

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

Submitted By

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 January 25, 2012

Program Participants

This Lamp Recycling Education Program Plan is developed and supported by members of the National Electrical Manufacturers Association (NEMA) Lamp Section and 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:

- AAAA World Import Export, Inc.
- Advanced Lighting Technologies, Inc./Venture Lighting
- Bulbrite Industries, Inc.
- Casio, Inc.
- Do It Best Corp.
- Earthtronics
- Eiko Limited
- Energetic Lighting, Inc.
- EYE Lighting International of N.A., Inc.
- Fanlight Corporation, Inc.
- Feit Electric Company, Inc.
- GE Consumer & Industrial Lighting
- Globe Electric Company, Inc.
- Greenlite Lighting Corp.
- Halco Lighting Technologies
- Light Sources, Inc.
- Lights of America, Inc.
- Litetronics International, Inc.
- Lumiram
- Maxlite, Inc.
- OSRAM SYLVANIA, Inc.
- OttLite Technologies, Inc.
- Overdrive Lighting/Global Consumer Products
- Panasonic Corporation of North America
- Philips Electronics N.A. Corp.
- P.Q.L., Inc.
- Ruud Lighting, Inc., a subsidiary of Cree Inc.
- Satco Products, Inc.
- SLi Lighting
- Sunshine Lighting
- Technical Consumer Products, Inc.
- Ushio America, Inc.
- Verilux, Inc.
- Westinghouse Lighting Corp.

This Lamp Recycling Education Program (“the 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, the 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 Program.

Entering the fifth year of this effort, manufacturers are building on lessons learned in previous years. 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.

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.

Updates for the site in 2012 will be based on continued monitoring of information for further improvements of recycling.

2. Schedule

Upgrades to the web site will be on a rolling basis throughout 2012. Marketing and promotion of the site will continue to be an ongoing activity.

B. Advertising Campaign

1. Activity Description

The Program plan for 2012 includes web display, pay per click, outdoor, local, event, and social advertising. 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.

- Web

Pay Per Click

Using Pay Per Click (PPC) in an education/awareness campaign such as this a unique benefit. PPC advertising is traditionally used to drive web visits to a particular site. While we will allot money for click-through's to lamprecycle.org, more impressions will be generated due to the message being visible to the general public, without them clicking on the ad.

These efforts will be geographically focused to drive the message to the largest percentage of the population.

Display

The program will again use display advertising as part of the campaign. The approach is to blitz a media outlet for approximately 30 days. (this 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).

Advertisements will be placed in the www.boston.com, www.telegram.com and www.wickedlocal.com. This campaign will cover the Boston designated market area (DMA) and central Massachusetts (Worcester County).

This method is used to remind readers who have become aware through ads of past years, as well as introducing new readership to the message, over a focused 30 days.

- Radio

The Program will develop a public service announcement (PSA) for radio to promote the availability of lamp recycling locations throughout the state. Radio PSAs can geographically target Massachusetts residents and quickly inform them about their legal

obligation to recycle mercury-containing lamps and where they can locate additional information (e.g. www.lamprecycle.org).

NEMA will request a letter of support for the PSA from the Governor or another state official or agency as this will increase the likelihood of the PSA garnering airtime.

- Outdoor

The Program again plans to utilize the 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, web-based, and radio ads in the 2nd quarter 2012.

C. Local Media/Community/Business Outreach

1. Activity Description

The Center for EcoTechnology (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 the Program plans to support include:

- Identify and promote existing hardware store recycling programs, while creating press releases and attending local community events 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.
- Work with Municipal Health and Building Departments.

- Work with local colleges and universities to engage the student population and identity collaborative methods for encouraging lamp recycling.
- Give technical assistance to local businesses, smaller hauling companies, and their customers.

The 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. CET was retained in early 2012 and the planned program will be rolled out on a schedule mutually agreeable to both CET and NEMA over the course of 2012.

D. Local Events

1. Activity Description

The Program plans to participate in 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. The contract with CET will add much support to the local effort of the event listed below.

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

2. List of Potential Events/Venues

| Event | Audience | Location | Date |
|--------------|-----------------|-----------------|-------------|
| EarthFest | Consumers | Boston | May, 2012 |

E. Member Company Customer/Marketplace Outreach

1. Activity Description

Certain Program Participants have agreed to engage their MA based sales staff in training initiatives and/or provide materials of the Program to their customers.

| Member Company | Meetings | Training Initiatives | 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, Inc. | All meetings for MA businesses include information about lamp recycling requirements. | State disposal regulations incorporated into national training programs | Post PowerPoint presentation on MA Disposal on website accessible to sales staff |
| Philips Electronics N.A. Corp. | All seminars for MA business include segment on lamp recycling requirements in MA. | All MA distributor product training includes segment on lamp recycling requirements in MA. Philips Lighting Center in Somerset, NJ plans to include MA recycling requirements in classes it plans to conduct in 2012. | |
| Ushio America, Inc. | | Plans to include reminders about state disposal programs in National Sales Meetings | Incorporate Message asking that distributors encourage recycling on invoices for mercury containing lamps. Email customers at least once per year to encourage them to urge their customers to recycle mercury containing lamps. |

F. 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.