State of Oregon
DEQ Department of Environmental Quality

Mattress Recycling Council

Public Comments, MRC 2025 Annual Report and Proposed 2027 Budget

Submitted to: State of Oregon Department of Environmental Quality

Date: Sep. 17, 2026



Document information

This document was prepared by Oregon Department of Environmental Quality

Materials Management

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From: Catherine Tran
To: Mattress Info * DEQ
Subject: Public Input
Date: Thursday, September 17, 2026 9:28:08 AM

You don't often get email from tdthiencat@gmail.com. Learn why this is important

Hello,

I just wanted to comment on a point shared in the meeting held earlier in the month.

I don't have data, but personal opinion - online ads and social media through their own channels (if that is what they meant in their meeting) don't sound effective for telling consumers to recycle their mattress. Hopefully a lot of the ad or social media focus is through local government channels or community organizations. A mattress is really specific to spend dollars on advertising... so I'm hoping them working with other EPR entities works out for them.

I would recommend community centers, post offices, transit stations and especially libraries as potential places to spread awareness of mattress recycling. I heard property managers for multifamily housing - HOAs, if they're accessible, could also be something.

Also I don't know about time of year but if there is a time of year where they've historically seen more mattresses dumped for example (would like to see more of rhe dumping data if possible) , then they can lean into ads/comms more around that time.
I notice many neighborhoods do garage sales and spring cleaning events so not sure if there is something to tap into there if not already (sounds more grassroots but might be effective).

Thank you,
Catherine

September 17, 2026

To: mattress.info@deq.oregon.gov

CC: Roxy Nayar

Re: Comments on the proposed 2025 Annual Report and 2027 Budget

Thank you for the opportunity to support DEQ and to be a member of MSPAC. I am grateful to DEQ's time and support for the review of the 2025 MRC Annual Report and proposed 2027 Budget.

I wanted to take the opportunity to summarize my comments and add any that I may not have gotten to during the MSPAC committee meeting.

- Compensation concerns continue. Compensation continues to be a barrier for siting locations and does not meet the requirement of providing reasonable actual costs to collect and manage discarded mattresses. It would be helpful to have a better understanding of the collection cost for sites, who has MRC reached out to and been denied by and the reason behind the denial. For potential sites that have voiced concern over the compensation rate, what negotiations have occurred, if any? What is MRC's plan to address this concern?
- Convenience standard. An alternative standard was approved for this reporting year. Permanent sites have been proven to perform better and provide a much higher level of convenience for the community. The dependency on an alternative plan should be phased out as permanent sites are brought online.
- Outreach and Education. MRC should consider expanding outreach to those seeking disposal and/or reuse options not just purchasing actions. It would be helpful if MRC developed outreach tools that partners could utilize such as text and images for social media posts, flyers, bill inserts and web content. It would be helpful if the MRC annual report documented outreach efforts in more detail.

Thank you for the opportunity to engage and provide feedback.

Sincerely,

Elizabeth Cole (she/her)

Recycling & Waste Reduction Program Coordinator
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THE BUREAU OF
PLANNING &
SUSTAINABILITY

September 17, 2026

Roxann Nayar
Oregon Department of Environmental Quality
Materials Management Program
700 NE Multnomah St, Suite 600
Portland, OR 97232
mattress.info@deq.oregon.gov

Re: Mattress Recycling Council 2025 Annual Report and 2027 Annual Budget Public Comment

Dear Roxann,

Staff at the City of Portland, Bureau of Planning and Sustainability (BPS), appreciate the work of Mattress Recycling Council (MRC) and Oregon Department of Environmental Quality (DEQ) to roll out a new mattress stewardship program in Oregon in 2025. We recognize it takes tremendous effort to build a successful program. Thank you for the opportunity to provide public comment on MRC's 2025 Annual Report and proposed 2027 budget.

We offer the following comments for your consideration:

Convenient service. MRC is obligated to provide one collection site per county with a population greater than 10,000, plus 25 additional sites across the state. With 15% of Oregon's population, Portland should be entitled to five collection sites[1]. There are currently three, and one of them does not meet all components of a permanent collection site due to insufficient hours open to the public. MRC's collection data (reference Table 7) clearly shows that permanent sites collect the largest volumes –

[1] Calculation is based on 15% of 25 = 3.75 + 1 per county = 4.75, rounded up to 5. Multnomah County includes 19% of the state's population. Population numbers based on PSU Population Research Center

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almost 19x more compared to events last year. We would like to see permanent sites added in Portland, in locations convenient for residents and haulers.

