



February 21, 2012

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Senator Edward Meyer
Representative Richard Roy
The Environment Committee
Legislative Office Building, Room 3200
Hartford, CT 06106

Dear Senator Meyer and Representative Roy:

The Product Stewardship Institute (PSI) is writing to express our support for **Senate Bill 89, An Act Establishing a Mattress Stewardship Program**. PSI appreciates the Committee's efforts to understand this complex environmental issue. This bill takes a similar approach to Connecticut's stewardship laws on paint and electronics. We urge you to continue Connecticut's leadership on product stewardship and move SB 89 out of committee.

The Product Stewardship Institute (PSI) is a national environmental institute located in Boston, Massachusetts, with membership from 47 states, over 200 local governments, and more than 70 companies, organizations, universities, and non-U.S. governments. These stakeholders work cooperatively, through PSI, to develop and implement product stewardship solutions that safely manage consumer products across their entire life cycle, from design to reuse, recycling, or disposal.

There are over 70 laws in the U.S. in 32 states covering 10 product categories that require producers to take financial responsibility for managing their products at the end of life. PSI's work in advancing product stewardship and supporting producer responsibility legislation in 15 product sectors, including paint, electronics, and mercury containing products, has provided us with the experience to coordinate a National Mattress Stewardship Initiative.

The problem of mattress disposal

About 40 million mattresses and box springs are sold in the United States each year, but only a small percentage are recycled annually. Currently, most mattresses and box springs are disposed of in landfills or incinerators, where their bulk makes them difficult to handle and expensive to manage. Whether they are recycled or disposed of, used

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mattresses represent a significant cost for many local governments and institutions to manage. Local governments in Connecticut and around the country are facing millions of dollars in costs for mattress management. In addition, the materials that comprise a mattress -- particularly metal, foam, and wood -- can be turned into new products. Numerous studies show that material recycling creates up to ten times the number of jobs as occur in waste disposal, and recycling mattresses is no exception.

Background on PSI Mattress Stewardship Initiative

In spring 2010, PSI surveyed our government members to determine the extent of the problem, and more than 80 respondents across the country expressed difficulty in managing and financing mattress disposal. PSI consulted stakeholders to develop a Mattress Stewardship Briefing Document outlining the problem and potential strategies, and providing background on the issue. In April 2011, PSI held a National Mattress Stewardship Meeting to explore strategies for addressing the problem. At the April meeting, stakeholders agreed that the two top strategies were to develop mattress stewardship legislation and to conduct pilot projects to gain more data, including management costs, and the sources and volume of mattresses that need to be managed. In a series of workgroup calls that followed the meeting, PSI developed model legislation with stakeholders. Participating state and local governments included California, Florida, Minnesota, Rhode Island, Texas, Washington, and Connecticut.

In November 2011, PSI and the City of Hartford held a second national multi-stakeholder meeting in Hartford to give legislators, state and local officials, manufacturers, retailers, recyclers, waste haulers and other key stakeholders the opportunity to comment on key elements of mattress stewardship legislation. Using PSI's legislative outline as a model, the City of Hartford sought input from all stakeholders through additional conference calls facilitated by PSI, and subsequently proposed language for SB 89.

PSI engagement with industry and other stakeholders

PSI has emphasized the need to engage with representatives of the mattress industry throughout all phases of this two-year dialogue. Although Ryan Trainer, President of the International Sleep Products Association (ISPA), attended both meetings and provided comments on PSI's briefing document, the mattress trade association has not demonstrated the level of engagement necessary to address the problem, nor have they offered a solution. For example, ISPA was not willing to fund a mattress recycling pilot project, one of the two top priorities identified by stakeholders at the April meeting. Despite many unsuccessful attempts by PSI and Connecticut stakeholders to reach out to others in the mattress industry, ISPA was not willing to provide contact information for their members or of their colleagues in the retail industry. ISPA was also not interested in pursuing a joint data collection effort to better understand the problem. In addition, ISPA did not actively participate in the November stakeholder meeting to discuss key elements of mattress stewardship legislation.

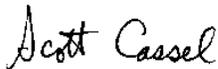
ISPA has made it clear that it does not support a state legislated producer responsibility solution to address mattress management, yet the industry has not proposed or committed to funding an alternative approach to mattress recycling that will alleviate the financial burden faced by municipalities in Connecticut and across the country. While the industry

has claimed to be working on legislation at the federal level for the past three years, PSI has not seen any evidence to support this claim, nor have we been included in their approach. Furthermore, we recognize that federal legislation will be difficult to pass in this political climate. Connecticut and other states need a solution now and cannot wait for the introduction of federal legislation.

SB 89 is fully aligned with the mission of our organization, and the basic approach we take to finance the recycling of difficult-to-manage wastes. By requiring manufacturers to internalize the cost of recycling their products, it provides a direct financial incentive for them to design better products that cost less to manage when they become wastes. These systems also save money for local governments by relieving them of the financial responsibility to pay for and manage the collection and recycling and proper management of mattresses.

Let me again express PSI's appreciation to the Committee for spending the time necessary to understand this complex environmental issue.

Sincerely,

A handwritten signature in cursive script that reads "Scott Cassel".

Scott Cassel
Chief Executive Office/Founder