

Fluorescent Lighting Meeting #2: Areas of general agreement & areas requiring discussion DRAFT 7-14-08

PSI is using this chart to capture the “state of affairs” as we understand it from the fluorescent lighting dialogue participants.

Bold text represents areas of general agreement (although the means for achieving the stated goal/strategy may not have been agreed upon, or even discussed, yet).

Italicized text represents areas requiring further discussion; in these areas, PSI has attempted to characterize the current status of the issue.

	Large Commercial Sector	Small Commercial Sector	Consumer Sector
Definition (“straw man”)	<i>Businesses, schools, hospitals, and anyone else who would typically replace more than 12(??) lamps at a time (per month?)</i>	<i>Small businesses or organizations/offices that would have no more than 12 (??) lamps to recycle at a time (per month)?</i>	<i>Households only.</i>
GOAL : Manufacturing and use of fluorescent lamps	The most energy efficient, longest-lasting, least toxic lamps should be manufactured and used.		
Promotion of efficient (etc.) lighting options	<i>“Green” procurement policies can promote use of these lamps, but their implementation is challenging. (Why?)</i>		CFLs and other energy efficient lighting should continue to be promoted as a replacement to incandescent bulbs, until preferable alternatives are available.
Reduce/eliminate amount of toxicity per lamp	NEMA members have agreed to (and achieved) a maximum of 5 mg Hg/25 W CFL. All manufacturers will have to comply with CA’s adoption of the EU’s RoHS. KEY QUESTIONS: Who can ensure accountability for the quality/characteristics of lamps that are sold (to ensure all meet the standards they claim to)?		
Reduce/eliminate mercury and other toxins released in manufacturing			

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GOAL: Disposal of fluorescent lamps	All mercury-containing lamps should be recycled. They should not be disposed of in landfills or incinerators.		
Disposal ban	<p>Yes</p> <p>KEY QUESTIONS: What is needed to get more such bans in more states (or nation-wide)?</p>	<p>Yes?</p>	<p><i>This might (would?) be acceptable if it follows the implementation of a robust collection system. Some would like to see a disposal ban in place because it strengthens the ability to require consumers to recycle lamps and reduces risks to waste haulers and others from broken bulbs.</i></p> <p>KEY QUESTIONS: What would “a robust collection system” need to look like in order to make a ban acceptable to all? If adequate recycling opportunities, widespread education, and financing are in place, is a ban necessary?</p>
Enforcement (of existing or new requirements)	<p>Yes, enforcement is very important. It must start with widespread compliance education.</p> <p>KEY QUESTIONS: What actions do we want to take to enhance enforcement of existing bans (or other regulations)?</p>	<p>KEY QUESTIONS: Is this the same as for the large commercial sector?</p>	<p><i>This is very challenging. Enforcement against homeowners (assuming a ban exists) is almost impossible and politically difficult. Working with haulers to educate their customers is more likely to be implemented successfully. Any enforcement should start with education about bans or other requirements.</i></p> <p>Options:</p> <ul style="list-style-type: none"> • Labeling at dumpsters or on products • Educating through haulers <p>KEY QUESTIONS: What are the options for enforcement of a disposal ban for this sector? What has been done elsewhere, and how has it worked?</p>
Education about recycling opportunities (in the context of a ban or otherwise)	<p>Yes, education is necessary.</p> <p>KEY QUESTIONS: Who should develop and implement educational efforts for these sectors?</p>		<p>Yes, education about the importance of recycling lamps is necessary, including where and how consumers can recycle.</p> <p>Education efforts could include information about the importance of safe handling and also a recycling requirement or recommendation (as applicable).</p>
Financing of collection, transport, recycling	<p><i>There is already a financing system in place for lamp recycling in this sector in the form of contractual</i></p>	<p>KEY QUESTIONS: Should there be a financing system that includes the recycling of lamps in this sector?</p>	<p><i>There should be some type of financing system that allows a consumer in this sector to recycle their lamps without an end-of-life fee. Governments should not</i></p>

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	<p><i>relationships between “large” consumers and recyclers or lighting service providers.</i></p> <p>Financing, cont. <i>It is unclear whether having to pay is a deterrent to recycling, though it can be assumed that if consumers in this sector did not have to pay, at least some would be more likely to recycle their lamps. However, it is also assumed that most who fall in to this category are able to pay for recycling.</i></p> <p><i>As compared to the “small” consumer sector, the recycling costs in this sector typically represent a smaller proportion of the overall cost of purchasing, installing, and using the lamps.</i></p> <p>KEY QUESTIONS: Should there be a financing system that includes the recycling of lamps in this sector? If not, how will the separation be implemented?</p>	<p>If not, how will the separation be implemented?</p>	<p><i>manage this system, though may play a role in education or monitoring/compliance. There are different points of view about how the financing should work, including the relative contributions of utilities, manufacturers, or retailers.</i></p> <p>Financing, cont. KEY QUESTIONS: Should a product stewardship financing system be legislated or voluntary? Should there be a visible fee that the consumer sees? What might be the role of a stewardship organization? Will education be part of what is financed through such a system?</p>
<p>Infrastructure (collection, transport, recycling)</p>	<p>Fully established and will grow with demand as needed.</p>	<p>KEY QUESTIONS: What infrastructure does this sector require?</p>	<p>The shipping and recycling infrastructure is well-developed.</p> <p>Collection opportunities are under-developed; retail locations will be a key component.</p> <p>KEY QUESTIONS: Should retailer participation be</p>

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			<p>mandatory (through legislation) or voluntary? If cost is removed as a factor and information is provided on how to overcome other obstacles, will retailers start collecting widely enough? What number and distribution of collection locations (retail & other) is "enough"?</p>
<p>Performance goals</p>	<p><i>Performance goals are important for those who are implementing or overseeing a program to know if it is successful. However, it is very difficult to measure performance without reliable data. Such data is unavailable at this time, in part because:</i></p> <ul style="list-style-type: none"> • <i>Sales data is proprietary</i> • <i>Recyclers will not necessarily provide data on lamps recycled (or the data may not be of the appropriate level of detail)</i> • <i>Lamps have long life-spans, so it is hard to know based on sales when they will be ready for recycling/disposal</i> <p><i>Some options include:</i></p> <ul style="list-style-type: none"> • <i>Generators keeping data (as under RCRA)</i> • <i>States requiring recyclers to provide specified type of data as part of permitting process</i> 		