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Extended Producer Responsibility Commission

Background document for policy recommendation on

MATTRESSES

Prepared by GreenerU for MassDEP

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Executive Summary

Between 75–90% of mattress components, including steel, wood, cotton, and foam, are recyclable.¹ But according to the U.S. Environmental Protection Agency (EPA), with data from the Department of Commerce, International Sleep Products Association (ISPA), and the Mattress Recycling Council (MRC), less than 10% of used mattresses are recovered for reuse or recycling nationally.²

Landfilling, illegally dumping, or other improper disposal of mattresses waste valuable resources and contribute to pollution:

- Ferrous metals (i.e., iron and steel) are the largest category of metals found in municipal solid waste collection.³ While steel is 100% recyclable, the U.S. Environmental Protection Agency estimates that the recycling rate of ferrous materials from durable goods, including from furniture, to be 27.8%.⁴
- Mattress foam is made up of materials such as polyurethane, flame retardants, and volatile organic compounds, which can leech into groundwater and soil and pose a threat to ecosystems.⁵
- Mattresses are bulky and costly to transport.
- Mattresses take up a considerable amount of space in landfills and are difficult to handle in municipal solid waste combustion facilities.⁶

The Massachusetts Department Environmental Protection (MassDEP) reports that more than 600,000 mattresses and box springs are discarded annually in Massachusetts.⁷ On November 1, 2022, Massachusetts added mattresses to its waste disposal bans (310 CMR 19.017), meaning these materials cannot be discarded in the state's landfills, waste-to-energy plants, or transferred for disposal unless they are contaminated.

The nonprofit MRC operates recycling programs in states that have enacted mattress extended producer responsibility (EPR) laws: California, Rhode Island, Connecticut, and, most recently, Oregon. The program is funded through a flat-rate fee at the point of sale for consumers—including individuals, hotels, hospitals, and universities—for all mattresses and foundations (box springs), regardless of size or type. Both brick-and-mortar and e-commerce retailers are required to assess the fee at the point of sale.

¹ Estimates range between 75% (Mattress Recycling Council) and 90%, according to some recyclers.

² U.S. Environmental Protection Agency. "Facts and figures about materials, waste, and recycling for durable goods: furniture and furnishings." Accessed June 10, 2025, at <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/durable-goods-product-specific-data#DurableGoodsOverview>.

³ U.S. Environmental Protection Agency. Ferrous metals: material-specific data. Accessed June 27, 2025, from <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/ferrous-metals-material-specific-data>.

⁴ *Ibid.*

⁵ CollectYourOldBed.com. The consequences of improperly disposing of a mattress. Accessed June 27, 2025, from <https://collectyouroldbed.com/the-consequences-of-improperly-disposing-of-a-mattress/>.

⁶ Massachusetts Department of Environmental Protection. Mattress Recycling. Accessed June 27, 2025, from <https://www.mass.gov/guides/mattress-recycling>.

⁷ Massachusetts Department of Environmental Protection. Mattress Recycling. Accessed June 27, 2025, from <https://www.mass.gov/guides/mattress-recycling>.

Program fees in current participating states range from \$16.00–\$22.50 to cover the costs of program administration, contracting, transportation, containers, collection events, education and outreach, and oversight.

Data suggest that MRC’s mattress recycling program has made significant progress toward participating states’ goals. For example:

- In its first year of implementation, the mattress recycling rate in Connecticut rose from 8.7% to 63.5%.⁸
- The City of San Diego saw a 25% decrease in illegal mattress dumping in 2023.⁹
- Tallying up all four participating states through 2025, more than 500 million pounds of materials have been recycled throughout the lifetime of the program, saving 14.9 million cubic yards of landfill space.¹⁰

While municipal mattress recycling programs have grown considerably since 2016, 27% of Massachusetts residents live in a community where there is either no municipal mattress collection program or there is no data available on a municipal program¹¹. In these municipalities, residents must pay directly for mattress recycling and collection services. Mattress collection and recycling costs, which are paid for by municipalities or by fees paid by residents, are estimated at \$12.4 million annually¹². Municipal officials have stated that mattress recycling fees can create incentives for illegal dumping, which can increase management costs.

A statewide EPR program would alleviate costs to municipalities that absorb program costs via their municipal solid waste programs and are burdened with the administrative responsibilities of collection, contracting for recycling, and transportation. A mattress EPR program would provide clear, uniform instructions for residents and bulk users such as hotels, hospitals, and universities on end-of-life options for mattress removal. Yet another benefit is a reduction in illegal dumping, which can occur when mattress disposal options are expensive, unavailable, or unclear.

Note that the MRC mattress recycling program does not include the cost of curbside pickup or in-home mattress removal, which some municipalities provide independently.

⁸ Product Stewardship Institute. “Up to 90% of materials in mattresses are recyclable.”

⁹ Inside San Diego. City News Team. “City of San Diego celebrates success of mattress recycling program.” March 3, 2025, 11:16 a.m. Accessed June 30, 2025, from <https://www.insidesandiego.org/city-san-diego-celebrates-success-mattress-recycling-program>.

¹⁰ *ibid.*

¹¹ Based on data reported to the Massachusetts Department of Environmental Protection through the 2024 Municipal Solid Waste and Recycling Survey. Accessed June 10, 2025. <https://www.mass.gov/doc/2024-municipal-solid-waste-recycling-survey-responses/download>.

¹² Mattress EPR Background Document, June 10, 2025, Product Stewardship Institute, <https://www.mass.gov/doc/2025-06-10-mattress-background-document/download>.

Extended Producer Responsibility Commission Recommendation

The Commission recommends that the Massachusetts Legislature enact legislation to establish an extended producer responsibility program for mattresses. The Commission recommends the development and implementation of a program that aligns with existing programs to the greatest extent possible.

