

March 10, 2026

The Honorable Founq Hawj, Chair
Senate Environment, Climate, & Legacy Committee
1150 Minnesota Senate Building
St. Paul, MN 55155

RE: Opposition to SF1980: Mattress Recycling Grants

Dear Chairman Hawj and Committee Members:

The International Sleep Products Association (ISPA) represents mattress manufacturers and suppliers of components, retailers and service providers to the mattress industry. ISPA created the Mattress Recycling Council (MRC) to operate mattress recycling programs in states that adopt mattress recycling legislation and currently operates statewide mattress recycling programs in California, Oregon, Rhode Island, and Connecticut. In its 10 years of operation, MRC has successfully recycled over 17 million mattresses and boxsprings and now processes over 2 million mattresses annually.

Unfortunately, ISPA must oppose MN SF 1980. SF 1980 would considerably disrupt the mattress retail market in Minnesota by requiring two separate \$5.00 fees — one remitted by a mattress or box spring manufacturer when it sells to a retailer and another remitted by a retailer when it sells a mattress or box spring to a consumer. This creates an overly complex system, which would most likely burden domestic manufacturers and brick-and-mortar stores in Minnesota.

The fee remitted from the mattress or box spring manufacturer to the retailer at the wholesale level is particularly challenging to account for. Many mattress manufacturers produce mattresses for brands, private labels, specialty outlets, sleep shops, and online retailers. Other mattress producers license brands that may be manufactured and/or sold by a host of suppliers and retailers. Mattress manufacturers often lack direct information about where final sales of their products occur. In the mattress industry, distribution centers often serve multiple states, as retailers don't have adequate space to store bulky mattresses on-site. This complex distribution system for mattresses creates numerous difficulties in fairly and accurately applying a funding mechanism at the point of production.

Furthermore, SF1980 lacks any enforcement language or penalties for noncompliance. Without such, and a mechanism for the state to enforce the funding, the bill would create an unlevel playing field for mattress manufacturers and brick and mortar stores in Minnesota. Given that upwards of 35% of mattresses are imported, domestic manufacturers and brick and mortar retail locations in Minnesota would be put at a competitive disadvantage to online retailers and foreign producers who, if recalcitrant in paying and remitting their fair share of the fees, would face no consequences under SF 1980.

Sustainable financing cannot be achieved with free riders. Domestic manufacturers and retailers, and ultimately, the Minnesota consumer, should not foot the bill.

In addition, it appears that while all Minnesota mattress and box spring purchasers would be paying for the program; the state is not actually mandated to use that funding for expanding state recycling; and if it does, the grants would only go to municipal governments that apply for such. Thus, there would be no statewide program that services all residents paying for the program.

In contrast, the MRC program is simple. When you buy a mattress in the state, the fee goes to MRC to fund collection, transportation, and recycling. MRC contracts directly with transporters and recyclers through an open RFP process. In our existing program states, MRC negotiates and contracts directly with local governments for collection at transfer stations and for residential access; retail locations for take back; and collection from large volume users, such as hospitals, hotels, universities, and the military. We use special collection events for rural communities to ensure state-wide convenience. MRC also undertakes an extensive education and outreach campaign to inform consumers about the program and collection opportunities.

MRC's existing statewide programs are full-service product stewardship programs, with state oversight and enforcement ensuring a sustainable financing system and access for all in-state residents. All of the program elements, including the fee, statewide collection convenience criteria, and recycling goals, are established in a program plan that gets approved by the state oversight agency, which in Minnesota would likely be the Minnesota Pollution Control Agency (MPCA). MPCA would also undertake enforcement for the program. MRC also submits annual reports detailing the program and its progress, as well as any future goals or changes.

The fee collected when a mattress is sold in the state is predicated on establishing a level playing field among all producers and retailers, whether brick and mortar or online — all producers register, and retailers can quickly assess whether the brand is in the program. MRC can also quickly assess whether the fee has been applied and, if not, can report it to the enforcement agency for action. MRC operates much like the PaintCare program, which has operated in Minnesota with MPCA oversight for 10 years.

ISPA shares the sponsor's goal of improving the mattress recycling landscape in Minnesota, but SF1980 takes the wrong approach. Instead, we urge the Committee to not advance the bill and would be happy to support harmonized mattress stewardship legislation in the future.

Sincerely,

Alison A. Keane, Esq., CAE, IOM
President