

**Updated Education Program Plan for
Massachusetts Consumers and Municipalities
For the Proper Use and Disposal of
Mercury-added Lamps**

**Submitted By The
National Electrical Manufacturers Association**

On Behalf Of Participating Manufacturers of Mercury-Containing Lamps

PURSUANT TO
An Act Relative to Mercury Management
The Commonwealth of Massachusetts
Chapter 190 of the Acts of 2006, Section 6J

Updated July 2010

Program Participants

This Lamp Recycling Education Program Plan is developed and supported by members of the National Electrical Manufacturers Association (NEMA) Lamp Section and six non-Lamp Section companies who manufacture or import mercury-containing lamps that are sold in Massachusetts and who have agreed to participate in supporting the Program (“Program Participants”). Other manufacturers of mercury-added lamps that are not members of NEMA have been invited to participate as well,

The following companies are the current Program Participants in this Lamp Recycling Education Program:

- Advanced Lighting Technologies, Inc./Venture Lighting
- Casio Inc.
- DoItBest Corp.
- Eiko Limited
- EYE Lighting International of N.A., Inc.
- Feit Electric Company, Inc.
- GE Consumer & Industrial Lighting
- Globe Electric
- Greenlite Lighting Corp.
- Halco Lighting Corporation
- Light Sources Inc.
- Lights of America
- Litetronics
- OSRAM SYLVANIA
- Philips Lighting
- Ruud Lighting Inc.
- Satco Products Inc.
- SLi Lighting
- Technical Consumer Products, Inc.
- Ushio America, Inc.
- Welch Allyn, Inc.
- Westinghouse Lighting Corporation

This Lamp Recycling Education Program remains open to other mercury-added lamp manufacturers who desire to participate.

I. Overview of Updated Lamp Recycling Education Program

The overall goals of the Updated Lamp Recycling Education Program continue to be:

- Increase the number of mercury containing lamps recycled in Massachusetts.
- Comply with applicable Massachusetts regulations.

- Build on prior years' efforts.
- Expand public awareness of the legal obligation to properly dispose mercury containing lamps.

To date, this Lamp Recycling Education Program has produced educational materials in the form of posters, brochures, web pages, articles for publication, and other items aimed at informing business owners, facility managers, state and local government offices, lamp distribution channel partners (wholesale and retail), lighting installers, the solid waste industry, lighting specifiers, and households and consumers. Specifically, the program has supplied information concerning:

- The economic and environmental benefits of mercury-added lamps;
- The hazards mercury can pose to human health and the environment
- Proper disposal and recycling methods for mercury-added lamps.
- Where and how to recycle mercury-added lamps

These educational materials will continue to be deployed as part of the updated Lamp Recycling Education Program.

Entering the third year of this effort, manufacturers are building on lessons learned in previous years. The target recycling rate in Massachusetts is 50% for 2010. The majority of growth in collections in previous years has come from commercial and industrial generators of waste lamps. However, as the installed base of fluorescent lamps ages in homes, targeting retail consumers will become more important in future years.

II. Updated Lamp Recycling Education Program Plan Activities

A. Update of www.lamprecycle.org

1. Activity Description

The web site www.lamprecycle.org is an important element of manufacturers' national and state specific outreach efforts. The site already generates significant traffic. NEMA member companies, as well as virtually all other lamp manufacturers, print the URL www.lamprecycle.org on the packaging of every mercury-containing lamp they sell, which leads to a significant portion of site visits. More than 60% of visitors go directly to the site, as opposed to using search engine or clicking on a link found at another web address.

In 2009 the lamprecycle.org website received updated content, navigation, and graphics. The addition of the Earth911 recycling tool added significant functionality, particularly for retail consumers seeking convenient recycling locations for end-of-life mercury lamps.

Two updates are planned for the site in 2010, as follows.

- A new feature will be added to promote local (typically HHW) recycling events. NEMA will get information on events from sources such as Google.

- A utility will be incorporated to expand listing of commercial lamp recyclers on the site. This will facilitate more timely updates and establish criteria for listing on the site.

2. Schedule

Upgrades to the web site are planned for completion by the end of the third quarter of 2010. Marketing and promotion of the site will continue to be an ongoing activity.

B. Advertising Campaign

1. Activity Description

The updated Lamp Recycling Education Program plan includes continued support for a web-based advertising campaign that will last approximately 30 days in each media outlet (web advertising is based on number of impressions; the campaign would run for 30 days or longer if the minimum number of impressions was not reached in 30 days).

The advertising campaign will focus on raising consumer awareness of the need to properly dispose mercury-added lamps and provide direction to more information (*e.g.* www.lamprecycle.org) for information on free or low-cost options for disposing waste mercury lamps.

Advertisements will be placed in the www.boston.com, www.telegram.com and www.wickedlocal.com. The plan is to utilize a 300x250 medium rectangle ad (ad size is dependent on availability). NEMA will purchase a minimum of 225,000 impressions in each outlet. This campaign will cover the Boston designated market area (DMA) and central Massachusetts (Worcester County).

