

**Australian Bedding Stewardship Council:
Application For Authorisation - Recycle My Mattress Scheme**

ATTACHMENT C: LETTERS OF SUPPORT

Organisation	Signatory	Page
1. Albury City Council	Andrea Baldwin, Team Leader Resource Recovery	3
2. A.H. Beard	Tony Pearson, Chief Executive Officer	4
3. Beds Australia	Alex Phiditis, Director	5
4. Carroll Engineering Services	Mick Carroll, Director	6
5. City of Canada Bay Council	Samantha Bones, Senior Resource Recovery officer	7
6. City of Casey	Thomas Johannsen, Team Leader Waste Management	8
7. City of Gold Coast	Rod Packer, Water and Waste - Manager Strategy and Innovation	9
8. City of Ballarat	Les Stokes, Executive Manager Waste and Environment	10
9. Dow Chemical Australia	Ray Livera, Sales Manager	11
10. Forty Winks	David Edwards, CEO	12
11. Green Industries SA	Dr Ian Overton, Chief Executive	13
12. Harvey Norman Holdings Limited (Yoogalu Pty Limited)	John Slack-Smith, Executive Director	14
13. Incredible Ltd.	Bernie Scott, Managing Director	16
14. Joyce	Kevin Graham, General Manager	17
15. KS Textiles	Lucy Ferretti, General Manager	18
16. Logan City Council	Michael Asnicar, Health, Environment and Waste Manager	19
17. LGANT	Sean Holden, Chief Executive Officer	20
18. Lockyer Valley Regional Council	Christine Blanchard, Manager Waste Services	21
19. Moreton Bay Regional Council	Michael Magalhaes, Manager Waste Services	22
20. Metropolitan Waste and Resource Recovery Group	Josephine Regel, Director Operations Planning and People	23
21. North East Waste and Resource Recovery Group	Kristy Kay, Executive Officer	24
22. Robovoid	Dr John Stehle, Director/Inventor	26
23. Resource Recovery Australia	Jeff Prater, Queensland Manager	27

Organisation	Signatory	Page
24. Scenic Rim Regional Council	Vartik Venkatraman, Manager Resources and Sustainability	28
25. Sealy	Simon Dyer, Managing Director	29
26. Soft Landing	Chris Richards, General Manager	30
27. Tempur	Jacinta Olsen, Marketing Manager - Australia and New Zealand	32
28. The Comfort Group	Anton McKenna, General Manager	33
29. Greenlit Brands Group	Michael Ford + 5 Brands Group Executive Chairman and CEO	34
30. ABSC	Response to Greenlit Brands submission	42



Contact: A Baldwin
Reference:

13 December 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')
By email: [REDACTED]

To whom it may concern,

Letter of Support – Recycle My Mattress Product Stewardship Scheme

Dear Vernon,

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to Albury City Council, regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that Albury City Council agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

Albury City Council are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us,

Please contact Andrea Baldwin, [REDACTED]

Yours sincerely,

[REDACTED]

Albury City Council ABN: 92965474349
Andrea Baldwin
Team Leader Resource Recovery

25th October 2021

Australian Bedding Stewardship Council Limited
Vernon Fair
Chief Executive Officer
Email: [REDACTED]

RE: An invitation to participate from the Board and Members of the ABSC

Dear Vernon,

In response to the Australian Bedding Stewardship Council product stewardship briefing for CEO's and an invitation to participate from the Board and Members of the ABSC as received 30th September 2021, please find here a reply on behalf of A.H. Beard.

A.H. Beard has a long-held commitment for diverting mattresses from going into landfill and continues to operate with consideration for the end-of-life implications of our mattresses. These approaches are consistent with the A.H. Beard Corporate and Social Responsibility (CSR) Policy and associated A.H. Beard Social and Environmental Sustainability Commitments. In this vein we appreciate the CEO Briefing and the work undertaken and ongoing of the ABSC and acknowledge that there continues to be a substantial volume of work to be undertaken by all parties to achieve our mutual goals.


At this point, I am more than happy to advise that A.H. Beard confirms our in-principle agreement to the proposed Scheme design as presented in the Australian Bedding Stewardship Council product stewardship briefing for CEO's and an invitation to participate from the Board and Members of the ABSC.

Yours sincerely,

[REDACTED]

Tony Pearson
Chief Executive Officer

19/11/2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')
By email: 

Dear Vernon

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information, you may contact me directly.

Yours sincerely,



Alexis Phitidis

Director



CARROLL ENGINEERING SERVICES PTY LTD
ABN 43 608 645 763

22ND November 2021

Mr Vernon Fair

Chief Executive Officer

Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Mick Carroll, mobile phone [REDACTED]

Yours sincerely,

Michael Carroll

Director

Carroll Engineering Services Pty Ltd

7 December 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

Dear Vernon

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Samantha Bones: [REDACTED] or [REDACTED].

Yours sincerely,

City of Canada Bay Council, 79 130 029 350



Samantha Bones
Senior Resource Recovery Officer

30 November 2021

Mr Vernon Fair

Chief Executive Officer

Australian Bedding Stewardship Council Limited ('ABSC') By email:
[REDACTED]

Dear Vernon

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact [Name and contact details].

Yours sincerely,

Thomas Johannsen
Team Leader Waste Management
City of Casey

Date: 22/11/2021
Contact: Donna Cox
Location: Nerang, Gold Coast
Telephone: 55817076
Your reference: Nov2021
Our reference: A72134974

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited (ABSC)
By email: [REDACTED]

Dear Vernon

Letter of Support ABSC Scheme Design

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Rod Packer Water and Waste – Manager Strategy & Innovation ph: [REDACTED].

Yours faithfully

[REDACTED]

Mr Rod Packer
Water and Waste – Manager Strategy & Innovation
Council of the City of Gold Coast

PO Box 655
Ballarat Vic 3353
AUSTRALIA

Telephone: 03 5320 5500
Facsimile: 03 5333 4061



Date: 06 December 2021

Our Ref: D-21-102054

Enquiries: (61) 03 5320 5548

Direct Email: @ballarat.vic.gov.au

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited
(‘ABSC’)
email: [REDACTED]

Dear Mr Vernon,

RE: MATTRESS PRODUCT STEWARDSHIP LETTER OF SUPPORT

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Environment Business Support on 03 5320 7400.

Yours sincerely

[REDACTED]

Les Stokes
Executive Manager Waste and Environment



Dow Chemical (Australia) Pty Ltd

ABN 72 000 264 979
Level 29, 367 Collins Street
Melbourne, Victoria, Australia 3000
Australia
Telephone: 61-3-9956-7500
Fax: 61-3-9916-9690

25th November 2021

Mr Vernon Fair

Chief Executive Officer

Australian Bedding Stewardship Council Limited ('ABSC') By email: [REDACTED]

Dear Vernon,

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Ryan Livera on [REDACTED].

