

2025

# ISPA Advocacy Report

## Legislative Session

INTERNATIONAL SLEEP  
PRODUCTS ASSOCIATION  
The Voice of the Mattress Industry®





## ISPA's Mission

The International Sleep Products Association (ISPA) is a nonprofit organization focused on protecting and advancing the interests of the mattress industry. For over 100 years, ISPA has supported the industry through comprehensive public policy, public affairs, and educational initiatives. As The Voice of the Mattress Industry®, ISPA actively advocates at the federal, state, and local levels, representing industry interests before legislators and regulators to foster a supportive regulatory environment and positive public perception. This report highlights legislation and regulations that ISPA has monitored and engaged with in 2025.

ISPA focuses its efforts on issues affecting mattress manufacturers, component suppliers, and retailers; this year, closely monitoring 240 bills across 37 states and D.C., and 7 federal bills. Of these, 18 state bills were ultimately enacted.

ISPA supported legislation to enable the Mattress Recycling Council (MRC) program in Maryland, Virginia, New Jersey, and Massachusetts. By contrast, ISPA worked to amend and later defeated poorly crafted mattress extended producer responsibility (EPR) legislation in New York, Minnesota, and Washington. ISPA also convened a dialogue moderated by the Product Stewardship Institute (PSI) to bring harmonization to the various mattress EPR bills across multiple states. PSI is a policy expert and consulting nonprofit that pioneered product stewardship in the United States and has led the movement for over two decades on EPR policies, programs, and laws. The goal is to achieve stakeholder agreement on certain elements of mattress EPR legislation, which should better align stakeholders and lead to less contentious legislative processes, allowing MRC's successful program to expand to new states.



After four years of sustained outreach from ISPA and its members, New York State granted enforcement discretion for mattresses containing modacrylic and aramid fibers. This action offers relief to mattress manufacturers, allowing them six additional months to comply with state law. In addition, it allows ISPA additional time to demonstrate the safety and importance of these fibers while seeking de-minimus levels set through regulation in addition to changes to the law through new legislation.

In 2026, ISPA will continue to actively engage on key issues impacting the industry and will keep members informed of developments.

## Setting Our Sites on the Future!

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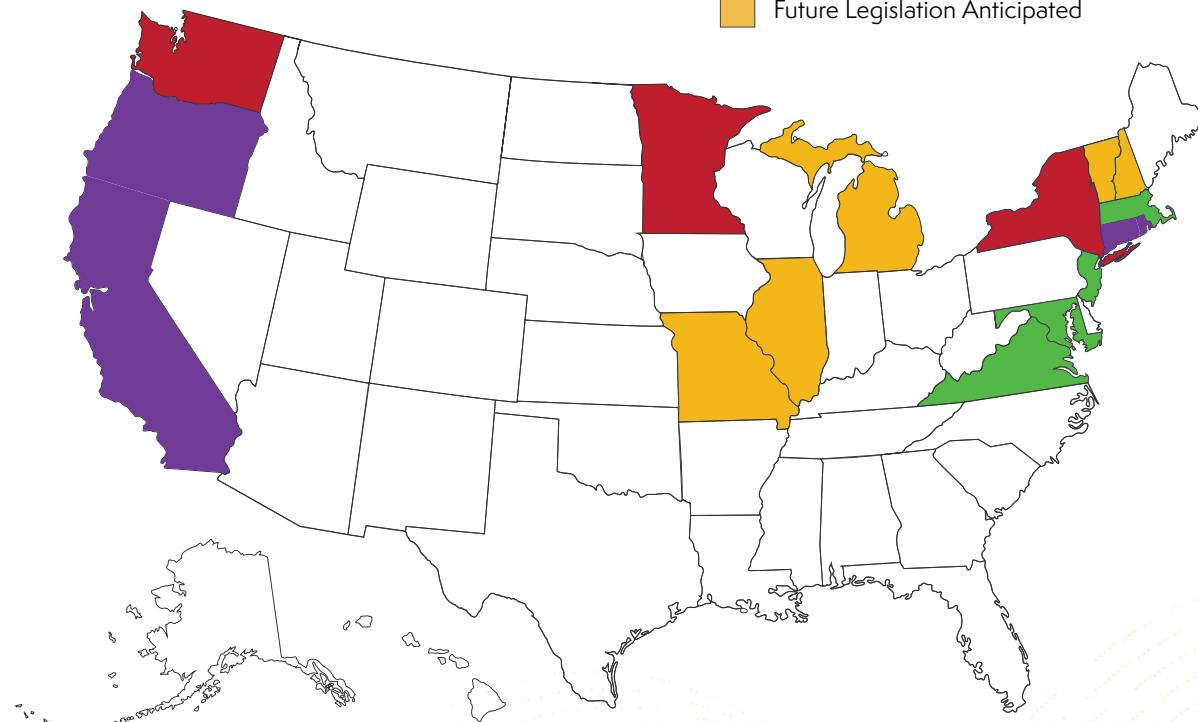
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# State Mattress Extended Producer Responsibility Legislation



ISPA is responsible for lobbying for or against legislation to establish statewide mattress recycling programs on behalf of the Mattress Recycling Council (MRC). Once a recycling law has been enacted (as in California, Connecticut, Oregon, and Rhode Island), should MRC apply and be approved to operate as the Producer Responsibility Organization, MRC is responsible for subsequent operational action. In 2025, seven states considered mattress recycling legislation. Five additional states (Michigan, Illinois, Vermont, New Hampshire, and Missouri) may potentially introduce mattress recycling legislation in the near future.

- ISPA Opposed Legislation
- ISPA Supported Legislation
- Existing MRC Program State
- Future Legislation Anticipated





## New York

The New York State Legislature considered two mattress recycling bills this session: an Assembly bill (NY A 1209) and a Senate bill (NY S 1463). ISPA strongly opposed both bills. Importantly, among other flaws, the legislation lacks a sustainable financing mechanism. Without authority to establish a mattress recycling fee and thus no clear method to equitably fund the program, ISPA worked to defeat the legislation.

Despite significant opposition from ISPA and its members, NY S 1463 passed the New York State Senate and looked likely to pass in the Assembly. Thanks to the outpouring of opposition from the industry and our supporters, this did not come to fruition. Notably, the flawed mattress recycling legislation received four additional “Nay” votes compared to past years in the Senate (bill passed 41-20 in 2024 and 36-24 in 2025). Each letter, email, or phone call delivered to a New York State Legislator helped ensure that harmful legislation did not pass in the Assembly.

ISPA would like to bring MRC’s program to the Empire State and continues to advocate for amendments to both bills to align them with MRC’s enabling legislation in its existing program states.