The Commission acknowledges proposed mattress EPR legislation under consideration before the Massachusetts legislature at the time of this recommendation —H.1023, H.3985, and S.614—but does not endorse any specific bill. H.1023 incorporates some of the elements contained in Oregon’s updated law, which the Commission recommends exploring.

The Commission recommends consideration of the following questions:¹³

1. Should the mattress fee be a flat fee or a variable fee based on size of mattress or cost? Current EPR programs have a flat fee regardless of the size (twin, full, queen, king) or cost of the mattress.
2. Should the disposal cost of mattresses that cannot be collected and recycled through the program be included?
3. Should the fee be collected at the wholesale or retail level? In current mattress EPR programs the fee is collected at the point of retail sale.

¹³ The International Sleep Products Association provided comments on each of these questions, which can be found in the appendix.

Background: The Problem

Approximately 36 to 42 million mattresses are sold annually in the U.S., though these estimates are challenged by a lack of uniform national data collection methodology.^{14,15} Based on these figures, Americans discard 18–20 million mattresses annually, which is an approximate 45–50% mattress replacement rate, according to the Mattress Recycling Council—meaning for every two mattresses sold, approximately one is thrown out.¹⁶

Between 75–90% of mattress components, including steel, wood, cotton, and foam, are recyclable.¹⁷ But according to the U.S. Environmental Protection Agency, with data from the Department of Commerce, International Sleep Products Association (ISPA), and the MRC, less than 10% of used mattresses are recovered for reuse or recycling nationally.¹⁸

Landfilling, illegally dumping, or other improper disposal of mattresses waste valuable resources and contribute to pollution:

- Ferrous metals (i.e., iron and steel) are the largest category of metals found in municipal solid waste collection.¹⁹ While steel is 100% recyclable, the U.S. Environmental Protection Agency estimates the recycling rate of ferrous materials from durable goods, including from furniture, to be 27.8%.²⁰
- Mattress foam is made up of materials such as polyurethane, flame retardants, and volatile organic compounds, which can leech into groundwater and soil and pose a threat to ecosystems.²¹
- Mattresses are bulky and costly to transport
- Mattresses take up a considerable amount of space in landfills and are difficult to handle in municipal solid waste combustion facilities.²²

Mattress removal and recycling in Massachusetts

According to the Massachusetts Department Environmental Protection (MassDEP), an estimated 600,000 mattresses and box springs are discarded annually in Massachusetts.²³

¹⁴ TheRoundUp.org. 39 official mattress industry statistics. Accessed June 30, 2025, from <https://theroundup.org/mattress-industry-statistics/#:~:text=Statistics%20show%20that%20the%20majority,firms%20are%20in%20the%20US?>.

¹⁵ Sleepdoctor.com. 25+ stats about mattresses. Accessed June 30, 2025, from <https://sleepdoctor.com/pages/reviews/statistics-about-mattresses>.

¹⁶ Mattress Recycling Council. Program Guide. 2021, page 2. Accessed June 10, 2025, at <https://mattressrecyclingcouncil.org/wp-content/uploads/2021/09/MRCprogramguide.pdf>.

¹⁷ Estimates range between 75% (Mattress Recycling Council) and 90%, according to some recyclers.

¹⁸ U.S. Environmental Protection Agency. “Facts and figures about materials, waste, and recycling for durable goods: furniture and furnishings.” Accessed June 10, 2025, at <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/durable-goods-product-specific-data#DurableGoodsOverview>.

¹⁹ U.S. Environmental Protection Agency. Ferrous metals: material-specific data. Accessed June 27, 2025, from <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/ferrous-metals-material-specific-data>.

²⁰ *Ibid.*

²¹ CollectYourOldBed.com. The consequences of improperly disposing of a mattress. Accessed June 27, 2025, from <https://collectyouroldbed.com/the-consequences-of-improperly-disposing-of-a-mattress/>.

²² Massachusetts Department of Environmental Protection. Mattress Recycling. Accessed June 27, 2025, from <https://www.mass.gov/guides/mattress-recycling>.

²³ *Ibid.*

On November 1, 2022, Massachusetts added mattresses to its waste disposal bans (310 CMR 19.017), meaning these materials cannot be discarded in the state's landfills, waste-to-energy plants, or transferred for disposal unless they are contaminated with mold, bodily fluids, insects, or oil or hazardous substances.

Leading up to the waste disposal ban, MassDEP provided \$2.7 million in grants to 128 municipalities and 34 additional regional participants to assist with mattress collection and recycling efforts. The state has also contracted with four vendors to accept and manage mattress recycling.²⁴

As of June 2025, there are nine known mattress recyclers in the state.²⁵ As of 2024, an estimated 399,000 mattresses and box springs were recycled or reused, or roughly 66% of the total estimated number of units discarded that year.

Massachusetts' mattress waste disposal ban and current recycling system, however, has resulted in a patchwork of municipalities and communities with widely varying options, policies, and costs (see Figure 1). For example, in brief:

- The suburban community of Sudbury, with a median household income of \$234,634 and a 2.6% poverty rate, will accept mattresses at the Sudbury Transfer Station on Boston Post Road for a fee of \$50 per item.^{26,27}
- The more urban community of Chelsea, with a median household income of \$72,220 and a 20.6% poverty rate, offers no-cost curbside mattress pickup on Mondays and Thursdays for city trash customers.^{28,29} Those who are not city trash customers pay a fee of \$40 per item for city mattress pickup. The service costs the City of Chelsea approximately \$250,000 annually, which includes collection, temporary storage, transit to the facility, and recycling for roughly 4,000 units per calendar year.³⁰
- In western Massachusetts, the rural community of Chester, with a median household income of \$87,308 and a 2.0% poverty rate, does not offer mattress disposal, nor do they

²⁴ Commonwealth of Massachusetts. Operational Services Division: FAC90designatedDEP: Carpet and Mattress Recycling Services Statewide Contract. Accessed July 2, 2025, from <https://www.mass.gov/doc/fac90designateddep/download>.