We propose an additional alternative mechanism for convenient service for residents. MRC could set up a system for each mattress delivery to take away one mattress, at no cost to the customer. Some large retailers offer this service and we would like to see it expanded, through this program, to all mattress delivery.

Compensation for collection sites. We heard from current and prospective collection sites at the 2025 Annual Report presentation that per-unit compensation for mattress collection does not cover their associated operating costs. BPS has also heard this informally. MRC is likely struggling to recruit new sites (and may lose existing sites) due to inadequate compensation. The formula for per-unit compensation should be revisited and increased to accurately reflect cost recovery for collection sites.

Focus on reaching multifamily residents. About one-third of Portlanders live in multifamily residences, and this proportion is projected to continue to increase. Portland's 2045 Housing Needs Analysis projects up to a 70% increase in multifamily units, potentially representing 100,000 more Portlanders living in multifamily dwellings by 2045[2]. Bulky waste (including illegal dumping) is a chronic problem at multifamily properties, and we know that mattresses are one of the most common bulky items[3]. We look forward to the required report on mattress collection at multifamily housing, as well as the upcoming funding for pilot projects targeting mattress collection at multifamily housing.

At the same time, MRC should not wait to apply learnings from other jurisdictions where it operates to its program in Oregon. Specifically, we'd like to see mattress collection made more convenient to multifamily residents. MRC's case study on illegal dumping in San Benito County noted challenges specific to multifamily and success with bulky item collection located onsite *at* multifamily dwellings. We would like to see those learnings applied in Oregon as soon as possible. Another option that could be piloted would be compensation for entities offering bulk pick up of mattresses from multifamily properties. We don't have an exact quantity in mind to qualify for compensation, but significantly fewer than the 100 required for the large volume program.

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[2] Source: BPS Revised 2025-2045 Forecast, BPS Analysis of ACS 1-year Variables B25033, B25032, DP04 and Metro 2026 Updated Distributed Forecast

[3] Metro Multifamily Bulky Waste Collection Study (2024)

Reuse. Reuse is a preferred strategy over recycling, ranking higher on the waste hierarchy. We are fortunate in Portland to have the sole collection site – Community Warehouse - that prioritizes mattress reuse. Reuse could be better facilitated with promotion of reuse in MRC outreach materials, and diversion of reuse-condition mattresses at collection events and other collection sites. To boost reuse numbers significantly, it needs to be incentivized with compensation for reuse.

2027 Annual Budget. We note several upcoming program studies in the 2027 budget, including bulky curbside study, convenience analysis, discarded mattress report, life cycle analysis, and collection services to low-income and multifamily housing study. We are very interested in these reports and would appreciate the opportunity to provide input on their scope and methodology; especially the bulky curbside and low-income and multifamily housing studies.

We look forward to working with DEQ and MRC to build on the program in the coming year.

Thank you for your consideration.

jcomeault

Jane Comeault
Waste Reduction Policy Coordinator
Bureau of Planning and Sustainability
City of Portland

From: Shaynna Hobson
To: Mattress Info * DEQ
Cc: Anna Kurnizki
Subject: MRC Annual Report feedback
Date: Thursday, September 17, 2026 10:02:18 AM

You don't often get email from shaynna@communitywarehouse.org. Learn why this is important

Good Morning,

Thank you again for allowing folks to make comments on the annual report. Below is the feedback Community Warehouse would like to provide regarding the MRC Annual Report.

Fair Compensation for Collection Sites

- Pg 12: “MRC negotiates agreements to provide compensation that covers the reasonable actual costs of collecting and managing units at the collection sites. The amount of compensation varies from site to site since it is based on variable factors, including the hourly wage rates for general labor handling mattresses, forklift operators, and type of forklift. After conducting extensive time studies at various collection locations in other program states, MRC learned that it should take no longer than 3 minutes per unit to load a mattress onto a trailer.”

MRC’s calculations above exclude the time spent evaluating/screening the mattress to ensure it qualifies for the program, unloading it from the donor's vehicle, and transporting it to the trailer. The minimal per-unit recycling reimbursement that we receive as a collection site does not cover the reasonable actual costs of collecting and managing units. When we communicated to MRC that the per-unit reimbursement was not covering actual costs and shared detailed data and financials as backup, MRC declined to negotiate or update the rate. This inadequate compensation is likely a factor in MRC's difficulty recruiting new collection sites.