## New Jersey

This year, ISPA worked with Senator John McKeon and Assemblywoman Melinda Kane to introduce our model mattress recycling legislation in New Jersey (NJ S 4626/NJ A 6054). ISPA supports this legislation and is working with interested stakeholders, including the Association of New Jersey Recyclers, to advance it in 2026.



## Massachusetts

In 2022, Massachusetts banned mattresses from its landfills. Unfortunately, the Commonwealth took this action without a coordinated statewide network for recycling the estimated 600,000 mattresses discarded annually. The landfill ban has resulted in a patchwork of recycling services and relatively expensive collection charges for Massachusetts consumers.



In the 2025 legislative session, lawmakers are considering two separate mattress recycling bills. ISPA supports MA H 1023, which would create a single, statewide system for recycling mattresses in the style of existing MRC programs. However, ISPA opposes MA S 614 and MA H 3985, its partner legislation in the House, because the bills stray from proven EPR programs for mattresses by requiring the Massachusetts Department of Environmental Protection (DEP) to run and administer the program, as opposed to mattress producers. ISPA testified at a May 2025 hearing in support of H 1023 and explained how H 3985 and S 614 differ drastically from successful mattress recycling programs and the basic principles of EPR generally.

In addition, ISPA presented MRC's program at the June 2025 meeting of the Massachusetts EPR Commission. Pursuant to a 2024 law, the EPR Commission was created to evaluate and recommend EPR policies for 6 product categories, including mattresses, to the state legislature and is comprised of a variety of stakeholders. MRC's program was well received, and the Commission recommended the development and implementation of a mattress recycling program that aligns with existing MRC programs to the greatest extent possible.

## Maryland

In 2025, the Maryland General Assembly considered legislation (MD HB 858) that would have enacted a statewide mattress recycling program. This year, ISPA successfully engaged with the bill sponsor to negotiate significant amendments. As a result, ISPA was able to change its position to full support, and HB 858 passed the Maryland House of Delegates and for the first time, received a hearing in the Maryland Senate Education, Energy, and Environment Committee. The bill did not pass the Maryland State Senate, however, as it ran out of time before the 2025 session ended.

ISPA will continue to advocate for mattress recycling legislation in Maryland to mirror MRC's existing state programs. ISPA continues to engage with interested Maryland stakeholders and has secured a Senate sponsor for 2026. Having cross-filed bills in the House and Senate will help advance the legislation next year.



## Virginia

ISPA secured the introduction of our model mattress recycling legislation (VA HB 1974/VA SB 990) in both chambers of the Virginia General Assembly this year. ISPA collaborated with both bill sponsors to introduce legislation that follows the structure that has enabled MRC to operate efficiently in existing states and allows for the flexibility needed to make the program a success in the Commonwealth.

ISPA was set to testify in support of these bills; however, given opposition from Governor Youngkin's office, both bills were tabled. ISPA is optimistic that the incoming Spanberger administration will be more receptive to a statewide mattress recycling program in Virginia in 2026.



## Washington

In 2025, ISPA opposed a critically flawed mattress recycling bill introduced in the Washington House of Representatives (WA HB 1901). HB 1901 was referred to the House Energy and Environment Committee but did not receive a hearing during the 2025 legislative session.

ISPA would like to see MRC's program expand to Washington State. However, HB 1901 does not establish the legislative framework necessary for a successful program. Similar to the New York bill, HB 1901 lacks the sustainable financing mechanism of the MRC program and contains impractical convenience standards based on battery collection. In order to have a more workable bill in 2026, ISPA has already engaged with stakeholders and legislators in Olympia to develop compromise legislation for 2026. ISPA is hopeful that this and the PSI dialogue can facilitate a successful mattress recycling program in the Evergreen State.



## Minnesota

In Minnesota, legislation (MN HF 1624/MN SF 1980) was proposed that would require mattress producers and retailers, separately, to add a \$5.00 recycling assessment to each mattress and box spring sold. The fees would be remitted to the Minnesota Pollution Control Agency (MPCA) to make grants to local governments for expanding and supporting mattress recycling programs in Minnesota.

ISPA opposed this legislation in Minnesota. The proposal diverges significantly from EPR legislation generally and ISPA's model mattress recycling legislation. The bill never received a hearing, so it did not advance. However, ISPA will engage with stakeholders in Minnesota to discuss the introduction of legislation to bring the MRC program to Minnesota, and interested stakeholders from the state are participating in the PSI dialogue.

## PSI Dialogue on Mattress Extended Producer Responsibility Legislation

ISPA has convened a dialogue facilitated by the Product Stewardship Institute (PSI). As the leading policy expert on EPR in the U.S., PSI's members include state and local solid waste officials as well as environmental advocates, recyclers, and interested industry partners. The dialogue included ISPA, MRC, ISPA members, state government officials, state environmental NGOs, retailers, recyclers, and other interested stakeholders. ISPA's goal is to seek alignment on key elements of MRC's enabling legislation and establish a memorandum of understanding between the participants for a harmonized approach to legislation across multiple states. With proactive engagement, the legislative process related to mattress EPR bills should become smoother, less adversarial, and continue to allow for the successful implementation of new MRC state programs.



## California Mattress Recycling Law Amendment

This year, a retailer introduced legislation in the California General Assembly to allow a mattress retailer to pay the mattress stewardship assessment on behalf of the consumer. ISPA opposed the legislation as written; however, after several rounds of consultation with the retailer, ISPA agreed to legislation that would enable this practice. The legislation, as passed, would allow a retailer, distributor, or seller to pay on behalf of their brands (and the consumer) only under a written agreement with MRC California. The retailer is still responsible for educating the consumer about MRC's program and the options available to consumers for free drop-off or collection of used mattresses in California.

# State Mattress Tagging Legislation



## Utah Repeals Digital Law Label Requirements

Since 2023, ISPA has monitored a proposed Utah rule that would have required online retailers to make law labels for mattresses (and upholstered furniture) sold on the internet easily accessible to Utah consumers before sale. In March, the Utah Department of Agriculture and Food (UDAF) removed all references to the digital law and textile label requirements from Utah's Bedding, Upholstered Furniture, and Quilted Clothing Rule (R70-101). The UDAF reversed course after pressure from members of the Utah State Legislature and the furniture industry.

However, based on this activity, legislation (UT SB 231) was introduced to eliminate the state's Bedding, Upholstered Furniture, and Quilted Clothing Program. ISPA did not support this legislation as the program provides important regulation and dissuades sales of unsanitary and unsafe used and renovated mattresses. If repealed, it may disrupt mattress registration in reciprocal states. ISPA worked with the state agency and the American Home Furniture Alliance to convince the sponsor to withdraw the bill and will closely monitor any potential developments in 2026. ISPA supports reasonable regulation of law labels in the sleep products industry to protect consumers from deceptive trade practices and mattresses that violate safety standards.

