresses to MRC-contracted recyclers:

- Recycling discarded mattresses through MRC is voluntary.
- Mattresses that are severely damaged, twisted, wet, frozen, soiled, infested with bedbugs or otherwise unsuitable for recycling cannot be recycled and should be disposed of through the existing solid waste stream. The transfer station should work with MRC to determine mattress acceptability.
- If at least 50 units are segregated for each recycling pick-up, MRC will work with the transfer station to evaluate it for on-site pick-up and no-cost recycling.

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• If the transfer station operates or contracts with a third party to provide delivery and removal services for discarded mattresses, it may drop them off directly at an MRC-contracted recycler at no cost to the generator.

• If the transfer station delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.

• The transfer station must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.

• Participating transfer stations and other covered entities may not charge for receiving mattresses generated in Rhode Island.

• Participating transfer stations will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

• Products other than mattresses and foundations may not be loaded into the storage container.

Goal: MRC seeks to have 80% of Rhode Island’s municipal transfer stations participating in the Program by the end of the first two years of operation.

Municipal Bulky Waste or Curbside Collection – Municipalities that collect discarded mattresses using curbside bulky waste pick-up methods may be eligible for MRC-funded recycling under the same transfer station conditions discussed above, depending on the specific circumstances of the facility and its needs.

Bulky waste collection programs may choose to pack units at their transfer station in containers for pick-up at MRC’s cost, or deliver them directly to an MRC-contracted recycling facility. In all cases, mattresses must be separated from other solid waste and must meet the acceptable conditions identified in MRC Collection Guidelines. MRC staff will meet with Rhode Island communities collecting mattresses at curbside to discuss their specific logistical and transport options.

Goal: MRC will contact all municipalities currently collecting mattresses through curbside or bulky waste collection services. MRC will consider flexible contracting options with those municipalities that may include compensation for some transport services.

Private Transfer Stations – Private transfer stations that collect discarded mattresses may be eligible for MRC-funded recycling under the same transfer station conditions discussed above, depending on the specific circumstances of the facility and its needs.

The following factors will apply when a private transfer station agrees to send its discarded mattresses.
mattresses to MRC-contracted recyclers:

- Recycling discarded mattresses through MRC is voluntary.
- Mattresses that are severely damaged, twisted, wet, frozen, soiled, infested with bed-bugs or otherwise unsuitable for recycling cannot be recycled and should be disposed of through the existing solid waste stream. The transfer station should work with MRC to determine mattress acceptability.
- If at least 50 units are segregated for each recycling pick-up, MRC will work with the transfer station to evaluate it for on-site pick-up and no-cost recycling.
- If the transfer station operates or contracts with a third party to provide delivery and removal services for discarded mattresses, it may drop them off directly at an MRC-contracted recycler at no cost to the generator.
- If the transfer station delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.
- The transfer station must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.
- Participating transfer stations may not charge for receiving mattresses generated in Rhode Island that will be recycled through the Program.
- Participating transfer stations will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.
- Products other than mattresses and foundations may not be loaded into the storage container.

Goal: Rhode Island has at least six private transfer stations. MRC’s goal is to serve four of these locations within the first two years of the Program.

**Rhode Island Retailers** – MRC has held numerous calls, meetings and discussions with both Rhode Island-based retailers and national retailers with a Rhode Island presence to discuss Program logistics and their obligations under the law, request their feedback, and explain how participating in the Program can benefit them. In addition, MRC has used email, direct mail and the press to communicate with these retailers. MRC will continue these efforts as the Plan is implemented.

The following factors will apply if a retailer wants to send its discarded mattresses to MRC-contracted recyclers:

- Recycling discarded mattresses through MRC is voluntary.
- Mattresses that are severely damaged, twisted, wet, frozen, soiled, infested with bed-
bugs or otherwise unsuitable for recycling cannot be recycled and should be disposed of through the existing solid waste stream. The retailer should work with MRC to determine mattress acceptability.

- If at least 50 units are segregated for each recycling pick-up, MRC will work with the retailer to evaluate it for on-site pick-up and no-cost recycling.
- If the retailer operates or contracts with a third party to provide delivery and removal services for discarded mattresses, it may drop them off directly at an MRC-contracted recycler at no cost to the generator.
- If the retailer delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.
- The retailer must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.
- Participating retailers will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

Goal: MRC’s goal is to inform all Rhode Island retailers about the benefits of recycling through the Program and to recycle up to 15,000 mattresses from Rhode Island retailers in the first two years.

**Lodging Establishments** – MRC estimates Rhode Island has 125 lodging establishments (including hotels and motels) that are potential sources of discarded mattresses. MRC will work with the Rhode Island Hospitality Association to conduct direct outreach to hotels and motels throughout the state.

The following factors will apply to lodging establishments that are interested in sending their discarded mattresses to MRC-contracted recyclers:

- Recycling discarded mattresses through MRC is voluntary.
- Mattresses that are severely damaged, twisted, wet, frozen, soiled, infested with bed-bugs or otherwise unsuitable for recycling cannot be recycled and should be disposed of through the existing solid waste stream. Participating entities should work with MRC to determine mattress acceptability.
- If at least 50 units are segregated for each recycling pick-up, MRC will work with an establishment to evaluate it for on-site pick-up and no-cost recycling.
- Lodging establishments that operate or contract with a third party to provide delivery and removal services for discarded mattresses may drop them off directly at an MRC-contracted recycler at no cost to the generator.
If a lodging establishment delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.

The establishment must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.

Participating establishments will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

Goal: MRC lacks any statistics to estimate the quantity of used mattresses discarded by these lodging establishments. Given these circumstances, MRC’s goal is to contact the lodging entities in the state to inform them of the Program, and seek to persuade them to send up to 2,500 mattresses for recycling through the Program within the first two years.

**Prisons and Other Incarceration Facilities** – Based on MRC’s discussions with recyclers, we understand that prison mattresses rarely contain innersprings (and therefore do not contain steel that can be recycled profitably) and for sanitary reasons are not considered recyclable unless the pad is uncontaminated. As a result, we expect a low recycling rate from incarceration facilities. Nevertheless, MRC will contact all eight incarceration facilities in Rhode Island to evaluate their individual circumstances.

