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Household Battery and Mercury Lamp Take Back Program

Consumer and Retailer Focus Groups

April 13 and 14, 2010

Pasadena, CA

Final Report

Prepared for:

San Gabriel Valley Council of Governments



San Gabriel Valley
Council
of Governments

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SGVCOG Battery/Mercury Lamp Take Back Program Focus Group Report



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1. INTRODUCTION

The San Gabriel Valley Council of Governments (SGVCOG) has received a grant from CalRecycle to provide outreach and education on extended producer responsibility (EPR) and establish convenient pilot take back locations for mercury-containing lamps and batteries. As part of the work plan, focus group research was conducted with area consumers and retailers to collect baseline information on their knowledge and attitudes in order to tailor the public education/outreach program and better understand the cost/benefit relationship to retailers for participating in such programs.

On April 13, 2010, two focus groups were conducted in Pasadena, CA with area consumers and on April 14, 2010, two focus groups were conducted with local retailers that sell household batteries and mercury lamps. The retailer groups were segmented so that one group consisted of retailers that currently take back household batteries, mercury lamps or both, and the other group consisted of retailers that do not take back batteries, mercury lamps or other hazardous materials.

A total of 20 consumers and 19 retailers participated in the discussions. Participant criteria were as follows:

Consumers:

- Resident of San Gabriel Valley (mix of locations)
- Mix of ages
- Gender balanced
- Mix of ethnicities, education and household income
- Have purchased household batteries and/or mercury lamps in the last 6 months and intend to do so in the future
- Mix of types of stores where usually purchase mercury lamps and batteries
- No employment history in advertising, market research, or waste disposal
- No focus group participation in last six months

The characteristics of the consumers who participated in the groups are shown in Table 1 on the following page.



TABLE 1: CONSUMER PARTICIPANT DEMOGRAPHICS

Criteria	Category	#
Gender	Male	10
	Female	10
Age	Age 20-29	2
	Age 30-39	6
	Age 40-49	9
	Age 50-55	3
Education	High school graduate	2
	Some college	9
	College graduate	8
	Post graduate	1
Household Income	Under \$25K	2
	\$25-50K	7
	\$50-75K	8
	\$75-100K	2
	\$100K+	1
Ethnicity	African American	4
	Asian	3
	Caucasian	7
	Hispanic	6
Where typically buy batteries	Radio Shack	1
	Drug stores (CVS, Rite Aid)	3
	Grocery stores	5
	Home Depot, Lowes	1
	Walmart, Costco	4
	99 Cent Store	3
	Target	3
	Convenience (e.g. 7-11)	1
Where typically buy mercury lamps	Target	7
	Home Depot, Lowes	5
	Walmart, Costco	4
	Grocery stores	3
	Drug stores (CVS, Rite Aid)	1
Proportion lamps in home are CFL	5-24%	2
	25-49%	4
	50-74%	7
	75-99%	3
	100%	4

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Retailers:

- Store manager/Local decision maker
- Store sells household batteries, mercury lamps or both
- Mix of store types including national chains and local independent retailers
- Mix of categories including hardware, electronics, office supply, auto parts
- Geographical mix of store locations
- No household employment in advertising, market research, or public relations

The actual characteristics of the retailers that participated in the groups are shown in Table 2 on the following page.



TABLE 2: RETAILER PARTICIPANT DEMOGRAPHICS

Criteria	Category	No Take Back Program	Yes Take Back Program
Gender	Male	6	6
	Female	4	3
Type of Store	Chain Hardware		2
	Independent Hardware	2	2
	Electronics	1	2
	Electrical Supply Wholesale	2	
	Drug Store	3	1
	Office Supply		2
	Auto Supply	1	
	Party Supply	1	
Name of Store		Tool Shop	Home Depot
		JT LED Supply	Ace Hardware
		Zack Electronics	Berg Hardware
		Walter Wholesale Electric	Crown City Hardware
		DDC Electrical Supply	Radio Shack (2)
		Rite Aid (3)	Walgreens
		Pep Boys	Staples (2)
		Balls Out	
Location of Store	Pasadena	4	5
	La Canada	2	
	Alhambra		1
	Arcadia		1
	Baldwin Park		1
	Covina		1
	Duarte	1	
	El Monte	1	
	Monrovia	1	
	San Gabriel	1	
	Products Sold	Rechargeable batteries	3
Alkaline batteries		8	9
CFLs		6	3
Fluorescent tubes		4	8
Incandescent lamps		6	8
LEDs		1	
Products Taken Back		Rechargeable batteries	
	Alkaline batteries		7
	CFLs		3
	Fluorescent tubes		4
	Incandescent lamps		2
	Other (lead acid batteries, electronics, etc.)	1	4