## Pennsylvania Bill Seeks to Allow Recycled Content in Mattresses

ISPA met with staff from the Pennsylvania House Labor and Industry Committee to discuss PA HB 2322 in 2024. This legislation would amend Pennsylvania's Bedding and Upholstery Law to allow recycled materials to be used in mattresses. Pennsylvania enacted similar legislation to allow for the use of recycled and reclaimed materials in stuffed toys. ISPA anticipates policy trends to require post-consumer recycled content in consumer products to potentially be applied to mattresses in the coming years. Thus, ISPA's proactive engagement with legislators in Pennsylvania allows the industry the opportunity to set a helpful precedent for including clean recycled content in mattresses. While ISPA offered language to amend the legislation, at the time of this writing, the bill has not been reintroduced in 2025. ISPA will continue to work with the state on a potential path forward, as this could be the model for future states and/or a standard.

# Trade and Tariffs

Given the significant uncertainty with the Trump administration's stance on trade and tariffs, ISPA is closely monitoring the landscape and is working with outside counsel to help the membership navigate the situation. A trade survey was sent to ISPA members in February, and based on the feedback received, a new trade subcommittee was formed. The trade subcommittee has convened when major trade actions are announced and has provided input on public comments that ISPA has submitted on the following topics:

- Comments to U.S. Customs and Border Protection on the United States-Mexico-Canada Agreement (USMCA) Implementing Regulations
- Comments to the Office of the U.S. Trade Representative (USTR) to support a Section 301 tariff exclusion extension for Viscose Rayon
- Comments to USTR on the operation of the USMCA, discussing improving access to the preferential terms of the USMCA for companies that import textiles from Canada and Mexico to manufacture mattresses in the United States.

## Increased Federal Presence

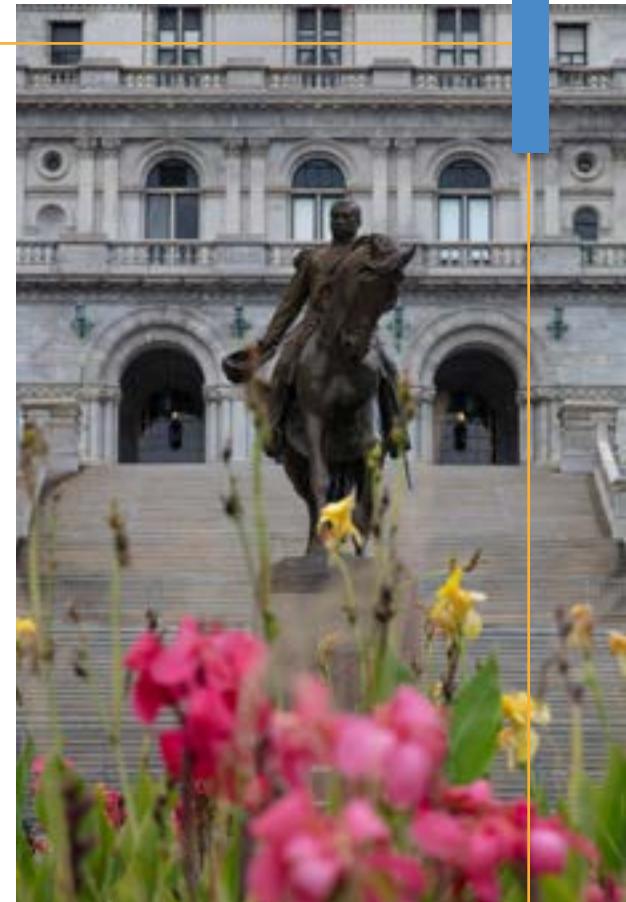
Also, as part of the 2025 strategic plan, ISPA increased its presence on Capitol Hill. In July, ISPA met with five key U.S. Senate offices. ISPA focused its efforts on U.S. Senators who represent states with significant mattress manufacturing presences, including Arizona, Georgia, North Carolina, and South Carolina. During two separate Hill visits in October and December, ISPA met with sixteen U.S. House offices with members who sit on the House Committee on Energy and Commerce.

The discussions focus on an introduction to ISPA and the sleep products industry, as well as MRC and our significant sustainability activity. Trade, EPR, and recycling are all on the agenda, including bills for advanced recycling and labeling for recyclability. These discussions are part of ISPA's ongoing efforts to represent and advocate for the sleep products industry, ensuring policies support a strong, innovative, and sustainable marketplace.

# Chemicals of Concern Legislation and Regulation

## New York Fiberglass Ban Bill

The New York State Legislature considered legislation (NY A 7912B/NY S 7821) to ban the sale of mattresses, juvenile products, and upholstered furniture that contain fiberglass. Notably, key definitions and an enforcement mechanism are absent from the legislative text. This effort resembles a California law (CA AB 1059), which bans the sale, distribution, and manufacture of mattresses, juvenile products, or upholstered furniture that contain textile fiberglass. To work towards a consistent regulatory environment for mattress manufacturers, ISPA engaged with Assemblyman Weprin (D) to introduce NY A 8537, a bill with a definition of textile fiberglass aligned with CA AB 1059. No bills related to fiberglass in mattresses were enacted this year in New York, but ISPA anticipates this legislation being reintroduced in 2026.



## New York Flame Retardant Law Compliance Update

While the New York State Legislature considered additional material bans for mattresses, ISPA endeavored to amend a New York State law enacted in 2021 that bans modacrylic and aramid fibers in mattresses. In response to ISPA's concerns, legislation (NY S 8412//NY A 8848) was introduced to extend an exemption for modacrylic and aramid fibers until January 1, 2027, and allow the industry time to submit evidence of the health and safety of these materials, similar to California's approach to regulating flame retardants in mattresses under CA AB 1059. Unfortunately, this bill died as it ran out of time at the end of the legislative session.

However, due to sustained outreach from ISPA and its members, New York State granted enforcement discretion regarding the state's ban of modacrylic and aramid fibers in mattresses, which was set to take effect on January 1, 2026. Specifically, the New York State Department of Environmental Conservation (DEC) will allow mattresses containing the following covered flame retardant chemicals to be sold in New York State until June 15, 2026:

*Textiles made using modacrylic fiber components without antimony trioxide when used internally as a barrier material in a memory foam or gel foam mattress or aramid fibers when used in the fabric that covers the bottom (non-sleep surface) of a mattress that has a sleeping surface on only one side of the mattress.*

This means that DEC will not enforce this section of the law on January 1, 2026, when it takes effect, but instead will wait until June 15, 2026, to do so. Manufacturers now have six additional months to comply with the current law, and retailers will not have to certify compliance from all producers as of January 1, 2026, and have more time to sell off current inventories.

