

Review of the Environment Protection (Waste to Resources) Policy 2010

Joint Submission Acknowledgement

This submission is presented jointly by the **Australian Bedding Stewardship Council (ABSC)**, in collaboration with **Soft Landing, Bounce Back**, and the **Australian Council of Recycling (ACOR)**. Together, these organisations bring diverse expertise and a united commitment to advancing South Australia's circular economy goals.

Each partner plays a distinct role:

- **ABSC**: Authorised Product Stewardship scheme for the bedding industry, aligning stakeholders across the value chain to achieve systemic sustainability outcomes. The scheme represents 18 Industry members and has authorised 10 recyclers nationally.
- **Soft Landing**: National social enterprise and registered charity that collects and recycles mattresses to keep waste out of landfill and create jobs for people experiencing barriers to employment. Soft Landing is the largest mattress recycler in Australia.
- **Bounce Back**: A key South Australian innovator in recycling infrastructure and material recovery technologies.
- **ACOR**: The peak industry body for Australia's resource recovery, recycling, and remanufacturing sector in, aiming to lead the transition to a circular economy through the recycling supply chain, with a priority of a nationally harmonised resource recovery framework.

These signature organisations are all committed to supporting South Australia's transition to a circular economy and welcomes the opportunity to provide feedback on the W2R EPP review. This joint submission represents shared priorities and demonstrates a cohesive strategy to address mattress waste challenges within South Australia.

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1. General Comments to the Policy Review

Context

We strongly support the EPA's initiative to modernise the W2R EPP to align with the principles of a circular economy and address the significant changes in the waste and resource recovery sector since 2010.

The revised W2R EPP should prioritise landfill reduction, mandate product stewardship within government procurement, expand take-back and refurbishment programs and stimulate the development of local recycling infrastructure, while fostering innovation and investment in circular economy practices.

Due to their size, material composition, and recycling challenge, mattresses represent one of the most complex waste streams. Based on per capita collected volumes from NSW, ACT, Victoria and Western Australia we estimate total annual mattresses reaching EOL in South Australia to fall in the range of 150,000 to 170,000. Of this volume an estimated 81% occurs within a radius of less than a 50-minute travel time from Adelaide CBD.

Despite such a significant portion of End Of Life (EOL) mattresses being within an area that could be serviced by capable, ABSC accredited recyclers operating at scale, less than 20% are collected by the ABSC's only accredited recycler in metropolitan Adelaide. This leads us to believe that up to 80% or 110,000 of EOL mattresses collected within a serviceable radius of Adelaide are likely going to landfill. In addition, a further 25,000 EOL mattresses per annum outside this serviceable radius are likely going to landfill. In the context of the significant environmental and operational challenges posed by landfilled mattresses including:

- **Space Consumption:** Mattresses take up disproportionate amounts of valuable landfill space that could otherwise accommodate biodegradable waste
- **Landfill Instability:** Their structure creates pockets within the landfill, leading to destabilization and the accumulation of methane gas
- **Chemical Leaching:** As mattresses decompose over an estimated 120 years, harmful chemicals can leach into the environment, posing long-term risks of soil and water contamination
- **Fire Hazards:** Mattresses are highly flammable, increasing the risk of fires in landfill facilities
- **Pest Attraction:** Improper disposal of mattresses can attract pests, further exacerbating landfill management challenges

Urgent action is required to drive a circular approach via methods already proven to work in other states of Australia.

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The consumer desire to engage in responsible EOL outcomes for mattresses was highlighted by a 2024 survey conducted by Soft Landing. In Australia's first consumer mattress sustainability survey (attached), over 1,000 Australians responded proving they are ready to act, and are eager to make sustainable choices. 96% wanted their local councils to provide a free mattress collection and recycling service and 80% are willing to pay extra for a retailer who offers access to this service. Consumers just need the right support to get there.

SA's leadership in circular economy initiatives provides a vital opportunity to address these challenges holistically. This joint submission draws on the expertise, networks and knowledge of peak organisations within the mattress recycling sector to propose key recommendations to improve the W2R. The Australian Bedding Stewardship Council (ABSC), alongside Soft Landing, Bounce Back and ACOR, is committed to supporting South Australia's efforts to create a sustainable, closed-loop system for mattresses.