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The groups were moderated by Lee Boylan, Manzanita Market Research, LLC. The focus groups were recorded and analyzed by Ms. Boylan in developing this report. The discussion guides used to facilitate the focus groups are attached at the end of the report.

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2. EXECUTIVE SUMMARY

Focus groups are a qualitative research methodology. They provide the opportunity to explore opinions and to probe into the reasons for those attitudes. While the number of participants is small and does not provide for broad, statistical conclusions for the larger population, focus groups can illicit emotional and cognitive processes behind thoughts and opinions and determine the importance of an issue to the audience.

A. AWARENESS OF DISPOSAL BANS

1. Knowledge of disposal bans: Neither the **consumers** nor the **retailers** were aware that it is illegal to dispose of alkaline batteries or mercury lamps in the general waste stream.
 - a. None of the **consumers** and only half of the **retailers** were aware that it is illegal to dispose of either product in the general waste stream.
 - b. **Consumers** were more aware that they should not dispose of alkaline batteries than they were mercury lamps. Only a few consumers knew that florescent lighting contains toxic mercury.
2. Consumers admit improper disposal: The majority of the **consumers** admitted they dispose of household batteries and mercury lamps in their household waste.
3. Upset over toxicity: Upon learning about the toxicity of these products – especially mercury lamps – many of the **consumers** and **retailers** expressed anger that hazardous products are being sold to the public and that these products are being sold without adequate public education regarding their hazards or proper handling.

B. REASONS FOR IMPROPER DISPOSAL

1. Reasons for improper disposal: The **consumers** cited:
 - a. Lack of awareness that the items are hazardous
 - b. Lack of awareness of where to properly dispose of materials
 - c. Convenience of disposing of these items in the household trash
2. Willingness to properly dispose of hazardous items if informed: Many of the **consumers** said they would dispose of batteries and mercury lamps properly if they knew they were hazardous, where to take them, and if it was convenient.
3. Awareness of hazardous disposal sites: With the exception of motor oil, very few **consumers** or **retailers** were aware of locations to dispose of hazardous materials.

C. TAKE BACK PROGRAM DESIGN

1. Program must be convenient and easy: Based on this research, a successful take back program for batteries and mercury lamps must be convenient for **consumers** and easy to implement for **retailers**.
 - a. For **consumers**, a convenient location is a place they shop frequently. They concluded that the stores that sell the products should take them back.
 - b. **Retailers** said an “easy” program would provide the collection containers and materials for packaging the hazardous items, pick them up frequently and minimize impact on floor space.

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D. IMPACT OF TAKE BACK PROGRAM ON RETAILERS

1. Positive impact on reputation: **Consumers** and **retailers** agreed that participation in such a program would have a positive impact on a retailer's reputation. Participating retailers would be appreciated both for their effort to help the environment and for their willingness to provide a service to consumers.
2. Positive impact on sales: Both **consumers** and **retailers** agreed that program participation would have a positive impact on sales.
 - a. Almost all the **consumers** said they would be more likely to shop at stores that participate in take back programs and that they would purchase something at the store when they brought back their items for disposal.
 - b. Although the **retailers** that currently participate in take back programs did not have specific data documenting increased sales attributable to their programs, they were confident most people who dropped off items also made purchases while in the store.