Yours sincerely,

[REDACTED]
Ryan Livera
Dow Chemical Australia
Sales Manager – Polyurethanes & PO & PG.
Australia & New Zealand
Mobile: [REDACTED]

15 December, 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon,

I refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) recently made to our organisation, regarding the proposed scheme design for the Recycle My Mattress product stewardship program, to be operated by the ABSC.

We note your comments that the proposed scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to further adjustments to the final version of the scheme.

The purpose of this letter is to confirm that the Forty Winks Franchising Board of Directors gives it's in principle agreement to the proposed scheme design, and that our Board understands the scheme's implications on both our business and the bedding industry in Australia. I am providing this confirmation so that the ABSC can present the draft proposed scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants.

Should you, or the ACCC, require any further information about our in principal support for the scheme, please contact me by email: [REDACTED].

Yours sincerely,

[REDACTED]

David Edwards

CEO, Forty Winks Franchising Pty Ltd.
ABN: 38 059 512 640



ABN 76 149 388 126

Level 4
81-95 Waymouth Street
Adelaide SA 5001

GPO Box 1047
Adelaide SA 5001

Tel +61 8 8204 2051
Fax +61 8 204 1911

www.greenindustries.sa.gov.au

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Mr Fair

Green Industries SA (GISA) is a South Australian government agency aiming to transform how South Australians use and value resources. Being a leader in advancing the circular economy in South Australia, GISA supports innovation, collaboration and excellence alongside:

- Creating jobs and economic growth;
- Maximising the value of our resources and reducing waste and pollution; and
- Improving our environment and wellbeing.

Statistics provided by your organisation indicates that approximately 2 million mattresses are sold per year and 1.8 million mattresses are discarded at end-of-life with over 40% of end-of-life mattresses being disposed to landfill. Mattresses are a common waste stream in South Australia currently with limited recycling processing options and capacity. GISA supports a national industry-led product stewardship scheme for mattresses to provide a nationally co-ordinated approach to the collection and recycling of end of life mattresses.

I thank you for the briefing presentation that was made to GISA staff regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC. I note your comments that the proposed Scheme is still in draft form and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

I am providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of in-principle support from GISA.

Should you or the ACCC require any further information of us, please contact Ms Serena Yang, Manager Policy and Evaluation via email: [REDACTED].

Yours sincerely,


[REDACTED]

Dr Ian Overton
Chief Executive
Green Industries SA

Date: 26 November 2021

9 December 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

By email: 

Dear Vernon

1. We refer to the briefing presentation that ABSC has made to our organisation regarding the proposed scheme design for the Recycle My Mattress product stewardship program, to be operated by ABSC.
2. We note your comments that the proposed scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the scheme.
3. The purpose of this letter is to confirm that we are in agreement with the proposed scheme design presented to us by ABSC, and its implications on both our business, as a franchisor, and the bedding industry in Australia. We are providing this confirmation so that ABSC can present the draft proposed scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of ABSC.
4. For the avoidance of doubt, we confirm the following:
 - (a) Yoogalu Pty Limited (**Yoogalu**) is a wholly owned subsidiary of Harvey Norman Holdings Limited (**HNHL**).
 - (b) HNHL and subsidiaries of HNHL own valuable intellectual property rights, including the trade marks Harvey Norman®, Domayne® and Joyce Mayne® (**Trade Marks**).
 - (c) A subsidiary of HNHL (**Franchisor**) grants separate franchises to independent franchisees (**Franchisees** and each a **Franchisee**) to use certain intellectual property, including the Trade Marks, and to conduct the retail business of the Franchisee (**Franchisee Business**), pursuant to the terms of a franchise agreement.
 - (d) HNHL does not control, or have any ownership interest in, any Franchisee or the Franchisee Business of any Franchisee.
 - (e) Neither HNHL nor any subsidiary of HNHL (including Yoogalu), under any name or style including the words "Harvey Norman®", "Domayne®" or "Joyce Mayne®", supplies or offers to supply, in Australia, goods or services to consumers, including mattresses.
 - (f) A Franchisee purchases goods (including mattresses), from suppliers and sells goods to the public from a physical store in the course of the Franchisee Business of that Franchisee.

- (g) Each Franchisee separately contracts with each supplier in respect of the supply of goods (including mattresses) by that supplier to that Franchisee.
- (h) HNHL, and each subsidiary of HNHL:
- i. does not contract with suppliers with respect to the supply of goods (including mattresses) by that supplier to a Franchisee;
 - ii. is not responsible for the discharge of any obligations of a Franchisee under any contract with a supplier;
 - iii. does not provide any guarantees to any supplier of goods;
 - iv. does not otherwise owe any responsibilities to a supplier in respect of any purchase of goods (including mattresses) by a Franchisee from that supplier;
 - v. does not at any time, have possession of or title to any goods (including mattresses) supplied by a supplier to a Franchisee.

5. We do not provide this letter for, or on behalf of, any Franchisee.

Should you require any further information of us, please contact John Slack-Smith at [REDACTED] or [REDACTED]

Yours sincerely,
Yoogalu Pty Limited

[REDACTED]
John Slack-Smith
Executive Director



Incredible Ltd

ABN 34 160 145 380
PO Box 6001
Mackay MC QLD 4741
t (07) 4952 2703
manager@incredible.org.au

25 NOVEMBER 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')
By email: [REDACTED]

Dear Vernon

I represent a regional social enterprise / registered charity operating in the recycling area in Mackay. I hope that we can participate in this scheme in the role of collector / recycler, and that the scheme can be made to suit operations in regional areas.

I refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to, inter alia, our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

I note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia. The only misgiving I have is in respect of the suggested one-size-fits-all Stewardship Fee.

Being located in a large statistical region but with a relatively scattered population, our logistics costs are of an order much higher than in an urban location; we are also dealing with a significantly lower population density. I am unaware if these factors have been fully recognised in the draft Scheme or will be in the final edit.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact me.

Yours sincerely,

Bernie Scott
MANAGING DIRECTOR

30th November 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')
By email: [REDACTED]

Dear Vernon,

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree in principle with the proposed Scheme design presented to us by ABSC, and its implications on both our business and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, I can be contacted via phone or email: [REDACTED], [REDACTED]

Yours sincerely,

[REDACTED]
Kevin Graham
General Manager



30th November 2021

Mr. Vernon Fair
Chief Executive Office
Australian Bedding Stewardship Council Limited (ABSC).