Summary of Recommendations:

1. Advance South Australia's circular economy goals through investment and focus on sustainable mattress management.
2. Introduce a landfill ban on mattresses - developing robust recycling infrastructure, market capability and downstream markets for recovered materials.
3. Promote product stewardship as a critical tool for lifecycle accountability and innovation.
4. South Australia should work with the Australian Government to harmonise circular economy rules, including resource recovery standards and definitions, ensuring consistency and preventing regulatory gaps.

2. Policy Reform Recommendations

a. Enforce a Comprehensive Landfill Ban on Mattresses

Proposal

It is of vital to include mattresses in the prohibited landfill waste category, also extending the ban to encompass mine sites to close disposal loopholes.

Rationale

A landfill ban reduces environmental burdens, ensures consistent application across all sectors and drives volume to recycling options thus underpinning investment in recycling infrastructure.

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Alignment with EPA Goals

Key Reform Areas 3 & 5: Maximizing resource recovery and protecting environmental and human health.
Supporting Pillars:

- **Phased Implementation Timeline:** Allow time to develop take-back schemes, infrastructure, and downstream markets before enforcement.
- **Infrastructure Grants:** Provide targeted funding for regional and remote recycling hubs, ensuring access statewide.
- **Alignment on Recovery Definitions:** Adopt federal recovery definitions to prevent practices like using shredded mattresses as landfill day cover from being misclassified as recovery.
- **Increased Public Education** on proper disposal options. Invest in education and behaviour change programs, such as Recycle Mate, to engage communities and businesses in responsible mattress disposal and recycling options.

b. Product Stewardship Integration in Procurement

Proposal

Mandate product stewardship participation for all government procurement involving mattresses.

Rationale

Stewardship programs ensure lifecycle accountability, driving innovation in product design and end-of-life management.

Alignment with EPA Goals:

Key Reform Areas 2 & 4: Avoiding waste generation and fostering strong markets for recovered resources.

Supporting Pillars:

- **ABSC Stewardship Model:** ABSC's framework integrates stakeholder collaboration, recycling metrics and circular design.
- **Employment Opportunities:** Stewardship-driven recycling and refurbishment programs create local jobs and economic resilience.
- **National Alignment:** Align South Australia's procurement policies with national stewardship standards and ACCC guidelines to ensure consistency.



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c. Expand and Strengthen Take-Back and Refurbishment Programs

Proposal

Introduce government (via transfer stations and bulky waste pick-ups) and retail (via takebacks at time of purchase) supported take-back and refurbishment schemes to reduce landfill dependency and extend product lifecycles.

Rationale

Take-back programs driven through retailers and transfer stations increase mattress recovery rates while supporting vulnerable communities through refurbished products.

Alignment with EPA Goals:

- **Key Reform Areas 2, 3, & 4:** Avoiding waste, maximising recovery, and creating strong markets for recovered materials.

Supporting Pillars:

- **Public Awareness Campaigns:** Increase consumer participation by highlighting take-back options and ongoing initiatives provided by ABSC, Bounce Back and Soft Landing within the market.
- **Social Reuse:** Establish programs to refurbish mattresses for low-income and remote communities. Case study: ABSC's work with our industry partners such as ReLove and Good360 to establish [Reuse pathways](#) for bedding and [RemoteOp Shop in the Northern Territory](#).
- **Cost Accessibility:** Address financial and logistical barriers with (potential) subsidies for low-income households / not for profits, council partnerships and accessible drop-off locations.

d. Investment in Recycling Infrastructure

Proposal

Support recyclers with financial grants for capital expenditure (CapEx) to scale and optimize operations.

Rationale

Recycling infrastructure is critical to managing the complexities of mattress waste sustainably and efficiently. Only one accredited mattress recycler, Bounce Back, operates in South Australia, which represents capacity concerns for an accelerated mattress collection scheme. Additionally, the recent transition from Minda Industries to Bedford Industries casts doubt on the long-term viability of mattress recycling infrastructure in SA.

