

13 September 2022

Attn: Connie Wu
Australian Competition & Consumer Commission
GPO BOX 3131
Canberra ACT 2601

Dear Australian Competition & Consumer Commission

Re: AA1000613 – Australian Bedding Stewardship Council – submission

The City of Stonnington writes to provide feedback on the Australian Bedding Stewardship Council's (ABSC) 'Recycle My Mattress' Product Stewardship Scheme Draft Determination. We acknowledge the significant environmental impact of end-of-life mattress disposal and support the development of a scheme that seeks to facilitate a circular economy model of the market and the innovation of recycling services.

Communication and Education

The City of Stonnington supports the development of a scheme that prioritises communication programs designed to increase consumer awareness of the environmental issues associated with end-of-life mattresses. We acknowledge the importance of facilitating informed consumer purchasing and disposal of such a common household item. The City of Stonnington is committed to educating and supporting our residents to understand resource recovery and make more sustainable choices. We welcome the provision of educational materials described in this draft and would commit to passing on useful information to our residents.

Furthermore, the addition of an accreditation regime for collectors, recyclers and refurbishers will assist both consumers and Local Governments be informed when choosing a service provider for the disposal of end-of-life mattresses. It is expected that the standardisation of accreditation of service providers will simplify Councils' processes of procurement and community education. Providing access to a list of accredited service providers will allow Council to pass on vetted options to residents seeking end-of-life recycling for their mattresses. It will also assist Councils when choosing contractors for their own services.

Local Government's Role

It would be beneficial, as the program begins its first stages, to have more defined guidance about the perceived role of Local Government within the scheme. The Draft Determination does not

detail the role the ABSC expects Councils will take within the scheme. Given the centralised role Councils play as educators, end-of-life mattress transportation and recycling service providers and are often the main point of contact for consumers seeking service information, it would be beneficial to define what will be expected of Councils in the delivery of this scheme and what forms of support will be provided. In our own context, the City of Stonnington accepts mattresses through our biannual hard waste collection and at our waste transfer station. We also educate our community about resource recovering and provide information through our A-to-Z Waste and Recycling Guide and other such resources. It is understood this first stage will concentrate on businesses within the sector. The inclusion of a more detailed map of Councils' involvement would be beneficial for Local Governments involved and the scheme itself.

Funding Model

The City of Stonnington acknowledges the range of funding model parameters proposed to enable the scheme to grow, invest in market development and explore innovation to enable greater recovery and recycling of mattresses. We are concerned that the collection and recycling rebates underestimates the true cost to both collect mattresses from metropolitan and regional areas, and to enable sufficient resources to disassemble and recover highly valued recycled materials. Comparatively, current cost to recycle a mattress range between \$52- \$80 (Soft Landing pricing guide 2022), this is significantly more than proposed product stewardship fee of \$17.50 and rebates of \$5 for collection and \$6 for recycling. We encourage the ABSC to review and adjust the rebates to account for the true costs of collection and recycling mattresses.

Rebate scope

The ABSC proposes to limit the eligible products for rebates to mattresses only. Bed bases also face the same recovery and recycling challenges and are often found dumped with mattresses. Council proposes that bed bases must also be incorporated into the scheme and rebates determined according to the recyclability of bed bases.

Conclusion

The City of Stonnington welcomes the introduction of the voluntary product stewardship scheme for mattresses. There are significant opportunities to work with all stakeholders along the supply chain to improve collection and recovery of mattresses. The proposed scheme is a welcomed first step and Council looks forward to working with the ABSC to implement, review and improve the scheme.

Council's Waste Strategy and Engagement Coordinator, Amy Yang, will be pleased to provide further commentary or clarification if needed. Amy can be contacted via email:

[Redacted email address]

Yours sincerely

[Redacted signature]

Simon Holloway
Manager Climate, Sustainability and City Greening
City of Stonnington