Dear Vernon,

We refer to the briefing presentation the Australian Bedding Stewardship Council (ABSC) made to our organization regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm, we agree with the proposed Scheme design presented to us by ABSC, and its implications within the bedding industry in Australia.

We are providing this letter of support so the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non members of the ABSC.

Should you or the ACCC require any further information, please email me on

Sincerely,

Lucy Ferretti,

Your Ref:
Enquiry Phone: Brett Lee [REDACTED]
File No: 155175-3
Document Reference: 15263400



23 November 2021

1301011121080021211123213012223813
Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')
GPO Box 4836
SYDNEY NSW 2001
By email: [REDACTED]

Dear Vernon

LCC LETTER OF IN-PRINCIPLE SUPPORT - ABSC SCHEME DESIGN

I refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our Council regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

I note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that I support the proposed Scheme design presented to us by ABSC, and its implications on both our organisation and the bedding industry in Australia.

I am providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Brett Lee at [REDACTED].

Yours faithfully

[REDACTED]
Michael Asnicar
Health, Environment and Waste Manager
Logan City Council

29 November 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council (ABSC)

By email: [REDACTED]

Dear Vernon

Letter of In-Principle Support – Proposed Expansion of the Recycle My Mattress Product Stewardship Scheme

The Local Government Association of the NT (LGANT) would like to express their in-principle support for the proposed expansion of the Recycle My Mattress Product Stewardship Scheme. LGANT attended the briefing presentation made by the Australian Bedding Stewardship Council (ABSC) as the operators of the scheme 11 November 2021.

I note that the briefing session made comments that the scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC following the assurance that expanding the benefits of the Scheme to the Northern Territory is being considered in 2022.

LGANT is providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information please contact Meredith Newall on [REDACTED] or by email [REDACTED]

Yours sincerely

[REDACTED]

Sean Holden
Chief Executive Officer



Lockyer Valley Regional Council
26 Railway Street, PO Box 82, Gatton Qld 4343
All official correspondence to be addressed to the CEO
Telephone 1300 005 872 | Facsimile (07) 5462 3269
Email mailbox@lvrc.qld.gov.au | www.lockyervalley.qld.gov.au

23 November 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited
By email: [REDACTED]

Dear Vernon

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Christine Blanchard, Manager Waste Services on [REDACTED] or email [REDACTED].

Yours sincerely,

[REDACTED]

Christine Blanchard
Manager Waste Services



Phone: 07 3205 0555

Date: 29/11/2020

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon,

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Michael Magalhaes via [REDACTED], [REDACTED].

Yours sincerely,

[REDACTED]

Michael Magalhaes
Manager Waste Services
Moreton Bay Regional Council
ABN: 92 967 232 136

30 November 2021

Mr Vernon Fair

Chief Executive Officer

Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon

SUBJECT: LETTER OF SUPPORT

We refer to the briefing presentation that ABSC has made to our organisation regarding the proposed scheme design for the Recycle My Mattress product stewardship program, to be operated by ABSC.

We note your comments that the proposed scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the scheme.

The purpose of this letter is to confirm that we have no objection to the proposed scheme design presented to us by ABSC, and its implications on both our business and the bedding industry in Australia. We are providing this confirmation so that ABSC can present the draft proposed scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of ABSC.

Should you or ACCC require any further information of us, please contact Zandy Powell at [REDACTED]

Yours sincerely

[REDACTED]

Josephine Regel

Director Operations, Planning and People

Metropolitan Waste and Resource Recovery Group

ABN: 64 480 279 309

7 December 2021

Mr Vernon Fair, Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC') By email:

[REDACTED]

Dear Vernon,

We refer to the briefing presentation by Australian Bedding Stewardship Council (ABSC) that representatives of our waste and resource recovery group (WRRG) attended regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

The North East WRRG works with seven councils and three alpine resorts in the north east region of Victoria. These partner organisations have long identified mattresses as a problematic material that is expensive and difficult to recycle, and also frequently subject to illegal dumping. For these reasons, our organisation and partners welcome the development of the proposed product stewardship scheme for bedding.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia. We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact Kristy Kay, Executive Officer on [REDACTED].

Yours sincerely,

[REDACTED]
Kristy Kay, Executive Officer
North East Waste and Resource Recovery Group.

ROBOVOID

19th November 2021

To: Mr Vernon Fair

Chief Executive Officer

Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon,

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree in principle with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact myself on [REDACTED]

[REDACTED]

Yours sincerely,

Dr John Stehle

Director/Inventor of ROBOVOID Pty Ltd (ABN 74 627 491 730)

[REDACTED]

30 November 2021

Vernon Fair

Chief Executive Officer

Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon,

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact myself either by phone or email.

Yours Sincerely,

Resource Recovery Australia, ABN 90 746 695 414

[REDACTED]
Jeff Prater

Queensland Manager

M: [REDACTED]

E: [REDACTED]

W: resourcerecovery.org.au

Enquiries: Emma Thomson
Phone: 07 5540 5111
File Ref: 02/09/011
31/08/002



26 November 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

Dear Mr Fair

Recycle My Mattress Product Stewardship Scheme

The briefing presentation provided by the Australian Bedding Stewardship Council (ABSC) regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC, provided a useful overview of the intended scheme design.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we support the proposed Scheme design presented to us by ABSC, and have considered its implications for our organisation. Our Waste Management and Resource Recovery Strategy 2021 - 2026 recognises the need to prioritise recovery of problem waste streams such as mattresses and we see the Scheme as an important tool to support us in progressing this strategic outcome. We are particularly encouraged by the consideration of at residence collection given the difficulty that customers can face in transporting mattresses no longer in use.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants.

Should you or the ACCC require any further information of us, please contact Emma Thomson, Coordinator Waste Services on [REDACTED]

Yours faithfully

[REDACTED]

Kartik Venkatraman
MANAGER RESOURCES AND SUSTAINABILITY



SEALY OF AUSTRALIA

Madad Pty. Ltd
ABN 57 009 678 344
1299 Boundary Road
WACOL QLD 4076
Telephone: (07) 3331 5200
Fax: (07) 3331 5350
Email: sealy@mail@sealy.com.au

January 18, 2022

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon

We refer to the briefing presentation that ABSC has made to our organisation regarding the proposed scheme design for the Recycle My Mattress product stewardship program, to be operated by ABSC.

We note your comments that the proposed scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the scheme.