In the meantime, ISPA will continue to pursue changes to the law through legislation in 2026 and is also requesting regulatory assistance in establishing a de-minimus level to allow the continued use of these fibers. Thirteen states, including California, have set these levels, and DEC has the authority to establish them.



## ISPA Submits Health Risk Assessment to California

As required by CA AB 1059 (enacted in 2023), ISPA submitted a Quantitative Health Risk Assessment of Potential Human Health Effects from Exposure to Residual Modacrylic Monomers in Modacrylic Fiber Without Antimony Trioxide Used in Mattresses (Report), performed by an independent toxicologist to the California Bureau of Household Goods and Services (BHGS). Modacrylic fiber is used to make certain fire-retardant (FR) barriers that mattress manufacturers use to meet the requirements of 16 CFR 1632 and 1633; however, California contemplated banning them. ISPA negotiated an exemption that was predicated on this study.

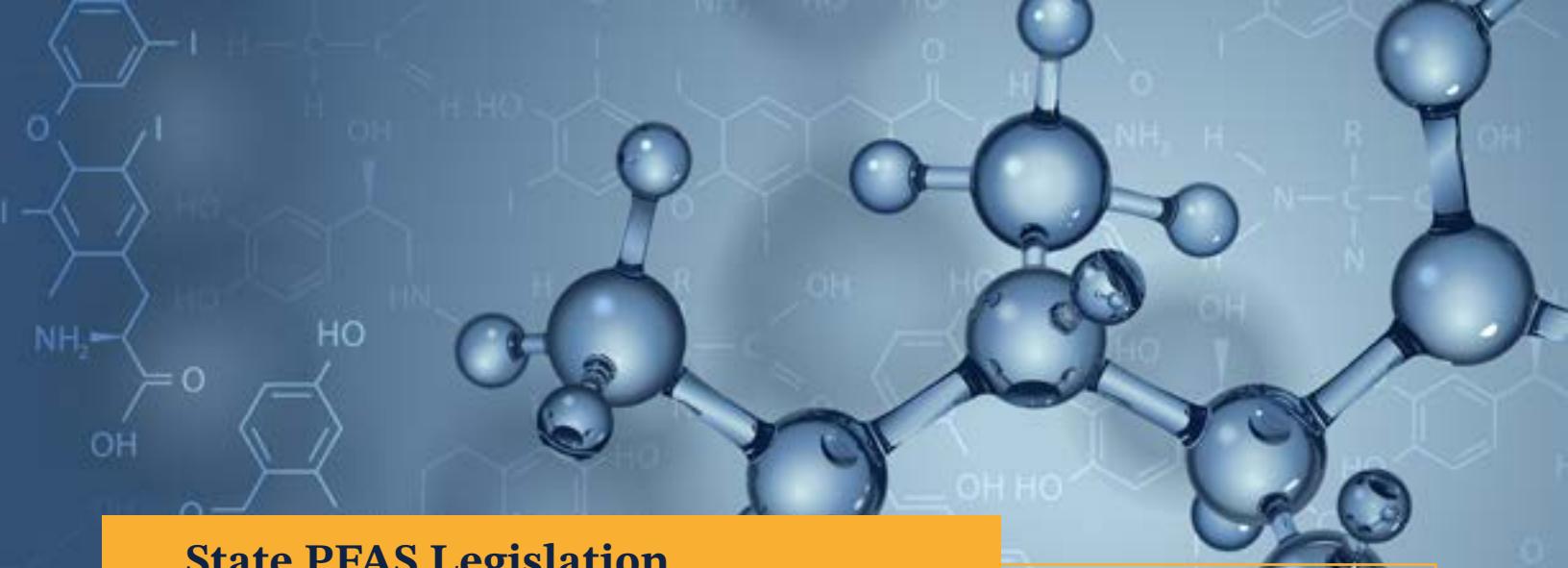
The study tested finished modacrylic fiber to determine if humans are exposed to its inputs (namely, acrylonitrile (AN), vinyl chloride (VC), and vinylidene chloride (VDC)) when they sleep on a mattress containing the fiber. Using samples of modacrylic fiber products on the market, the study evaluated potential inhalation, oral, and dermal exposures to AN, VC, VDC, and chlorine released from modacrylic fibers. Testing determined that there are no detectable levels of AN, VC, VDC, or chlorine released from modacrylic fibers, with concentrations of each chemical measured below reporting limits for all samples tested. The study design included highly conservative assumptions and multiple worst-case scenario exposure assumptions. Even under the unrealistic exposure scenario assumptions tested, the report found no human health risk in the normal course of consumer use of a mattress containing modacrylic fiber without antimony trioxide as an FR barrier.

Thus, the report confirms the legislative and regulatory decision in CA AB 1059 to exempt modacrylic fiber without antimony trioxide or other covered FR chemicals from the state's ban and ISPA believes the status quo will remain with regard to this law in California. ISPA has also provided this report to NY DEC for additional evidence on the safety of modacrylic fiber without antimony trioxide.

## California Fire Barrier Survey

Pursuant to CA AB 2998, enacted in 2018, California law requires ISPA to survey which flame-retardant (FR) materials mattress manufacturers use to meet the federal 16 CFR 1632 and 1633 fire safety standards every 3 years. Mattress manufacturers that are registered with the BHGS are required to complete this survey. AB 2998 also requires ISPA to submit a list of CA-registered producers who fail to respond to the FR survey to BHGS, who must post them on its website. ISPA sent the 2025 survey to all ISPA members as well as non-members in California on November 12th, 2025. ISPA requests that companies fill out and return the survey by January 9th, 2026. The survey report is due to BHGS on January 31, 2026.





## State PFAS Legislation

Continued concern over the health and environmental risks of perfluoroalkyl and polyfluoroalkyl chemicals (PFAS) resulted in another active year for legislation restricting PFAS in consumer products. ISPA tracked 47 state PFAS-related bills in 2025, which cover a wide range of issues, including product labeling and bans on the use of PFAS in consumer products.

The product categories relevant to the mattress industry often included in PFAS ban bills include textile articles, upholstered furniture, fabric treatments, and juvenile products. However, each bill is slightly different. [ISPA prepared a chart](#) summarizing the scope and status of several PFAS ban bills that ISPA has been tracking.

In 2025, New Mexico enacted legislation (NM HB 212) to create a phase-out timeline banning PFAS in consumer products. The law bans PFAS in juvenile products effective January 1, 2027, before extending its restrictions to textile furnishings, upholstered furniture, textiles, and fabric treatments effective January 1, 2028. Finally, the ban extends to the use of intentionally added PFAS in all consumer products effective January 1, 2032.

Meanwhile, Illinois (IL HB 2516) enacted a PFAS ban for juvenile products. Vermont enacted legislation (VT H 238) to update its existing PFAS in consumer products phaseout timeline, which already included a ban on textile furnishings, upholstered furniture, textiles, and fabric treatments containing intentionally added PFAS effective January 1, 2028.