- Recycling discarded mattresses through MRC is voluntary.
- Incarceration facilities must be keenly aware of the need to distinguish between units that are biologically contaminated and those that are not, and exclude the contaminated units from pick-up for recycling.
- Mattresses that contain breached vinyl covers, contaminated foam, or are severely damaged, twisted, wet, frozen, soiled, infested with bed-bugs or otherwise unsuitable for recycling, cannot be recycled and should be disposed of through the existing solid waste stream. Participating entities should work with MRC to determine acceptability.
- If at least 50 units are segregated for each recycling pick-up, MRC will work with a facility to evaluate it for on-site pick-up and no-cost recycling.
- A facility that operates or contracts with a third party to provide delivery and removal services for discarded mattresses may drop them off directly at an MRC-contracted recycler at no cost to the generator.
- If a facility delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.
- The facility must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.
Participating facilities will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

Products other than mattresses and foundations may not be loaded into the storage container.

Goal: At this time MRC does not know how many uncontaminated prison mattresses are suitable for recycling. However, MRC will contact all Rhode Island prisons to discuss Program logistics and encourage participation. MRC has a goal of recycling acceptable discarded mattresses from two incarceration facilities during the first two years of the Program.

Health Care Facilities – MRC understands that Rhode Island has an estimated 130 health care facilities, including acute care, nursing, hospitals and clinics. Based on MRC’s discussions with recyclers, we understand that when a medical facility discards a hospital mattress, the product often retains a high residual value in secondary markets and is rarely dismantled for recycling. These units are expensive when new and are typically paired with an articulating base and air bladders for comfort and position adjustability. Unlike residential mattresses, worn parts and materials on hospital beds often may be repaired or replaced, and then reused by the original or a subsequent owner, and the full hospital bed unit is rarely discarded for full dismantling and recycling.

By contrast, mattresses used in ambulances and hospital emergency rooms may in some cases be discarded for recycling. These products tend to have a solid foam core and are surrounded by a thick vinyl cover. If the cover has not been breached and the interior contaminated by bodily fluids or other contaminants, recyclers inform MRC that these units may be recyclable. MRC will work with the Hospital Association of Rhode Island to identify sources of mattresses that are suitable for recycling and encourage those facilities to participate in the Program.

The following factors will apply to healthcare facilities that are interested in sending their discarded mattresses to MRC-contracted recyclers:

- Recycling discarded mattresses through MRC is voluntary.
- Health care facilities must be keenly aware of the need to distinguish between units that are biologically contaminated and those that are not, and exclude the contaminated units from pick-up for recycling.
- Mattresses that contain breached vinyl covers, contaminated foam, or are severely damaged, twisted, wet, frozen, soiled, infested with bed-bugs or otherwise unsuitable for recycling, cannot be recycled and should be disposed of through the existing solid waste stream. Participating entities should work with MRC to determine acceptability.
- If at least 50 units are segregated for each recycling pick-up, MRC will work with a facility to evaluate it for on-site pick-up and no-cost recycling.
• Health care facilities that operate or contract with a third party to provide delivery and removal services for discarded mattresses may drop them off directly at an MRC-contracted recycler at no cost to the generator.

• If a health care facility delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.

• The facility must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.

• Participating facilities will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

Goal: MRC will work with industry associations to disseminate Program information. MRC’s goal is to recycle acceptable discarded mattresses from 10 health care facilities in the first two years of the Program.

Educational Institutions with Dormitory Facilities – MRC understands that Rhode Island has an estimated 13 educational institutions with dormitory facilities, including universities, colleges and boarding schools. MRC has discussed recycling options with Keep America Beautiful and the College and University Recycling Coalition, two groups that are encouraging recycling at educational institutions. These groups have indicated a strong interest in working with MRC to promote mattress recycling services at the end of each semester or other school term in cities and towns where colleges and universities are located. MRC will actively work with these and other entities to develop a process for collecting and recycling units from these institutions.

The following factors will apply to lodging establishments that are interested in sending their discarded mattresses to MRC-contracted recyclers:

• Recycling discarded mattresses through MRC is voluntary.

• Mattresses that are severely damaged, twisted, wet, frozen, soiled, infested with bedbugs or otherwise unsuitable for recycling cannot be recycled and should be disposed of through the existing solid waste stream. Participating institutions should work with MRC to determine mattress acceptability.

• If at least 50 units are segregated for each recycling pick-up, MRC will work with an institution to evaluate it for on-site pick-up and no-cost recycling.

• Institutions that operate or contract with a third party to provide delivery and removal services for discarded mattresses may drop them off directly at an MRC-contracted recycler at no cost to the generator.

• If an institution delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an
efficient transaction.

- The institution must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.

- For end of semester, special event or large volume pick-ups, the institution should contact MRC directly to arrange for transportation and recycling logistics.

- Participating institutions will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

Goal: MRC will contact all Rhode Island educational institutions to encourage their participation in the Program. MRC’s goal is to recycle discarded mattresses from four educational institutions in the first two years of the Program.

Military Bases – Rhode Island has one military base in Newport. It has expressed interest in participating in the Program.

The following factors will apply when the base sends its discarded mattresses to MRC-contracted recyclers:

- Recycling discarded mattresses through MRC is voluntary.

- Mattresses that are severely damaged, twisted, wet, frozen, soiled, infested with bedbugs or otherwise unsuitable for recycling cannot be recycled and should be disposed of through the existing solid waste stream. The base should work with MRC to determine mattress acceptability.

- If at least 50 units are segregated for each recycling pick-up, MRC will work with the base to evaluate it for on-site pick-up and no-cost recycling.

- If the base operates or contracts with a third party to provide delivery and removal services for discarded mattresses, it may drop them off directly at an MRC-contracted recycler at no cost to the generator.

- If the base delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.

- The base must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.

- The based will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

Goal: Once the Program launches, MRC will work directly with the base to recycle mattresses through the Program.
Other Entities – Other entities may have discarded mattresses that are eligible for recycling under the Program. Each entity has different circumstances that may affect how it should participate in the Program. To allow MRC to evaluate whether and under what circumstances an entity may participate in the Program, each entity should contact MRC in advance to discuss its circumstances, including location, likely volumes of discarded mattresses, suitability of those products for recycling, etc.

The following factors will apply when another entity sends its discarded mattresses to MRC-contracted recyclers:

- Recycling discarded mattresses through MRC is voluntary.
- Mattresses that are severely damaged, twisted, wet, frozen, soiled, infested with bed-bugs or otherwise unsuitable for recycling cannot be recycled and should be disposed of through the existing solid waste stream. The entity should work with MRC to determine mattress acceptability.
- If at least 50 units are segregated for each recycling pick-up, MRC will work with the entity to evaluate it for on-site pick-up and no-cost recycling.
- If the entity operates or contracts with a third party to provide delivery and removal services for discarded mattresses, it may drop them off directly at an MRC-contracted recycler at no cost to the generator.
- If the entity delivers directly to a participating consolidation site or an MRC-contracted recycler, it must arrange a drop-off time with the recycler to facilitate an efficient transaction.
- The entity must complete a bill of lading before delivery to a collector or recycler to document the location, source and number of units delivered for recycling.
- Participating entities will be provided with MRC Collection Guidelines (see Attachment B) to help them understand how to maximize the number of units recycled while providing safe and efficient handling practices.