If, as recommended, mattresses are banned from landfill then scalable capacity to efficiently deal with the volume will need investment in:

- collection equipment such as trucks and hook bins,
- processing equipment that presents downstream materials in a form that maximises the value of recoveries at an economically viable cost.

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Alignment with EPA Goals:

- **Key Reform Areas 1 & 4:** Supporting the transition to a circular economy and strengthening recovery markets.

Supporting Pillars:

- **Innovative Technology:** Fund advanced processing equipment for materials like memory foam and pocket springs .
- **Regional Expansion:** Establish recycling hubs in under-served areas to reduce transportation costs and improve accessibility.
- **Market Development:** Collaborate with peak bodies: ACOR or the Waste Management and Resource Recovery Association of Australia and other stewardship schemes (Tyres and Textiles particularly) to create robust downstream markets for recovered materials.

3. Highlighting Product Stewardship Value

Product stewardship can be an integral element to achieving circular economy goals, if effectively designed and delivered. ABSC's Product Stewardship Scheme provides a framework for success, demonstrated by:

- **Transparency:** Detailed reporting tracks mattress recovery rates and material flows – not just collection rates.
- **Innovation:** Projects such as modular bed bases and circular product designs highlight ABSC's commitment to ensuring that waste and resource recovery is addressed in the design and manufacture stages of mattress production.
- **Collaboration:** ABSC is endeavouring to lead other Federal stewardship programs to harmonise practices and enhance efficiency, as well as ensuring the entire value chain for mattresses can engage with the scheme – from manufacturers, importers, charities, hotels, recyclers, and government agencies. It is not possible for one company or one department to drive the changes needed at an industry level and PS schemes can help close that gap.
- **Impact:**
 - Diverted over **497,000 mattresses** from landfill over March-September 2024, while scaling recyclers nationwide.
 - Worked with Remote Op Shop and Urapunga Community to get the **first tranche of beds on country to be tested**, to drive the 'Mattresses for Community' Project, with the double aim of assisting with EOL resource management but also focusing on the health impacts of Rheumatic Heart Disease on First Nations communities.

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- Working with Government bodies and our recycler network to expand the authorised recycler offering in Tasmania, FNQ and Northern Territory.
- Released our first 2 x Expressions of Interest around key research projects with industry-wide benefits on mattress design and also JV investment for a recycling operation in SEQ.

4. Risks and Mitigation Strategies

Infrastructure Gaps

- **Risk:** Insufficient facilities could delay landfill ban compliance.
- **Mitigation:** Provide CapEx grants and prioritize mobile recycling units for underserved regions.

Mine Site Exemptions

- **Risk:** Allowing mine sites to dispose of waste on-site undermines the landfill ban.
- **Mitigation:** Extend the landfill ban universally, including enforcement at mine sites.

Weak Downstream Markets

- **Risk:** Limited markets for recovered materials may lead to stockpiling.
- **Mitigation:** Collaborate with ACOR to strengthen industry adoption of recycled materials through incentives.

Implementation Delays

- **Risk:** Insufficient lead time for establishing take-back schemes and infrastructure.
- **Mitigation:** Propose a phased timeline to ensure readiness and stakeholder engagement.

Recovery Definitions

- **Risk:** Misaligned standards create reporting loopholes.
- **Mitigation:** South Australia should work with the Australian Government to harmonise circular economy rules, including resource recovery standards and definitions, as recommended by the Circular Economy Ministerial Advisory Group in their final report Circular Advantage.

5. Conclusion

This joint submission represents the collective commitment of ABSC, Soft Landing, Bounce Back and ACOR to advancing South Australia's circular economy goals. By prioritising product stewardship, recycling innovation, infrastructure, public education and aligned policy frameworks, we believe the South Australian Government has the potential to create lasting systemic change in mattress waste management.

We welcome the opportunity to work closely with the EPA and other stakeholders to bring these recommendations to fruition.

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Attachments

Mattresses Matter Sustainability Survey [MattressMatters-SurveyReport](#)

Reuse: [Collaborating for Reuse Pathways in the Northern Territory](#)

Redesign: [Mattress Design for Remote First Nations Communities](#)

Endorsements

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