## EPA Finalizes Formaldehyde Risk Evaluation

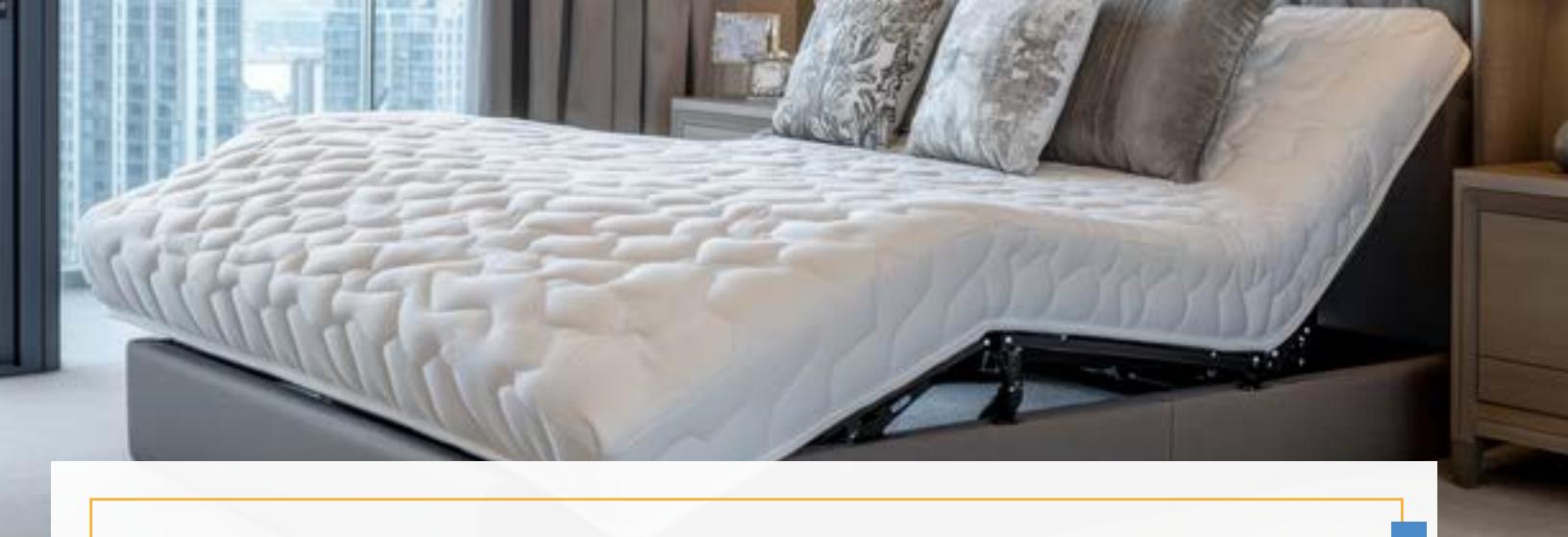
In January 2025, the Environmental Protection Agency (EPA) released its final risk evaluation under the Toxic Substances Control Act (TSCA) for formaldehyde. EPA has determined that formaldehyde presents an unreasonable risk of injury to human health. Under TSCA, EPA must initiate risk management actions to address its unreasonable risk determination. EPA's options for risk management include labelling requirements, use restrictions, phase-outs, and bans.

Of note to the mattress industry, the report identifies textiles, foam bedding and seating, furniture, adhesives, sealants, and composite wood products as consumer product categories that may use formaldehyde. Notably, formaldehyde is also naturally occurring and produced during combustion and the decomposition of organic matter.

This risk evaluation was completed under the Biden Administration's EPA. However, the Trump Administration will determine the risk management actions taken through rulemaking. The Small Business Regulatory Enforcement Fairness Act requires the EPA to form a Small Business Advocacy Review (SBAR) Panel for certain proposed EPA rules and conduct a pre-proposal consultation with affected small entity representatives (SERs). The forthcoming EPA TSCA risk management rule for formaldehyde may have significant impacts on small businesses; thus, a SBAR Panel has been convened.

ISPA applied to participate as a SER on the upcoming SBAR Panel. A SBAR Panel offers an important opportunity for businesses to provide input, influence the EPA rulemaking process, and mitigate any final EPA risk management actions. The Panel issues a report containing recommendations on risk management actions for the EPA Administrator to consider, with panel consensus recommendations historically included in proposed rules.

ISPA is collaborating with a coalition of manufacturers facilitated by the American Chemistry Council (ACC) to prepare for the formaldehyde SBAR panel. The coalition's goals are to educate the EPA on how its risk management actions will affect small businesses. Specifically, the coalition hopes to avoid duplicative workplace standards across multiple federal agencies, maintain reasonable use conditions, and encourage flexible compliance options that achieve the desired health goals while minimizing the introduction of new hazards and barriers for small businesses.