Goal: MRC will document discussions with other entities and encourage their participation in the Program. The Program’s annual report will identify these other entities and discuss whether their discarded mattresses were recycled through the Program.

Stakeholder Outreach - MRC has held stakeholder meetings with state officials, municipalities, retailers, manufacturers and recyclers to address concerns and promote interest in the Program. MRC will continue to inform stakeholders in addition to those discussed above of their obligations under the Law and their respective roles in the Program.
Goals:

- Develop point-of-sale materials that explain the purpose of the recycling Fee to consumers.
- Contact all Rhode Island mattress retailers and explain their obligation to register with MRC and to collect and remit the Fee.
- Facilitate stakeholder meetings for each covered entity subgroup and other interested parties.
- Attend stakeholder events and meetings to increase awareness of the Program and the benefits of participation.
- Contact and visit stakeholders to inform them about how they may participate in the Program.

**Recycling Mattress Components** – MRC will collect and audit data from Program recyclers to verify compliance among participants and service providers with Program objectives.

Goal: MRC-contracted recyclers will strive to recycle 85% of collected mattresses and foundations by weight, and implement appropriate verification measures to confirm compliance.

**Consumer Incentive** - The Program will provide a monetary incentive for Rhode Island residents delivering no more than four (4) mattresses at any one time to an MRC-contracted recycling facility. Residents may deliver up to eight (8) mattresses per year, per household. Rhode Island consumers will receive an incentive of $2.00 per mattress unit to deliver mattresses to these recyclers. The recycler will pay the incentive to the consumer by cash, check or other acceptable means. However, the incentive amount and number of accepted mattresses is subject to change by MRC, depending on a variety of factors, including the availability of funds and the volume of discarded mattresses collected in this manner.

In order to protect the Program against fraud, recyclers paying the incentive are required to record the number of units delivered and document proof of Rhode Island residency through license plate number or other in-state document. This information will be used to verify they have not exceeded the eight mattresses per year limit and will be submitted to MRC on a monthly basis. MRC will review the information from each recycler to identify any possible fraud or abuse of the incentive and notify recyclers of violators when needed.

Consumers may receive the incentive for dropping off mattresses at the following MRC-contracted recyclers at the addresses indicated:
Express Mattress Recyclers, LLC  
310 Bourne Avenue  
East Providence, Rhode Island 02916

Ace Mattress Recycling LLC  
14 Clyde St  
West Warwick, RI 02893

**Proposed Recycling Facilities**

On February 24, 2015, MRC asked potential service providers to submit binding proposals to provide transport and recycling services needed to collect and transport discarded mattresses from the state’s 39 towns. MRC also requested proposals for recycling services alone.

As a result of this process, MRC has selected the following Rhode Island-based recyclers to service the Program, pending RIRRC’s approval of the Plan and the proposed Fee:

Express Mattress Recyclers, LLC  
310 Bourne Avenue  
East Providence, Rhode Island 02916

Ace Mattress Recycling LLC  
14 Clyde St  
West Warwick, RI 02893

These recyclers will use in-house transportation capabilities and will jointly provide recycling services to participating towns and covered entities in Rhode Island. MRC will notify RIRRC if alternative transporters or recyclers are required to service the Program.

The recycling contracts stipulate that MRC will pay contracted recyclers for transport and processing upon documentation that they have processed a stated quantity of discarded mattresses obtained in the state. Pursuant to these contracts, the recyclers must meet the recycling standards described in Attachment C.

Among other things, MRC’s recycling contracts will require each recycler to place mattress storage containers at participating municipal transfer stations throughout the state. Contractors will transport mattresses obtained at these locations to the MRC-contracted recycler’s facility. This service will be made available to participating transfer stations at no cost.

**Promoting Recycling of Discarded Mattresses**

The Program is designed to reduce the number of mattresses disposed of as solid waste in Rhode Island by creating diversion alternatives for discarded mattresses generated by mattress retailers, consumers, and businesses throughout Rhode Island, including:
1. **No-cost retailer recycling**: The Program will accept for recycling discarded mattresses from any retailer providing these units to an MRC-contracted recycling facility. Retailers will pay no charge for such recycling. Discarded mattresses that retailers provide for recycling will reduce the quantity of discarded mattresses that they currently send to landfills.

2. **No-cost business recycling**: Business or large-volume mattress consumers (such as hotels, dormitories, nursing homes, etc.) generating discarded mattresses may provide these units to an MRC-contracted recycling facility at no-cost. This should reduce the quantity of discarded mattresses that such entities dispose of through solid waste facilities that are often landfilled.

3. **No-cost consumer drop-off**: The Law provides that consumers may drop-off mattresses at participating collection sites throughout Rhode Island at no-cost. This provision is expected to reduce the quantity of mattresses that consumers might illegally dump rather than pay for curbside collection.

4. **Consumer incentive**: MRC will offer Rhode Island residents that deliver discarded mattresses directly to an MRC-contracted recycling facility a payment. This is expected to reduce the quantity of mattresses that consumers would otherwise have disposed of through the existing solid waste stream. This provision is also expected to reduce the quantity of mattresses that consumers otherwise might illegally dump rather than pay for at transfer station or through curbside collection.

5. **Recyclers’ target**: MRC requires its contracted recyclers to maximize the recovery of mattress components, including metal, foam, fabric, and wood through the dismantling and recycling process. MRC has established an 85% by weight recycling target for our recyclers. Only non-recyclable scrap (which is expected to be minimal) will be disposed of through the solid waste system using appropriate means.

MRC anticipates the quantity of discarded mattresses recycled annually in Rhode Island will increase as we implement these diversion tactics.