Mattress Reuse

- Pg 17: “Reuse and Program Development MRC considers the views of reuse organizations and other interested stakeholders when setting program policies. For example, MRC has offered to work with a reuse organization to divert good-quality units from local mattress collection events back into the community. MRC also facilitated an introduction between the reuse organization and the nearest mattress recycler to support the recovery of reusable mattresses from the facility. Although the organization has not yet attended an event or received mattresses from the recycler, MRC will continue to notify it of opportunities to collect reusable mattresses.”

We anticipated that MRC would help facilitate relationships with recyclers to increase the number of units diverted to reuse. While an introduction to one recycler was made, it did not

result in a partnership; we believe that is due to no financial incentive for the recycler to participate in reuse. We asked MRC to notify us in advance of upcoming opportunities to attend collection events in the tri-county area so we could collect the reusable mattresses, but to date we have not been notified.

Meaningful reuse diversion will require both stronger relationship-building and compensation that reflects the actual costs recyclers incur to participate in the program. The statute provides $0 in reimbursement for mattresses collected for reuse, even though a reused mattress could be delivered directly to an Oregon family otherwise sleeping on the floor. With no reuse incentive, only 1.5% of mattresses collected statewide in 2025 were reused or refurbished, compared to 35% reused by Community Warehouse. Other furniture banks in Oregon have not signed up to become mattress collection sites (despite already operating mattress reuse programs) due to the insufficient recycling reimbursement and lack of reuse reimbursement.

Convenient Collection & Pickup

- Pg 38: “MRC’s outreach efforts reinforce that mattresses in any condition are eligible for no-cost dropoff at participating locations.”

- Pg 40: “Convenience emerged as a major factor, including limited access to disposal or recycling sites, transportation barriers, and the physical difficulty of moving mattresses. Some urban areas also reported ‘inadvertent’ dumping, such as residents leaving mattresses and other durable goods in public spaces with the intent that others reuse them.”

As communicated through the stakeholder engagement process, a major factor of illegal dumping is that many Oregonians do not have the resources (money, physical capacity, and/or vehicle) to move their mattress to a collection site. MRC’s outreach efforts are moot if people cannot drop off their mattress. MRC should reconsider its framing of convenience-based dumping, where residents leave mattresses "with the intent that others reuse them," as solely a dumping problem to be mitigated. Instead, MRC should recognize this behavior as evidence of unmet reuse demand and formalize it through scheduled bulky-item swaps or a recycling/reuse pickup program, which would allow MRC to address both its illegal dumping and reuse goals through a single, coordinated initiative rather than treating them as separate efforts.

We recommend that MRC move beyond funding scattered "pilot projects" in individual communities or with private entities, and instead design and organize a statewide mattress pickup solution that ensures consistent access regardless of where a resident lives. MRC's stakeholder engagement for this project should be expanded to include transportation providers, moving companies, multifamily housing operators, and nonprofit haulers, not just

public-sector entities. Since convenience and transportation barriers were identified as the top drivers of illegal dumping, these operational stakeholders likely hold the most relevant knowledge for designing an effective pickup solution and should be consulted before further program design proceeds.

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Shaynna Hobson

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Visit our website!

September 16, 2026

Oregon Department of Environmental Quality
Materials Management Program
700 NE Multnomah St., Suite 600
Portland, Oregon 97232

RE: Lane County Comments on Mattress Recycling Council's 2025 Annual Report & 2027 Budget

Dear Oregon Department of Environmental Quality:

Lane County appreciates the opportunity to comment on the Mattress Recycling Council's (MRC) 2025 Annual Report and proposed 2027 Budget. As a participating collection site, Lane County supports the goals of Oregon's Mattress Stewardship Program and recognizes the significant work undertaken during the program's first year.

The 2025 Annual Report provides useful information about program implementation and identifies several areas where MRC intends to conduct additional analysis. At the same time, the report reinforces several implementation questions Lane County has raised previously that remain unresolved. Our comments focus primarily on collection-site reimbursement, administrative requirements associated with program participation, and whether the program's convenience standard is resulting in practical access for residents throughout Oregon.

Collection-site reimbursement and "reasonable actual costs"
MRC states that it negotiates collection-site compensation to cover the "reasonable actual costs" of collecting and managing mattresses. However, the Annual Report does not demonstrate whether its methodology captures the full costs incurred by Oregon collection sites.