E. POTENTIAL BARRIERS TO RETAILERS' PARTICIPATION IN A PILOT TAKE BACK PROGRAM

1. Concerns that program must address: **Retailers** that do not already participate in take back programs identified the following concerns that must be addressed before they would consider participating:
 - Safety of handling hazardous materials
 - Storage space
 - Employee time required for handling the materials
 - Cost of shipping
 - Need for corporate permission/buy-in
 - Need for good marketing to inform consumers of program
2. Retailers with an existing take back program have few concerns: These **retailers** find programs easy to implement and maintain.
 - a. Space is not an issue due to rapid pick-up and good planning.
 - b. Time for employees to monitor collection stations and ensure batteries and lamps are properly contained is the biggest challenge, but they are willing to devote the time because of the community and business benefits brought about by the program.

F. BRINGING RETAILERS INTO THE PROGRAM

1. Recruit retailers to program by detailing benefits to them: Both groups of **retailers** thought the most effective way to market the program to new businesses was to highlight the benefits.
 - a. **Retailers** that already have take back programs focused on "softer" benefits such as promoting a "green" image, providing a customer service, and bringing in more foot traffic, as well as the simplicity of program implementation.
 - b. **Retailers** that do not currently do take back programs wanted more "hard" data regarding benefits, including evidence of increased sales and the value of free advertising.



G. MARKETING THE PROGRAM TO CONSUMERS

1. Motivate consumer participation with education, convenience and financial incentives: The **consumers** suggested the best ways to motivate people to properly dispose of these hazardous items are:
 - a. Education regarding the harmful effects of the products
 - b. Convenient disposal sites
 - c. A financial incentive (such as a coupon or gift card)
2. Consumers suggest using packaging to advertise take back programs: **Consumers'** preferred medium for marketing a take back program was on the product packaging (directing the consumer to a web page for more details), followed by stories on the local television news and inserts in utility bills.
3. Retailers' preferred marketing materials included window stickers, wall posters, and shelf hangers: The **retailers** recommended a menu of marketing options because stores vary greatly in design. The menu should include:
 - a. Window stickers. Many stores do not have visible wall space, so windows are the best option.
 - b. Wall posters. Some stores have wall space for modest sized posters.
 - c. Launch banners
 - d. Shelf hangers/stickers
 - e. Fliers. Some stores have space for fliers on counters or attached to collection bins.
 - f. Local publications
4. Design a recognizable logo: Both **consumers** and **retailers** liked the idea of having a recognizable logo for the program.
5. Free publicity will motivate retailers to participate and attract consumers: The **retailers** recommended using publicity in order to motivate retailers to participate. They indicated that the proposed "Good Steward" designation is a great idea that will motivate businesses to participate.

H. MAJORITY OF RETAILERS OPPOSED TO CONTRIBUTING TO COST OF PROGRAM

1. Majority of retailers will not contribute to cost of program: Almost all of the **retailers** were opposed to paying for the cost of the collection materials or mailing costs, and some expressed surprise and concern at being asked to consider it.
 - a. A few **retailers** that do not already have back programs were willing to entertain paying the disposal costs if they were convinced, via a cost/benefit analysis, that there would be equivalent value to them in the program's marketing their business or in experiencing increased business volumes.

I. MOTIVATING CONSUMERS TO PARTICIPATE

1. Financial incentive likely to increase consumer participation: Although some people will recycle because it is the "right thing to do," the **consumers** suggested including a financial incentive to encourage participation. Their suggestions were modeled off of current recycling programs and include:



- a. Charging a small “deposit” which would be refunded when the items are returned, similar to the CRV for beverage containers.
 - b. Providing store coupons toward purchase of any item in the store.
 - c. Offering discounted prices on replacement items when bringing old items in for disposal.
 - d. Implementing a deposit added to the cost of the item that is charged if the old items are not returned, like the battery core charge.
2. Retailers are willing to incentivize consumers with store coupons: The only financial contribution many **retailers** were willing to make toward the program was offering store coupons for a discount on store merchandise when consumers bring in products to recycle. This is a win-win as it boosts sales while increasing recycling.