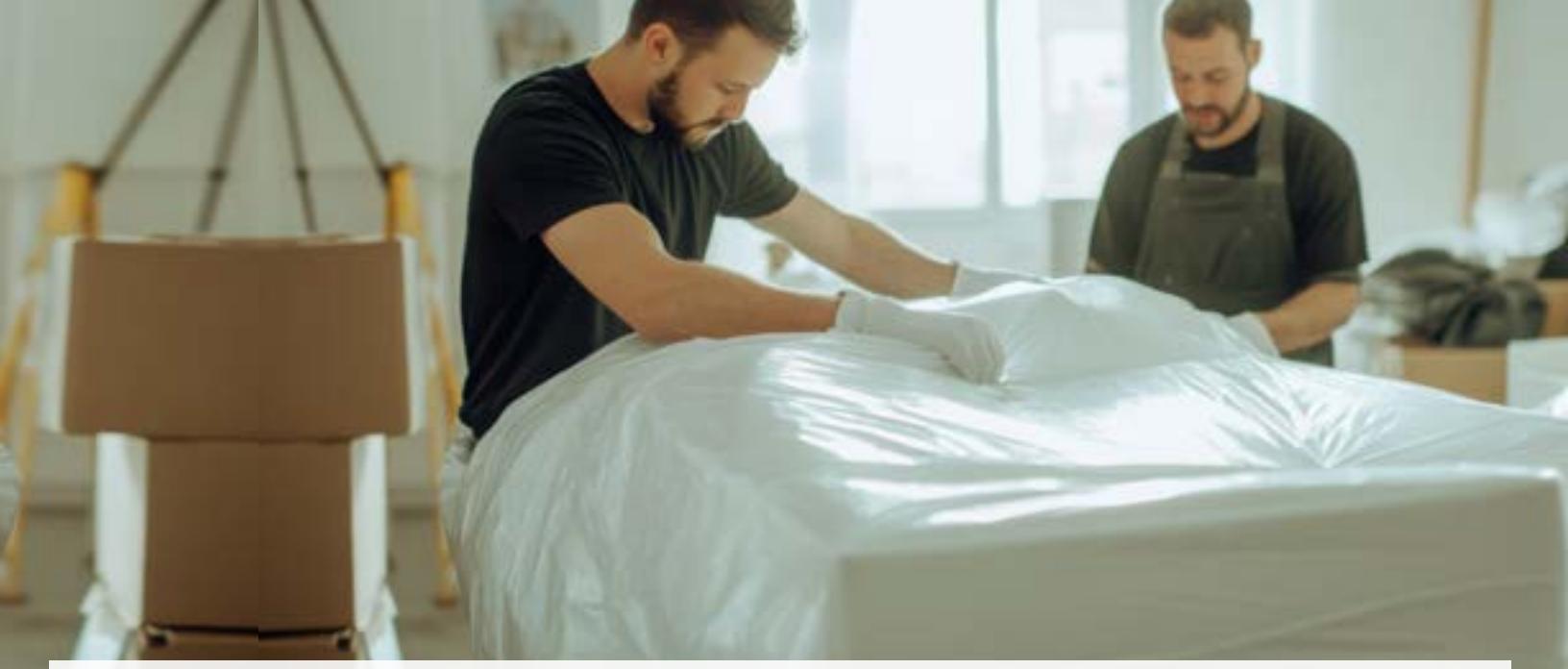
# Right to Repair Legislation

Legislation to allow consumers more flexibility to repair products without voiding the warranty has proliferated over the last several years. Generally, these laws allow consumers and independent repair shops access to the tools, parts, and documentation required to repair certain types of equipment. Legislation has generally focused on consumer electronic equipment, although the language is often broad enough to conceivably cover electric components in mattresses and motion foundations. As a result, ISPA has been tracking this legislation closely. ISPA monitored 25 right to repair bills in 17 states in 2025.

## Texas, Washington, and Connecticut Enact Right to Repair Laws

Texas (TX HB 2963), Washington (WA HB 1483), and Connecticut (CT SB 3) enacted right to repair laws in 2025. The laws require a manufacturer to provide consumers and independent repair shops with documentation, tools, and parts for diagnosing, maintaining, or repairing consumer electronic equipment on fair and reasonable terms. Consumer electronic equipment is defined in both laws to include a product that “functions, in whole or in part, on the basis of digital electronics that are embedded within or attached to the product.” Since 2022, 9 states have passed right-to-repair laws for consumer electronics.





# Paper and Packaging Extended Producer Responsibility Legislation

In 2025, Maryland (MD SB 901) and Washington (WA SB 5284) became the 6th and 7th states to enact paper and packaging extended producer responsibility (EPR) laws. Maine, Oregon, California, Colorado, and Minnesota have already enacted paper and packaging EPR laws, which they are in the process of implementing. Nine other states introduced but failed to enact paper and packaging EPR bills this year. Rhode Island (RI H 6207A) and Hawaii (HI HB 750) both enacted legislation to conduct needs assessments for packaging EPR programs. Needs assessments are often seen as precursors to passing future paper and packaging EPR laws.

**ISPA monitors these bills and the implementation of the existing laws to understand:**

- How this legislation and regulation affect mattress packaging.
- If these recycling developments will affect future mattress recycling bills.

In general, these laws require producers of products that use packaging and paper products to financially support the statewide improvement and expansion of recycling programs for packaging and paper (like newspaper, magazines, inserts and advertising flyers). Generally, companies that sell packaged products under their brand names will be required to join a producer responsibility organization (PRO) that will collect producer fees to implement this law. To date, Circular Action Alliance has been chosen as the PRO to facilitate brand obligations in most states.

**In Maryland**, the approved PRO must submit a five-year producer responsibility plan by July 1, 2028. Under SB 901, brand owners are required to pay 50% of the residential recycling cost starting July 1, 2028, increasing to 75% by July 1, 2029, and to 90% by July 1, 2030. SB 901 does not include specific performance targets. Instead, within 5 years of plan approval, the PRO must determine targets for recycling, composting, waste reduction, reuse, return rates, and post-consumer recycled content usage for each covered material type.

**In Washington**, producers are required to join a PRO by July 1, 2026. The PRO must submit a plan to the Washington Department of Ecology for approval by Oct. 1, 2028. Like Maryland, reimbursements for recycling service providers will be phased in over time: 50% by 2030, 75% by 2031, 90% by 2032. Unique to Washington, the PRO must fund and implement a reuse financial assistance program, investing at least \$5 million beginning in 2029 and then annually, adjusted for inflation. Lastly, the PRO must determine performance targets based on the results of a needs assessment for reuse rates, return rates, recycling rates, composting rates, targets for plastic source reduction and postconsumer recycled content by covered material type, as applicable.

## Implementation Challenges for Paper and Packaging EPR Laws

Numerous states have faced implementation challenges for their paper and packaging EPR programs. For example, Maine enacted cleanup legislation (ME SP 579) in 2025 to streamline its paper and packaging EPR law due to their initial law's infeasibility to implement. In March, California Governor Gavin Newsom rejected CalRecycle's initial draft regulations for California's paper and packaging EPR law, citing concerns that the proposed rules would impose excessive costs on businesses and consumers. As a result, CalRecycle had to start from scratch, which severely delayed their regulatory process. In Oregon, the National Association of Wholesaler-Distributors filed a lawsuit against the Oregon Department of Environmental Quality (DEQ) to challenge Oregon's paper and packaging EPR program, which launched on July 1, 2025. In short, the lawsuit challenges the constitutionality of the law and argues that wholesalers should not be considered producers under the law. Once CalRecycle's regulations are finalized, ISPA expects California's program to be challenged in court as well.





# U.S. Consumer Products Safety Commission Update

In 2024, the Consumer Products Safety Commission (CPSC) started the formal rulemaking process to potentially amend the mattress flammability standards codified at 16 CFR Parts 1632 and 1633. ISPA met with the CPSC, submitted public comments, and attended their July and November 2024 public meetings to emphasize the mattress industry's needs and discuss potential solutions. Unfortunately, likely due to the new Administration and the uncertainty over the future of the CPSC, the formal rulemaking process has not advanced in 2025.

Notably, all three Democratic CPSC Commissioners were fired by President Trump. The fired commissioners include Mary T. Boyle, Alexander Hoehn-Saric, and Richard Trumka Jr., all of whom had multiple months left on their terms. The agency is led by five commissioners who serve seven-year terms. The Commissioners sued the Administration and temporarily won back their seats. However, the Supreme Court later published a temporary, unsigned ruling in July, allowing Trump to fire the Democratic Commissioners. The case is now awaiting a full hearing in the Supreme Court; however, it is unclear whether or not they will take it up. Separately, Doug Dziak, a Republican member of the CPSC, resigned from his position in August, leaving just one Commissioner. In October, President Trump nominated William Hewes III, who will need to be confirmed by the U.S. Senate, to fill one of the vacancies on the CPSC in a term that expires October 26, 2031.