Lane County is concerned that a methodology focused primarily on labor and loading time may omit costs for customer screening, receiving, staging and storage, facility space, equipment, recordkeeping, invoicing, documentation, training and administration. We ask DEQ to evaluate which costs MRC includes, whether its assumptions have been validated under Oregon operating conditions, and how negotiated rates are shown to reflect reasonable actual costs.

Administrative burden and mattresses remaining outside the program
The Annual Report shows that mattresses continue to move outside the stewardship program. In 2025, MRC reported 134,121 program mattresses and 11,628 non-program mattresses. Of 139 solid waste facilities surveyed, only 17 responded; six collected mattresses but did not participate. Reporting non-program facilities sent 5,335 mattresses to disposal, including 4,962 in western Oregon.

Lane County's experience suggests MRC should examine why mattresses remain outside the program, not assume recruitment alone will solve the issue. Lane County does not complete the additional documentation needed for reimbursement for certain non-program mattresses because the administrative burden is disproportionate to the reimbursement; those mattresses continue to be disposed.

We ask DEQ and MRC to evaluate whether documentation requirements are a barrier to participation and diversion and whether existing auditable facility records—such as scale, transaction or fee-booth

records—could provide adequate verification without duplicative paperwork. Reimbursement adequacy should account for the administrative work required to receive it.

Convenience should measure practical access, not simply compliance
MRC reports that it met the alternative convenience requirement in 2025 with 11 permanent collection sites and 14 collection events, plus 17 additional events. Lane County has expressed interest in adding permanent collection locations at County transfer stations, but MRC has indicated additional sites are unnecessary because the existing network meets the applicable standard.

Meeting a numerical or geographic minimum does not necessarily mean the system is practically convenient. Mattresses are bulky and difficult to transport, particularly for rural residents and households without access to a truck or large vehicle. This concern is heightened by MRC's stated intent to prioritize counties with the highest population density to maximize diversion; that approach may not address access in geographically large or rural counties.

Convenience analysis and a pathway for addressing gaps
The 2025 Annual Report states that MRC would conduct a statewide GIS analysis in 2026 to identify service gaps and determine the percentage of Oregon's population within 15 miles of the collection network. The proposed 2027 Budget also funds a convenience analysis. Lane County requests clarification on the status and scope of this work and encourages MRC not to rely on a 15-mile population metric alone.

A meaningful analysis should also consider travel time and distance, rural geography, access to appropriate vehicles, use of existing sites and events, mattresses continuing to enter disposal, demand for additional locations, and willing facilities in identified service gaps. Results should distinguish urban and rural access.

Just as important, DEQ should clarify how identified gaps can be addressed. If the numerical standard is met but practical access remains limited, can MRC add permanent sites when willing partners exist? Can DEQ require additional service? Can changes occur under the approved stewardship plan or require a plan amendment, EQC rulemaking or legislation? Data collection is most useful when there is a clear pathway for acting on the findings.

Using future reporting to evaluate program performance
MRC states that additional data are needed before recommending substantive program changes. Lane County agrees that future decisions should be data-driven. Those evaluations should answer four practical questions: Are collection sites being compensated for reasonable actual costs? Are administrative requirements discouraging participation? Is mattress recycling practically accessible across urban and rural Oregon? Are recoverable mattresses still entering disposal because of gaps in reimbursement, participation or access?

The 2025 Annual Report provides useful baseline data, but these questions remain unresolved. We encourage DEQ to address them through its review of the Annual Report, proposed budget and forthcoming program evaluations.

Thank you for considering these comments.

Sincerely,



Angie R. Marzano
Waste Reduction Program Supervisor

From:	Sabrina Gogol
To:	Mattress Info * DEQ
Cc:	NAYAR Roxy * DEQ; Thomas Egleston; Warren Johnson
Subject:	Comments on 2025 Annual Report and 2027 Budget
Date:	Tuesday, September 15, 2026 4:26:25 PM
Attachments:	image001.jpg

Thank you for this opportunity to support DEQ and MSPAC's review of MRC's submitted 2025 Annual Report and 2027 Budget. We are grateful for DEQ staff's dedication to sharing information about how mattress collection and recovery is going in Oregon. We are also grateful for MSPAC's robust discussion and the public engagement at the September MSPAC meeting.

Several participants in the September MSPAC meeting shared our concerns about compensation missing for permanent collection sites and residents' lack of site access. The 2025 Annual Report demonstrated permanent sites' exceptional convenience value compared to temporary sites. Should an alternative standard continue to be approved, we recommend that a more equivalent implementation of the law is achieved by increasing the required use of permanent sites to meet any alternative standard.