²⁵ Data from Massachusetts Department of Environmental Protection review of available information including state contract vendors, general permits issued for mattress recycling operations, and other available information, conducted spring 2025.

²⁶ United States Census Bureau. Quick Facts: Sudbury town, Middlesex County, Massachusetts, data in 2023 dollars. Accessed June 26, 2025, from <https://www.census.gov/quickfacts/fact/table/sudburytownmiddlesexcountymassachusetts,MA>.

²⁷ Town of Sudbury. Transfer Station Fees. Published February 15, 2024. Accessed June 26, 2025, at <https://sudbury.ma.us/transferstation/2024/02/15/transfer-station-fees/>.

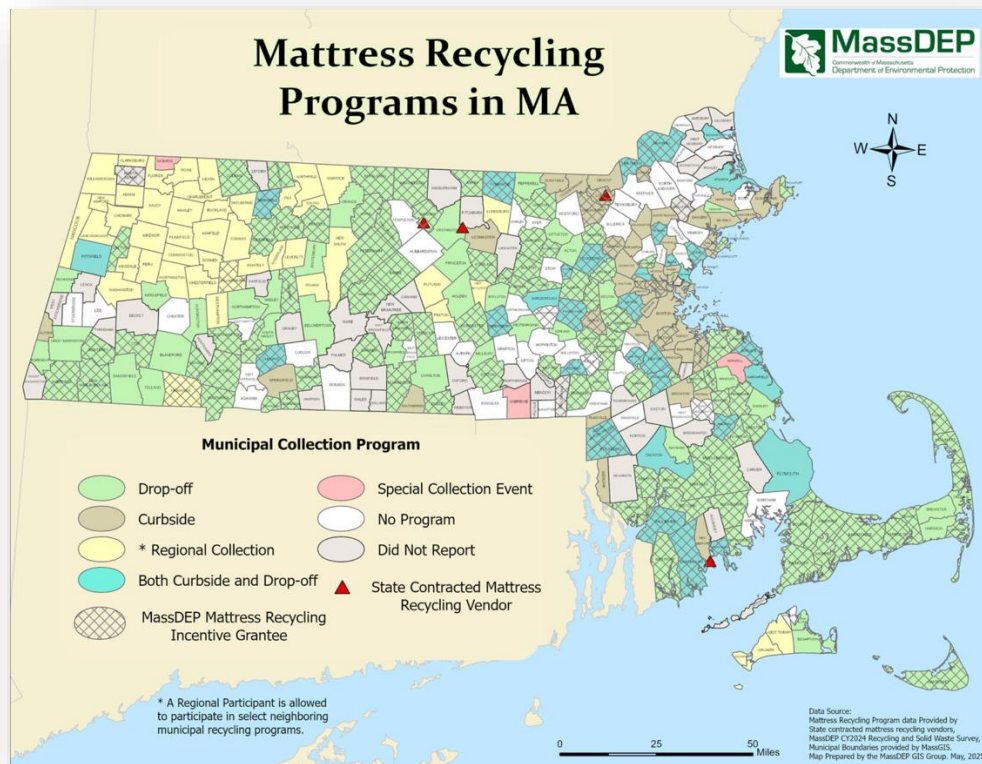
²⁸ United States Census Bureau, Quick Facts: Chelsea city, Massachusetts, data in 2023 dollars. Accessed June 26, 2025, from https://recyclingworksma.com/recyclers/?fwp_material=mattresses.

²⁹ City of Chelsea, Massachusetts. Mattress Recycling. Accessed June 25, 2026, from https://www.chelseama.gov/departments/public_works/trash_recycle_yard_waste/disposal_regulations/mattress_recycling.php.

³⁰ Information from Cate Fox-Lent, Commissioner, Chelsea Department of Public Works, provided July 25, 2025.

provide resources or information on mattress disposal or recycling on their website.^{31,32}

Figure 1. — Mattress recycling programs in Massachusetts³³



Beyond municipal recycling programs, Massachusetts residents have some additional options:

- When buying a new mattress, retailers will often offer to remove and recycle an old mattress as part of new mattress delivery. There may be a separate fee for this service.
- MassDEP's [Beyond the Bin](#) identifies organizations that will accept or collect used mattresses for reuse or recycling. These organizations will typically charge a fee.

Components of mattresses are recycled or reused by disassembling them using a combination of manual and automated equipment and organizing their raw materials.³⁴ As shown and described in Figure 2, parts of mattresses can be recycled in the following ways:

- Foam padding is turned into carpet underlayment or animal bed padding.
- Fabric and fibers are used in industrial oil filters and other textile applications.

³¹ United States Census Bureau. Chester town, Hampden County, Massachusetts, data from 2023 estimates. Accessed June 26, 2025, from https://test.data.census.gov/profile/Chester_town,_Hampden_County,_Massachusetts?q=060XX00US2501313485#income-and-poverty.

³² Town of Chester. Transfer Station. Accessed June 25, 2026, from <https://townofchester.net/transfer-station/>.

³³ Image from the Massachusetts Department of Environmental Protection, accessed June 25, 2025, from <https://www.mass.gov/info-details/map-massachusetts-communities-that-provide-for-mattress-recycling>.

