

Mattress EPR Background Document

Massachusetts EPR Commission Meeting
June 10, 2025



The Product Stewardship Institute

The Product Stewardship Institute is a policy expert and consulting nonprofit that powers the emerging circular economy to ensure products are responsibly managed from design to end of life. In 2000, PSI pioneered product stewardship in the United States by convening diverse stakeholders to build extended producer responsibility (EPR) policies and programs. Drawing on global best practices and expansive multinational relationships, our facilitated dialogues, policy models, and expert testimony have helped enact 145 EPR laws in 34 states across 20 product categories, including packaging, paint, batteries, mattresses, and electronics. Our members include state, local, and tribal governments in 48 states, and we partner with more than 120 businesses, academic institutions, environmental nonprofits, and international governments. Together, we advance scalable solutions that protect people and the planet. Join us at www.productstewardship.us.

Acknowledgements

PSI prepared this report for the Massachusetts Department of Environmental Protection as an information resource for the Extended Producer Responsibility Commission.

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1. History of Mattress EPR in the U.S.

In 2012, the Product Stewardship Institute (PSI) worked with Connecticut state and local governments and Reworld to develop model mattress EPR legislation with input from mattress recyclers and producers. In 2013, Connecticut used the model legislation to enact the first mattress EPR law in the country. That same year, California and Rhode Island established mattress EPR laws based on the same model. In 2022, PSI worked with Oregon state and local government officials, the International Sleep Products Association, and the Mattress Recycling Council to develop a bill that expanded on the original policy model to incorporate lessons learned from 10 years of EPR implementation. That bill was enacted into law in 2023 and the program launched in 2025.

Mattress EPR Timeline

- 2012** PSI Model Mattress EPR Legislation
- 2013** Connecticut Enacts First Mattress EPR Law in the U.S., followed by Rhode Island and California
- 2015** Connecticut Mattress EPR Program (Bye Bye Mattress) Launches
- 2023** Oregon Enacts an Updated Mattress EPR Law
- 2025** Oregon Mattress EPR Program (Bye Bye Mattress) Launches

2. Mattress Problems, Interests, Goals

Wasted Resources and Lost Economic Potential

Wasted resources

Americans dispose of more than 50,000 mattresses each day.¹ Although 90% of mattress components are recyclable² – including valuable materials like steel, wood, cotton, and foam – less than 10% of used mattresses are recovered for reuse or recycling nationally.^{3,4} Materials

¹ Mattress Recycling Council Program Guide, page 1. Accessed June 10, 2025 at <https://mattressrecyclingcouncil.org/wp-content/uploads/2021/09/MRCprogramguide.pdf>

² Mattress Recycling Council estimates that 75 percent of mattress materials are recyclable, but some recyclers estimate it is higher, at 90 percent.

³ U.S. Environmental Protection Agency, Facts and Figures about Materials, Waste, and Recycling for durable goods as of 2018 estimates that less than 1 percent of furniture, and furnishings (including mattresses) are recycled. Accessed June 10, 2025 at <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/durable-goods-product-specific-data#DurableGoodsOverview>

⁴ Based on mattress generation estimates for the country of 50,000 per day (18.25 million per year) and MRC program data on number mattresses recycled, MRC recycles about 10 percent of mattresses generated nationally.

recycled from mattresses can be used as feedstock for numerous products. For example, the foam padding of a mattress can be turned into carpet padding or animal bed padding, the wooden frames can be shredded to produce landscaping mulch, the steel springs can be recycled as metal scrap to be remanufactured into new metal products, and new recycling technologies are spurring more outlets for recycled mattress materials.

Wasted landfill capacity

Due to their bulky nature and composition, mattresses take up significant space in landfills, many of which are stretched to capacity. In Massachusetts, prior to investments in recycling capacity and a ban on the disposal of mattresses, most mattresses were either disposed in-state through waste-to-energy or shipped to out-of-state landfills at significant cost and transportation emissions owing to limited in-state landfill capacity.

Lost Jobs and Economic Value

Reuse and recycling generate 30 times more jobs than landfilling waste, according to the Tellus Institute.⁵ Mattress refurbishment and recycling is still labor-intensive, and the skills required can be easily learned with training. Therefore, boosting mattress recovery, refurbishment, and recycling will create additional local job growth in transport and processing. State investments in mattress recycling capacity, and the statewide mattress disposal ban, have already spurred economic growth in Massachusetts⁶. A mattress EPR law could amplify and boost that growth.