We have the following requests for more information to be provided as part of MRC's responsibility to provide a complete Annual Report and a transparent 2027 Budget for DEQ and MSPAC review.

- **Include clear tracking of how the regular convenience standard was met (or not met) and clarify which increased costs in the proposed budget are intended to increase the number of permanent collection locations**. With both these additions, MRC is providing a package of information to support a clear comparison between alternative and regular convenience implementation and delivers on the "good faith effort" to fulfill the convenience standard (Program Plan, p22). For example, MRC could create a table to track progress towards the regular convenience standard, like the one for alternative convenience (2025 Annual Report, p26).
- **Provide more quantifiable tracking of MRC's 2025 outreach achievements compared to MRC's program plan outreach**

requirements. Additional information should be made available in the 2025 Annual Report to understand how implementation compared to the approved Program Plan. The Report identified that MRC performed outreach if the site proactively confirmed they wanted help (2025 Annual Report, p26), whereas the approved Program Plan has MRC taking specific steps if the site is non-responsive (Program Plan, p24). It is unclear if those steps were consistently taken.

- **Share how MRC has received and responded to complaints.** It is currently unclear how MRC has fielded complaints, including any coming from the required maintenance of a consumer and industry hotline and mailbox to provide assistance to residents seeking information (Program Plan, p29).

Thank you again for this opportunity to engage in the program implementation process.
Sincerely,

Sabrina Gogol (she/her)
Senior Planner, Policy and Program Development
Waste Prevention and Environmental Services
Oregon Metro | oregonmetro.gov | 408-799-6977

OREGON REFUSE & RECYCLING ASSOCIATION

September 14, 2026

Ms. Roxy Nayar, Oregon DEQ
700 NE Multnomah St.
Portland, OR 97232

via email only to: mattress.info@deq.oregon.gov

Re: ORRA comments on 2025 Annual Mattress Recycling Council Report

The Oregon Refuse and Recycling Association (ORRA) represents the companies who operate Oregon's waste collection, recycling, and material recovery systems. ORRA's regular members collect and process most of Oregon's residential and commercial refuse and recyclables, and operate material recovery facilities, compost facilities, and many of Oregon's municipal solid waste transfer stations and landfills; additionally, ORRA's associate members provide goods and services to regular members, including various types of trucks and equipment needed for the proper collection and handling of solid waste and recycling.

As a member of the Mattress Stewardship Program Advisory Committee (MSPAC), I was prepared to share these comments and questions during the September 3, 2026 MSPAC meeting. I was disappointed MSPAC members were only afforded 45 minutes for questions and discussion, particularly given the significant amount of time members were expected to commit to reading the annual report and budget in advance, coupled with any additional research or supporting reading (e.g., ORS 459A.150-189). Given limited time for questions and discussion, I provide the following comments on the Mattress Recycling Council's 2025 Annual Report and welcome the opportunity for further discussion to address ORRA's questions and concerns.

ORRA commends the Oregon Department of Environmental Quality (DEQ) and the Mattress Recycling Council (MRC) for the early work to implement the mattress stewardship program. We appreciate the difficult task of standing up a new program and understand our role on the MSPAC to be to evaluate the annual report to determine whether the producer responsibility organization (PRO), in this case MRC, is meeting its obligations. As such, ORRA provides the following comments and questions for consideration.

Mattress disposal data

What data is available regarding the number of mattresses disposed of in Oregon annually? Does the public have access to the total number of units or pounds disposed in Oregon prior to 2025? What percentage of the total volume of discarded mattresses is being captured as program mattresses? It is difficult to evaluate the efficacy of MRC's efforts without first knowing the total volume of material available. In their 2025 Annual Report, p. 19, MRC states, "Recyclers do not track landfill disposal data by material type, making it impossible for MRC to provide data regarding the quantity of materials landfilled in 2025." Yet then on later on p. 19, MRC states, "MRC Oregon recyclers landfilled 1,890,419 pounds of material in 2025." This data

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seems contradictory. Furthermore, there is no baseline data with which to compare. Please clarify the volume of mattresses (either number of units or pounds) being disposed of in Oregon annually prior to 2025, along with the volume of mattresses landfilled and managed outside the mattress stewardship program, as well as the volume of program mattresses landfilled by MRC.

Compliance and enforcement

Please clarify the roles and responsibilities associated with compliance and enforcement. What is the responsibility of DEQ? What is the responsibility of MRC? What is expected of local code enforcement? At the September 3, 2026 MSPAC meeting, DEQ indicated, "DEQ has regulatory oversight and enforcement authority." ORRA would like to better understand what this includes.