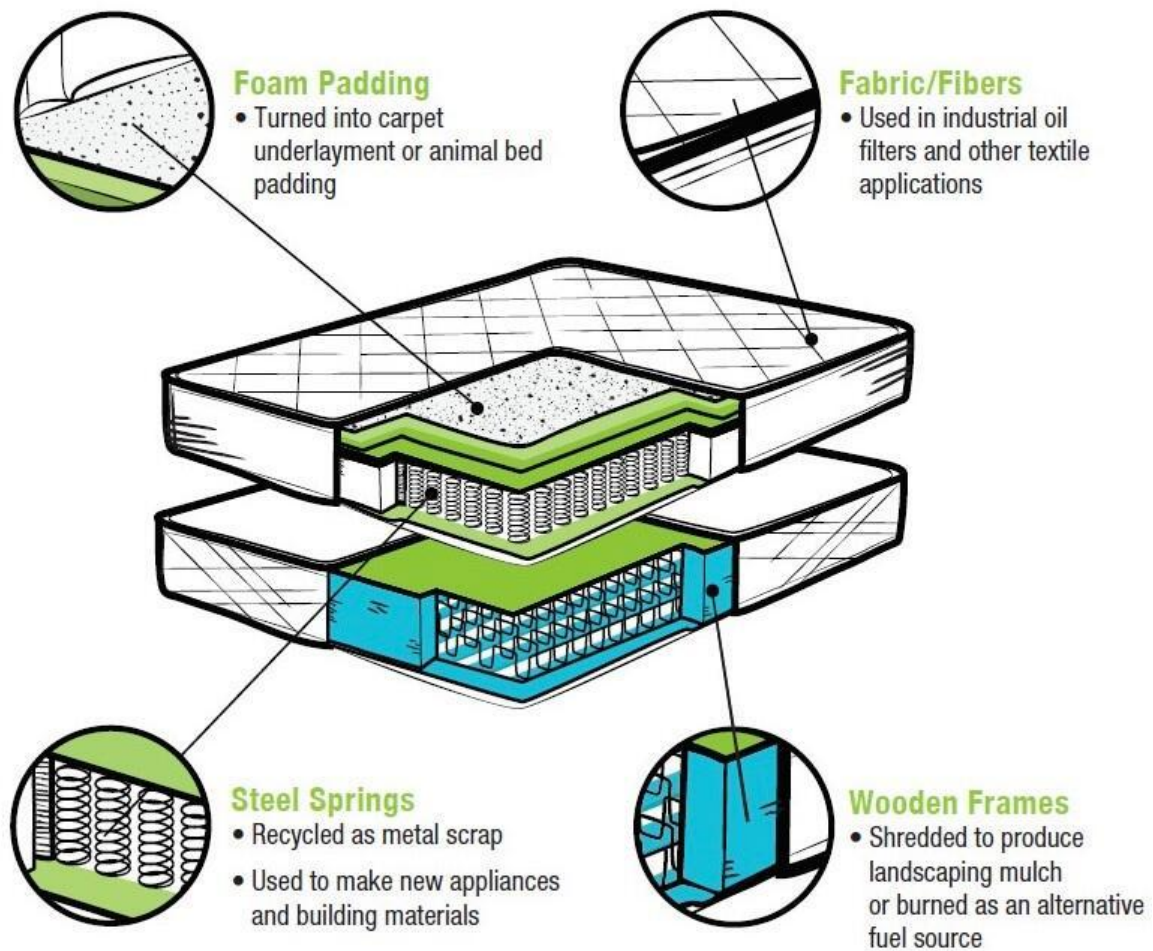
³⁴ Data from Mattress Recycling Council.

- Steel springs are sent to scrap yards and ground up to be resold and reused to make new appliances and building materials.³⁵
- Wooden frames are shredded to produce landscaping mulch or burned as an alternative fuel source.

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³⁵ Massachusetts Department of Environmental Protection. HandUp Case Study. Accessed June 27, 2025, at <https://www.mass.gov/doc/handup-case-study/download>.

Figure 2. — How mattress components are recycled³⁶



³⁶ Image courtesy of the Mattress Recycling Council.

Proposed Solution

The [International Sleep Products Association](#) (ISPA) is a trade association representing mattress manufacturers and component suppliers. In 2015, the ISPA formed the nonprofit [Mattress Recycling Council](#) (MRC) to operate recycling programs in states that have enacted mattress EPR laws. MRC in turn created a consumer-facing program, [Bye Bye Mattress](#), to provide responsible mattress recycling currently in four states: California, Rhode Island, Connecticut, and, most recently, Oregon.

As it exists in other states, the Bye Bye Mattress program is funded through a flat-rate fee at the point of sale for consumers—including individuals, hotels, hospitals, and universities—for all mattresses and foundations (box springs), regardless of size or type. Both brick-and-mortar and e-commerce retailers are required to assess the fee at the point of sale.

How Mattress Recycling Council programs work

MRC offers three channels for mattress and box spring collection:³⁷

- Via existing state solid waste collection infrastructure to establish collection sites at landfills, transfer stations, or public works yards or by working with curbside collectors such as municipalities or waste contractors
- Via collection events for consumers
- Via commercial volume programs

MRC uses the point-of-sale fee to provide:

- Program administration
- Competitive bidding for contracts with collection sites, transporters, and mattress recyclers
- Mattress and box spring transportation to recyclers and recycling
- Containers for collection sites
- Hosting collection events
- Education and outreach efforts
- Oversight and enforcement

Flat vs. adjusted fee

MRC uses a flat per-unit fee in each participating state, rather than assessing fees based on variables such as mattress size, density, content, or price. MRC has considered alternative formulas for calculating the mattress recycling fee and concluded that it was necessary to set a fee that:

- Is simple and easy for consumers and retailers to understand and apply
- Is easy to verify whether the retailer has applied and collected the fee correctly
- Covers the full cost to dismantle and recycle the mattress being discarded
- Allows MRC to budget revenues in a predictable manner

³⁷ Mattress Recycling Council 2025.

In short, according to MRC, complexity may compromise program success, as complex fee schedules may decrease the likelihood of compliance from retailers, recyclers, and consumers. The current legislation filed in Massachusetts does not specifically identify fee structures, only that an assessment would be established in the plan to be approved by MassDEP.

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Costs and Benefits

Program fees in current participating states range from \$16.00–\$22.50, as illustrated in Table 1. Fees are occasionally reassessed to adjust for inflation and market fluctuation (see Figure 3).