**Public Education Program**

MRC is committed to education and outreach for all stakeholders affected by the Program. Our strategy will inform manufacturers and retailers about their legal obligations and Program mechanics, and consumers about the Fee and how to recycle their mattresses. MRC has created a significant amount of content for our stakeholders and will continue to develop unique and effective tools as we launch the Program and provide on-going mattress recycling to Rhode Island residents and businesses. To accomplish these goals, MRC has developed two websites: one targeted at business and a second targeted at consumers.
Business-Targeted Website:

mattressrecyclingcouncil.org

MRC continues to upgrade and expand mattressrecyclingcouncil.org, which will remain the Program’s online interface with businesses involved in the manufacture, sale and recycling of mattresses. Website content is focused on the legal obligations of producers and retailers, as well participating collection and recycling facilities. The following table summarizes the targeted audiences, key messages and methods of communication to these groups:

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<td>Retailers</td>
<td>How do I report/remit the fee</td>
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<td>Solid Waste Facilities</td>
<td>How can I participate in recycling</td>
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<td>Recycling Industry</td>
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<td>Traditional &amp; Social Media</td>
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<td>Regulatory Agencies</td>
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<td>Environmental &amp; Civic Groups</td>
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<td>Hospitality Industry</td>
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<td>Universities</td>
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<tr>
<td>Furniture Rental Companies</td>
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<tr>
<td>Non-Governmental Organizations</td>
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Video Series

In 2014 and 2015, MRC produced videos to educate the mattress industry about MRC, the new recycling laws, and the need to register with MRC. The most recently developed video focuses on recruiting collection sites and demonstrates the registration, reporting, and fee remittance processes.

Program Overview

This video provides an overview of MRC and explains in general terms how the Program works. It touts the benefits of recycling and encourages public and private sector entities to become registered collectors. It also answers common questions about why MRC was created and why the Fee is applied. Video link.
Retailer Registration
This video provides a step-by-step description of the online registration process and answers questions about who needs to register and how to do so. Video link.

Retailer Reporting & Remittance
The third video is a sequel to the retailer registration video. It explains the reporting and fee remittance process. It answers questions about how to use the features and highlights major points in the Fee remittance policy. The video is under production at time of Plan submittal, but will be accessible through mrcreporting.org.

Since these videos are targeted at commercial participants in the Program (not consumers), they are only accessed through www.mattressrecyclingcouncil.org and www.mrcreporting.org. MRC will continue to uses these tools at industry events and through social media targeted at commercial participants.

Direct Mail
In March 2015, MRC mailed an initial notice to Rhode Island Producers and Importers about their upcoming obligations under the Law. This letter is included in Attachment D.

In March 2015, MRC also contacted approximately 50 online mattress retailers that sell mattresses to consumers in Rhode Island and other states with mattress recycling laws (Connecticut and California), informing them of MRC activities in all three states (including the anticipated launch of the Program in Rhode Island in early 2016).

Once the Plan is approved by RIRRC, MRC will notify these audiences about the details of the Program, as approved. MRC will send a reminder notice approximately one month before the Program start date. Once the Program begins, MRC will send an urgent notice via certified mail to any unregistered retailer.

Direct Contact
MRC has held in-person meetings with manufacturers and retailers throughout the Program Plan development. In addition to answering questions about Program details and implementation, these meetings have been useful in understanding how and when retailers discuss the recycling Fee with customers, and whether they are interested in sending discarded mattresses to MRC-contracted recyclers. MRC developed its consumer FAQs from this feedback.

MRC staff has contacted all municipal transfer stations in Rhode Island to assess their interest in participating in the Program. Maintaining an effective and efficient collection network will be an on-going requirement of the Program and is critical to meeting our recycling goals.
Printed Publications
MRC leverages ISPA’s industry publications, BedTimes and SleepSavvy, to keep manufacturers and retailers informed of Program developments. BedTimes is a monthly magazine targeted at mattress manufacturers and suppliers to the mattress industry, while SleepSavvy is published eight times a year and is targeted at mattress retailers.

Each publication has a sustainability section that MRC regularly supplies with content. These publications combined reach approximately 30,000 readers, while the online versions of each magazine (which are publicly accessible) extend the audience for MRC and mattress recycling content even further. MRC will continue to provide content to these publications before, during and after the Program is implemented.

E-mail/E-news
MRC regularly supplies content to ISPA Insider, a weekly electronic newsletter sent to 2,200 ISPA members.

MRC disseminates Program news to over 200 parties that have subscribed to MRC’s updates. We have also found targeted e-mail campaigns to solid waste facilities helpful in recruiting collection sites and generating interest in the Program. Once the Program launches, MRC will continue to issue program updates to its subscribers and supply ISPA Insider with content. MRC will send quarterly email reminders to retailers about customer education materials, to collection sites with best practices, and to other targeted audiences as necessary.

Printed Materials
MRC developed a series of information sheets to educate other generators of discarded mattresses about the benefits of recycling their mattresses through the Program. These information sheets are distributed by MRC staff as they network throughout their designated regions. The sheets are housed online in the resources area of mattressrecyclingcouncil.org and are disseminated through social media and e-mail.

Traditional and Social Media
Upon the Plan’s approval and commencement of the Program, MRC is prepared to distribute press releases to all major media outlets in the state announcing these achievements. It also anticipates hosting a press conference when the Program officially begins.

MRC’s Facebook, Twitter and Google+ pages will also aid in distributing these announcements and generating awareness and conversation about Program milestones and achievements. MRC also will use social media to make followers aware of new resources added to the websites.

Events
MRC’s participation at ISPA’s Industry Conference, Las Vegas Market (a large biannual international market for finished mattresses and other interior furnishings products) and the North American Home Furnishings Association Networking Conference has raised visibility and awareness of the Act, mattress recycling developments and MRC among the mattress industry.
We informed those subject to the Act about their registration and Fee collection obligations, and the benefits of the Rhode Island Program.

Once the Program launches, MRC will continue to attend major events in the furniture/mattress and recycling industries. In future years, MRC may expand participation to nationwide recycling events and creating its own conferences where program participants can share best practices for mattress recycling, developing markets for recycled materials, and innovations that make mattress recycling more efficient.

**Consumer-Targeted Outreach:**

![Bye Bye Mattress](image)

**TARGETED AUDIENCES**

- Consumers
- General Public

**KEY MESSAGES**

- What is the fee amount
- Why is the fee needed
- What does the fee fund
- How/Where can I recycle my mattress

**METHODS**

- Website
- Customer Communications
- Public Service Announcements
- Online Advertising
- Traditional & Social Media
- Special Events

MRC has retained Williams Whittle Associates (WWA), an Alexandria, VA-based marketing firm with extensive experience working with non-profit organizations, to develop a customer-targeted identity known as “Bye Bye Mattress.” WWA will develop and place public service announcements, create retailer point-of-sale materials, assist with branding and creative services, and provide media relations strategy and social media guidance.
ByeByeMattress.com

The consumer-targeted website:

- Explains Program details using consumer-friendly language.
- Uses zip-code-based map locator to help consumers find the nearest mattress drop-off location.
- Hosts online videos that educate consumers about the recycling process and why the Program is important.
- Publishes announcements about special community events and Program milestones/improvements.
- Houses public service announcements that WWA will distribute via radio, print and outdoor outlets in Rhode Island and the other two states (see below for further discussion of these media tools).