MRC indicates in its 2025 Annual Report under *Collection Site Management* on p. 13, "MRC visits new and existing collection sites at least every other year and as needed." Is this sufficient to ensure protection of health and safety (workers and the public) and the environment? Does this meet DEQ's expectations? Further, under *Contractor Compliance,* p. 23, MRC states, "A variety of inspection and accounting procedures are used to verify that permanent collection sites, transporters and recyclers comply with their contractual obligations, including environmentally sound management practices." Additionally, under *Oversight and Verification,* p. 23, MRC indicates, "MRC performs monthly desk audits… (and) conducts site inspections…." Regarding *Recyclers*, on p. 24 of the 2025 Annual Report, MRC indicates it "conducts quarterly virtual or in-person site visits…" and regarding *Permanent Collection Sites and Collection Events*, p. 25, "MRC…conducts site visits every two years or as needed." It is unclear under what conditions it would be determined that a site visit would be "needed" and the report does not speak to how MRC plans to respond to complaints. The 2025 Annual Report speaks to enforcement of contractual obligations, but it remains unclear how MRC will evaluate performance as it relates to human health and environmental impacts. ORRA requests more detail regarding MRC's plans for accountability and complaint response.

ORRA would also like to understand how sites are selected and determined to be "suitable" (ORS 459A.162(2)(a)(B)). The statute indicates the stewardship organization (i.e., MRC) will "…establish and maintain collection sites at other suitable sites for the collection of discarded mattresses…." What criteria are considered to determine site suitability? Does DEQ maintain approval authority? Some sites are subject to conditions under DEQ solid waste facility permits and others are not. How is compliance monitored for facilities not covered by a solid waste facility permit? Is this reliant upon local code enforcement? When will DEQ step in? How are complaints handled?

Franchise authority

Discarded mattresses are solid waste as defined in ORS 459.005(25). As such, the collection of mattresses is subject to city and county government franchise authority established in Oregon law under ORS 459A.085. On p. 23 under *Contractor Compliance* in its 2025 Annual Report, MRC indicates, "MRC contracts with third parties to collect, transport, and recycle discarded units… contractors must comply with all applicable federal, state, and local laws and

regulations….” How are DEQ and MRC ensuring contractors are complying with local laws and regulations?

Furthermore, under *Small Volume Commercial Loads* (p. 12), MRC indicates program mattresses are “delivered by junk haulers, small businesses and third-party premium service curbside collectors.” The 2025 Annual Report includes additional references to “junk haulers” (p. 10 and p. 30) and “premium service” (p. 28). ORRA requests confirmation that these services are being provided by the franchised hauler and assurances that MRC contractors are not operating in franchised collection areas in violation of the franchise system.

Convenience standards

Oregon’s geography is diverse and nuanced. What is considered “convenient” for someone living in Elgin is going to be different from what is considered “convenient” for someone living in Salem, for example; as is Bend vs. Coos Bay, Medford vs. Clatskanie, Portland vs. Klamath Falls. DEQ has convenience standards in rule (OAR 340-090-0640) relating to the duties of a PRO (ORS 459A.896) and collection of covered products under the Uniform Statewide Collection List. There is not, however, a convenience standard for mattress collection, other than the requirement in ORS 459A.162(1)(a) to provide for convenient service through:

(A) At least one permanent collection site in every county with a population of 10,000 (i.e., 29 of 36 counties) or more and an additional 25 collection sites (distributed in a manner to extend convenient service to residents); (C) to be staffed and open to the public at least 6 days per week; and

(B) At least one collection event per year in counties that have a population less than 10,000 and that do not have a permanent collection site; (D) to be staffed and open to the public at least 1 day per week.

MRC includes definitions for “rural areas” and “urban areas” in its 2025 Annual Report. These definitions are oversimplified. ORRA encourages DEQ and MRC to consider alternative definitions that better reflect the diversity and nuance of Oregon’s communities. For example, the Oregon Office of Rural Health defines “rural areas” as any geographic location that is greater than or equal to 10 miles from a population center of 40,000 people or more; and “remote areas” are defined as having a population density of 6 or more people per square mile. When we are talking about traveling with bulky waste items, ORRA urges consideration of distance to collection site when determining convenience, or convenience that considers consumer purchase and disposal habits.