J. WHO SHOULD FUND END-OF-LIFE PRODUCT MANAGEMENT?

1. Consumers and retailers concluded tax and rate payers are currently funding end-of life product management: The focus groups ended with a discussion of who should fund end-of-life product management. This was a topic the focus group participants had not previously considered. Ultimately, almost all of the **consumers** and **retailers** concluded that costs are currently being borne by tax and rate payers.
2. Consumers and retailers believe disposal costs should be included in the product price: All four focus groups concluded: the cost of disposal should be added to the cost of the product and the consumers who made the product choice should pay.
 - a. 18 of 20 **consumers** came to the conclusion that the best, and fairest, approach is to add the cost of end-of-life management to the price of the product rather than to spread it over all tax and rate payers. The other two consumers suggested sharing the costs, with tax/rate payers carrying some of the cost.
 - b. 18 of 19 **retailers** stated that the cost of disposal should be added to the purchase price of the product.
3. The participants believed that adding the cost of end-of-life management to the purchase price would have the two-fold effect of fairly allocating the cost to the user and of incentivizing manufacturers to develop safer products: The **consumers** and **retailers** agreed that end-of-life costs should not be assigned to all tax and rate payers but instead be paid by those who purchase the product. Numerous participants also focused on the ethical responsibility of manufacturers to clean up the hazardous products they produce and to take responsibility for producing safer products. They thought that adding end-of-life management costs to the cost of the product would encourage producers to develop safer products.



3. IN-DEPTH FINDINGS

Below are detailed findings from the focus groups. Illustrative quotations from participants are provided in italics. Topics that were discussed by both the consumers and the retailers are reported together.

A. AWARENESS OF DISPOSAL BANS

Neither the **consumers** nor the **retailers** were well-informed of the disposal bans for alkaline batteries and mercury lamps in the general trash stream.

- None of the **consumers** knew whether disposal of either product is legal.
- Half of the **retailers** did not know of the disposal ban on these products.

TABLE 3: AWARENESS OF ILLEGALITY OF DISPOSAL AND ACTUAL BEHAVIOR

	Is it Legal to Dispose in Garbage?		Do You Personally Dispose in Garbage?	
	Alkaline Batteries	Mercury Lamps	Alkaline Batteries	Mercury Lamps
Consumers	All: Don't Know	All: Don't Know	Most: Do	Most: Do
Retailers (do <u>not</u> offer take back programs batteries/mercury lamps)	Most: Don't Know (Assume Illegal)	All: Illegal	N/A	N/A
Retailers (<u>offer</u> take back programs)	All: Illegal	Most: Don't Know	N/A	N/A

Consumers were more aware of the dangers of alkaline batteries than they were of mercury lamps.

- Although they did not know about the disposal ban, all of the consumers stated that alkaline batteries should not be disposed of in their household waste.
- Only a few consumers knew that mercury lamps contain hazardous material. Most who did know named mercury as the hazardous material.

Nonetheless, most of the **consumers** admitted that they currently, or will in the future, dispose of household batteries and mercury lamps in their household waste.

Consumer comments:

“I’d like to know what’s inside them.”

“Why don’t they educate the public that these lamps are dangerous?”



“I think it says on the packaging to dispose of properly, but where do you dispose of them?”

“I’d like to recycle them but it’s not readily available how or where to take them.”

“Is it really okay to put a lot of the things we put in the trash, but do we think twice about it or care about it? I don’t go to the trouble to look up where to dispose of it properly. If I have to drive to do it, is it really worth it? Everybody else is [throwing it in the trash].”

Some **consumers** assumed that there are conveyor belts at garbage facilities where workers sort through household waste and remove items for recycling or proper disposal. Some mentioned seeing these sites on television, such as the program “Dirty Jobs.”

Consumer comment:

“Even a paint can, I will try to hide in the garbage. I’m just lazy. I probably know in the back of my mind it’s wrong, but... I understand that someone is sorting our trash on a conveyor belt.”

Asked specifically if it is **illegal** to dispose of batteries and/or mercury lamps in the household trash, none of the **consumers** knew the answer. One participant suggested it may be “softly illegal,” i.e., not criminalized or enforced. A few others assumed it was illegal, but did not know for sure.

Consumer comments:

“If it’s illegal, wouldn’t it say on there [the packaging]?”

“How do they make people aware it’s illegal?”