Retail Customer Communications

To help retailers explain why a recycling fee is collected on each mattress sale in Rhode Island, MRC has prepared an informative card that it provides free of charge to mattress retailers. Although designed primarily to be attached to the sales receipt at the end of the transaction, retailers may use this card at any point during the mattress purchase process to educate customers about the Fee or how to recycle their mattress. Sales associates may also refer to MRC’s comprehensive Q&A document to answer common customer questions.

Additional customer communication items are available to retailers through MRC’s media library at mattressrecyclingcouncil.org, including:
- Posters
- Rack Cards
- Social Media Content
- Newsletter Content

A retailer may customize these materials for in-house branding, or use in their existing format.

**Public Service Announcements**

The public service announcement (PSA) campaign will include print, radio and outdoor media formats. Targeting residents over 18-years-old, the main message will encourage them to recycle their mattress.

**Radio**

Radio stations will have the option to use recorded spots or “live-read” scripts that will include the following:

- Recorded 15 and 30 second spots.
- Live-read scripts that can be customized for specific needs, such as local collection events or to fit the timing of important mattress sale periods. For example:
  - Presidents Day sales (February)
  - Residential moving peak (May - September)
  - Earth Day (April)
  - College move out (May)
  - Memorial Day sales (May)
  - Independence Day sales (July)
  - Back-to-school/college and downsizing/empty nesters (August)
  - Labor Day sales (September)
  - Columbus Day sales (October)
  - America Recycles Day (November)

**Print**

Ads for use in full-size magazine and quarter-page newspaper are in development. Local publications will be the primary targets. The timing of the placement will be determined by each publication and as space is available.

**Outdoor Media**

An ad for use on 60-foot billboards is in development. This can be easily resized to fit other spaces, such as dioramas, spectaculours, bus benches, banners, rail cards, and all forms of digital outdoor spaces.
Online Advertising

Mattress Recycling In CT - Don’t Dump Your Mattress
Ad: www.byebemattress.com/
Find A Local Recycling Facility

As a non-profit organization, MRC is eligible to participate in GoogleGrants, a Google AdWords program that provides free in-kind AdWords advertising. We will launch campaigns that will target residents who are disposing of an old mattress or seeking mattress removal services in Rhode Island.

Traditional & Social Media
When we launch the Program, MRC will distribute a press release to all major media outlets in the state. It has also developed a template for municipalities to use in their local media. This allows them to customize the announcement with specific details about their collection site and any special instructions.

MRC also anticipates hosting a press conference when the Program officially begins. This was successful in Connecticut in generating local coverage prior to, during and immediately following the Program launch.

Bye Bye Mattress has its own Facebook and Twitter profiles to generate awareness of the Program, share Program developments and milestones, and inform the public about the benefits of recycling.

Special Events
MRC will leverage the momentum that Earth Day (April 22) and Keep America Beautiful’s (KAB) America Recycles Day (Nov. 15) give to environmental awareness about mattress recycling. We will also work with local KAB chapters to coordinate efforts on community clean-up days.
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<th>Company Name (DBA Name)</th>
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<td>Alessanderx SpA - (Alessanderx SpA)</td>
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<td>American Excelsior Company - (American Excelsior Company)</td>
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<td>Anodyne Medical Device, Inc.</td>
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<td>Ashley Furniture Industries, Inc. - (Ashley Furniture Industries, Inc.)</td>
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<td>Bedinabox, LLC - (Bedinabox.com)</td>
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<td>Blue Bell Mattress Co. LLC</td>
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<td>Bob Barker Company, Inc. - (Bob Barker Company, Inc.)</td>
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<td>Bourdon's Institutional Sales, Inc. - (Bourdon's Institutional Sales, Inc.)</td>
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<td>Boyd Flotation Inc. - (Boyd Specialty Sleep)</td>
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<td>Brick Church Manufacturing LLC - (Brick Church Mfg.)</td>
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<td>Carico International, Inc. - (&quot;Carico&quot; or &quot;Carico International, Inc.&quot;)</td>
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<td>Comfort Bedding of the United States LLC</td>
</tr>
<tr>
<td>Comfort Revolution, LLC. - (Comfort Revolution, LLC.)</td>
</tr>
<tr>
<td>Corsicana Bedding, Inc. - (Corsicana Bedding, Inc.)</td>
</tr>
<tr>
<td>Dorel Home Products - (Ameriwood Industries Inc.)</td>
</tr>
<tr>
<td>E&amp;E Bedding Co. Inc. - (SPRING AIR)</td>
</tr>
<tr>
<td>E.S. Kluft &amp; Company, LLC - (Aireloom Mattress)</td>
</tr>
<tr>
<td>Eastern Sleep Products Co. Inc. - (Symbol Mattress)</td>
</tr>
<tr>
<td>Elite Foam, Inc. - (Elite Foam, Inc.)</td>
</tr>
<tr>
<td>Ergomotion Inc. - (Ergomotion Inc.)</td>
</tr>
<tr>
<td>Ethan Allen Operations, Inc. - (Ethan Allen)</td>
</tr>
<tr>
<td>Exel Inc. - (Exel Inc.)</td>
</tr>
<tr>
<td>Factory Direct Inc.</td>
</tr>
<tr>
<td>Flotation Innovations, Inc. - (Innovations)</td>
</tr>
<tr>
<td>Friendship Upholstery Company Inc.</td>
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<tr>
<td>Future Foam Inc.</td>
</tr>
<tr>
<td>Future Foam Inc. - (Foam Craft)</td>
</tr>
<tr>
<td>FXI, Inc.</td>
</tr>
<tr>
<td>GF Health Products, Inc. - (GF Health Products, Inc.)</td>
</tr>
<tr>
<td>Hickory Springs Manufacturing Company - (HSM)</td>
</tr>
<tr>
<td>Hickory Springs of California, LLC - (HSM)</td>
</tr>
<tr>
<td>Hill-Rom, Inc. - (Hill-Rom Company, Inc.; Hdill-Rom Holdings, Inc.; Hill-Rom DTC, Inc.)</td>
</tr>
<tr>
<td>Company Name</td>
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<tr>
<td>------------------------------------------------</td>
</tr>
<tr>
<td>Inncor, Inc.</td>
</tr>
<tr>
<td>Invacare Corporation</td>
</tr>
<tr>
<td>Jeffco Fibres, Inc.</td>
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<tr>
<td>Jiaxing Taien Springs Co., LTD</td>
</tr>
<tr>
<td>Keetsa, Inc.</td>
</tr>
<tr>
<td>Kingsdown, Inc.</td>
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<tr>
<td>Klaussner Home Furnishings, Inc.</td>
</tr>
<tr>
<td>Made Rite Bedding Company</td>
</tr>
<tr>
<td>Magniflex USA Ltd</td>
</tr>
<tr>
<td>Medical Depot, Inc.</td>
</tr>
<tr>
<td>MFL, Inc.</td>
</tr>
<tr>
<td>New England Bedding Transport Inc.</td>
</tr>
<tr>
<td>Norix Group Inc.</td>
</tr>
<tr>
<td>Oddello Industries, LLC</td>
</tr>
<tr>
<td>Pacific Urethanes, LLC</td>
</tr>
<tr>
<td>Paramount Industrial Cos., Inc.</td>
</tr>
<tr>
<td>Pragma Corporation</td>
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<tr>
<td>Prestige Fabricators Inc.</td>
</tr>
<tr>
<td>Restmore, LLC</td>
</tr>
<tr>
<td>Restwell Mattress Co</td>
</tr>
<tr>
<td>Revive Sleep Inc.</td>
</tr>
<tr>
<td>Rio Home Fashions, Inc.</td>
</tr>
<tr>
<td>Safe For Home Products LLC</td>
</tr>
<tr>
<td>Sealy Mattress Co. of Albany, Inc.</td>
</tr>
<tr>
<td>Select Comfort Retail Corporation</td>
</tr>
<tr>
<td>Select Comfort SC Corporation</td>
</tr>
<tr>
<td>Sleep Studio, LLC</td>
</tr>
<tr>
<td>Sleepmaster Ltd</td>
</tr>
<tr>
<td>Sommex Bedding Corporation</td>
</tr>
<tr>
<td>Span America Medical Systems, Inc.</td>
</tr>
<tr>
<td>State of Connecticut</td>
</tr>
<tr>
<td>Suite Sleep, Inc.</td>
</tr>
<tr>
<td>Technogel US Inc.</td>
</tr>
<tr>
<td>Tempur Sealy International, Inc.</td>
</tr>
<tr>
<td>The Bedding Group Inc.</td>
</tr>
<tr>
<td>The House of the Foaming Case, Inc.</td>
</tr>
<tr>
<td>The Lantern Group, Inc.</td>
</tr>
<tr>
<td>The Natural Mattress Store LLC</td>
</tr>
<tr>
<td>Therapedic of New England, LLC</td>
</tr>
<tr>
<td>Company Name</td>
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<tr>
<td>University Loft Company</td>
</tr>
<tr>
<td>Ureablock S.A. DE C.V.</td>
</tr>
<tr>
<td>Venture Products LLC - (Venture Products, LLC)</td>
</tr>
<tr>
<td>Vinyl Products Mfg. Inc. - (Vinyl Products Mfg. Inc.)</td>
</tr>
<tr>
<td>Vi-Spring Limited - (Vispring)</td>
</tr>
<tr>
<td>Woodhaven Furniture Industries</td>
</tr>
<tr>
<td>Zhejiang Alright Home Textiles Co., Ltd. - (Mattress Protector, Mattress Cover)</td>
</tr>
<tr>
<td>Zinus Inc. - (Zinus Inc.)</td>
</tr>
</tbody>
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5 ........................................... Mattress Collection & Handling
7 ............................................ Transportation & Processing
7 ............................................ Recordkeeping
7 ........................................... Program Withdrawal & Termination

