

December 19th, 2025

Sanjay Thirunagari

Programs Manager, Department of Environmental Quality

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*Submitted electronically to sanjay.thirunagari@deq.virginia.gov

ISPA Comments on Draft New Virginia Updated Solid Waste Management Plan

Dear Mr. Thirunagari,

The International Sleep Products Association (ISPA) appreciates this opportunity to submit comments on the new Virginia Solid Waste Management Plan (SWMP). Headquartered in Alexandria, Virginia, ISPA represents mattress manufacturers and suppliers of components and services to the mattress industry. The mattress industry is a \$10 Billion industry that employs over 25,000 people throughout the United States.

ISPA assists our members in improving the environmental sustainability of their operations and products. To further this goal, ISPA created the Mattress Recycling Council (MRC) to operate mattress recycling programs in states that adopt mattress recycling legislation. MRC currently operates in California, Oregon, Rhode Island, and Connecticut. In its 10 years of operation, MRC has successfully recycled over 15 million mattresses and boxsprings and now processes over 2 million mattresses annually.

ISPA is generally supportive of the SWMP's recommendation to expand extended producer responsibility (EPR) in the Commonwealth to include a program for mattresses. However, ISPA does not support the framework approach to EPR discussed in the SWMP. This approach fails to consider the specific characteristics of distinct products. ISPA believes it is vital to tailor EPR legislation to precisely address the challenges and management needs of specific products. Bulky mattresses are dissimilar to cans of paint, batteries, and electronics. Thus, a mattress EPR program requires different convenience standards, performance goals, and program structure to address the specific challenges associated with managing discarded mattresses. A one-size-fits-all approach for dissimilar products will not lead to successful, implementable EPR programs in Virginia.

Based on MRC's experience operating four successful statewide mattress EPR programs, ISPA collaborated with Senator Williams Graves and Delegate Laufer to introduce mattress recycling legislation during the 2025 Virginia legislative session (VA SB 990/VA HB 1974).



An updated version of this legislation will be introduced during the 2026 session of the Virginia General Assembly. ISPA supports this legislation as it would create a statewide mattress EPR program that is harmonized with MRC's existing states.

In short, the legislation requires the mattress industry to develop and run the program, subject to state oversight and reporting. A program plan would be submitted to the Virginia Department of Environmental Quality outlining the components of the program, including collection sites, transportation and recycling services, education and outreach, and program administration, including a budget.

ISPA is confident that the proposed legislation will enhance the infrastructure for the efficient recovery and recycling of discarded mattresses in the Commonwealth while reducing the burden on local governments and increasing landfill diversion rates for mattresses. ISPA and the mattress industry want to establish an efficient, proven mattress recycling program in Virginia.

We look forward to working with the Virginia General Assembly, mattress manufacturers and retailers, cities and counties, and the Department of Environmental Quality, among other stakeholders, to implement a workable and sustainable program.

Sincerely

A handwritten signature in blue ink that reads "Alison Keane". The signature is fluid and cursive, with a long horizontal line extending from the end of the "e" in "Keane".

Alison Keane, Esq., CAE, IOM
President
International Sleep Products Association