

REQUEST FOR ACTION

To: Zoe Heller
Director

From: Michelle Martin
Deputy Director, Division of Circular Economy

Request Date: September 15, 2025

Decision Subject: Review of Mattress Recycling Council's 2024 Annual Report

Action By: September 29, 2025

Summary of Request

Mattress Recycling Council (MRC) submitted its *2024 California Annual Report (2024 Annual Report)* to the Department of Resources Recycling and Recovery (CalRecycle) on July 1, 2025, as required by statute. This Request for Action (RFA) presents staff's analysis regarding Mattress Recycling Council's *2024 Annual Report*.

Background

MRC must annually submit to CalRecycle by July 1 a report that describes its activities and provides quantitative information for the preceding calendar year. MRC submitted its *2024 Annual Report* to CalRecycle on July 1, 2025. CalRecycle determined that the *2024 Annual Report* was complete and notified MRC on July 25, 2025, pursuant to Title 14, California Code of Regulations (14 CCR) section 18964(c). Pursuant to Public Resources Code (PRC) section 42990.2 and 14 CCR section 18964(c), CalRecycle may adopt a determination of compliance or non-compliance by approving, disapproving, or conditionally approving the annual report no later than 90 days from receipt.

Director decisions on annual reports do not necessarily impact actions taken by CalRecycle's Waste Permitting, Compliance, and Mitigation Division or its independent Office of Audits. Furthermore, nothing in this RFA hinders CalRecycle's right to pursue enforcement actions for instances of noncompliance identified through other means, including but not limited to, field inspections. In addition, director decisions on annual reports do not affect CalRecycle's authority to conduct its own audits of MRC for compliance with statute and regulations and consistency with MRC's *Used Mattress Recovery and Recycling Plan (Plan)*, annual report, and annual program budget pursuant to PRC section 42990(d).

According to MRC's *2024 Annual Report*, MRC:

- Achieved all statewide and program goals.
- Provided consumer convenience to 97.7 percent of residents within 15 miles of 268 collection opportunities covering all 58 counties.
- Participated in 105 collection events, including 59 in environmental justice communities.

- Increased retailer convenience to 172 collection sites for small volume loads, providing on-site trailers to 70 entities, 5 consolidation sites, and 290 live load pickups.
- Reused, renovated, and recycled 65,115,035 pounds of mattress materials.
- Achieved a 73.7 percent program recovery rate.
- Completed eight research and development projects and continued four active projects.
- Supported renovation of 179,984 units statewide.

Staff Analysis

Staff evaluated whether MRC's program implementation activities in 2024 addressed the requirements of statute, regulations, and MRC's *Plan* based on the information in MRC's *2024 Annual Report*. Additionally, staff assessed whether the *2024 Annual Report* demonstrated MRC's good faith effort to comply with the state mattress recycling goals established by CalRecycle pursuant to PRC section 42987.5(b). The following sections present a summary of staff's analysis of MRC's *2024 Annual Report*.

Program Convenience

Requirements: Report on activities, progress, and planned efforts to demonstrate good faith effort to meet the statewide convenience goals pursuant to PRC section 42990.1(m)(1), PRC section 42987.5(a)(1)(C) and (D), and 14 CCR section 18964(b)(13). Describe how consumers of mattresses in California had an opportunity to recycle and properly manage their used mattresses, including the number, location, and type of collection points in the program pursuant to 14 CCR section 18964(b)(5).

Analysis: Requirements Met

Table 1. MRC's 2024 Results Compared to State Mattress Recycling Baseline and Goal for Consumer Convenience

Goal	Baseline	2024 Goal	2024 Reported
Consumer Convenience (number of collection opportunities)	120	221	268

Consumer Convenience and Access

CalRecycle established consumer convenience goals that require a specific number of collection opportunities statewide each year to ensure that all residents have convenient access to drop off used mattresses at no cost. MRC was required to demonstrate good faith efforts to meet statewide consumer convenience goal by establishing 221 collection opportunities by the end of 2024. MRC reports it exceeded the consumer convenience goal by providing 268 collection opportunities, comprised of 242 permanent collection sites and 26 franchise haulers and municipalities that aggregate collected units (i.e., mattresses, foundations, and futon mattresses) from curbside bulky item collection. MRC reports it increased the number of permanent collection sites by 2 sites compared to 240 collection sites in 2023 and that it has established at least one permanent collection site in all 58 counties.