Cost to Government and Taxpayers

High Cost of Recycling Mattresses

Mattresses are expensive to recycle owing to the labor required to manually disassemble components such as springs, fabric, foam, and wood. Pocket coils, which have become a popular feature of mattresses, are particularly burdensome to separate from mattresses for recycling. Additionally, transportation costs are high due to the weight and bulky size of mattresses.

Processor Equipment Damage

Mattresses also have caused significant damage to waste management equipment due to their heavy weight, bulky size, and composition. For example, mattress springs have gotten caught on equipment at landfills and incinerator operations. This has led to significant surcharges for mattress disposal at solid waste facilities.

⁵ Tellus Institute with Sound Resource Management. More Jobs, Less Pollution: Growing the Recycling Economy in the U.S., 2011. Accessed May 29, 2025 at <https://tellus.org/wp-content/uploads/2023/05/More-Jobs-Less-Pollution-Growing-the-Recycling-Economy-in-the-US.pdf>.

⁶ Massachusetts Department of Environmental Protection.

Limited Access to Reuse and Recycling

Limited Collection Opportunities

Nationally, collection opportunities for mattresses are limited, even for those living in urban areas with relatively robust waste management operations. Limited permanent collection sites and sporadic collection events for mattresses leave significant gaps in access for residents to properly dispose of their mattresses.

Massachusetts residents fare better than residents in most states: 50% of the population has access to curbside mattress collection and another 22% has access to drop-off sites. But at least 20% of communities (16% of the population) have no municipal mattress collection services and another 11% offer only sporadic events.⁷

Environmental Impacts

Water Conservation, Energy Savings and GHG Reductions

Recycling one mattress saves roughly 500 gallons of water, enough energy to power a home for three days, and greenhouse gas emissions equivalent to a car driving 60 fewer miles.⁸

Illegal Dumping

Mattresses are some of the most prominent illegally dumped products in the U.S. and pose significant issues beyond just being an eye sore, including environmental, economic, and health hazards. Specifically, these mattresses can become a breeding ground for pests, such as rodents and insects, and many mattresses contain chemicals like flame retardants and synthetic materials that can leach into the surrounding soil and groundwater.

Key Stakeholder Interests

Municipal Governments

- Cost savings
- Convenient collection for constituents
- Statewide education and outreach provided by the mattress industry
- Reduced illegal dumping, pest infestations, and related cleanup costs

⁷ Based on data reported to the Massachusetts Department of Environmental Protection through the 2024 Municipal Recycling Survey. Accessed June 10, 2025 at <https://www.mass.gov/doc/2024-municipal-solid-waste-recycling-survey-responses/download>

⁸ Mattress Recycling Council and Scope 3 Consulting. “Life Cycle Analysis of Mattress Recycling in California” June 2024. Accessed on May 28, 2025. https://mattressrecyclingcouncil.org/wp-content/uploads/2024/06/AnnexJune2024_MRC-MattressRecycleLCA_Report_v1.0_CriticallyReviewed_06-06-2024.pdf

Mattress Manufacturers

- Reduced regulatory risk
- Increased access to recycled materials

Mattress Recyclers / Refurbishers

- Steady, predictable supply of recyclable mattress materials
- Ability to invest in technology and infrastructure

Retailers

- Reduced cost to manage used mattresses collected from new mattress customers
- Free point-of-sale consumer education

- Innovations in mattress design
- Enhanced reputation for environmental stewardship

- Job creation

Solid Waste Transporters / Haulers

- Increased business opportunities

Consumers and Residents

- Convenient, free mattress collection service for all residents
- Consistent statewide education
- Decreased cost to recycle mattresses
- Reduced illegal dumping

3. Mattress Management in Mass.

Leftover Mattress Generation

Based on data provided by the Massachusetts Department of Environmental Protection (MassDEP), Massachusetts residents generate an estimated 600,000 used mattresses annually⁹.

Collection Access and Amounts

Massachusetts Mattress Disposal Ban

As of November 1, 2022, Massachusetts has prohibited the disposal of mattresses and textiles in landfills, transfer stations, and waste-to-energy facilities. Mattresses must be reused, recycled, or donated, if they are in good condition. If the mattress is deemed unfit for reuse, refurbishment, or recycling, then it must be sent to a designated waste disposal facility. The disposal ban covers all mattresses and box springs of any size, from twin up to California King size, and applies to both residential and commercial entities.