For example, MRC hosted one collection event in Lincoln County in 2025. This is an important example of the practical application of the expectation of convenience. In MRC’s 2025 Annual Report, *Appendix B: Collection Network* (p. 83) shows that a collection event was held in Eddyville, Oregon, which is located nearly 30 minutes’ drive from the nearest population center (Newport) and nearly one hour from Lincoln City, with the only permanent collection site on the Oregon coast being located in Florence to the south and events in Tillamook and Astoria to the north. This leaves the majority of coastal residents and second homeowners without convenient access to a collection option. ORRA does not believe this meets the spirit of convenience or DEQ’s expectations of convenience under the law.

Under *Collection Site Development* (p. 28) in its 2025 Annual Report, MRC indicates, "In implementing the program, we've found that there are places in the state where the existing solid waste infrastructure isn't operating enough days per week to allow MRC the opportunity to meet the preferred definition of convenient service…." Please clarify what is meant by "the preferred definition of convenient service." ORRA requests additional information substantiating this claim. Furthermore, ORRA urges geographic convenience be prioritized over hours of operation, understanding the public's disposal habits in communities across the state align with solid waste facility operating hours.

At the September 3, 2026 MSPAC meeting, MRC presented a *Collection Opportunities Map*. This map depicted several areas without collection service, indicating significant gaps in convenience. At the same meeting, MRC indicated they are conducting a 2026 convenience analysis. ORRA requests information to better understand what this analysis will include. During public testimony at the September 3, 2026 MSPAC meeting, committee members heard from Metro and Community Warehouse regarding concerns about MRC's cost model, testimony that MRC reimbursement is not covering reasonable costs, convenience standards are not being met, the encouragement of more permanent sites, and frustrations about experience with MRC's level of engagement. Furthermore, MSPAC members shared that they are not seeing messaging and information in their day-to-day lives, indicating outreach and engagement needs to be improved, suggesting ads targeted at disposal behaviors, encouraging an increase in multifamily dwelling outreach, and requests for outreach materials in multiple languages. ORRA asserts MRC's 2026 convenience analysis should review and consider the cost model, responsiveness, and outreach strategy as possible barriers to convenience.

During the September 3, 2026 MSPAC meeting, DEQ and MSPAC members heard several reports that the MRC cost model is not covering reasonable actual costs to collect and manage discarded mattresses as required under ORS 459A.162(2)(c). Under *Collection Site Management* (p. 12) in their 2025 Annual Report, MRC shares, "MRC learned that it should take no longer than 3 mins per unit to load a mattress onto a trailer." This flat fee assumes all operating conditions are the same, which they are not. In 2025, ORRA provided DEQ "…feedback from some of our members regarding the practical challenges they face under the current reimbursement structure offered by MRC." Cost data and member experiences revealed "…that costs and handling times vary widely depending on facility size, available equipment, and site layout. Several of our haulers used MRC's cost calculator to estimate their expenses, and the results highlight a significant gap between actual costs and MRC's narrow and inflexible statewide reimbursement rate." (C. Campbell, ORRA, December 18, 2025) ORRA requests that DEQ provide any analysis DEQ has conducted to determine whether MRC is in fact meeting its statutory obligation to cover reasonable actual costs to collect and manage discarded mattresses as required under ORS 459A.162(2)(c).

Solid waste facility participation

In its 2025 Annual Report, MRC states that solid waste facilities have "declined participation" (see *Collection Site Types – Nonprofits,* p. 10). ORRA members have consistently reported that they have been unable to reach agreement with MRC to cover the reasonable actual costs of

collecting and managing discarded mattresses. This is different from "declining participation" as asserted by MRC.

The 2025 Annual Report indicates, "MRC distributed the survey to 139 facilities, receiving 17 responses" (*Solid Waste Facility Survey*, p. 30). Additionally, "MRC surveyed all known SWFs and permanent mattress collection sites in Oregon… Two permanent collection sites reported… and 4 non-program solid waste facilities reported…" (*Data Collection and Reporting – Permanent Collection Sites and Solid Waste Facilities,* p. 34). Does DEQ consider these to be acceptable response rates? Did MRC evaluate why the response rates were so low; and, if so, did MRC provide that information to DEQ? MRC indicates they issued advance notice of the survey in its newsletter and distributed six follow-up reminders to encourage participation (*Solid Waste Facility Survey*, pp. 30-31). ORRA requests more information regarding how MRC distributed reminders and what efforts were made to engage directly with solid waste facilities.