About the Mattress Recycling Council
The Mattress Recycling Council (MRC) is a non-profit organization established by the mattress industry to develop and operate the Rhode Island mattress recycling program. MRC submitted an implementation plan to Rhode Island Resource Recovery Corporation (RIRRC) on July 1, 2015. The plan was approved on [insert date]. The Rhode Island mattress recycling program will begin on [insert date].

MRC has contracted with service providers to transport mattresses for recycling to collection sites throughout the state. This Program is funded by recycling fees collected when Rhode Island consumers buy a mattress or box-spring (aka foundations). For simplicity, we will refer to both mattresses and box-springs as just mattresses. These Guidelines describe the Program and what your facility needs to do to participate. These Guidelines may also be subject to change.

Public Law
In 2013, Rhode Island enacted Code 23-90, later amended in 2015, which requires mattress manufacturers to create a recycling program for mattresses discarded in the state. The mattress industry created MRC to fulfill these requirements.

What MRC Provides
Staff at all participating collection sites must be knowledgeable regarding these Guidelines before accepting mattresses.

The MRC program will provide the following to participating municipalities:

- A collection container to store 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 municipal collection site to a contracted recycler.
- No-cost mattress recycling services.
PROGRAM MATERIALS

ACCEPTABLE
Only mattresses used and discarded in Rhode Island can be accepted by the Program. Below are mattresses that are acceptable by the program.

A participating collection site may not charge for mattresses that are dropped off at its site and recycled through the Program, but may charge for the service of collecting a mattress at curbside or through other means that is then taken to a collection site for recycling.
NON-PROGRAM MATERIALS

UNACCEPTABLE

- Severely damaged, twisted, wet, frozen or soiled mattresses
- Mattresses infested with bed bugs or other living organisms
- Sleeping bags
- Pillows and cushions
- Loose bedding, blankets or sheets
- Car beds

- Juvenile products, i.e., a carriage, basket, dressing table, stroller, playpen, infant carrier, lounge pad, or crib bumper
- Water beds
- Camping air mattresses
- Fold-out sofa beds
- Futons and furniture
- Loose mattress pads and toppers
NON-PROGRAM MATERIALS

Mattress Inspection and Examination
Facility 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 materials for evidence of bed bug infestation.

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.

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.

For more information on bed bugs, please refer to the resources made possible by the Connecticut Coalition Against Bed Bugs at www.ct.gov/ccab
MATERIALS COLLECTION & HANDLING