⁹ Used mattress generation rates provided by the Massachusetts Department of Environmental Protection based on waste characterization studies and reported quantities of mattress recycled by public mattress collection outlets.

Mattress Collection Access

Curbside collection is the most convenient option for residents seeking to dispose of a mattress. But in spite of the disposal ban, only 19% of Massachusetts communities (representing 50% of the Massachusetts population) offer curbside collection for discarded mattresses, according to data reported by municipalities to MassDEP.¹⁰ Another 42% of communities (representing 23% of the Massachusetts' population) offer drop-off or regional collection opportunities, but these options require that Massachusetts residents transport their used mattresses themselves to a collection facility, which is inconvenient due to the size and weight of mattresses, and even more difficult for residents without cars. The remaining 20% of Massachusetts communities (representing 16% of the population) offer no collection opportunities for end-of-life mattresses.

In addition to municipal services, several mattress recycling companies offer private collection services, including pick-up services for a fee.

Table 1 summarizes public mattress collection access in the Commonwealth.

Table 1: Percentage of MA Communities and Residents Served per Public Mattress Collection Outlet

Collection Opportunity	% Communities	% of Population
Drop-off	32%	22%
Curbside	11%	35%
Both Curbside and Drop-off	8%	15%
Regional Collection	10%	1%
Special Collection Event	1%	0%
None	20%	16%
No Data	18%	11%

Mattress Generation and Disposition

In 2024, permitted mattress recycling facilities known to MassDEP reported 398,542 mattresses recycled, about 66% of total used mattresses generated in the state. About 168,400 mattresses (28% of mattresses) were disposed of through bulky waste facilities¹¹ or municipal solid waste

¹⁰ Based on data reported to the Massachusetts Department of Environmental Protection through the 2024 Municipal Recycling Survey. Accessed June 10, 2025 at <https://www.mass.gov/doc/2024-municipal-solid-waste-recycling-survey-responses/download>

¹¹ The estimate is based on 156,400 tons of bulky waste reported in the 2024 Annual C&D Report, of which 2.1% is mattresses and boxsprings per the June 2022 waste characterization study, for a total of 3,284 tons. 1,000 tons were reported separated for recycling, leaving 2,284 tons disposed. At an average weight of 50 lbs. per mattress, 91,360 mattresses were disposed in C&D facilities. C&D report and waste characterization studies accessed May 29, 2025 at <https://www.mass.gov/doc/2024-annual-cd-report-summary-data/download> and <https://www.mass.gov/doc/statewide-bulky-waste-characterization-study-june-2022/download>.

disposal.¹² The remainder are unaccounted for – possibly moved out of state or sold through informal marketplaces. Table 2 below summarizes the estimated disposition of mattresses in Massachusetts.

Table 2: Mattress Generation and Disposition in Massachusetts

Mattress Generation & Disposition	Mattresses (Est)	Percent of Total
Total used mattresses generated annually	600,000	100%
Disposed of in solid waste stream	168,400	28%
<i>Bulky Waste Stream</i>	<i>91,360</i>	<i>15%</i>
<i>Municipal Solid Waste Stream</i>	<i>77,040</i>	<i>13%</i>
Recycled (recycling rate)	398,524	66%
Unknown: Stored; Resold/reused through informal marketplaces	33,076	6%

Mattress Recycling Costs

Recycling costs

On average, mattress recyclers in Massachusetts charge \$21 per mattress for recycling (processing) services.¹³ For the 398,524 mattresses reported to be processed by recyclers in 2024, we estimate that **residents and municipalities paid \$8,369,004 for mattress recycling.**

Table 3: Estimated cost to Massachusetts municipalities to collect and recycle mattresses

Mattress Management Cost Type	Estimated Annual Costs
Mattress recycling (processing)	\$8,369,004
Mattress on-site storage for drop-off sites	\$571,200
Mattress transportation	\$3,500,369
Collection events	\$3,450
Curbside collection	<i>unknown</i>
Total estimated cost to recycle mattresses	\$12,444,023

¹² The estimate is based on the most recent waste characterization studies, which show 2,586 tons of mattresses and box springs, and assumes an average of 50 lbs. / mattress or boxspring for a total of 102,720 mattresses. Some of these were pulled from municipal waste for recycling. Assuming 25% were recycled, 77,040 mattresses were disposed. <https://www.mass.gov/guides/solid-waste-master-plan#waste-characterization-&capacity-studies>