The purpose of this letter is to confirm that Sealy of Australia provides it's in principle agreement with the proposed scheme design presented to us by ABSC, and its implications on both our business and the bedding industry in Australia. We are providing this confirmation so that ABSC can present the draft proposed scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of ABSC.

Should you or ACCC require any further information of us, please contact David Wood, COO by email: [REDACTED]

Yours sincerely,

[REDACTED]

Simon Dyer
Managing Director
Madad Pty Ltd (t/as Sealy of Australia), ABN: 57 009 678 344



www.softlanding.com.au

Monday, 29 November 2021

Mr Vernon Fair

Chief Executive Officer

Australian Bedding Stewardship Council Limited ('ABSC')

By email: [REDACTED]

Dear Vernon

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme. Of note to Soft Landing in that regard is the uncertainty that exists around the end-to-end administration of the scheme rebate system and as such, we do not at this stage have enough clarity of any direct consequence or impact that the administration environment may ultimately have on organisations.

The purpose of this letter is to confirm that we provisionally agree with the high-level proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Creating local jobs that care for the planet

SOFT LANDING IS A SOCIAL ENTERPRISE OF COMMUNITY RESOURCES

SOFT LANDING MATTRESS RECYCLING | ABN 90 746 695 414 | PHONE (02) 6555 8922 | **NSW ACT VIC WA**
Dharawal Country, 5/82 Wentworth Street, Port Kembla, NSW 2505 | PO Box 43, Port Kembla, NSW 2505

Should you or the ACCC require any further information of us, please contact Chris Richards on [REDACTED]
[REDACTED], or [REDACTED].

Yours sincerely,

[REDACTED]

Chris Richards

General Manager – Soft Landing Mattress Recycling

Community Resources Limited

ABN: 90 746 695 414

Creating local jobs that care for the planet

SOFT LANDING IS A SOCIAL ENTERPRISE OF COMMUNITY RESOURCES

SOFT LANDING MATTRESS RECYCLING | ABN 90 746 695 414 | PHONE (02) 6555 8922 | **NSW ACT VIC WA**
Dharawal Country, 5/82 Wentworth Street, Port Kembla, NSW 2505 | PO Box 43, Port Kembla, NSW 2505

24 November, 2021

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')

Dear Vernon,

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please do not hesitate to contact me.

Yours sincerely,



JACINTA OLESEN
Marketing Manager – Australia and New Zealand



30 November 2021

Australian Comfort Group Pty Ltd

ABN 23 098 742 584

447 Foleys Road

Deer Park VIC 3023

Australia

PO Box 265

Deer Park VIC 3023

Australia

Mr Vernon Fair
Chief Executive Officer
Australian Bedding Stewardship Council Limited ('ABSC')
By email: [REDACTED]

Dear Vernon

We refer to the briefing presentation that the Australian Bedding Stewardship Council (ABSC) has made to our organisation regarding the proposed design for the expanded Recycle My Mattress Product Stewardship Scheme, to be operated by ABSC.

We note your comments that the proposed Scheme is still in draft form, and subject to industry, member and regulatory input and approvals, which may lead to adjustments in the final version of the Scheme.

The purpose of this letter is to confirm that we agree with the proposed Scheme design presented to us by ABSC, and its implications on both our business/organisation and the bedding industry in Australia.

We are providing this letter of support so that the ABSC can present the draft proposed Scheme to the Australian Competition & Consumer Commission (ACCC) with evidence of support by industry participants, including members and non-members of the ABSC.

Should you or the ACCC require any further information of us, please contact [Name and contact details].

Yours sincerely

[REDACTED]

General Manager
Australian Comfort Group

p: +61 3 9449 6600

e: info@thecomfortgroup.co

w: thecomfortgroup.co





Executive Summary

Thank you for the opportunity to provide feedback to the Australian Bedding Stewardship Council (ABSC) in relation to the proposed Recycle My Mattress v2.0 scheme (Proposed Scheme).

Businesses within the Greenlit Brands Group account for a significant portion of the mattress manufacturing, importing and retail industry in Australia. We operate the Fantastic Furniture, Freedom, OMF and Snooze retail businesses along with the FutureSleep mattress manufacturing business.

While individual businesses within the Greenlit Brands Group have had discussions with the ABSC about the Proposed Scheme, the Greenlit Brands Group has not previously provided feedback from a whole-of-group perspective.

While the Greenlit Brands Group, and each of our businesses, recognise the importance of the management of end-of-life mattresses and are committed to working with industry to address this issue, a number of businesses within the Greenlit Brands Group hold similar concerns about the operation of the Proposed Scheme. These concerns include numerous factors the Greenlit Brands Group believes will prevent the effective take-up of the scheme by industry.

In this document, we have sought to consolidate feedback obtained from the businesses within the Greenlit Brands Group about the design of the Proposed Scheme. Given the differences in operations between the businesses in the Group, a common position is not necessarily held by our businesses. Instead, in this document, we have tried to identify concerns and feedback which is common across different businesses in the Group.

The Greenlit Brands Group is concerned that, as currently proposed, the Proposed Scheme is not designed to maximise its impact on consumer behaviour and will disproportionately impact on economically disadvantaged and at risk consumer groups.

The Greenlit Brands Group believes that any scheme that is ultimately adopted should include safeguards to ensure association with the scheme is not exploited and to ensure consumers are aware of their participation in the Proposed Scheme when paying the Product Stewardship Fee.

The Greenlit Brands Group believes there are further opportunities to enhance the scheme, including by formalising alternative arrangements for the management of end-of-life mattresses and exploring ways to expand the scheme to supplement the costs to consumers associated with recycling their end-of-life mattress.

We hope this feedback will be of assistance as the ABSC continues to refine the Proposed Scheme.



The Greenlit Brands Group

The Greenlit Brands Group is a leading integrated retailer and manufacturer of furniture, homewares and household goods across Australia and New Zealand. In all that we do, we strive to achieve “remarkable retail” by anticipating our customers’ needs and delighting them better than our competitors. Our businesses include Fantastic Furniture, Freedom, FutureSleep, OMF, Snooze and Unitrans.

The Greenlit Brands Group is a significant participant in the mattress manufacturing, importation and retail sectors. The Greenlit Brands Group’s operations include manufacturing, importation and the retail sale of mattresses, both through company owned stores and franchised networks. Greenlit Brands Group’s bedding retail businesses operate over the full spectrum of the industry sector, including value and premium offerings.

We believe our extensive industry knowledge, as manufacturers, importers and retailers of mattress provides us with significant insight as to the practical application of the Proposed Scheme in industry.

Existing initiatives of the Greenlit Brands Group and industry

Businesses within the Greenlit Brands Group already engage in a range of activities designed to promote and facilitate the recycling of end-of-life mattresses to aid the development of a more responsible and sustainable industry.