MRC reports it held 105 collection events in 2024 to supplement the collection opportunities, 59 of which were held in environmental justice communities and 92 were held within 15 miles of environmental justice communities. This is a decrease from 2023, in which MRC reported 131 collection events, 71 of which were held in environmental justice communities. MRC attributes this decrease in collection events to collaborations with organizations for existing permanent sites rather than MRC hosting events.

MRC was also required to provide 94 percent of California consumers with convenient access to MRC's collection network, including collection sites and bulky item pick-up, within 15 miles of where they reside by 2024. MRC reported that 97.7 percent of California residents resided within 15 miles of a permanent collection site or a curbside collection program in 2024. Despite the decrease from 98.4 percent reported in 2023, MRC achieved the consumer access goal in 2024. MRC reports challenges to expanding the program's collection network, such as some solid waste facilities not wanting to become collection sites, contractual restrictions, and logistical challenges for solid waste facilities.

Retailer Access to the Program

PRC section 42992 requires retailers to offer consumers the option to have a used mattress picked up for recovery at no additional cost to the consumer if a new mattress is delivered to the consumer. MRC reports it encourages retailers who pick up used mattresses to drop them off at an MRC-contracted recycler, a collection site that accepts commercial loads, or commercial-volume consolidation location. MRC reports it established 172 permanent collection sites that accept commercial loads and 5 consolidated sites, which are located in private yards that are not available to the public, by the end of 2024. This is compared to 154 permanent collection sites that accept commercial loads and 7 consolidated sites in 2023.

To further support retailer access to the program, CalRecycle established a program goal for 80 percent of Californians in urban areas to be within 20 miles of a collection site and 95 percent of Californians in rural areas to be within 40 miles of a collection site that accepts commercial volume by 2024. MRC reports achieving these goals with 99.2 percent of urban households located within 20 miles of a permanent collection site and 99.5 percent of rural households located within 40 miles of a permanent collection site that accepts commercial volume by the end of 2024.

PRC section 42987.5(a)(1)(D)(i)(II) also requires MRC to provide no-cost freight services to any mattress retailer, health care facility, educational facility, military base, or lodging establishment that has at least 100 used mattresses to pick up at one time. In 2024, MRC's Commercial Volume Program, which offers pick-up services consistent with this goal, provided and serviced 70 permanent onsite trailers for entities that generated at least 100 units per month, an increase from 60 in 2023. MRC also arranged for trucks and trailers to pick up 290 loads from 101 sites for entities that required less frequent collection, an increase from 257 loads from 78 sites in 2023.

Collection

Requirements: Describe MRC's methods to collect, transport, and process used mattresses pursuant to PRC section 42990.1(h) and 14 CCR section 18964(b)(3). Report on quantity of discarded used mattresses collected for recycling in the program pursuant to PRC section 42990.1(c). Describe MRC's methods to coordinate activities with existing used mattress collection and recycling programs pursuant to 14 CCR section 18964(b)(7).

Analysis: Requirements Met

MRC collects used mattresses through a collection network that includes permanent sites, curbside bulky item pick-up programs, events, retailer take-back, and its commercial volume program. The *2024 Annual Report* describes MRC's efforts to coordinate with existing mattress collection programs run by solid waste facilities, bulky item collection programs, retailers, and non-profit organizations. MRC states it continuously recruits new collection sites, provides on-site training to site staff, and provides funding for facility improvement projects to support the efficacy of its collection network.

MRC reports it collected more program units than the previous year despite a 3.5 percent decrease in California mattress sales. MRC reports it collected 1,560,655 program units for recycling in 2024, an increase from 1,468,360 units in 2023. MRC reports its recyclers collected an additional 24,197 non-program units from non-California sources or Prison Industry Authority mattresses, bringing the total number of program and non-program units collected statewide for recycling to 1,584,852.