Even with a lack of Commissioners over most of 2025, the CPSC has issued multiple recalls of mattresses that violate federal mattress flammability standards. ISPA supports these recent recalls, as many low-cost imported mattresses fail to meet 16 CFR Parts 1632 and 1633, and has publicly called on CPSC regulators to take strong action to protect consumers and level the playing field for domestic manufacturers complying with the standards.

In light of the ongoing lawsuit, the potential restructuring of the CPSC (into the Department of Health and Human Services), and the recent government shutdown, it is unlikely that we will see any draft revisions to 1632/33 this year.

# State and Federal Climate Reporting Obligations

## SEC Halts Climate Rule

In March 2025, the U.S. Securities and Exchange Commission (SEC) decided to end its defense of the rules requiring disclosure of climate-related risks and greenhouse gas emissions. Despite dropping the legal defense of the rule, the SEC has not taken any formal action to rescind it. The SEC is now asking the U.S. Court of Appeals for the Eighth Circuit, where the court challenges were consolidated, to make a legal decision about the merits of the rule.

## California Climate Disclosure Law Implementation Update

Despite the end of the SEC Climate Disclosure Rule, U.S. companies will continue to be subject to mandatory climate reporting under California's climate disclosure laws. California's Climate Corporate Data Accountability Act () requires companies that do business in California with over \$1 billion in revenue annually to report their scope 1, 2, and 3 emissions. Meanwhile, the Climate-Related Financial Risk Act (CA SB 261) requires companies with more than \$500 million in revenues to report climate-related financial risks and threats each year.

Companies should be mindful of two approaching climate disclosure deadlines in California:

- Initial climate risk reports due pursuant to CA SB 261 on January 1, 2026
- Initial scope 1 and 2 emissions reports CARB target due date August 10th, 2026

In addition, ISPA monitored legislation in Colorado, Illinois, New Jersey, and New York modeled after California's climate disclosure laws. None of these bills advanced out of Committee.





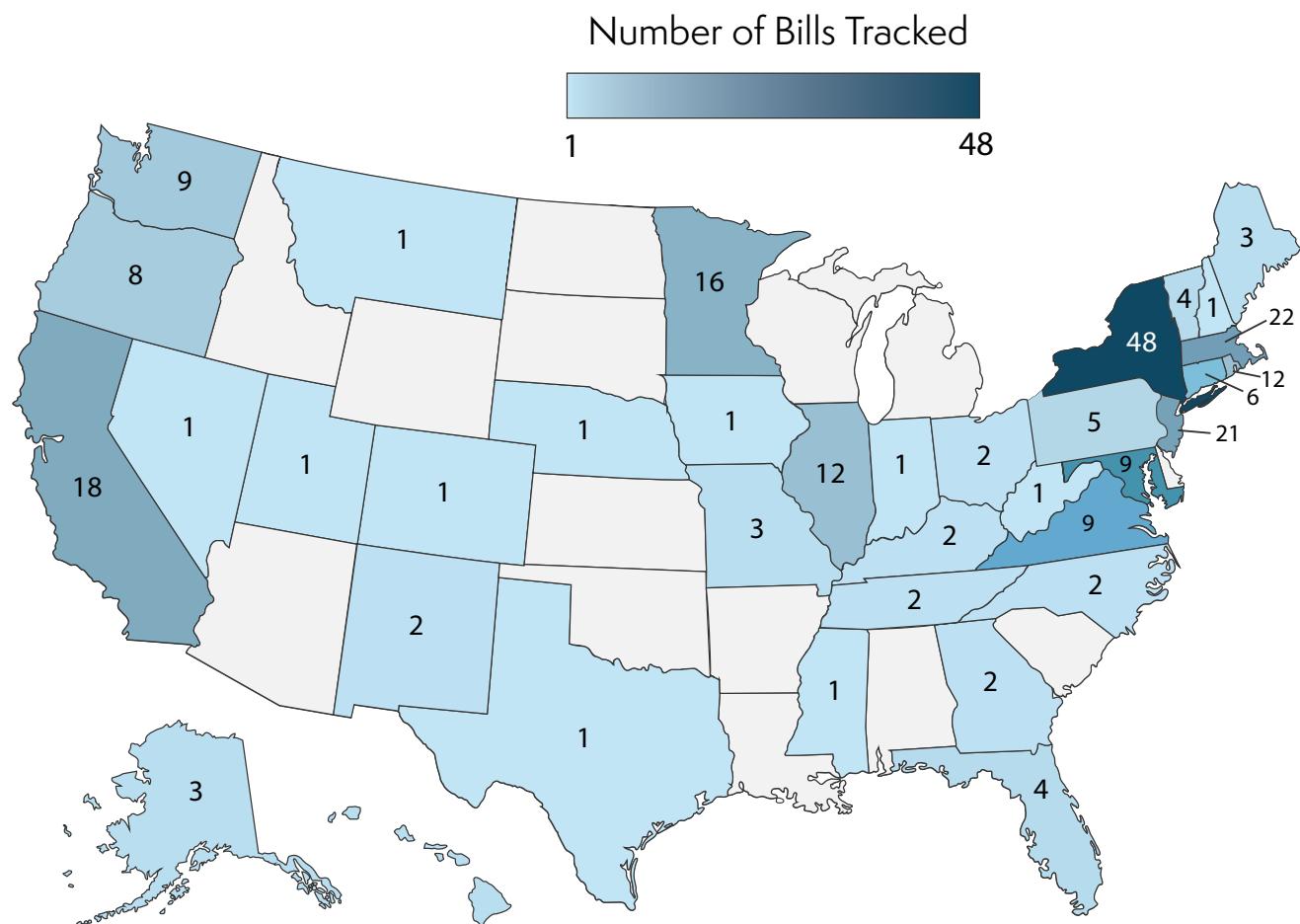
# ISPA Government Affairs Committee

Under ISPA's 2025 strategic plan, the association looks to reactivate its Government Affairs Committee. The mission of the committee is to direct ISPA's monitoring and lobbying activities regarding legislative and regulatory issues that could affect the association and its members.

The Committee will make recommendations to the Board on advocacy strategies and official positions. If you are interested in participating, please do not hesitate to contact us. The Committee will meet virtually for updates monthly during the bulk of state legislative sessions, January through June, and quarterly thereafter. ISPA will also send out periodic updates on both state and federal activity.