Many of our businesses already offer a service where they will collect mattresses from a consumer (for a cost). Once mattresses are collected, they are redirected either to repurposing, recycling (either through private or local-government facilitated operations) or, where these solutions are not available, destruction for landfill.

Competitor retailers in the mattress industry sector have also introduced a range of other services designed to assist consumers in the management of their end-of-life mattresses.

The Proposed Scheme should take into account existing end-of-life pathways for mattresses to allow a gradual transition to the Proposed Scheme. In the alternative, due recognition should be given under the Proposed Scheme to existing pathways and schemes which may have more favourable sustainability outcomes than the Proposed Scheme. This is discussed further below.



Feedback on the Proposed Scheme

Representatives of the Greenlit Brands Group's retail businesses have attended the consultation sessions facilitated by the ABSC. Representatives of the Greenlit Brands Group's businesses have also met to discuss the Proposed Scheme and the likelihood of its ongoing success, including likely industry take-up of the scheme in its proposed form.

At the outset, the businesses in the Greenlit Brands Group are committed to the development and implementation of appropriate whole-of-life schemes for mattresses, including an effective and efficient program for the recycling of end-of-life mattresses.

While the businesses in the Greenlit Brands Group are generally supportive of the introduction of a scheme similar to the Proposed Scheme, there are a number of areas where the Greenlit Brands Group believes there are opportunities for the Proposed Scheme to be improved from its current form.

Each of those areas are addressed below.

1. Adoption of a uniform Product Stewardship Fee

Under the Proposed Scheme, a uniform Product Stewardship Fee will be charged to all consumers who purchase a mattress either manufactured by a participating domestic manufacturer or imported by a participating domestic importer or retailer.

The businesses within the Greenlit Brands Group are of the unanimous view that charging of a uniform Product Stewardship Fee is a fundamental flaw in the design of the Proposed Scheme which will materially impact on the take-up of the scheme by industry. A uniform Product Stewardship Fee gives no recognition to:

- the retail price of the mattress being sold and the affordability of the Product Stewardship Fee;
- the size of the mattress and type, the material(s) from which it is made;
- to what extent the mattress contains recyclable materials;
- the potentially environment damage caused by the mattress and which is avoided by having the mattress recycled; and
- the labour and cost associated with transporting and recycling the mattress.

Each of the above factors are directly relevant to the ultimate cost to have the end-of-life mattress recycled and the potential impact of the mattress on the environment.

As currently designed, the proposed uniform Product Stewardship Fee:

- will exclude key segments of the mattress retail sector from participating in the Proposed Scheme, including because of an inability of consumers to pay;
- will disproportionately impact on economically disadvantaged families and other consumers least able to afford to participate in the Proposed Scheme (regardless of their personal preferences);
- fails to incentivise consumers to include environmental sustainability in their considerations when selecting a mattress and in deciding what to do with their end-of-life mattress; and
- will result in a significant opportunity to increase consumer knowledge and drive positive changes in consumer behaviour directly relevant to the overall objectives of the Proposed Scheme being missed.

Each of these are addressed further below.



A uniform Product Stewardship Fee disproportionately affects manufacturers and retailers of mattresses for sale in the value segment of the industry. Mattresses in the value segment are typically manufactured using fewer materials and are in fact easier to process for recycling.

Value segment retailers have mattresses with a retail price of \$60. Consumers in the value segment are highly price conscious and the addition of even a \$10 Product Stewardship Fee on mattresses may mean that consumers seek to avoid the Product Stewardship Fee by shopping with retailers who are not participants in the Proposed Scheme.

The result is that retailers operating in the value segment of the industry will be unable to participate in the Proposed Scheme due to competitive pressures, an inability to absorb the Product Stewardship Fee into limited retail margins and an inability of consumers in the segment to pay the Product Stewardship Fee.

The Greenlit Brands Group is concerned that a uniform Product Stewardship Fee will disproportionately impact families and community organisations which typically utilise single mattresses, including where there may be a need to turn-over mattresses more frequently. The mattresses concerned are easier to transport, store and recycle and yet under the Proposed Scheme, consumers who purchase a larger or more expensive mattress (which will have a greater impact on the environment in its life) and who are likely to have greater capacity to contribute the Proposed Scheme are charged the same Product Stewardship Fee.

The charging of a uniform Product Stewardship Fee on all new mattresses fails to incentivise consumers to take sustainability into account in the selection of their new mattress. Regardless of the environmental bona fides of a mattress, the consumer will pay the same Product Stewardship Fee. The charging of a uniform Product Stewardship Fee also fails to incentivise manufacturers and importers of mattresses to adopt more environmentally sustainable practices.

A uniform Product Stewardship Fee also fails to incentivise consumers in the choices they make about recycling or otherwise disposing of their end-of-life mattress. The Product Stewardship Fee in no way contributes to the recycling of the consumers then end-of-life mattress and does not incentivise the consumer to make the investment to have their end-of-life mattress recycled. In circumstances where the charging of a Product Stewardship Fee will result in consumers still having to pay to have their end-of-life mattress recycled, the Greenlit Brands Group believes that the Product Stewardship Fee should be designed to provide recognition to consumers making sustainable choices in relation to their end-of-life mattress.

The Greenlit Brands Group firmly believes that any scheme in which a uniform Product Stewardship Fee is charged will not obtain the necessary support of the whole of industry as retailers operating in the value segment of the industry will be unable to participate in the scheme due to competitive pressures and the inability of consumers in the segment to pay a Product Stewardship Fee.

2. Notice to consumer of Product Stewardship Fee

The Proposed Scheme should enshrine a right for retailers to separately identify the Product Stewardship Fee charged on a consumer's invoice. This is particularly so in circumstances where the design of the Proposed Scheme is intended to have the consumer ultimately fund the Product Levy Fee.

Notice of the Product Stewardship Fee to consumers will also assist to address competitive disadvantages which may arise as a result of retail brands electing not to join the ABSC and participate in the Proposed Scheme. It will also aid in educating consumers about the true costs, both financial and environmental, in the disposal of end-of-life mattresses.

3. Whole of business membership requirements

Brands within the Greenlit Brands Group believe the requirement for membership fees to be paid by the retailer for all retail premises operated is a disincentive to retail brands joining the ABSC and participating in the Proposed Scheme. This is particularly the case where:

- there are significant limits on the geographical operation of the Proposed Scheme meaning retail brands are required to pay a membership fee, and facilitate the pass-through of a Product



Stewardship Fee to consumers, in areas where the purported benefits of the Proposed Scheme cannot be realised;

- the fact the Proposed Scheme does not require entire franchise networks to become members of the ABSC meaning franchise networks may obtain the benefit of association with the ABSC and the Proposed Scheme without financially contributing to the scheme; and
- the Proposed Scheme does not appropriately recognise existing pathways for end-of-life mattresses, including schemes already operated by retail brands.

