



March 29, 2022

Senator Bill Ingebrigtsen, Chair
Senator Carrie Ruud, Vice-Chair
Senator Patricia Torres Ray, Ranking Minority Member
Senate Environment and Natural Resources Finance Committee

Ref: SF 4062 (Art 2 sec 53) (Ingebrigtsen) concerning mattress recycling, included in Senate Omnibus Environment bill

Second Chance Recycling, the largest mattress recycler in Minnesota, and a subsidiary of Emerge Community Development is writing to oppose the referenced mattress recycling bill and are asking for its withdrawal. We would be negatively affected by the proposed Senate language concerning mattress recycling, a proposal that does not take into account the significant work that has already been completed in Minnesota to create a system of mattress recycling that works well and grows significantly each year.

Second Chance Recycling:

- Has been recycling mattresses since 2008
- Has processed over 600,000 mattresses
- Currently processes over 70,000 mattresses per year
- Recently expanded capacity to handle over 120,000 per year
- Employs over 100 citizens per year coming out of incarceration in a transitional job

Our opposition is due to significant deficiencies both within the legislation itself and, more importantly, concern about the impact of the prescribed program on the long-term advancement of mattress recycling across the state and its impact on the current mattress recycling infrastructure that working well today. We would support future legislation provided the industry adequately address significant concerns regarding the design. The current legislation was proposed by mattress manufacturers and discussions with them have failed to address the concerns adequately. Minnesota is significantly different from the states on which this legislation is based (California, Connecticut and Rhode Island) and yet a detailed model of how the program would work has not been developed.

Some of the concerns include:

- The rate of recycling mattresses will actually be retarded over the long-term.
 - After 5 years of operation, California's program recycling rate is only 40% while their own data indicates 70-80% should be recycled.
- Lack of standards for the amount of material to be recycled.
 - Absences of standards could result in the majority of material still being landfilled
 - 94% of the material in typical mattress is recyclable.
- Skepticism regarding the programs ability to address the needs in Greater Minnesota.
 - Population density matters. California is 3.6x and Rhode Island is 15.0x denser.
 - Long drives by residents will be required.
- Government units/landfills will continue to bear substantial cost
 - Non-recyclable units are not covered such as those infested with bed-bugs.
 - Industry claims it will be covered but the language is unclear.



- Ditch/Alley/Street dumping will continue and be the responsibility of government
 - 4% California units are still dumped in the street
- The collection component of the program does not adequately address three major factors currently preventing a high percentage of recycling: multi-unit housing, high population dense areas and low population dense areas.
- Existing recycling systems currently in place and working well could be decimated by the new program.
- While the mattress manufacturers want to take credit for "creating a system" where one already exists and could be expanded, they are not contributing in any meaningful way:
 - They oppose creating incentives to move toward more recyclable content
 - They oppose reporting transparency (too expensive)
 - They oppose transparency in their proposed bidding processes
- Consumers (or governments) will still have to pay something for disposal unless they find a way to transport it themselves. In this sense the program is a **Subsidy** program not a fully paid for recycling program.

Bottom line: this legislation is not ready for Minnesota. As proposed, the industry creating the problematic material seeks to impose a system that it neither funds nor is accountable for. We ask that the language be removed.

Sincerely,

A handwritten signature in black ink that reads "Kevin Engdahl". The signature is written in a cursive, flowing style.

Kevin Engdahl
Executive Vice President
Emerge Community Development and Second Chance Recycling