The Lamp Recycling Education Program plans to utilize Commuter Rail Platform Advertising. This large (46"x60" poster), colorful media form draws the attention of daily commuters. NEMA has been advised that this form of advertising will put the recycling message in front of an estimated 3.4 million Commuter Rail riders over a four week period

2. Schedule

NEMA plans to arrange for the placement of rail platform ads in the 2nd quarter 2010. NEMA plans to arrange for the placement of web-based advertising campaign in fall 2010.

C. Local Media/Business Outreach

1. Activity Description

The Center for Ecological Technology (CET), a non-profit organization based in Pittsfield, MA, will be contracted by NEMA on behalf of the Program Participants to aid in providing media outreach and linkages to local business sectors to promote lamp recycling, primarily in

Western, MA. The CET activities that this Lamp Recycling Education Program plans to support include:

- Identify and promote existing hardware store recycling programs, while creating press releases to make public aware of these opportunities. Work with existing municipal outreach mechanisms to include the retail take-back option - This also includes promoting use of the retail collateral available on the lamprecycle.org website (Sec. F below).
- Follow-up with participants of “Green Business” workshops previously conducted by CET to disseminate recycling message and provide technical assistance on establishing a recycling program.
- Identify media opportunities including inserts in local papers and/or America Recycles Day.
- Coordinate with Covanta Energy to engage partnerships at their facilities across the Commonwealth.

In addition, the Lamp Recycling Education Program plans to continue its ongoing efforts to work with counterparts in other trade associations such as the Associated Industries of Massachusetts to spread the message to their respective memberships.

2. Schedule

The timing or certainty of these earned media placements and engagements with third-parties is not readily predictable and outside of CET’s control, although America Recycles Day is slated for November 15, 2010. CET will be retained in early 2010 and the planned program will be rolled out on a schedule mutually agreeable to both CET and NEMA over the course of 2010.

D. Local Events

1. Activity Description

The Lamp Recycling Education Program plans to participate in a number of public events in Massachusetts. The objective is to raise awareness among various groups of the legal obligation to recycle mercury-containing lamps and various mechanisms available in Massachusetts to comply with law.

Where applicable, the NEMA recycling brochure and poster (developed in 2008) will be distributed.

2. List of Potential Events/Venues

| Event | Audience | Location | Date (tentative in some cases) |
|--------------|-----------------|-----------------|---------------------------------------|
|--------------|-----------------|-----------------|---------------------------------------|

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|-----------------------------|-------------------|-------------|----------------------|
| New England Facilities Expo | Facility managers | Boston | February 10-11, 2010 |
| Topsfield Fair | Consumers | Topsfield | October 1-11, 2010 |
| Three-County Fair | Consumers | Northampton | September 2010 |
| EarthFest | Consumers | Boston | May, 2010 |

E. Member Company Customer/Marketplace outreach

1. Activity Description

All Program Participants plan to redistribute a one-page NEMA communication on MASS lamp disposal regulations to their respective primary customers whom they know sell mercury-containing lamps in Massachusetts and direct their Field Sales forces to provide copies to electrical wholesalers and customers. In addition, certain Program Participants have agreed to have MA based sales staff, where they have MA-based sales staff, engage in training programs or provide Lamp Recycling Education Program materials to their customers.

| Member Company | Meetings | Training Programs | Other |
|-----------------------------------|---|--|--------------|
| GE Consumer & Industrial Lighting | Resend PowerPoint presentation on MA Disposal to MA sales force for use in local meetings | Incorporate state Disposal regulations in National Training Programs | |
| OSRAM SYLVANIA | Staff New England Facilities Expo (Feb 10-11, 2010) | Plans to incorporate state disposal regulations into national training programs | |
| Phillips Lighting | All seminars for Massachusetts business include segment on lamp recycling requirements in Mass. | All Massachusetts distributor product training includes segment on lamp recycling requirements in Mass. Phillips Lighting Center in Somerset, NJ plans to include MA recycling requirements in classes it plans to conduct in 2010. | |

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|---------------------|--|---|--|
| Ushio America, Inc. | | Plans to include reminders about state disposal programs in National Sales Meetings | <p>Incorporate message asking that distributors encourage recycling on invoices for mercury containing lamps.</p> <p>Email customers at least once per year to encourage them to urge their customers to recycle mercury containing lamps.</p> |
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F. Retail store communications

1. Activity Description

A template of collateral on the Massachusetts section of the website, www.lamprecycle.org has been posted that retailers can download and print. Collateral is in the form of a tear sheet that retailers can post in the store or provide at point of sale.

NEMA staff plans to, on behalf of the Program Participants, reach out again to the Retailers Association of Massachusetts to remind them of the available materials and offer assistance to its members.

2. Schedule

Ongoing activity

G. Engagement with other Stakeholders

1. Activity Description

NEMA staff plans to arrange individual meetings in Massachusetts with Massachusetts lamp recyclers to discuss (1) the identification of Massachusetts generators who may not be engaged in recycling and (2) marketing those generators to promote legal compliance.

2. Schedule

These meeting will take place during the first and/or second quarters of 2010. Follow-up activities, if determined to be feasible, will be planned during or after the meeting.

H. Amendment

Circumstances may change in the course of the Program year that require a change in planned activities or the addition or deletion of Program Participants, and NEMA will submit on behalf of Program Participants an amended Lamp Recycling Education Program Plan as circumstances require.