Table 1. — Overview of Mattress Recycling Council programs in participating states³⁸

	Connecticut	California	Rhode Island	Oregon
Launch date	May 1, 2015	Dec 30, 2015	May 1, 2016	Jan 1, 2025
Flat fee in 2025	\$16.00	\$16.00	\$20.50	\$22.50
State population	3,675,069 ³⁹	39,431,263 ⁴⁰	1,112,308 ⁴¹	4,272,371 ⁴²
Mattresses recycled to date	1,700,000	13,000,000	750,000	no data

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³⁸ Data from Mattress Recycling Council.

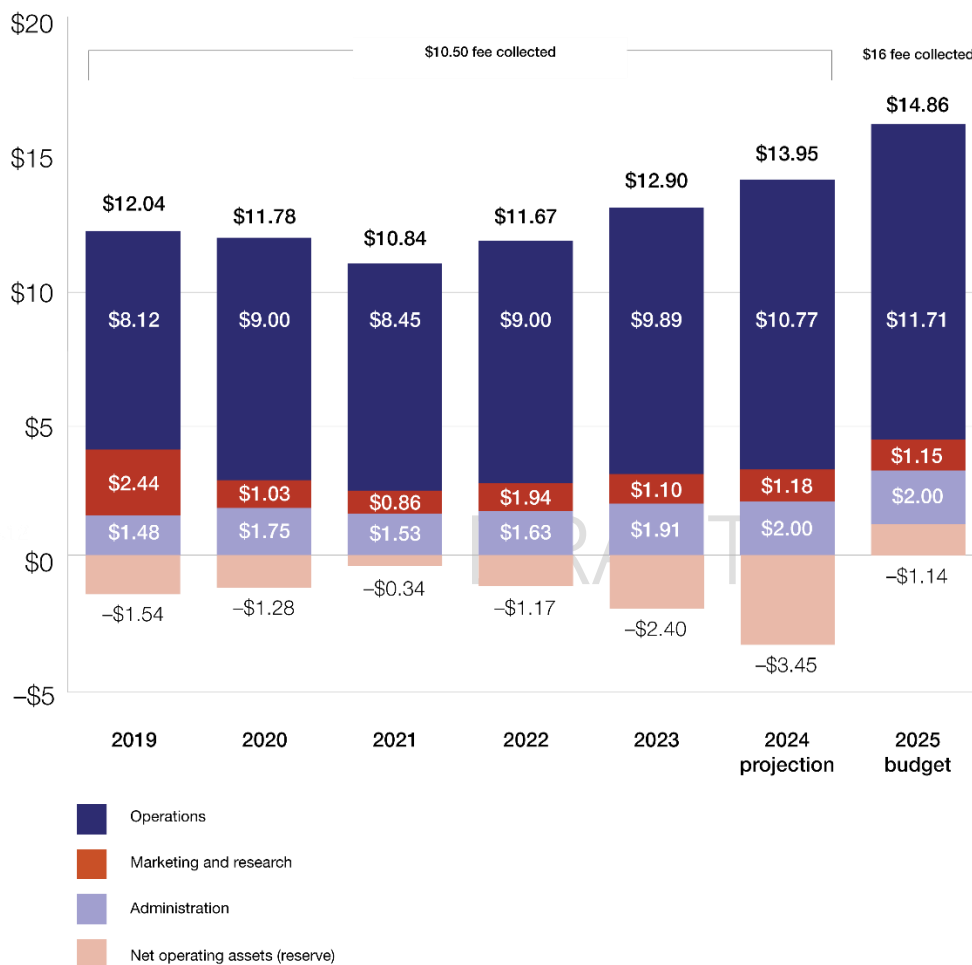
³⁹ U.S. Census Bureau. Fast Facts: Connecticut. Accessed June 27, 2025, from <https://www.census.gov/quickfacts/fact/table/CT/PST045224>.

⁴⁰ U.S. Census Bureau. Fast Facts: California. Accessed June 27, 2025, from <https://www.census.gov/quickfacts/fact/table/CA/PST045224>.

⁴¹ U.S. Census Bureau. Fast Facts: Rhode Island. Accessed June 27, 2025, from <https://www.census.gov/quickfacts/fact/table/RI/PST045224>.

⁴² U.S. Census Bureau. Fast Facts: Oregon. Accessed June 27, 2025, from <https://www.census.gov/quickfacts/fact/table/OR/PST045224>.

Figure 3. — Cost of mattress recycling per unit sold, California: 2019–2025 budgeted⁴³



One main benefit to a statewide mattress EPR program is alleviating costs to municipalities. As shown in Figure 1 above, Massachusetts’ 351 municipalities offer a range of mattress recycling options to residents, including collection events, drop-off sites, and even free curbside pickup. Municipalities that offer no program leave residents without a clear option for disposal.

Thus, a statewide mattress EPR program would alleviate costs to municipalities that absorb program costs via their municipal solid waste programs and are burdened with the administrative responsibilities of collection, contracting for recycling, and transportation. A mattress EPR program would provide clear, uniform instructions for residents and bulk users such as hotels, hospitals, and universities on end-of-life options for mattress removal. Yet another significant benefit is a reduction in illegal dumping, which can occur when mattress disposal options are expensive, unavailable, or unclear to residents.

⁴³ Data from California Used Mattress Recovery and Recycling 2025 Program Budget. July 1, 2024. Submitted by Mattress Recycling Council California, LLC, to California Department of Resources Recycling and Recovery.

Program success in participating states

Data suggest that MRC's mattress recycling program has made significant progress toward participating states' goals. For example:

- In its first year of implementation, the mattress recycling rate in Connecticut rose from 8.7% to 63.5%.⁴⁴
- The City of San Diego saw a 25% decrease in illegal mattress dumping in 2023.⁴⁵
- Tallying up all four participating states through 2025, more than 500 million pounds of materials have been recycled throughout the lifetime of the program, saving 14.9 million cubic yards of landfill space.⁴⁶

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⁴⁴ Product Stewardship Institute. "Up to 90% of materials in mattresses are recyclable."