¹³ Based on pricing quoted for four mattress recycling companies on state contract PF90. Accessed June 10, 2025 at <https://www.commbuys.com/bsi/external/purchaseorder/poSummary.sdo?docId=PO-15-1045-BWP00-BWP01-00000005711&releaseNbr=0&parentUrl=contract>

Storage costs

The 140 Massachusetts municipalities that offer mattress drop-off services store the mattresses in either roll-off containers or trailers (sized 48' or 53') to keep them dry, clean, and in good condition for recycling. The average cost to rent a roll-off container,¹⁴ was \$190 per month, and the average cost to rent a trailer was \$490 per month. Assuming that each municipality that offers mattress drop-off service must have at least one drop-off site and one container, and assuming an even split between roll-off containers and trailers, we estimate that municipalities collectively spent about \$571,200 on mattress storage each year.¹⁵

$$\begin{array}{r} 70 \text{ municipalities} \times \$190/\text{mo. for roll-out container} \times 12 \text{ months} \\ + 70 \text{ municipalities} \times \$490/\text{mo. for a trailer} \times 12 \text{ months} \\ \hline \$571,200 \end{array}$$

Collection event costs

In 2024, **municipalities have collectively spent \$3,450 on mattress collection events**. Based on PSI's informal survey of mattress recyclers, the average cost of a full-day mattress collection event is \$1,150. Three Massachusetts municipalities held mattress recycling events that collected 3.38 tons (6,760 lbs.) of mattresses – about 135 mattresses, based on an average weight of 50 lbs. per mattress.¹⁶ The resulting per-mattress-cost to recycle from a collection event is, therefore, about \$25.50.

Transportation costs

In addition to processing costs, municipalities pay to transport mattresses from the collection site to the recycling facility. These costs vary by distance and truck size, as follows:

- 24' box truck → \$518 average cost
- 48' trailer → \$628 average cost
- 40-foot cubic yard → \$435 average cost

Many recyclers require a minimum number of 45 mattresses and a maximum of 75 mattresses for pickup. By assuming that each load contains 60 mattresses, PSI estimates that municipalities spend over \$3.5 million each year to transport and recycle mattresses.

$$398,524 \text{ mattresses recycled} \div 60 \text{ mattresses per load} \times \$527 \text{ per load} = \$3,500,369$$

¹⁴ PSI's informal survey includes price information for storage containers provided by the following mattress recyclers: UTEC, Raw Materials Recovery Corporation, Ace Enterprises LLC, Green Mattress, HandUp US LLC, and Tough Stuff Recycling – six mattresses recycled on state contract.

¹⁵ The total low-end cost estimate, assuming all municipalities use roll-off containers, is \$319,200 and the high-end cost estimate, assuming all municipalities use trailers, would be \$823,200.

¹⁶ The average weight of a mattress or foundation (box spring) is 50 pounds.

Curbside collection costs

Municipalities with curbside collection also incur costs for their own collection of mattresses. There is no data available on the cost of curbside collection services that can be allocated to mattress collection. However, this cost would not be covered by MRC under mattress EPR.

Fees charged to residents

It is important to note that at least 184 communities, serving 54% of the Massachusetts population, charge residents a fee for mattress recycling services.¹⁷ These fees vary widely from municipality to municipality, ranging from \$20 to \$70 or more.¹⁸ Table 4 below summarizes the information about communities that charge residents mattress recycling fees.

Table 4: Municipalities that charge residents a mattress recycling fee for curbside or drop-off

Charge a mattress recycling fee	# of Communities	% of Communities	% of Population
Yes	184	53%	54%
No	19	5%	19%
Did not answer the question	85	24%	16%
Did not report	64	18%	11%

4. Mattress EPR Laws in the U.S.

As of May 29, 2025, there were mattress EPR laws in four states – Connecticut, Rhode Island, California, and Oregon. All four programs are run by the Mattress Recycling Council through their consumer-facing program, Bye Bye Mattress. Table 4 below summarizes the date each law was enacted and each program launched.