Under *Challenges to Expanding the Collection Network* (p. 33), "MRC continues to face challenges in recruiting certain solid waste facilities. Some solid waste facilities decline to serve as permanent collection sites because they charge residents a fee for mattress disposal. While MRC offers compensation to cover reasonable actual costs of collecting and managing mattresses, it does not pay the same amount as the fees charged to consumers." ORRA requests additional information substantiating this claim. ORRA members regularly indicate challenges in negotiating a rate that covers reasonable actual costs of collecting and managing discarded mattresses, coupled with inconsistent communications and responsiveness by MRC, as barriers to participating as a mattress stewardship program collection site. MRC identifies, "Participation by solid waste facilities is not mandatory per SB 1576" (*Challenges to Expanding the Collection Network*, p. 33) as a barrier to program participation. The law requires MRC to cover the reasonable actual costs of collecting and managing discarded mattresses; an unwillingness to negotiate reasonable compensation has been consistently cited as reason for declining to participate. As the regulator, ORRA expects DEQ to hold MRC accountable to their statutory obligation under ORS 459A.162(2)(c).

Collection network expansion

ORRA recognizes there are some recent instances that point to improving negotiations between MRC and solid waste facilities (e.g., Lincoln County). Further, ORRA is pleased to see in the 2025 Annual Report, "In 2026, MRC will… Conduct targeted outreach to non-participating solid waste facilities, reuse organizations, retailers, and other eligible entities, with an emphasis on underserved areas" (*Challenges to Expanding the Collection Network*, p. 33). ORRA requests more information about how MRC plans to engage with solid waste facilities. There are no mentions of solid waste facilities and the solid waste industry under *Collection Network Outreach* (p. 45) and *Industry Outreach* (pp. 47-48), and ORRA continues to hear from its members that MRC is consistently unresponsive and provides confusing and conflicting information.

During the September 3, 2026 MSPAC meeting, MRC indicated there are a number of mattress collection site improvement projects underway. The 2025 Annual Report indicates three sites took advantage of this funding in 2025 (*Table 2. 2025 Site Improvement Funding*, p. 14) and MRC reported at the MSPAC meeting that six additional site improvement projects are planned

for 2026. ORRA is interested in learning more about how MRC is engaging with solid waste facilities to promote mattress recycling through *Mattress Collection Facility Improvement Funding* (p. 18). It is unclear what role collection facility improvements will play in MRC's strategies to expand mattress recycling in Oregon. Additionally, ORRA requests clarification about where site improvement funding is accounted for in MRC's 2027 Oregon budget.

Outreach and engagement

Lastly, ORRA encourages MRC to improve consumer outreach targeting disposal behavior. At the September 3, 2026 MSPAC meeting, MRC presented on consumer outreach efforts. There was no mention of engaging solid waste haulers and/or solid waste facilities to reach consumers. Similarly, in MRC's 2025 Annual Report, *Measuring Impact of Outreach* (pp. 49-51), there is no mention of outreach to and engagement with solid waste facilities. Residents are largely used to disposing of mattresses and other bulky waste items at their local transfer station, so it serves as a natural location for customer education.

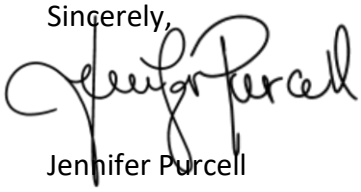
ORRA members regularly indicate they hear about permanent mattress collection sites indirectly, as opposed to receiving information directly from MRC. ORRA hears accounts of little to no coordination between MRC and solid waste facilities. ORRA requests information about how MRC plans to engage with the solid waste community to ensure mattresses are being diverted for recycling at increasing rates.

ORRA recommends MRC share information with solid waste facilities, franchised haulers, and local government solid waste staff, engaging with consumers via their disposal habits. As required by the Opportunity to Recycle statute (ORS 459A.005), local governments and their solid waste service providers maintain public education and recycling promotion programs. ORRA encourages MRC to ensure messaging aligns with local government outreach and engagement efforts and urges MRC to provide information on alternative disposal options to solid waste facilities not participating as collection sites.

Thank you for the opportunity to share our comments, questions and concerns. As I mentioned in my opening remarks, I was disappointed there was insufficient time to engage in a discussion with DEQ, MRC, and my fellow MSPAC members on these questions and concerns. I look forward to hearing from you in response.

If you have questions, please feel free to contact me directly at jenniferp@orra.net.

Sincerely,



Jennifer Purcell
Deputy Executive Director
Oregon Refuse and Recycling Association