⁴⁵ Inside San Diego. City News Team. "City of San Diego celebrates success of mattress recycling program." March 3, 2025, 11:16 a.m. Accessed June 30, 2025, from <https://www.insidesandiego.org/city-san-diego-celebrates-success-mattress-recycling-program>.

⁴⁶ *Ibid.*

Public Support

A fact sheet and supporting organizations is available at via the Massachusetts Product Stewardship Council: <https://massrecycle.org/wp-content/uploads/2025/06/Mattress-EPR-Fact-Sheet.pdf>

In addition, the International Sleep Products Association (ISPA) submitted a statement of support as follows:

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The International Sleep Products Association (ISPA) represents mattress manufacturers and suppliers of components and services to the mattress industry. ISPA has a long history of supporting well crafted mattress EPR legislation, and we continue to support legislation like HB 1023, filed by Representative Phillips in Massachusetts this year.

ISPA is proud to be a leader in mattress recycling. As the primary association representing the mattress industry in the U.S., ISPA works to assist our members in not only improving the environmental sustainability of their operations, but also their products. To further this goal, ISPA created the Mattress Recycling Council (MRC) to operate mattress recycling programs in states that adopt mattress recycling program laws. MRC currently operates statewide mattress recycling in California, Oregon, Rhode Island, and Connecticut. In the 10 years the MRC program has been operating, it has successfully recycled over 15 million mattresses and boxsprings and is now processing over 2 million mattresses annually.

HB 1023 would create a mattress recycling program in Massachusetts based on the successful operations that MRC is running in existing states. Like those other programs, Rep. Philips' bill would require the mattress industry to develop and run the program, subject to state oversight from the Massachusetts Department of Environmental Protection (DEP). Through a network of municipal and private collection sites as well as third-party transporters and recyclers, MRC would provide no-cost and accessible state-wide opportunities for residents and businesses to discard their used mattresses for recycling. The program provides cost-effective recycling that saves cities, towns, retailers and consumers money.

We look forward to continuing our work with the Extended Producer Responsibility Commission and our pursuit of bringing a sustainable, workable mattress recycling solution to Massachusetts. Should you have any questions, please feel free to contact [Alison Keane](#), [Grant Johnson](#) or [Dan McGowan](#).



EPR Commission Recommendation

Table 6 shows a detailed breakdown of how the EPR Commission voted on the following resolution:

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Table 6. —Extended Producer Responsibility Commission vote on enacting mattress stewardship legislation⁴⁷

Commissioner	Title, Organization	Vote
John Beling, Chair	Deputy Commissioner, Massachusetts Department of Environmental Protection	
Rep. Christine Barber	Appointee for Rep. Michael Day, Massachusetts House of Representatives	
Senator Mike Barrett	Chair, Joint Committee on Telecommunications, Energy, and Utilities	
Sharon Byrne Kishida	Nominee, Senate Minority Leader	
Leigh-Anne Cole	Executive Director, Community Action Works	
Jose Delgado	Arise for Social Justice	
Janet Domenitz	Executive Director, MassPIRG	
Lew Dubuque	Vice President, Northeast Chapter, National Waste and Recycling Association	
Magda Garncarz	Vice President of Government Affairs, Associated Industries of Massachusetts	
Sarah Kalish	Executive Office of Economic Development	
Dalene LaPointe	Assistant Director, Environmental Toxicology Program at Massachusetts Department of Public Health	
David Melly	Legislative Director, Environmental League of Massachusetts	
Conor O'Shaughnessy	Budget Director and Environmental Policy Analyst, Office of Senator Bruce Tarr	
Andrew Potter	Chair, Select Board, Town of West Stockbridge	
Catherine Ratte	Director, Land Use and Environment Department, Pioneer Valley Planning Commission	
Bill Rennie	Senior Vice President, Retailers Association of Massachusetts	
Neil Rhein	Executive Director, Keep Massachusetts Beautiful	
Waneta Trabert	Vice President, MassRecycle	
Tracy Triplett	Senior Enforcement Counsel, Office of Attorney General Andrea Joy Campbell	
Abbie Webb	Vice President of Sustainability, Casella Waste Management	

⁴⁷ From a vote taken at a XXX, 2025, EPR Commission meeting.

APPENDIX: Public Comments Received

Comment 1

I want to ask the following questions in the EPR Commission Meeting #3, scheduled for June 18th:

1. Product Stewardship Institute ("PSI") June 2025 Document: 1. Page 10. The report states: "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." Given that the report states 50% of the population of Massachusetts relies on curbside pickup, is it not a punitive tax for those residents to have to pay the "MRC Recycling Fee" when they will not have the opportunity to have their mattress taken for free? Understanding that many urban residents don't have access to a vehicle to transport a mattress or box spring to a centralized site, is there not a concern that this is a tax on those least able to afford it, and will not have the ability to use this service they have paid for? The current system does charge these residents to have curbside pickup, to meet them where they are, but does not also impose an additional tax on these residents because they don't happen to own a vehicle.
2. Opportunities for Massachusetts- PSI notes that 66% of MA mattresses were recycled in 2024, which was the 2nd full year after the MassDEP Waste Ban. They suggest that with the EPR program this would rise to 95-98%. How do they justify this material increase when all of the other EPR programs, which have been in existence over 10 years do not exceed 68%? Does this not suggest the MA approach, spearheaded by MasDEP, is exponentially more effective as recycling rates are almost the same after only 2 years in place?
3. "Mattress EPR would save Massachusetts municipalities \$12 million per year" - PSI notes, in the following section, that "...more than 50% of residents are already paying municipalities to recycle their mattresses..." so would they not need to show the revenue municipalities get for charging residents to recycle not just the costs to calculate "savings"? Our analysis, from over 80+ municipalities throughout the State of MA, shows that almost all of them are charging residents, which we believe in almost every instance more than covers the cost of handling, storage, transportation, and recycling.
4. "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." This suggests that the current MassDEP approach has created a healthy and vibrant competitive market for municipalities and consumers to choose from. Can PSI quantify the number of mattress recyclers in each state where the MRC currently operates?