Brands within the Greenlit Brands Group believe that any membership requirements imposed by the ABSC should have regard to the areas in which the Proposed Scheme operates, with recognition provided to retail brands which facilitate the recycling of end-of-life mattresses, whether through ABSC accredited recyclers or other providers.

Any other arrangement would effectively penalise retail brands with operations in areas where the Proposed Scheme does not operate and which have already implemented arrangements to facilitate the recycling of end-of-life mattresses.

4. Participation of franchise networks

The Greenlit Brands Group acknowledge that participation in the Proposed Scheme has the potential to provide a competitive advantage and will assist businesses in demonstrating their sustainability and corporate social responsibility credentials. However, a number of franchise systems operate in the bedding and mattress retail industry sectors.

The Greenlit Brands Group is concerned that franchise networks may seek to take advantage of the benefits of being members of the ABSC and participating in the Proposed Scheme by taking up a membership at the franchisor level (which would ordinarily include any company-operated stores in the network) without a corresponding requirement for franchisees within the network to follow suit. This could result in circumstances where the franchisor is promoting its association with the ABSC with very few retail stores being members.

Subject to any limitations under the franchise agreements concerned, provided the franchisor amends its manual (or equivalent) to include a requirement to join the ABSC and participate in the Proposed Scheme, and provided a franchisor gives its franchisees reasonable notice of this requirement, a franchisor should be able to require that franchisees join the ABSC and participate in the Proposed Scheme.

To ensure that franchise networks or particular franchisees do not obtain the benefits of associated with membership of the ABSC and participation in the Proposed Scheme in circumstances where the entire network has not become members of the ABSC and agreed to participate, a minimum percentage of eligible stores should be set before a franchise network can promote its membership with the ABSC and participation in the Proposed Schemes. Individual franchisees or company-operated retail stores that have joined the ABSC and are participating in the Proposed Scheme should however be permitted to locally promote their participation in the Proposed Scheme.

5. Addressing initial competitive disadvantages

The pass-through of the Product Stewardship Fee to consumers during the introduction of the Proposed Scheme will put participating retailers at a competitive disadvantage to their peers who are not participating in the Proposed Scheme. This is particularly the case for retailers who operate in the value segment of the industry.

Unless these retailers can absorb part or all of the cost of the Product Stewardship Fee into existing margins, until the Proposed Scheme is taken up broadly by industry, the retailers will likely lose market share (acknowledging that some consumers may change their purchasing behaviours to buy from a retail brand participating in the Proposed Scheme).

We suggest that the ABSC adopt a phased approach to the introduction of the Proposed Scheme such that the Product Stewardship Fee only becomes payable once the Proposed Scheme has been adopted by at least a majority of industry participants.

6. Lack of coverage for recycling operations

Currently, the processing capacity for mattress recycling is concentrated in New South Wales and Victoria, with recyclers located in capital cities or conurbation.

The ABSC is exploring operations in capital cities in Queensland and South Australia however, at present, there is limited to no capacity for recycling operations in these jurisdictions. There is also limited scope for recycling operations outside of capital cities without significant logistics costs in having end-of-life mattresses transported from regional centres.

The Greenlit Brands Group believes the ABSC must accelerate the identification of recycling operations which can be accredited to ensure national coverage for the Proposed Scheme. If this is not possible, the Greenlit Brands Group believes the Proposed Scheme must be designed to incorporate the costs associated with storing and then transporting end-of-life mattresses to locations where they can be recycled.

7. Leveraging off existing collection pathways

The Greenlit Brands Group the design of the Proposed Scheme does not adequately prioritise leveraging existing collection and recycling pathways for end-of-life mattresses. The Greenlit Brands Group is concerned that as a result of this, elements of the Proposed Scheme may indirectly result in a greater impact on the environment.

A range of schemes are already in operation across Australia to facilitate the collection and recycling or disposal of end-of-life products from consumers, including whitegoods, furniture and mattresses. These schemes are often operated by local councils, with or without a fee.

Leveraging off the existing collection pathways also eliminates the need for a collector rebate to be considered, or alternatively redirected to supporting the existing collection pathways. This is discussed further below.

Prioritising collaboration with existing collection pathways will assist to minimise duplication of activities and, by partnering with the operators of existing pathways, the ABSC will be better placed to address the implications of the limits on the geographical scope of the Proposed Scheme. This is because there will be greater scope to centralise collection activities to ensure scale in the transport of end-of-life mattresses for recycling.

8. Ensure the ability of the retailer to charge a collection/pick-up fee

Increasingly, retailers in Australia use third-party logistics providers to conduct their deliveries. This trend is likely to continue as more participants enter the market with pure online operations.

Even for established retailers with bricks and mortar operations, the use of third-party logistics providers (including delivery drivers) is high. The result is that retailers generally do not operate their own fleet of delivery vehicles meaning that vehicles do not return to a centralised depot operated by the retailer at the end of each day.

The use of third-parties to conduct delivery operations means there is a direct cost to the retailer in delivering a mattress to a consumer. As the vehicle is not scheduled to return to a centralised depot, any collection and return of goods is also at a direct additional cost to the retailer.

There are further additional costs that will be incurred by a retail brand in arranging the return of a mattress for recycling at end-of-life. This includes packing materials to bag the mattress for transport and storage costs at the destination before the mattress is collected for recycling.

As currently designed, no rebate payable under the Proposed Scheme for member retailers who facilitate the collection and/or recycling of an end-of-life mattress from consumers.

In these circumstances, the Greenlit Brands Group believe it is critical that, unless the Proposed Scheme is modified to include the costs of collection and recycling of end-of-life mattresses, a clear right for



retail brands to charge an additional fee to consumers for the collection and/or recycling of end-of-life mattresses must be enshrined in the Proposed Scheme.

9. Payment of a collector rebate

The Greenlit Brands Group is not supportive of the payment of a collector rebate and believes that the introduction of a collector rebate will unnecessarily complicate the Proposed Scheme.

As detailed elsewhere in this document, the Greenlit Brands Group believes there are a number of alternatives available to the ABSC to aid in facilitating the collection of end-of-life mattress for recycling. In these circumstances, unless there is clear evidence of a difficulty in identifying contractors who can be engaged to transport end-of-life mattresses from designation collection points to recyclers for recycling, the Greenlit Brands Group believes that the payment of a collector rebate is not necessary.