¹⁷ Based on data reported to MassDEP in the annual municipal recycling survey. Another 19 communities (serving 19% of the population) do not charge, 85 communities (serving 24% of the population) did not answer the question about mattress fees, and 64 communities (serving 11% of the population) did not report at all. Accessed June 10, 2025 at <https://www.mass.gov/doc/2024-municipal-solid-waste-recycling-survey-responses/download>.

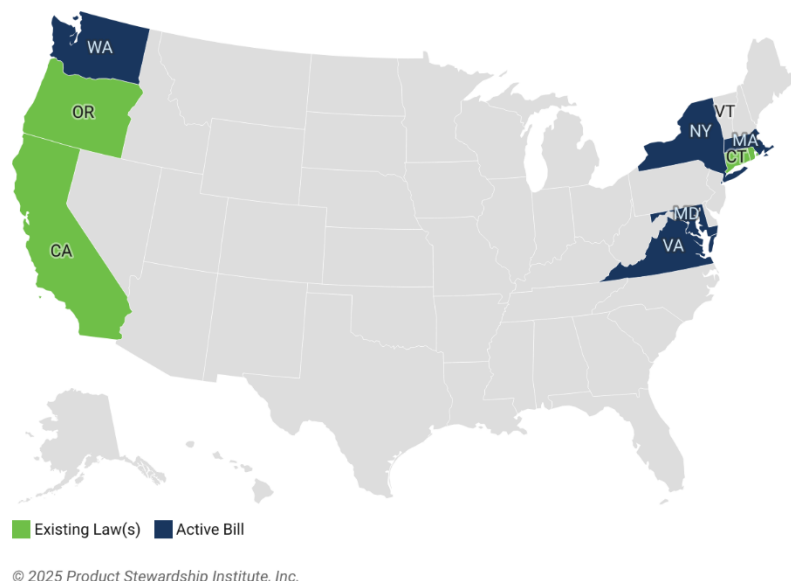
¹⁸ Based on a sampling of municipalities including the Concord (\$45), Danvers (\$40), Everett (\$70 for the first mattress or boxspring and \$45 for each additional item), Methuen (\$40 per mattress, \$20 per box spring), Reading (\$55 for pick-up; \$33 for drop-off), Wakefield (\$60), Watertown (\$50).

Table 5: Mattress EPR Laws in the United States

State	Enacted	Launched
Connecticut	2013	2015
Rhode Island	2013	2016
California	2013	2016
Oregon	2022	2025

Five other states introduced mattress EPR legislation in 2025, including Massachusetts, H 1023 & S 614. (See Figure 1).

Figure 1: Mattress EPR Laws and Bills in the United States



How Mattress EPR Laws Work

Mattress Recycling Council (MRC)

Once a mattress EPR law is enacted, MRC develops and submits a detailed program plan to the state oversight agency (typically the environmental agency) for approval. That plan includes information about how the program will be run to meet the statutory requirements. The mattress recycling program run by MRC is called Bye Bye Mattress.

Once the oversight agency has approved the plan, MRC begins its work, which includes the following responsibilities:

- Securing and contracting with collection sites (e.g., retailers, transfer stations, recycling facilities) and ensuring equitable access in urban, suburban, and rural areas.

- Providing retailer and collection sites with supplies, training, education materials, and logistical support for registration and reporting.
- Securing and contracting with transporters and mattress recyclers / processors.
- Conducting public education and outreach, including a statewide promotion campaign to inform consumers about how and where to dispose of their mattresses.
- Managing finances and assessing and adjusting fees, while using funds exclusively for program operations (not for profit).
- Monitoring mattress manufacturer compliance and reporting.
- Reporting annually to the oversight agency on program activities and results.
- Ensuring transparency and accountability through audits and evaluations.

Producers

Producers (i.e., mattress manufacturers) must register with MRC. If a manufacturer also offers a product for sale directly to end users (e.g., consumers, hotels, universities), then the producer must register as both a “manufacturer” and as a “retailer,” and must include the recycling fee on receipt or invoices.¹⁹ Producers may not sell mattresses in a state with a Mattress EPR law if they are not registered with MRC.

Consumers

When a customer purchases a mattress in a state with mattress EPR legislation, the price of the mattress includes a visible recycling fee (in Oregon it is referred to as a stewardship assessment) listed on the receipt or invoice. The fee is flat across all mattress types, regardless of size, cost, or other attributes, and is remitted to the retailer by the consumer. Some of the current mattress EPR programs have increased their recycling fee over the years to adequately fund the program (see Table 6).²⁰ Consumers can bring their unwanted mattresses to any of the program’s permanent collection sites or to a certified collection event for recycling or disposal.