Response 1

These comments will be shared as additional background information for the June 18th Commission Meeting.

Comment 2

While the mattress recycling rate is high and DEP often points to that statistic as proof that the waste ban works, it's not the complete picture. It is very costly to manage mattresses, and it is very time-consuming for large municipalities. So I would urge the State to not look at recycling rate as the only metric to consider with EPR. First, the rate can be a reflection of the grants that DEP offered to start programs. It also can be a reflection of the extra fee that trash disposal sites charge for mattresses. Transfer stations and trash disposal sites often charge a fee for mattresses going into the trash. From our experience that cost can be as high as \$140 per mattress. The amount of work for municipalities to manage mattresses is overlooked under the current system. In Cambridge (and in other urban muni's) we spend an incredible amount of time fielding calls for abandoned mattresses and fielding issues with property managers not able to dispose of mattresses because they have private trash collection. And without any universal system, we end up getting called regularly to pickup a mattress from various locations on a regular basis.

Under EPR, there would be more resources available to municipalities to divert the mattress and the municipality wouldn't have to be the managing entity. The imbalance of time spent managing mattresses and tonnage diverted from the trash is wide. For the amount of time we spend managing mattresses we could make significant progress on reducing commercial and residential trash, improving other sanitation issues, and making our programs more equitable and accessible to our diverse population.

Response 2

Issues related to municipal mattress management and cost are addressed in the Draft Commission background document and policy recommendation for mattresses, which is posted here: <https://www.mass.gov/doc/draft-eprcmattress-backgroundrecommendationdocjuly2025/download>

Comment 3

At IKEA, our vision is to create a better everyday life for the many people. We work towards this vision by offering well-designed, functional, durable, affordable and sustainable home furnishing solutions for our customers. To care for people and planet, we also have an ambition to transition towards a circular business and support policies to increase recycling. We commend the Massachusetts Commission on Extended Producer Responsibility (EPR) for exploring policies to increase recycling and circularity through EPR.

As Massachusetts considers establishing a mattress stewardship program, we encourage the Commonwealth to adopt a tiered fee structure—where lower-priced mattresses are assessed lower recycling fees than higher-priced ones. This approach supports equity for lower-income consumers, who are more likely to purchase affordable mattresses that are also generally less complex and less costly to recycle. Conversely, higher-priced mattresses typically involve more materials, are more difficult to recycle, and should contribute proportionately to the cost of the program. In states with a flat mattress recycling fee—such as Oregon, where all mattresses incur a \$22.75 fee regardless of price—lower-income consumers effectively subsidize the recycling of more expensive products. A tiered fee model would better align recycling costs with product characteristics and consumer ability to pay, while still achieving strong environmental outcomes. We believe this balance is critical to the long-term success and fairness of any mattress stewardship program.

Response 3

The Commission has raised this point as a question for further consideration in the draft policy recommendation for mattresses, which is posted here:

<https://www.mass.gov/doc/draft-eprcmattress-backgroundrecommendationdocjuly2025/download>

DRAFT



July 28, 2025

Greg Cooper, Hazardous and Solid Waste Director
Massachusetts Department of Environmental Protection
100 Cambridge St. Suite 900
Boston, MA 02114

Re: Questions posed on the Mattress Recycling Council program in the Extended Producer Responsibility Commission

Dear Mr. Cooper,

As the Extended Producer Responsibility (EPR) Commission considers its final recommendations to the legislature regarding mattress EPR, several questions were raised in its mattresses report that the International Sleep Products Association (ISPA) would like to address. As you know, the Mattress Recycling Council (MRC) has operated statewide mattress recycling programs since 2015 and is looking to expand into Massachusetts, should harmonized legislation be enacted.

Based on our operational experience, MRC believes we are well positioned to answer the questions that the Commission has posed ahead of its anticipated September vote on its recommendations. We want to emphasize that we appreciate the Commission's time on this matter and their interest in considering mattress EPR. Below, please find the questions and answers to those included in the Commission's initial report.

1. Should the mattress fee be a flat fee or a variable fee based on size of mattress or cost? Current EPR programs have a flat fee regardless of the size (twin, full, queen, king) or cost of the mattress.

As mentioned in the EPR Commission's report:

- i. It is simple and easy for consumers and retailers to understand and apply
- ii. It is easy to verify whether the retailer has applied and collected the fee correctly
- iii. Covers the full cost to dismantle and recycle the mattress being discarded
- iv. Allows MRC to budget revenues in a predictable manner

However, there are additional reasons this single fee makes the most sense. Low-cost units are typically less durable than higher priced units and are replaced more often. With a

shorter life cycle, they are more likely to enter the program for recycling sooner and therefore place an outsized financial burden on MRC compared to more durable units. Thus, a lower fee based on price results in an imbalance in the program that could seriously impact the underlying finances of the program that would be difficult to project. Further, it may inadvertently encourage consumers to buy less sustainable products with shorter lifespans. In addition, varying sizes of mattresses do not result in a significant differential in the amount of time, effort, or expense it takes to disassemble a unit, so a fee based on size could have the same negative financial impact as a fee based on cost. Finally, a tiered fee structure based on purchase cost or mattress size is not harmonized with other mattress recycling laws currently in operation. Implementing a one-off program in Massachusetts would therefore add costs for mattress retailers who would have to update their software systems to account for a variable fee in one state and a single fee in others. In addition to costs, this would lead to producer, retailer and ultimately consumer confusion as everyone has to navigate multiple fee systems in varying states. While well-intentioned, MRC believes that a tiered structure for durable mattress products is prohibitively cost-intensive to budget, implement, and audit for compliance. This is exactly why the program was founded and continues 10 years later to finance our programs based on a per unit fee. Nevertheless, in our model mattress recycling bill, ISPA has left that provision open to changes in the future should operational circumstances change.