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

<table>
<thead>
<tr>
<th>MINIMUM PROGRAM REQUIREMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SITE</strong></td>
</tr>
<tr>
<td>Each collection site must be secure with adequate space and staffing to handle and store acceptable mattresses.</td>
</tr>
<tr>
<td><strong>PERMITS</strong></td>
</tr>
<tr>
<td>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. Please confirm whether your site is in compliance with all applicable notifications or requirements for accepting mattresses for recycling at your site.</td>
</tr>
<tr>
<td><strong>INSURANCE</strong></td>
</tr>
<tr>
<td>Each collection site must maintain general liability insurance of at least $1,000,000 per occurrence.</td>
</tr>
<tr>
<td><strong>TRAINING</strong></td>
</tr>
<tr>
<td>Staff at each collection site must be trained and knowledgeable regarding these Guidelines before accepting mattresses for recycling.</td>
</tr>
<tr>
<td><strong>STORING &amp; LOADING MATTRESSES</strong></td>
</tr>
<tr>
<td>See page 6 for photos and guidelines</td>
</tr>
<tr>
<td>A collection site must store program materials in weather proof containers, or under cover, to maximize their recyclability. In addition, all collection sites must:</td>
</tr>
<tr>
<td>• Make every effort to place mattresses in MRC-designated storage containers immediately upon acceptance</td>
</tr>
<tr>
<td>• Keep mattresses intact and not intentionally crush or puncture them</td>
</tr>
<tr>
<td>• Efficiently stack mattresses to maximize the number of units loaded in each storage container</td>
</tr>
<tr>
<td>• Provide oversight to keep unacceptable items out of MRC-designated storage containers</td>
</tr>
<tr>
<td>• Remove any non-program materials from MRC-designated storage containers before transport to MRC recyclers</td>
</tr>
<tr>
<td>• Practice good housekeeping standards, and keep storage containers and program materials in a neat and orderly condition</td>
</tr>
<tr>
<td><strong>SITE ACCESS</strong></td>
</tr>
<tr>
<td>Collection sites must allow MRC access to confirm compliance with these Guidelines.</td>
</tr>
</tbody>
</table>
**Loading Mattresses in Storage Containers**

<table>
<thead>
<tr>
<th>Container Type</th>
<th>Number of Mattress</th>
</tr>
</thead>
<tbody>
<tr>
<td>20-foot sea container</td>
<td>25-40</td>
</tr>
<tr>
<td>30-yard roll-off container</td>
<td>25-35</td>
</tr>
<tr>
<td>40-yard roll-off container</td>
<td>25-40</td>
</tr>
<tr>
<td>45-foot trailer</td>
<td>110-180</td>
</tr>
<tr>
<td>55-foot trailer</td>
<td>125-190</td>
</tr>
</tbody>
</table>

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

Mattresses and box springs must be packed as efficiently as possible to maximize the number of units in each container.

**Left:** An example of how mattresses should be stacked in a container.

**Bottom Left & Right:** Examples of how mattresses should be stacked in a trailer.
TRANSPORTATION AND PROCESSING

Transporters
MRC will assign each collection site a transporter to provide a storage container and transport services. The contact information for your assigned transporter is included in the Contacts section on the first page of these Guidelines.

- MRC contracted transporters will provide participating locations with evidence of automobile insurance coverage of at least $1,000,000 per occurrence
- Each collection site should notify transporter at least 2 business days before a storage container is full of mattresses
- The assigned transporter will pick up full containers within 2 business days of notification and drop off an empty container at the same time
- On the scheduled pick up day, the collection site must make the collection container readily accessible to the transporter
- At the time of pick-up, collection site staff must be present to sign a three-part Bill of Lading (BOL) supplied by the transporter that details the quantity of mattresses in the container, and must provide appropriate copies of the BOL to the transporter

A collection site may choose to provide its own storage containers and transportation at its own cost. MRC requests that such sites contact MRC in advance to schedule a convenient drop-off time.

Recyclers
MRC currently uses two mattress recyclers to process mattresses discarded in Rhode Island. The contact information for your assigned recycler is included in the Contacts section on the first page of these Guidelines.

- A municipal collection site may only use its assigned recycler
- Your assigned transporter will deliver program materials from your site to the assigned recycler

Recyclers under contract with MRC must meet established standards and quantify all mattresses it receives, the mattress components it recycles (e.g., foam, steel, wood, fiber, etc), and any residual disposal.

PROGRAM WITHDRAWAL & TERMINATION
A collection site's participation in the Rhode Island mattress recycling program is voluntary. Either party may withdraw from participation with 30 days' notice to the other party. MRC reserves the right to remove any collection site not in compliance with these Guidelines from further participation in the Program.

RECORDKEEPING

Bill of Lading:
A Bill of Lading (BOL) will be provided by the transporter. Before a full container leaves the site the BOL must be completed and signed by facility staff. Following is a sample BOL and required information:
# BILL OF LADING

Unique BOL #: pre-printed #

<table>
<thead>
<tr>
<th>Collection Site/ Generator</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
</tbody>
</table>

- **Type of Collection Site:**
  - [ ] municipal transfer station
  - [ ] mattress retailer
  - [ ] other: _______________________

- **Collection Container Type:**
  - [ ] 20 ft. sea container
  - [ ] 30 yd. roll-off
  - [ ] 40 yd. roll-off
  - [ ] 53 ft. trailer
  - [ ] other: _______________________

- **Collection Site Count:**
  - Mattress and Box Spring Units: _________

- **Collection Site Certified Net Weight (if available):** _________ lbs.

I hereby certify that to the best of my knowledge, the above information is accurate, and all of the products described in this document were used and discarded in Rhode Island.

<table>
<thead>
<tr>
<th>Name (print), Title</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Transporter</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Company Name:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>Truck #:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name (print), Title</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Mattress Recycler</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th>Company Name:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>Recycler Count:</td>
<td>Mattress Units: _________ Box Spring Units: _________</td>
</tr>
<tr>
<td>Net Weight of all Mattress and Box Spring Units: _________ lbs.</td>
<td>Comments/Count Discrepancies:</td>
<td></td>
</tr>
</tbody>
</table>

I hereby certify that to the best of my knowledge, the above information is accurate, and all of the products described in this document were used and discarded in Rhode Island.

<table>
<thead>
<tr>
<th>Name (print), Title</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>
Rhode Island Mattress Recycling Standards

The Mattress Recycling Standards (Standards) define the minimum requirements to be an approved Recycler for the Mattress Recycling Council (MRC). Under these Standards, mattresses must be managed and processed in a manner that adequately safeguards the environment, industry employees and consumers. The Standard also includes data tracking and reporting requirements.

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

For purposes of these Standards, the term “mattress” should be interpreted to include both mattresses and foundations (or box-springs).

Background

The MRC is a non-profit organization formed by the International Sleep Products Association (ISPA) to develop and implement mattress recycling programs in states with laws requiring recycling of discarded mattresses.

Recyclers must comply with these Standards, contract terms and conditions and all legislative and regulatory requirements. Recyclers must have transparent operations, clear and documented recycling procedures and accurate tracking of all mattresses and components (including non-recyclable waste). All Recyclers will be audited under these Standards.

Disclaimer

The MRC does not intend for these Standards to constitute or provide legal guidance of any kind. The Recycler must be aware of and abide by all local, state, or federal laws and regulations applicable to the management of post-consumer mattresses or the business operation of the Recycler. In the event that these Standards are inconsistent with any such laws or regulations, the laws or regulations take precedence, and the Recycler must inform the MRC of such inconsistency.

