

Leslie Lukacs
President, National Recycling Coalition
Box 314, 1151 Eagle Drive
Loveland, CO 80537

To Whom it May Concern:

The International Sleep Products Association (ISPA) is the trade association for the mattress industry. We represent mattress manufacturers and companies that supply components and services to the mattress industry. ISPA and our members have devoted substantial resources for over 30 years to addressing the challenges of recycling used mattresses at the end of their useful life. Toward that end, in 2013 ISPA created a non-profit entity called the Mattress Recycling Council (MRC) to implement and operate mattress recycling programs required by state laws. MRC currently administers mattress recycling programs in California, Connecticut and Rhode Island and will launch a similar program in Oregon in 2025.

We are writing today in opposition to the National Recycling Coalition's (NRC) position on advanced recycling. ISPA supports increasing recycling rates for a broad range of materials used to manufacture mattresses. A key aspect in advancing the circularity and recyclability of certain mattress components is embracing innovative technology such as gasification that fall under the umbrella of advanced recycling.

In MRC's three existing state programs, a reoccurring challenge is having reliable end markets for postconsumer mattress components. In 2021, MRC conducted a comprehensive Life Cycle Assessment (LCA) of our California program. That LCA determined that all forms of recycling including mechanical and chemical are far better for the environment than landfilling. Advanced recycling has the potential to diversify and stabilize end markets for a variety of mattress components. Excluding advanced recycling as an acceptable form of recycling hinders circularity and sustainability in the mattress industry.

Advanced recycling methods such as molecular recycling and gasification are wholly accurate in being defined as recycling methods. Mechanical and advanced recycling are complementary approaches to recycling a variety of post-consumer products which decreases the need for virgin materials. While mechanical recycling works well for some materials, advanced recycling opens the door to more effectively recycling difficult to recycle materials including polyurethane foam. Moreover, this increases the circularity of these products and advances sustainability goals. Without advanced recycling technologies, more plastics and other materials end up in landfills or incinerators.

While advanced recycling began as a method to convert hard-to-recycle plastics into fuel, these technologies have shifted to focus to manufacture new chemical feedstocks that can be reintroduced into commerce. This technological step widens the variety of applications for which these materials can be used. The end result is a more circular manufacturing process, increased recycling rates, a reduction in the amount of material sent to landfills, and lower GHG emissions compared to virgin fossil-based production.

Considering the foregoing reasons, ISPA concludes that advanced recycling methods should be included in the definition of recycling and considered when calculating recycling rates.

In advance, thank you for your consideration of ISPA's position.

Sincerely,



Alison Keane,
President, ISPA