Upon learning about the hazardous nature of these products – particularly the mercury lamps – many of the **consumers** and **retailers** expressed anger that dangerous products are being sold to the public at all and that they are being sold without adequately informing the public about their danger or the proper way to handle them.

Consumer comments:

“We’re all outraged. We came in oblivious. Now we all want to be on the front lines.”

“I didn’t know there was mercury in it [mercury lamp] and if I drop one and it explodes and it’s most potent when [it’s new and] I’m putting it in, I don’t want my kids around it. I probably won’t use it any more. It’s better for me not to have to deal with the mercury when I’m putting it in, not to have to deal with recycling when I’m taking it out. I’ll just buy the other bulbs [incandescent] and I’ll pay more every month in my electricity bill.”

Retailer comment:

“The manufacturers are the ones producing the hazardous material...If they’re going to be manufacturing these things, they need to be responsible. It’s an ethical argument and ... they violate all [types of ethics] by not being responsible for their actions.”

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B. AWARENESS OF DISPOSAL LOCATIONS

With the exception of motor oil, very few **consumers** were aware of locations to dispose of hazardous materials. The few who were aware mentioned the following as collection locations:

- library
- hairdresser
- Whole Foods
- Radio Shack
- Office Depot, Staples

The **retailers** that do not currently participate in take back programs were also asked about their awareness of hazardous material collection sites. Their awareness level was comparable to that of consumers. Take back programs mentioned by a few retailers were:

- Home Depot – batteries
- Auto Zone – oil
- Best Buy – cell phones
- Verizon – cell phones

C. REASONS FOR IMPROPER DISPOSAL

When asked why people dispose of hazardous items improperly, most **consumers** cited:

1. Lack of awareness that the items are hazardous
2. Lack of awareness of where to properly dispose of them
3. Convenience of throwing item away in the household trash

Many of the **consumers** said they would dispose of batteries and mercury lamps at hazardous waste collection points if they knew the following: 1) the items contain hazardous materials, 2) where to take them to properly dispose of them, and 3) the disposal locations were convenient.

Consumer comments:

“I never thought twice about it because I didn’t know. If you tell them, people would recycle.”

“I try to recycle everything, but I didn’t know about this.”

Consumer participants’ willingness to utilize take back programs was evidenced by their awareness of and participation in the automobile oil recycling program.

D. DESIGNING THE IDEAL TAKE BACK PROGRAM

The **consumers** were asked what an ideal program for properly disposing of batteries and mercury lamps would look like. Initially, a few consumers envisioned disposal bins on the streets or picked up periodically from their homes and apartments. However, this model was



disregarded as the group determined this would put hazardous materials out in the open. Ultimately, both groups agreed on a system that would allow consumers to return the items to stores that sell them. They stressed that take back locations should be convenient – meaning places that consumers visit frequently.

Consumer comments:

“Make it so that discarding them would be part of people’s regular process, for example, the place to get rid of it could be at the supermarkets you go to get them to begin with.”

“The stores that sell them should be responsible for educating the consumer to bring it back. ‘If you buy it here, you can drop it off here.’”

“Any place people go in the process of their day. Places people frequently go to or go by.”

There was spontaneous discussion of incentives to encourage people to return the hazardous items. Although some people expressed a willingness to recycle because it is “the right thing to do,” many suggested a financial incentive should be included in the program. Various types of incentives were suggested, some modeled on current programs the **consumers** were aware of:

1. Charge a small recycle “deposit,” which would be refunded when the items are returned, along the lines of the CRV for beverage containers.
2. Store coupons toward purchase of any item in the store
3. Discounted cost for replacement items when used items are returned for proper disposal
4. Implementing a deposit added to the cost of the item that is charged if the old items are not returned, like the battery core charge.

Finally, the **consumers** spontaneously discussed how to safely store batteries and fluorescent lamps at their homes before taking them back for disposal. Several suggested that the packaging the items are purchased in should be designed for storage and return at the end of life.

Consumer comment:

“Have the packaging you buy them in be the packaging you return them in.”