MRC's collection methods met the statutory and regulatory requirements.

Recycling

Requirements: Demonstrate MRC's good faith efforts to meet the state recycling rate goal of 81 percent \pm 5 percent and the state efficiency rate goal of 65 percent \pm 5 percent pursuant to PRC section 42990.1(l) and 14 CCR section 18964(b)(13). Report on the quantity of used mattresses and materials recycled and otherwise disposed of pursuant to PRC section 42990.1(e) and (g) and uses for recycled materials pursuant to PRC section 42990.1. Report on MRC's activities to prioritize the use of in-state processing facilities pursuant to PRC section 42990(m)(2).

Analysis: Requirements Met

Table 2. 2024 Statewide Results Compared to the State Mattress Recycling Baseline and Goals for Recycling Rate and Efficiency Rate

Goal	Baseline	2024 Goal	2024 Reported
Recycling Rate	81%	81% \pm 5%	85.9%
Efficiency Rate	65%	65% \pm 5%	64.6%

Recycling Rate

MRC's *2024 Annual Report* was required to demonstrate MRC's good faith effort to comply with the state mattress recycling goals established pursuant to PRC section 42987.5. The statewide recycling rate goal for 2024 was to recycle and renovate 81

percent of the total units collected and managed inside and outside of MRC's program, with an allowable range of 5 percent below and above 81 percent. Total units collected statewide is calculated by adding the number of units recycled, renovated, and disposed. MRC reports it used data reported to CalRecycle by mattress recyclers, renovators, and solid waste facilities and determined that 1,761,464 units were renovated or recycled out of 2,050,054 total units collected statewide. Accordingly, the statewide recycling rate was 85.9 percent, which met the 81 percent statewide goal.

MRC reports it actively promotes the recycling and reuse of discarded units' mattress materials statewide, including continually expanding its collection network, increasing consumer awareness about the program, providing incentives for consumers to drop off units directly to recyclers, providing convenient no-cost options for retailers and other commercial entities to recycled use mattresses, funding research projects and collection site improvement projects and educating recyclers and collection sites on how to prevent contamination and increase efficiency.

Efficiency Rate

The statewide efficiency rate goal for 2024 was to recycle and renovate 65 percent of the total weight of all mattress materials recycled, renovated, and disposed statewide, with an allowable range of 5 percent below and above 65 percent. MRC used data reported to CalRecycle by mattress recyclers, renovators, and solid waste facilities and determined that the statewide efficiency rate was 64.6 percent, which met the 65 percent goal, accounting for the allowable range of 5 percent.

MRC reports its efforts to increase the percentage of mattress materials that are recycled or reused include contracting with renovators to serve as permanent collection sites, working with recyclers to reduce contamination and increase the amount and quality of materials that can be recycled, and conducting research to identify new and better end uses for recovered materials. MRC states it continues to invest in research focusing on difficult to recycle mattress materials. For example, in 2024, MRC sponsored the Recycled Mattress Foam in Footwear and Automotive project at George Mason University, which will evaluate the feasibility of integrating recycled mattress foam in footwear and automotive parts.

MRC established a recycler's target in its *Plan* for its contracted recyclers to reuse and recycle 75 percent, by weight, of the units they process, and now refers to this target as its program recovery rate. In 2024, MRC reports its recyclers reused and recycled 65,115,035 pounds out of the total 88,394,995 pounds of mattress materials generated for a program recovery rate of 73.7 percent. Staff note that the program recovery rate reported in MRC's *2024 Annual Report* is an aspirational target and is distinct from the goals established by CalRecycle.

Renovation

Requirements: Demonstrate good faith effort to comply with the state mattress renovation baseline of 225,000 units pursuant to PRC section 42987.5(b) and 14 CCR section 18964(b)(13).