Table 6: MRC Recycling Fees (Stewardship Assessment)

State	2013	Current (2025)
Connecticut	\$9.00	\$16.00
Rhode Island	\$10.00	\$20.50
California	\$10.50	\$16.00
Oregon*	N/A	\$22.50

*In Oregon, the MRC recycling fee is called a “stewardship assessment.”

¹⁹ MRC Mattress Obligation Fact Sheet for Rhode Island. Accessed June 10, 2025 at <https://mattressrecyclingcouncil.org/wp-content/uploads/2022/09/MRC-RI-Obligation-Info-Sheet.pdf>

²⁰ Recycling assessment fees established in each state program plan, accessed June 10, 2025 at <https://mattressrecyclingcouncil.org/programs/>. In 2015, Rhode Island enacted amendment H 5755 to the mattress EPR law to enable MRC to change the fee each year to cover program costs. Accessed June 10, 2025 at <https://webserver.rilegislature.gov/BillText15/HouseText15/H5755.pdf>. Other laws allowed for MRC to adjust the fee in the program with state agency approval.

Retailers

All retailers that sell covered mattresses into the state, whether physical stores or online, must collect the “recycling fee” on each sale of a covered mattress and/or foundation (e.g., boxspring) to both individual consumers and contract purchasers, such as hotels, hospitals, and universities. Retailers must report and remit the “recycling fee” to MRC monthly. At the point of sale, retailers also must provide consumers with educational information, which MRC provides to them, about available collection and recycling options for used mattresses. In California, all retailers must offer no-charge take-back of used covered mattresses from their customers.

Retailers must also register with MRC and report on the brands of covered mattresses they sell. They are not permitted to sell mattress brands that have not registered with MRC and that do not participate in the program.

Municipalities

Municipalities may voluntarily serve as collection sites for the MRC program through their solid waste facilities, transfer stations, and public yards. For municipalities that hold collection events, MRC will provide labor, transportation, recycling, education, and publicity for events.

Bye Bye Mattress Program Results

Since the Bye Bye Mattress program launched in 2015, the program has recycled more than 15 million mattresses from 432 permanent collection sites. This effort has saved 14.9 million cubic yards of landfill space and diverted 575 million pounds of material from landfill to recycling.²¹ The program has also increased the rate of collection and recycling. For example, in Connecticut the mattress recycling rate rose from 8.7% before the program to 63.5% in the first year. The programs have also helped clean up illegal dumping sites. In California’s first program year, more than 23,700 illegally dumped mattresses were collected in 29 counties. Table 7 below summarizes MRC program results from the latest annual reports for 2024.²²

Table 7: Summary of Mattress EPR Program Results as of latest annual report in each state

	CT	RI	CA	OR	Total
State Characteristics					
Population (in millions)	3.7	1.1	39.5	4.3	48.6
Urbanization rate	86%	91%	94%	81%	
Annual Collection Opportunities					
Permanent Collection Sites	135	39	240	N/A	414
Curbside Bulky Item Collection Programs	4	N/A	87	N/A	91

²¹ Mattress Recycling Council, 10 Years of Impact Report, 2025. Accessed June 10, 2025 at <https://mattressrecyclingcouncil.org/impact-report/>.

²² Data compiled from the latest available program reports for each state. The Oregon program launched January 2025 and has not yet reported data. Accessed June 10, 2025 at <https://mattressrecyclingcouncil.org/programs/>.

	CT	RI	CA	OR	Total
Collection Events	21	17	131	N/A	169
<i>Totals</i>	160	56	458	N/A	674
Convenience					
% of Residents within 15 miles of a Drop-Off Site	N/A	N/A	98.4%	N/A	
% of Municipalities Participating in the Program	92.3%	91%	N/A	N/A	
Mattress Recycling					
Annual number of mattresses recycled	199,528	85,524	1,468,360	N/A	1,753,412
Percent of Collected Mattress Material Recycled	68%	68%	66%	N/A	67%

5. Opportunities for Massachusetts

Increase Access and Collection Volumes

Provide mattress recycling service to the 16% of Mass residents without it

Mattress EPR programs have increased access to collection and recycling services. Before the Bye Bye Mattress program launched in California, there were 40 solid waste facilities providing permanent collection sites for mattresses. As of 2024, there are more than 240 permanent collection sites established throughout the state plus an additional 131 collection events. The laws in California and Oregon also require a minimum level of collection convenience for residents. In 2024, 98.4% of California residents lived within a 15-mile radius of a permanent collection site. Oregon’s program is still ramping up, after launching January 2025 and data is not yet available. An EPR program would expand mattress recycling access to all residents, including the 16% to 27% of Massachusetts residents currently without service.