E. CONSUMER REACTION TO PROPOSED TAKE BACK PROGRAM AT RETAIL STORES

The **consumers** were enthusiastic about a proposed pilot take back program utilizing retail stores as return sites, which was consistent with their previous discussion of how to structure the “ideal” take back program. All participants thought that retail stores would be very convenient for consumers, as opposed to Household Hazardous Waste facilities or one-day hazardous waste collection events.

Consumer comment:

“The cons (downsides) are all on the store side, none for the consumer.”



F. PROGRAM MUST BE EASY FOR RETAILERS TO IMPLEMENT

Both **retailer** focus groups emphasized that a take back program must be easy for the retailer to implement. They defined “easy” as a program where retailers’ are provided the collection containers and materials for packaging the hazardous items and frequent pick-up of the collected items.

The **retailers** that already have take back programs all characterized their current programs as convenient and simple to implement and maintain. This included those using Mercury Disposal Systems (MDS)¹ as well as those whose corporate offices provide collection materials and pick-up. They acknowledged there was a time investment associated with safely packaging the products, but felt this was worthwhile as the rest of the set-up and disposal was simple. The only negative comment was regarding the time consuming nature of properly handling batteries, either by sealing the ends or separately packaging them.

Comments by retailers with take back programs:

“The MDS program is real simple and free of charge. It’s a really good program. It’s really easy.”

“The MDS program was real simple at first, but then they told us we had to seal the batteries with stickers. I got a little upset because I don’t like my employee spending this much time on recycling batteries. This is ridiculous, so she does it on her own time.”

“[Store with rechargeable battery take back program] It takes a good chunk of time. Some customers bring in big boxes of rechargeable batteries. We have to separate every one of them and put on stickers or put them in bags. I just did a box yesterday and it took about an hour of my time, while at the same time I have to manage the store. It can be a hassle as far as big orders go.”

Comments by retailers without take back programs:

“If it’s not easy for us, then it’s not going to work. Easy is like the [current] battery program [in Pasadena]. A service comes and picks [the items] up at a regular interval so there’s little involvement by us, it takes very little storage.”

“I could imagine it if the city provided us with the [collection] trash bins so that we don’t have to make our own trash cans. That’d be good.”

“I agree it has to be simple. Right now we pile up cardboard and someone picks it up. It needs to be like that.”

“If it’s going to become a hassle for us we’re not going to promote it. Expedient pick-up is most important. For example, in Oregon they provide a bin for batteries and then pick it up. In Madison they were making them separate the batteries. That’s the thing you don’t want to do because now you’re hassling the retailer. The more you do that, the less likely they will want to comply. It needs to be as simple as possible.”



G. CONSUMERS' PREFERRED RETAIL SITES FOR TAKE BACK PROGRAM

Consumers identified the following types of stores as preferred take back locations:

TABLE 4: CONSUMERS' PREFERRED TAKE BACK LOCATIONS

Store	First Preference	Second Preference
Grocery stores	16	1
National chains (e.g., Home Depot)	2	6
Warehouse (e.g., Costco)	0	4
Convenience (e.g., 7-11)	0	4
Drug stores (e.g., CVS)	1	2
Office supplies	1	1
National electronics (e.g., Radio Shack)	0	1
Local hardware	0	0
Auto supply	0	0

1. Grocery stores were most popular due to the frequency of trips by consumers.
2. Home improvement chains would seem like a logical location because they sell large quantities of batteries and mercury lamps, but consumers preferred collections where they shop more frequently such as grocery stores.
3. While there are more convenience store locations, they are often more expensive and busier so are less attractive to the participants for a drop-off location.
4. Consumers felt that people purchase these items in bulk at warehouse stores; therefore, they may also be willing to return the items there in bulk.
5. Electronics stores were not preferred as they are not visited frequently.

H. IMPACT ON REPUTATION FOR RETAILERS' PARTICIPATION IN TAKE BACK PROGRAM

All but one of the **consumers** said they would have a more positive opinion of stores that participate in a take back program. They would appreciate those stores' willingness to help the environment and perform a community service.

Retailers that currently participate in take back programs also believe their customers have a more positive perception of them for being environmental stewards and appreciate the customer service they are providing.

Retailers that do not currently participate in take back programs also thought participation would positively impact their image in the community.