Analysis: Requirements Met

Renovated units are included in the calculations for the statewide mattress recycling rate and recycling efficiency rate. CalRecycle established that a baseline of 225,000 units were renovated in 2018, and MRC must demonstrate its good faith efforts to comply with this baseline annually. In 2024, renovators reported to CalRecycle a total of 179,984 units renovated, which was below the established baseline and a decrease from 189,558 units renovated in 2023. The *2024 Annual Report* describes MRC's efforts to maintain the baseline, such as contracting with renovators to serve as permanent collection sites, and listing renovators on its online drop-off site locator tool and informing renovators about their statutory obligations and opportunities. MRC reports renovators purchased 6,090 units and an estimated 5,490,678 pounds of materials from MRC recyclers in 2024, a 24 percent increase over 2023. Although the reported number of units renovated was below the baseline in 2024, MRC demonstrated a good faith effort to comply with the state mattress renovation baseline, which met the statutory and regulatory requirements.

Mitigation of Illegal Mattress Dumping

Requirements: Report on research activities to address the problem of illegal dumping and report on the progress made as a result of the research activities pursuant to PRC section 42990.1(m)(3). Report on pilot programs, such as those designed to clean up illegally dumped mattresses pursuant to PRC section 42990.1(m)(4).

Analysis: Requirements Met

MRC reports addressing illegal mattress dumping by (1) intercepting discarded mattresses before they are illegally dumped, (2) compensating participating entities that provide data to inform MRC and policymakers of the extent of illegal mattress dumping through its Illegally Dumped Mattress Collection Initiative (Initiative), (3) using this data to measure and document where illegal dumping is happening in participants' geographic area and if mitigation efforts are effective, (4) funding pilot projects to mitigate illegal dumping and communicating these findings to illegal dumping technical experts, and (5) engaging in other activities to mitigate illegal dumping, including working with technical experts, attending illegal dumping work groups and conferences, and promoting recycling and illegal dumping mitigation resources.

MRC's *2024 Annual Report* states it established the Initiative to gather reliable data about the extent of illegal mattress dumping throughout California from local governments, solid waste facilities, franchise haulers, nonprofits, and other entities that report data regarding illegally dumped mattresses to MRC. MRC provides a per-unit compensation rate of up to \$15 in urban counties and \$20 in rural counties for entities to collect illegally dumped units and report the collection data to MRC. In 2024, MRC reports 76 participants representing 36 counties participated in the Initiative, no net change from the 76 participants in 2023. Eight participants from 2023 did not report in 2024, but two new entities joined the Initiative, and six existing participants reported data that did not report data in 2023. MRC reports participants collected 64,227 units in 2024, an increase from the 55,554 units collected in 2023, which MRC states is due to an increase in data reporting efforts by participants.

MRC reports it awarded funding for illegal dumping mitigation pilot projects in Daly City, San Benito County, Ventura County, and the City of Modesto. Daly City, in partnership with Republic Services, used the funding to increase awareness of proper mattress disposal, educate residents about illegal dumping consequences, and reduce illegally dumped mattresses in the city by hosting free, local mattress collection events. MRC funded San Benito County's comprehensive strategy to address illegal mattress dumping by providing bilingual education and outreach materials to its residents, which resulted increased recycling event attendance and public awareness on proper disposal options.

Research

Requirements: Report on research activities to improve used mattress collection, dismantling, recycling operations, source reduction, and green product design, and a report on the progress made as a result of the activities pursuant to PRC section 42990.1(m)(3).

Analysis: Requirements Met

MRC reports it continually conducts research projects to advance the efficiency of mattress collection, transportation, and recycling processes and to improve end markets for mattress materials in addition to its illegal dumping research. MRC's *2024 Annual Report* describes eight research projects it completed in 2024, four active research projects still ongoing, and several future research topics of interest. One research project, for example, seeks to increase the recyclability of collected units and the safety of site staff, and consisted of 11 mattress collection site improvements that MRC completed in 2024 and three active mattress collection site improvements still ongoing.

Another of the research studies characterized the composition, variability, and presence of extractable components of foam, which provided information about what factors need to be considered for recycling or reusing post-consumer mattress foam. MRC's active research projects include implementing lean manufacturing and facility fire assessments for MRC California recyclers, testing recycled mattress foam in outwear and automotive applications, and designing surface engineered powders from recycled mattress foam. MRC also shared areas of interest for future research projects, such as those exploring innovations on a commercial scale, high-performance carbon from recycled mattress materials, biochar, and foam circularity research.