Increase the mattresses recycling rate from 66% to 85%

Increased access will increase collection and recycling quantities. In the first year of program implementation, the mattress recycling rate in Connecticut rose from 9% to 63%. By 2023, Connecticut’s mattress recycling rate rose to 74%.

Massachusetts has a mattress recycling rate of 66% as of 2024, generating about 0.10 mattresses per capita per year for those with access to mattress recycling. When the 16% to 27% of Massachusetts residents without mattress recycling access gain services, the Commonwealth could further boost recycling by between 114,176 and 192,672 mattress per year – reaching a mattress recycling rate of between 85% and 98%.²³

²³ The estimate assumes that between 16% of the population (1,141,760 residents) and 27% of the population (1,926,720) will generate approximately 0.10 mattresses per capita, which is the current generation rate among municipalities with mattress recycling services, thereby increasing the number of mattresses recycled by between 114,176 and 192,672 mattresses for a new annual total of between 512,430 and 591,196 mattress – about 85% to 98% of the 600,000 used mattresses generated in the Commonwealth.

Municipal Savings and Additional Benefits

Mattress EPR would save Massachusetts municipalities \$12 million per year

Massachusetts municipalities and residents are estimated to be spending more than \$12 million per year to recycle 66% of the used mattresses generated each year.²⁴ Under an EPR program, those costs would be covered entirely by the program through a recycling fee. And since more than 50% of residents are already paying municipalities to recycle their mattresses, the recycle fee will make the fee uniform across all communities and residents. Additionally, the Commonwealth would reap additional benefits valued \$5.7 million for additional mattress recycled from communities without access currently.²⁵

In-state Jobs and Small Business Growth

As more discarded mattresses are refurbished and recycled, additional in-state job opportunities will be created for haulers, recyclers, and refurbishers. A 2023 report evaluating Connecticut's program found that the Bye Bye Mattress program created or sustained 42 jobs at two Connecticut mattress recyclers.²⁶ In Massachusetts, the MassDEP's investments in mattress recycling and the eventual disposal ban have similarly sparked business growth for 20 mattress recyclers, including UTEC, Green Mattress, HandUp Mattress Recycling and Upcycling, Ace Mattress Recycling, Aires Mattress Recycling, and others.²⁷

²⁴ Based on cost estimates outlined in Section 3: Mattress Management in Massachusetts.

²⁵ Based on \$30 per mattress (\$12 million divided 398,524 mattress currently recycled) multiplied by the expected additional 192,672 mattresses collected per capita (0.10 mattress per capita) for up to 27% of the population (1.9 million people) without sufficient access to mattress recycling services now.

²⁶ CT DEEP. "Evaluation of Connecticut's Mattress Stewardship Program" January 2023. Accessed on May 29, 2025. https://portal.ct.gov/-/media/DEEP/reduce_reuse_recycle/mattress/Mattress_EPR_Report_012523.pdf?utm_source=chatgpt.com

²⁷ A directory of mattress reuse, refurbishment, and recycling service providers in Massachusetts can be found on the Recycling Works website at <https://recyclingworksma.com/>

6. Challenges to be Managed

Obstacles to Passing Legislation

Consumer Fee perceived as tax

Some view the point-of-sale consumer fee as a tax, even though the fee is paid directly to the producer for recycling services – not to the government. It is also paid by the mattress consumer and not all residents/taxpayers, some of whom do not receive the recycling benefits.

Concerns about cross-border sales loss

Some retailers, especially those near state borders, worry that cost-conscious consumers will drive to neighboring states without a mattress recycling fee to buy a new mattress, leading to:

- Lost sales revenue
- Competitive disadvantage
- Reduced participation in EPR programs

Proper implementation, including consumer and retailer education, as well transparent and visible fee displays, can effectively mitigate these cross-border concerns.