Instead of the payment of a collector rebate, the amounts that would otherwise be paid should either:

- be paid as an additional fee to the accredited recycler who will be responsible for the collection of mattresses from designated collection points
- be paid to the collection point to assist to cover the costs of storage prior to collection
- be redirected to assist consumers to afford end-of-life recycling of their mattress.

In each case, the redirection of the payment will support the ultimate objectives of the Proposed Scheme.

10. Requirement for payment to be made by the consumer to recycle the mattress

The Proposed Scheme does nothing to influence consumer behaviours when a decision is made by the consumer whether to recycle their end-of-life mattress.

Ordinarily, consumers are required to pay in excess of \$70 (and often more) to have an end-of-life mattress recycled. This may be paid to the retailer as part of the cost of collection of the mattress (which aids in recovering the reverse logistics costs incurred) or to a third party operating a collection business.

Alternatively, a consumer can elect to dispose of an end-of-life mattress, usually through the existing collection pathways addressed above. This ordinarily is at no cost to the consumer provided they are able to transport the mattress to the collection pathway or the collection pathway is from their residence however the alternative pathways ordinarily do not result in the end-of-life mattress being recycled without intervention from a third party (such as the operator of the collection pathway).

Under the Proposed Scheme, regardless of the decision made by the consumer about their end-of-life mattress, the consumer is required to pay the same Product Stewardship Fee for their replacement or new mattress. This does not incentivise consumers to change their behaviour in the manner in which they dispose of their end-of-life mattress and will result in a model where the primary barrier to recycling end-of-life mattresses, namely cost, is not meaningfully addressed.

In order for the Proposed Scheme to be effective, the Greenlit Brands Group believes it should be altered to incentivise consumers to make the decision to recycle their end-of-life mattress. There are a range of ways this could be achieved, including through the provision of rebates at allocated collection spots (as is the case for PET bottles), through the provision of rebates to retailers to off-set the costs associated with facilitating the recycling of the end-of-life mattress (including reverse-logistics costs and the actual costs of recycling) or through a wholesale redesign of the Proposed Scheme so that the relevant levies were adequate to incorporate the cost of recycling. This would also offer an opportunity to redistribute the costs associated with recycling end-of-life mattresses.

The Greenlit Brands Group does not advocate for any one approach however is firmly of the view that without the Proposed Scheme including incentives to alter consumer behaviours in the decisions they



make about their end-of-life mattress, it will not be as successful in diverting end-of-life mattresses for recycling as would otherwise be the case.

Next steps

The Greenlit Brands Group has provided a broad range of feedback for consideration by the ABSC as it continues to refine the Proposed Scheme. The feedback has been provided as our businesses see the value in an industry-led product stewardship scheme to address sustainability concerns associated with end-of-life mattresses. However, given the significant breadth of the industry sector and the fractured ownership of retailers within the sector, the Greenlit Brands Group believes that for any product stewardship scheme to succeed, it must be designed to operate fairly and efficiently across the entire sector.

In that light, we trust that the ABSC will find the feedback included in this document useful as it considers the structure of the Proposed Scheme to ensure the most viable and sustainable scheme can be developed which will drive the behavioural and cultural changes necessary.

We note that the ABSC is already in direct discussions with representatives of a number of our businesses and encourage the ABSC to continue this dialogue.

We would be happy to facilitate a meeting between representatives of the Greenlit Brands Group (and its businesses) and the ABSC to discuss the contents of this document further. If you would like to do so, please contact Michael Cooper, Chief Legal Officer at [REDACTED] who will be able to coordinate relevant meetings.



Michael Ford
Group Executive Chairman and CEO



Blaine Callard
Chief Executive Officer – Freedom



Ian Vann
Chief Executive Officer – OMF



Kieron Ritchard
Chief Executive Officer – Fantastic Furniture



George Giannopoulos
Managing Director – FutureSleep



Simon Beaty
Chief Executive Officer – Snooze

The background of the slide features a photograph of a bed with white and teal linens. The top portion of the image shows a white pillow and sheet, while the rest of the image is dominated by a teal-colored sheet or blanket that is folded and draped, creating soft shadows and highlights. A semi-transparent teal overlay covers the bottom two-thirds of the image, providing a background for the text.