2. Should the disposal cost of mattresses that cannot be collected and recycled through the program be included?

Massachusetts currently has a disposal ban for mattresses. Should Massachusetts pass a harmonized mattress recycling bill, between the ban and the MRC program, the state should have the highest diversion rates in the country. Mandating that MRC pay for any and all disposal of mattresses and mattress components that escape the system, would raise program costs while the existing solid waste infrastructure is already best situated to handle unrecyclable units that are crushed, contaminated, and disposed of with other solid waste and are already paid for by existing tipping fees. Removing them from the solid waste stream would require modification of existing solid waste contracts, and solid waste facilities would have to track, document and invoice for the discarded units in order to be reimbursed. MRC cannot pay an invoice without supporting documentation per generally accepted accounting principles.

Processing techniques and technology at mattress recyclers has improved during the past decade, and very few units arriving at a recycling facility are unrecyclable. In MRC's Connecticut program, less than 0.5% of units coming into the program are unrecyclable.

Moreover, MA H 1023 requires, as part of the annual report, that MRC include an evaluation of why mattress materials sent for disposal were not recycled and describe efforts to increase recycling rates.

Separately, MRC must meet standards set in the law and regulations that govern each program. Paying for the costs of municipalities or solid waste facilities that have not taken reasonable steps to mitigate contamination as so many others have done with success would only encourage poor handling techniques. Those that are experiencing abnormally high rejection rates because their collection methods for contaminated or damaged units should be motivation to consider alternatives. MRC is prepared to work with solid waste handlers to help protect the quality of the units they collect, but municipalities and facilities must do their part to help solve contamination problems.

3. Should the fee be collected at the wholesale or retail level? In current mattress EPR programs the fee is collected at the point of retail sale.

As covered in the Commission's recommendation, a retail-based fee is largely explained by the Commission's own explanation of its first question:

- i. It is simple and easy for consumers and retailers to understand and apply
- ii. It is easy to verify whether the retailer has applied and collected the fee correctly
- iii. Covers the full cost to dismantle and recycle the mattress being discarded
- iv. Allows MRC to budget revenues in a predictable manner

In addition to those points, we estimate that 40-50% of units sold today are compressed box beds sold to an identifiable delivery address - commonly referred to as boxed bedding. Collecting the fee at retail point of sale provides the most accurate method to properly determine when the unit is actually sold in or into the state, rather than relying on wholesales estimates into regional distribution warehouses that service multiple states. Fee enforcement based on wholesale data becomes very challenging when based on estimates and not an audit trail that can be easily verified with online search methods.

Over and above the operational uncertainty and costs of wholesale fees– this method also lessens consumer awareness and necessitates additional spending on marketing to inform consumers of the program and collection services.

Moreover, this is not a universally applicable option in the current mattress supply chain. Mattress manufacturers often have distribution centers that serve multiple states and do not know what state each unit will be sold into. New England states are in close proximity to each other which would further complicate audits and compliance. Thus, it also makes enforcement more costly and difficult.

Further, many boxed beds are sold directly from 3rd party manufacturers to consumers making it impossible to administer a fee at the wholesale level for online sales of mattresses. A point-of-sale retail fee ensures that if a mattress is bought at an online retailer and shipped to a Massachusetts address, that purchase triggers the remittance of the fee and reporting to MRC.

4. Should the EPR fee cover some form or partial cost of municipal curbside collection?

Collecting mattresses curbside would be a significant financial and operational burden for a mattress EPR program in Massachusetts and interfere with existing solid waste infrastructure and contracts. By virtue of just having the program, the EPR fee will cover partial costs of premium curbside service, however, covering all of the cost would result in significant cost increases for the entire State. The higher cost of including premium curbside collection in the MRC fee will incentivize consumers to shop in neighboring states with lower fees. Limiting such collection to only programs that are paid for by a premium service fee is a compromise that still enables the municipal government to provide the service while also realizing the cost savings of having the recycling (and in some cases transportation costs) paid for through the MRC program.

In addition, covering the cost of premium curbside service through the statewide MRC program would subsidize areas with curbside and penalize areas without. This would generally place more of the burden on rural communities or those without strong existing solid waste systems. Per a PSI report, currently 50% of residents (only 19% of towns) have access to curbside. Therefore, it would not be equitable to have the other half of residents pay for curbside, the bulk of whom are urban and suburban residents at the detriment of rural residents.

If a municipality chooses to collect mattresses curbside and consolidates those mattresses at their transfer station or MRC collection site, MRC provides a trailer at the solid waste facility, transport to the recycler and recycling of those units. This is a significant portion of the costs to recycle a mattress to responsible end markets.

Conclusion

MRC has been in operation for over 10 years and is operational in 4 states, including two neighboring states to Massachusetts: Rhode Island and Connecticut. ISPA and Rep. Phillips have proposed legislation, under HB 1023, that efficiently addresses the concerns above and harmonizes any MA program with those already in existence. We urge the



Commission to endorse a mattress recycling system that mirrors other successful mattress recycling programs, similar to the endorsement of the PaintCare program adopted earlier in the Commission's process. We welcome the opportunity to continue this dialogue and are ready to answer any further questions and provide more information upon request. Please do not hesitate to reach out to me directly or Dan McGowan.

Sincerely,

Alison Keane, Esq., CAE, IOM
President, ISPA and MRC

A handwritten signature in blue ink, appearing to read "Alison Keane", is positioned below the typed name.