In Massachusetts, however, this issue is a less significant concern because two bordering states, Connecticut and Rhode Island, have established mattress EPR laws with a recycling fee. There are three bordering states without mattress EPR programs (New York, New Hampshire, and Vermont). There have been reports of Massachusetts residents dropping off used mattresses for recycling in Connecticut and Rhode Island to avoid point-of-disposal costs in Massachusetts.

Social Benefit / Jobs Funding for Nonprofits – specific to Massachusetts

In Massachusetts, the legislature has introduced multiple mattress stewardship bills over the past several years – one based largely on the existing MRC program model with updated features in Oregon’s law, and another that includes producer funding to support growth and development of social enterprises that recycle mattresses. Proponents of the bill supporting social enterprises view the provisions as an opportunity to support in-state businesses that offer both environmental and social benefit. Other stakeholders do not believe it is the role of the producer to be required to invest in social enterprises, but rather the state’s role. Also, there is concern over favoring and paying more for one type of service provider over another, since it increases program costs and unfairly benefits some providers over others.

Policy Considerations

There are several factors about the existing mattress EPR model that Massachusetts stakeholders should consider:

Wet and other non-recyclable mattresses are not collected under the program

Currently, the four mattress stewardship programs run by MRC require municipalities and other covered generators to separate out mattresses that are not recyclable due to their condition (e.g., wet, moldy, bed bug infested). Municipalities are responsible for managing and financing the disposal of non-recyclable mattresses. This results in a scenario where consumers have paid the recycling fee when they purchased a mattress but do not have disposal services covered by the program; instead, their disposal is covered through taxes or they pay out of pocket—essentially paying twice.

There is growing consensus among state and local governments working on EPR throughout the country that this element of the program should be changed to ensure that MRC manages all mattresses through their program, regardless of their recyclability.

Consumer Fee is not related to mattress size, cost, or environmental attributes

The consumer fee is a flat fee across all mattress types, regardless of size, cost, recyclability, or other environmental attributes. Some stakeholders believe that flat fees are inequitable, since consumers of smaller and simpler mattresses (e.g., fewer electronic gadgets and materials) pay the same fee as those who purchase an expensive large mattress. The flat fee has the potential to disproportionately affect low-income consumers who seek to purchase more affordable mattresses, since the fee alone could be one fourth of the price of a less expensive mattress.

This challenge could be addressed in different ways:

1. Requiring differentiated consumer fees for mattresses based on the cost to manage the mattress, mattress price, and/or mattress size. Maryland's 2025 mattress EPR bill includes considerations for differentiated fees to fund the program.
2. Mattress EPR bills introduced in New York and Washington in 2025 include requirements for the program to be funded through producer fees (cost-internalized) rather than through consumer fees.

Minimum convenience standards

Of the four states with mattress EPR laws, only the California and Oregon laws include minimum collection convenience standards. In Rhode Island and Connecticut, the programs established performance goals related to the percentage or number of municipalities participating in the program, but these goals do not always ensure equitable access to collection services.

In 2025, legislatures in Maryland, New York, Washington, and Virginia introduced mattress EPR bills with minimum collection convenience standards, similar to laws for paint. For example, Washington's 2025 mattress stewardship bill, SB 1901, requires that there be at least one permanent collection site within a 15-mile radius for at least 95% of Washington residents.

Requiring minimum collection convenience for both urban and rural areas in a mattress EPR law would ensure that all residents have convenient year-round access to mattress recycling.

Multi-family Access

Under the current MRC program, residents living in multi-family buildings often have difficulty accessing recycling services. First, they often cannot directly request mattress removal services; property managers/owners typically must request this service. Additionally, since multi-family buildings have limited or no storage space for bulky items like mattresses, residents may have to store them in their unit. They may also lack access to a loading dock or curbside area for mattress pickup vehicles. Therefore, residents in multi-family units often must transport their own mattress to a drop-off facility, which can be burdensome and costly if a resident does not own a car or has to rent a vehicle large enough to transport the mattress. Oregon's law required that MRC conduct a study of multi-family access to mattress recycling and identify ways to increase access and convenience. Policy provisions outlined in the Elements of Mattress EPR (See the Appendix) can help address this issue.

7. The Road Ahead

For those interested in learning more about mattress EPR and mattress recycling, PSI will be leading a collaborative national effort in 2025 with state and local governments, ISPA, MRC, and mattress recyclers to increase the collection, reuse, and recycling of used mattresses. For more information, contact PSI's Scott Cassel at scott@productstewardship.us.