

Review of Operations

TIC Mattress Recycling

Factory 3, 899 Mountain Hwy, Bayswater North

This statement has been prepared as a result of a detailed investigation of the operations of TIC Mattress Recycling (TMR), which was conducted as part of a wider review of the mattress recycling sector in Victoria between July and December 2015.

While the efforts of most mattress recyclers Boomerang Alliance inspected are generally meritorious, Boomerang Alliance identified both significant risks and hazards at most operations and in some instances observed suspicious activity that may be unlawful – indicating regulators, local government and reprocessors all need to look closely at mattress operations.

Some of the key issues with mattress recycling identified in our review include:

- Illegal dumping is evident. In the mattress industry has 2 major sources – the professional scale of operation where mattress collectors illegally stockpile at unpermitted premises; and fly tipping - i.e. the dumping of smaller quantities of waste along roadsides and outside op shops or transfer stations. Local government reports that, on average, 8% of all end of life mattress recovery has been illegally dumped – we identified at least 1 suspicious operation within a major Victorian mattress recycler (not TIC) which has been reported for investigation and potential prosecution.
- We observed large quantities of pollution escaping sites (synthetic fibres and other microplastics) as a result of poor controls to ensure waste materials did not escape the site.
- Consistent exaggeration regarding claimed recycling rates and in turn somewhat misleading information communicated to rate payers.
- A number of dismantling operations are undertaken on landfill facilities (inside the gate) and there appears to be poor controls over weighing the contractor's disposal of recycling residuals (leading to potential waste levy avoidance by the dismantling operation).
- Inconsistent application (and disclosure) of health standards and sterilisation of re-used and/or refurbished mattresses.
- Worker safety hazards in the collection, dismantling and resource recovery process.
- Sub-standard due diligence processes by councils in awarding mattress recycling contracts.

We found that TIC Mattress Recycling was the exception to the norm. TIC Mattress Recycling demonstrated good management control and actively seeks to maximise its recycling while not compromising overall environmental and safety outcomes (i.e. by managing the hazards above), and is the clear best practice standard in Victoria. Features that led Boomerang Alliance to this conclusion included:

1. TMR was open to independent review, was transparent in providing factual information to substantiate its legitimacy and took immediate action to improve operations while BA conducted this review.
2. All mattresses received are actually processed recycled and the proportion of material recovered is relatively high at over 60%.
3. The facility processes all mattresses, stores all recovered materials and waste inside its factory – eliminating much of the waste migrating off site unlike other facilities and ensuring that the site (and materials) are not infested by vermin.

4. TMR is the only operation using curtains to restrict airborne fibres and pollutants, an important worker safety and pollution mitigation strategy.
5. There is a solid paper trail proving that every mattress received is recycled or refurbished. TMR also recovers a consistently high proportion of the materials in a mattresses to lift recovery without creating environmental risk.
6. TMR demonstrated strong diligence in ensuring its partners genuinely recycle the materials it dispatches and provides a genuine environmental benefit.

A summary of TMR's performance (benchmarked against the industry norm) is as follows:

Aspect of Mattress Recycling	Observation at TIC Mattress Recycling	TMR Score	Industry Av. Score
Regulatory Compliance	Planning Permit & Fire Inspection in place. Complies with Planning Permit.	5/5	3/5
OH&S Management	Only operation that manages dust and fibres. Manual lifting and injury hazards well controlled. OH&S systems are well managed.	5/5	2/5
Level of Recycling	100% of collections were processed. At least 60% of mattress components are recycled.	4/5	3/5
Accuracy of Environmental Claims	No deliberate misrepresentation observed. Information regarding the proportion of mattresses recovered should be more specific.	4/5	3/5
Accuracy of Operational Description	Operational description is too focused on new operation. A summary of the current operation should be published.	3/5	2/5
Pollution Controls	Very good capture of particulates and dust.	5/5	2/5
Fire Hazards	Very Good. 1 small issue regarding the need to reposition a fire hose reel.	4/5	2/5
Management Control	Good record keeping overall. Very transparent and provided evidence to show all mattresses collected are responsibly handled. Strong controls over their supply and disposal chain.	5/5	2/5
Average Score		4.5/5	2.7/5

Dave West, December 2015