1. General Requirements

Each Recycler shall:

1.1. Possess a current and valid business license and meet all applicable local, state and federal requirements for providing the type of recycling services required by the MRC.
1.2. Possess valid state approved permits, plans, and approvals, as applicable.

1.3. Comply, and be in good-standing, with all applicable federal, state, and local regulations including but not limited to:

- Department of Transportation (DOT) if providing any transportation services
- 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

1.4. Possess Commercial General Liability Insurance, including coverage for bodily injury, property damage, complete operations and contractual liability with combined single limits of not less than $1 million per occurrence and $2 million aggregate. Recycler's policy must be endorsed to name MRC, its directors, officers, employees, agents, and assigns, as Additional Insureds. Recycler must carry its own Business Auto and Workers Compensation policies. Recycler shall require all third parties that it uses to provide any services under its contract with MRC to comply with the same insurance requirements specified in these Standards.

1.5. List the MRC as an additional insured party.

1.6. Possess and maintain in good standing workers compensation and unemployment insurance coverage through a state program or through private insurance policy or sufficient self-insurance coverage.

1.7. 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.

1.8. Develop and keep current a written plan that assures:

1.8.1. proper closure of the Recycler’s facility or site in the event of sale, closure, abandonment, bankruptcy, any form of dissolution of the Recycler, or for any other reason;

1.8.2. against abandonment of any mattresses, mattress materials, or other products or materials processed by the Recycler in the event of closure; and

1.8.3. proper remediation of any contamination to the Recycler’s facility or site in accordance with all applicable local, state and federal laws and regulations
As part of that plan, the Recycler must obtain a bond or other financial instrument sufficient to pay for the closure activities described in the plan in the event that the Recycler itself is financially unable to perform all or some of such activities. The Recycler shall make such plan and bond or other financial instrument available for inspection by the MRC upon request.

1.9. Maintain a process to provide written notice of closure to the MRC with a minimum of 90-days advance notice.

1.10. Maintain a process to provide written notice to the MRC of any incidents that required the assistance of first responders within 24 hours of the occurrence. Provide written notice of any corresponding regulatory orders, fines or other governmental or administrative actions taken within 48 hours of receiving such orders or fines.

1.11. Maintain a documented process to record and track accidents, injuries or violations and any corresponding corrective and/or preventive actions taken.

1.12. 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.

1.13. 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 the mattresses.

2.2. Recycle at least 85% by weight of the mattresses it processes by selling such material in appropriate markets for use in making new materials or products.

2.3. Minimize the quantity of material disposed of through landfills, incineration, 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 facility.

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 their processing facilities and the flow of recyclable and non-recyclable materials generated through mattress deconstruction. The plan shall at minimum require the following:

3.1. Weigh all in-bound mattresses.

3.2. Maintain annually calibrated and certified scale to weigh all in-bound and outbound materials on-site or document all out-bound shipments using third party calibrated and certified scales.

3.3. Maintain daily records of all receipts of used mattresses, mattress processing, sales or other dispositions of recycled or non-recyclable materials, and inventories.

3.4. Provide the MRC a list of all purchasers of recycled materials, and notify the MRC of any changes to that list at least 10 business days in advance (the MRC will treat this information as confidential). Recycler must obtain written approval from MRC for new facilities.

3.5. Train employees on how to prepare and maintain all necessary records and other documentation related to the receipt, processing, inventory and disposition of mattress and mattress materials.

3.6. Provide certificates of recycling for all material received and processed.

4. **Downstream Due Diligence**

Each Recycler shall have processes in place to identify, audit and approve all purchasers of recycled materials. The processes shall at a minimum require:

4.1. Annual desk audits to verify each purchaser’s compliance with all applicable local, state and federal environmental and other requirements, and review of each purchaser’s operating permits, environmental compliance permits, business licenses, insurance and certifications.

5. **Bed Bug Management**

Each Recycler shall implement and maintain a documented plan to identify and mitigate bed bug infestation in the facility and among employees. Components of the plan shall, at minimum, address the following provisions:

5.1. Document that all employees attended bed-bug identification and mitigation training.
5.2. Post bed bug identification posters in prominent work place location to encourage proactive identification and isolation of contaminated mattresses.

5.3. Clearly identify how infested mattresses will be isolated and either decontaminated or disposed.

5.4. Track the number and if possible, source of contaminated units.
ATTACHMENT D – PRODUCER AND IMPORTER NOTIFICATION

March 2015

NOTICE TO MATTRESS PRODUCERS AND IMPORTERS—REGISTRATION WITH MATTRESS RECYCLING COUNCIL REQUIRED BY JULY 1, 2015

The Mattress Recycling Council (MRC) is a non-profit organization created by the mattress industry to plan and manage the mattress recycling program required by Rhode Island Code 23-90. In addition, that law requires mattress producers and importers that sell, or offer mattresses for sale, to Rhode Island end users to join MRC by July 1, 2015.

Producers or importers that fail to join MRC are prohibited from selling in Rhode Island. To join MRC, register now at www.mrcreporting.org.

What is the Mattress Recycling Council?
MRC is a non-profit organization established by the mattress industry to plan and manage the Rhode Island recycling program, which will begin in early 2016. Using recycling fees collected from end users (like consumers, hotels, universities, etc.) on mattress and box spring sales, MRC will contract with transportation and recycling service providers to administer the mattress recycling program.

Registration with MRC
Under the law, each producer and importer must join MRC. Registration is easy and free of charge through MRC’s online portal at www.mrcreporting.org. Those who do not register will be prohibited from selling mattresses and box springs in the state.

If you sell directly to end users (like consumers, hotels, universities, etc.), your registration will also allow you to access the portal to report and remit the fees you must collect from your sales. Visit the resources section of the portal for further details about the fee, its collection and the remittance process.

Who is considered a Producer?
A “producer” is any person who manufactures or renovates a mattress that is sold, offered for sale or distributed in Rhode Island under the manufacturer’s own name or brand.

The term “producer” also includes 1) the owner of a trademark or brand under which a mattress is sold, and 2) any person who imports into the United States a mattress that is manufactured or renovated by a person who does not have a presence in the United States and is sold or offered for sale in Rhode Island.

Are producers required to recycle used mattresses and box springs?
No. The law does not require producers to recycle used mattresses or box springs. However, if they have used mattresses, they may voluntarily participate in the program to take advantage of the transportation and recycling services that MRC will provide.

For assistance:
Toll Free: 1-888-646-6815
support@mattressrecyclingcouncil.org
www.mattressrecyclingcouncil.org