Financing Mechanism

Requirements: Include the mattress recycling organization's total expenses and revenues associated with the implementation of the used mattress recycling program, including the mattress recycling charge, capital costs, education/outreach costs, end-of-life used mattress management costs, and program administration costs pursuant to PRC section 42990.1(a) and 14 CCR section 18964(b)(9).

Analysis: Requirements Met

Table 3. MRC's 2024 Program Costs by Cost Category

<u>Cost Category</u>	<u>MRC's 2024 Cost</u>
Collection	\$6,833,776
Transportation	\$9,550,143
Recycling	\$20,964,578
Education and Outreach	\$2,425,118
Research and Development	\$883,415
Program Administration	\$6,619,452
Total Program Costs	\$47,276,482

MRC's primary source of revenue was the \$10.50 mattress recycling charge collected on all mattresses, foundations, and futon mattresses sold in California. MRC also reports it collected \$28,388 in late fees from retailers who did not remit mattress recycling charges to MRC on time. MRC's total revenue, including the recycling charge and late fee revenue, was \$34,315,561 in 2024. MRC's total costs were \$47,276,482, including collection, transportation, recycling, education and outreach, research and development, and program administration. An analysis of MRC's revenues, costs, and reserve is included in the RFA regarding MRC's *California Used Mattress Recovery and Recycling 2026 Program Budget*, which was submitted separately to CalRecycle.

Staff Analysis Conclusion and Program Observations

Staff evaluated MRC's *2024 Annual Report* to determine whether MRC's program implementation activities in 2024 addressed statutory, regulatory, and *Plan* requirements. CalRecycle's analysis in this RFA is limited to assessing compliance and CalRecycle does not attest to the accuracy of all claims, characterizations, or statements reported in MRC's *2024 Annual Report*.

MRC reports efforts undertaken during the reporting period to address the statutory, regulatory, and *Plan* requirements. MRC's *2024 Annual Report* met all requirements.

Overall, based on the information and metrics reported in MRC's annual reports, MRC appears to demonstrate continued success in providing convenient mattress collection options for Californians and strong overall program performance.

Consultation with Mattress Advisory Committee

Pursuant to PRC section 42990.1(k) and 14 CCR section 18964(b)(12), the *2024 Annual Report* includes a report from the MRC Advisory Committee that summarizes its consultative process with MRC.

Feedback from Interested Parties

CalRecycle solicited public comments on MRC's *2024 Annual Report* from July 2, 2025, through July 16, 2025. CalRecycle received two comments from California Product Stewardship Council and David Goldstein of Ventura County and considered these comments when reviewing MRC's *2024 Annual Report*.

Action

Pursuant to PRC section 42990.2(a) and 14 CCR section 18964(c), I hereby:

- Approve MRC's 2024 Annual Report*
- Conditionally approve MRC's 2024 Annual Report*
- Disapprove MRC's 2024 Annual Report*

Dated: September 29, 2025

Signed by: Zoe Heller, Director

Attachments

The document listed below is posted to CalRecycle's website.

1. [Mattress Recycling Council's 2024 California Annual Report](https://www2.calrecycle.ca.gov/PublicNotices/Details/5483) (July 1, 2025):
<https://www2.calrecycle.ca.gov/PublicNotices/Details/5483>
2. [Consideration of Proposed 2020 State Mattress Recycling Baseline and Goals](https://www2.calrecycle.ca.gov/PublicNotices/Details/3965)
(June 27, 2020): <https://www2.calrecycle.ca.gov/PublicNotices/Details/3965>
3. [Consideration of Proposed State Mattress Recycling Baseline and Goals \(effective January 1, 2022\)](https://www2.calrecycle.ca.gov/PublicNotices/Details/4136) (October 21, 2020):
<https://www2.calrecycle.ca.gov/PublicNotices/Details/4136>
4. [Mattress Recycling Council's Used Mattress Recovery and Recycling Plan](https://www2.calrecycle.ca.gov/PublicNotices/Documents/14633)
(January 9, 2023):
<https://www2.calrecycle.ca.gov/PublicNotices/Documents/14633>