Product Stewardship and Greenlit Brands

Feedback considerations

30 March 2022

01

Introductions

02

Recap Scheme
Objectives

03

Overview of GB
sustainability
objectives

04

GB concerns -
discussion

05

Minimising
affordability impacts



ABSC scheme objectives



Scheme success criteria

Acceptability of the scheme to consumers and the general public

Meets members' objectives

Financial sustainability

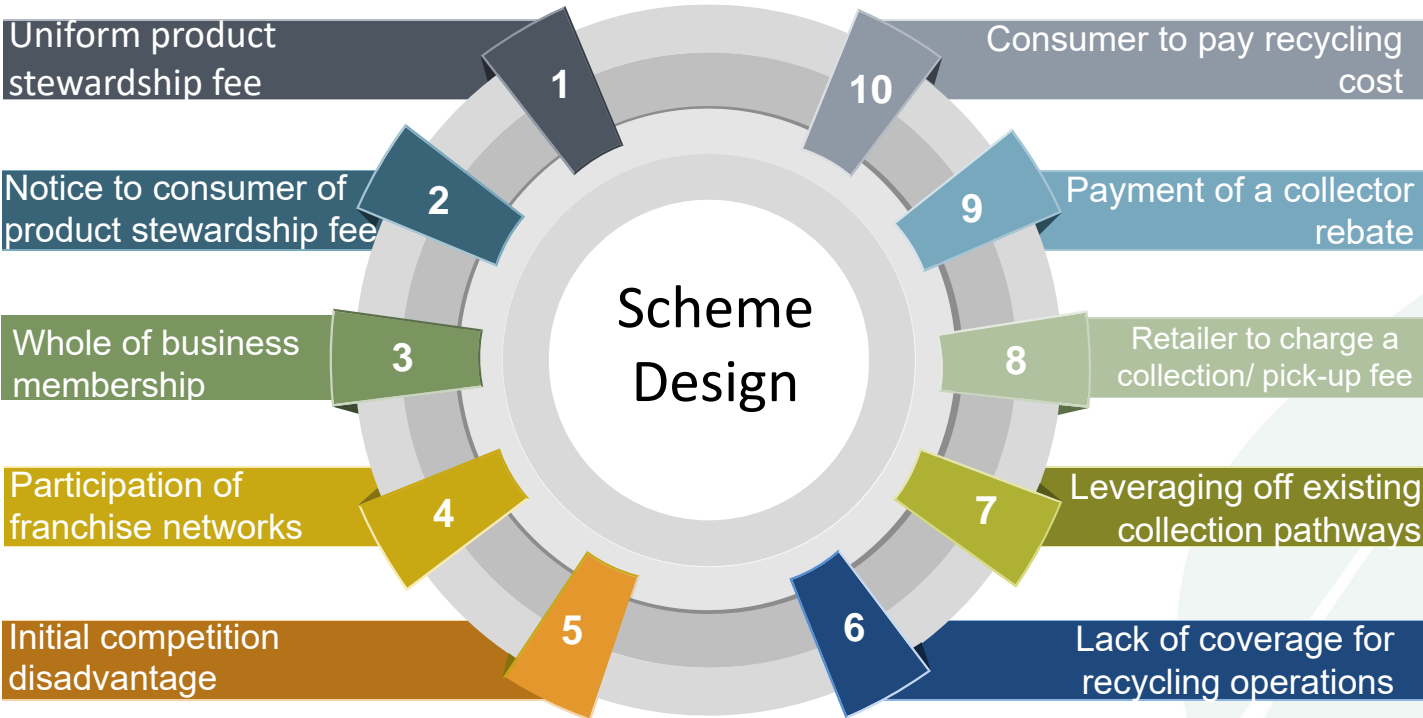
Environmental performance

Acceptability of the scheme to the Federal and Local Governments

Scheme does not distort the market (maintains level playing field)

Increased geographic access

Greenlit Brands Feedback –key points



1. A uniform product stewardship fee

(i) Impact on lower socio-economic groups

Considerations

- Global experience
 - All US Schemes (MRC) flat fee across all price ranges
 - France 2-tier based on size
 - Belgium flat fee
 - Few differentiated schemes
 - Tyres based on size (on passenger unit equivalent - EPU) Batteries based on EBU (24g)
 - MobileMuster moving to membership fee
- Collection and recycling currently costs the same regardless of type, size or price
- Average collection and recycling cost in metro areas is more than proposed PS fee.
- **How do you apportion overheads and transport cost across low-cost mattresses?**

How can we support LSE groups?



1. A uniform product stewardship fee

(ii) Impact on competition

Considerations

- The nature of voluntary product stewardship
- Requires brand and Scheme marketing and awareness-raising
- Working with Government policy-makers and PSoE on broad product stewardship awareness raising
- Create FOMO – fear of missing out
- Scheme accreditation under Fed program
- This is an opportunity to separate one's business from the rest and show industry responsibility, leadership and environmental commitment by example.

1. A uniform product stewardship fee

(iii) Fails to incentivise consumers to include environmental sustainability in their purchase decision-making

Considerations

- Differentiation by being a Participant
- Accreditation (recyclers & collectors) means transparency & raising the bar
- Contribution to R&D
- Stories (not greenwashing) about proactive participants
- Collaboration with brands on leadership
- Recyclable versus recycled
- % of rebates to collectors and recyclers is expected to be passed on to consumer

What types of mattresses do you sell?

Eco-modulation

Modulated product fees according to their level of eco-design

- Eco-modulation has little direct effect in the short term but may have important indirect effects in the long term.
- Eco-modulation will be all the more effective if it is combined with other instruments.
- PROs play a key role in the implementation, support and evolution Eco-modulation.
- Eco-design requires collective support that can be provided by PRO

Source:

[Eco-modulation as a driver for eco-design: A dynamic view of the French collective EPR scheme - ScienceDirect](#)

- EBIA - European Bedding Industries Association - comparing current design to eco design. Eco-modulated fee. *Very sensitive*. Working with technical centre in Belgium. Forced to do it as this regulation will come.
- Belgium expected to introduce eco-modulation by 2025
- Affected by certification, life-span, ability to separate, availability of markets for quantities (min/max), method of deconstruction

This is an enormous and contentious piece of work.
Who should fund it?

1. A uniform product stewardship fee

(iv) Missed opportunity to drive consumer behaviour through awareness-raising

Considerations

- A critical role of the ABSC and Participants is raising consumer awareness of the issues of EOL mattresses and present Participant and Scheme actions to reduce the environmental impacts of mattresses

2. Participation of franchise network

Considerations

- Each brand is responsible for ensuring their franchisees participate
- It is imperative that the franchisees are on board to ensure the integrity of the Participant's brand and the Scheme.
- ABSC agrees with GB suggestion

3. Whole of business membership requirements

Considerations

- Current membership model requires fee only where collection and recycling is available
- PS fee will largely replace this and apply to all locations
- All mattresses in landfill have a cost and will take resources to address
- Unless all mattresses attract the fee then only the serviced areas will continue to benefit and the expansion of the scheme will be stunted
- The more mattresses that a PS fee is applied to the greater the opportunity to increase the contribution to mattress recycling, upstream/downstream R&D and consumer awareness marketing

4. Notice to consumer of product stewardship fee

Considerations

- ACCC will be prescriptive on this point
- Addressed in implementation phase

5. Addressing initial competition disadvantages

Considerations

The PS fee will be determined by uptake by industry. Without sufficient support the voluntary approach will fail

6. Lack of coverage of recycling operations

Considerations

- The ABSC is heavily focused on expanding coverage
- Current values for recovered materials v costs of collection and recycling are NOT attractive to recyclers hence ABSC's focus on R&D
- This is the reason for offering rebates to recyclers

7. Leveraging off existing collection pathways

Considerations

- ABSC is already addressing these points
- This is a primary reason for collector rebates

8 Ensure the ability of the retailer to charge a collection / pick-up fee

Considerations

- Retailers may still charge their collection and recycling costs to the consumer. In this scenario they will receive the consumer portion of the rebate
- This is an opportunity to engage the consumer to a better buying experience and potentially improve sales and margins by offering a solution to a difficult problem, aligning it with the environmental and social benefits of the scheme and the Brand's sustainability and service agenda

9. Payment of collector rebate

9. Payment of collector rebate

Considerations

- The ABSC is open to discussion on the best use of this rebate.
- Some recyclers are collectors and would receive both rebates
- Both financial and environmental considerations apply.

10. Consumer to pay recycling cost

Considerations

- A portion of the rebates is required to be passed on to the consumer
- ABSC is open to how best to achieve this
- Retailers organising the collection and recycling will receive the consumer portion of rebate which they may pass on to their customer
- With a voluntary scheme, and the levy not being applied to ALL mattresses sold, this can only be a contribution to the recycling cost.
- The more brands we bring on the higher the rebate will eventually be