# Appendix A

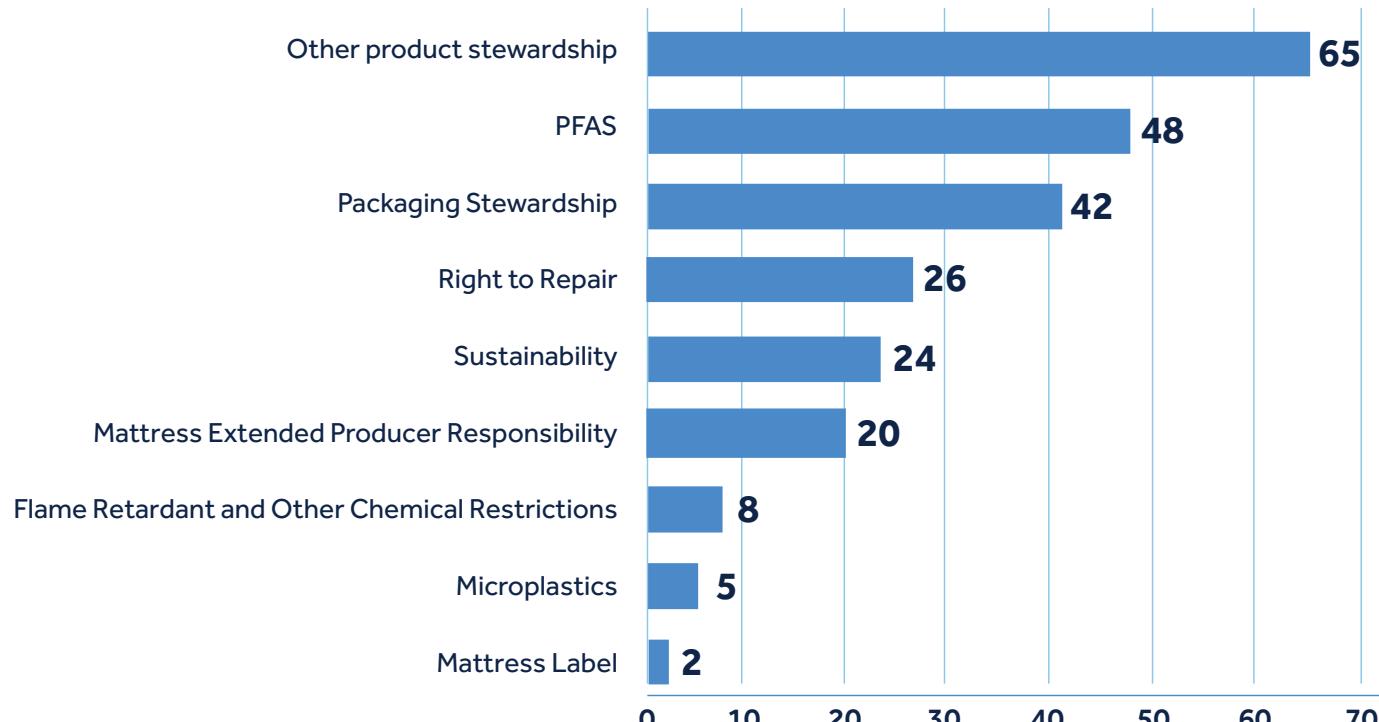
## Bills Tracked by U.S. Map



# Appendix B

## Bills Tracked by Issue Category

### Number of Bills Tracked by Issue Category



# Appendix C

## Bills Enacted by State and Issue Category

State	Bill Number	Title	Issue Category
California	AB 1478	Used Mattress Recovery and Recycling Act: mattress recycling charge	Mattress extended producer responsibility
California	AB 154	Greenhouse gases: climate corporate accountability: climate-related financial risk: regulations: California Environmental Quality Act exemption	Sustainability
California	SB 861	Consumer Affairs	Flame retardants and other chemical restrictions
Connecticut	SB 3	An Act Concerning Consumer Protection and Safety	Right to repair
Hawaii	HB 750	Relating to the Environment	Packaging extended producer responsibility
Illinois	HB 2516	PFAS Product Ban	PFAS
Maryland	HB 901	Environment - Packaging Materials - Producer Responsibility Plans	Packaging extended producer responsibility
Maine	SP 579	An Act to Improve Recycling by Updating the Stewardship Program for Packaging	Packaging extended producer responsibility
New Mexico	HB 212	PFAS Protection Act	PFAS
New York	SB 824	Relates to the climate change adaptation cost recovery program and requirements for climate change adaptive infrastructure projects	Sustainability
Rhode Island	S 17	An Act relating to Commercial Law - general regulatory provisions - deceptive trade practices	Other extended producer responsibility
Rhode Island	H 6207A	The Statewide Needs Assessment for a Redemption and Recycling Plan	Packaging extended producer responsibility
Rhode Island	S324	Creates a public education program on methods to recycle textiles	Other extended producer responsibility
Rhode Island	S997A	The Statewide Needs Assessment for a Redemption and Recycling Plan	Packaging extended producer responsibility
Texas	HB 2963	Relating to diagnosis, maintenance, and repair of certain digital electronic equipment.	Right to Repair
Vermont	H 238	An act relating to the phaseout of consumer products containing added perfluoroalkyl and polyfluoroalkyl substances	PFAS
Washington	SB 5284	Improving Washington's solid waste management outcomes.polyfluoroalkyl substances	Packaging extended producer responsibility
Washington	HB 1483	An Act Relating to supporting the servicing and right to repair of certain products with digital electronics in a secure and reliable manner to increase access and affordability for Washingtonians	Right to Repair

# Appendix D

## Full ISPA Legislative Tracker

The purpose of ISPA's Legislative Tracker is to organize and summarize bills that may affect the mattress industry. ISPA updates this resource regularly to reflect legislative trends and accurately report status updates on bills and regulations as they advance. The data in the tracker is used to identify key trends, strategically plan ISPA advocacy efforts, and communicate legislative and regulatory updates to ISPA's membership.

The Legislative Tracker contains basic identifying information on each bill or regulation including the state, bill or regulation number, sponsor, and status. In addition, each bill or regulation is briefly described and categorized by issue area. In the Excel sheet, you may sort the entries based on what you find most relevant. For example, if you want to identify legislation in Maryland only, you can filter out all other states using the filter tool for the state column. Each column in the tracker is sortable, but the state and issue category filters are the most useful.

The tracker serves as a resource for ISPA's staff and membership. You may download the latest version of the [\*\*ISPA Legislative Tracker\*\*](#) from the Advocacy section of the ISPA website.

If you have issues locating the tracker, email **Marty Salamone**, [msalamone@sleepproducts.org](mailto:msalamone@sleepproducts.org).

[Download the ISPA Legislative Tracker](#)



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