Consumer comments:

“It makes me feel more positive [about the store] that they are attempting to do something for the customer and the environment.”

“It would show they care.”

“It would definitely give me a more positive image. I may think about actually becoming a customer of theirs if I wasn’t a customer before because of their contribution to saving the environment.”

“I’d definitely have a positive view of them because they’re not only getting money from you (by selling goods) but are also providing a service to the community.”

“It seems like they are trying to give back to the community.”

“It would be a good community plus for a store to do it.”

“I don’t think it would matter to me. It doesn’t give me warm fuzzy feelings about the store. [This was the only non-positive comment in two focus groups.]”

Comments by retailers with take back programs:

“It brings the customer back and he likes that we’re doing him a service.”

“It’s looked at as a charity. Any time it’s the right thing to do and socially responsible people will think well of us for doing it.”

“A major corporation that goes green makes people feel good.”

“It can be a hassle, but we only do it for the customers as a customer service thing. Because corporate wants us to do it, we do it as a customer service. It’s a service for our customers and that’s the only reason we do it.”

“Customers think it’s great. They say ‘I’m glad you do it, or else I would just throw them away.’”

“They love it because it’s a one-stop. They drop it and then they buy something.”

Comments by retailers without take back programs:

“It would help our reputation in the community.”

“We would be seen as environmentally friendly.”

“People want to be responsible and that social responsibility crosses all lines.”

I. IMPACT ON SALES FOR RETAILERS’ PARTICIPATION IN TAKE BACK PROGRAM

Almost all the **consumers** thought they would be likely more likely to shop at stores that



participate in take back programs and that they would purchase something at the store when they brought back their batteries or mercury lamps.

The **retailers** that currently participate in take back programs did not have specific research or data documenting increased sales attributable to their programs. However, they assumed their corporate offices were tracking the program even if the local store did not see the information. Nonetheless, some believed sales of certain items that are collected had increased. Several said sales of mercury lamps have dramatically increased but were not sure whether to attribute that to the recycling program or to increased consumer awareness of the products and preference for energy-saving products. Many also anecdotally reported that most people who come in to their stores to dispose of items tend to make purchases while there. They suggested that it might be possible for stores that become collection locations to track sales of subclasses of products like batteries and mercury lamps before and after starting the program.

Many **retailers** that do not participate in take back programs also assumed the programs would result in increased sales. However, they did not think there would be reliable hard data on sales tied to take back programs.

Consumer comments:

“Gas is expensive, so we’re going to try to multi-task if we can get more than one thing done at a place.”

“If you have to drop them off at Target, you might as well pick some things up while you are there.”

“I usually go to the grocery store for XYZ, but since I have to go to Target to throw these in the bin, I’ll get it at Target.”

“If Lowes was doing it and Home Depot was not, then I might go to Lowes.”

Comments by retailers with take back programs:

“It’s convenience for the customers. It’s one-stop shopping. They come in, drop off their old stuff and maybe buy some new stuff.”

“It gets customers in the door.”

“The more convenient you make it for your customers, the more they come back.”

“Customers feel good because they did something for the environment and if they’re feeling good while they’re in the store they’ll buy something.”

“I’m sure that if people see something that catches their eye maybe they’ll pick up another light lamp, or a door handle or nuts and bolts. Eventually it gets back to us as far as the retail business does increase somewhat.”

“It’s really rare for someone to just drop something off and not buy something while they are there.”

“It’s great PR. We’re on everyone’s website as a collection site. It’s a win-win situation.”

SGVCOG Battery/Mercury Lamp Take Back Program Focus Group Report



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Comments by retailers without take back programs:

“Wouldn’t it generate business? They would come in to return batteries and would buy some more batteries.”

“Office Depot did that with toner cartridges. It was supposed to be temporary but they have continued it for years. You have to buy a replacement, so they get your business when you bring it back.”

“There’s always something people will buy while they’re there – ice cream, candy.”

“It can’t hurt business, it can only help.”

“It would hurt the businesses that are not doing it.”

Consumers had mixed responses as to whether they would be more loyal to a store that participates in a take back program. About half of participants said they would be more loyal to a store that takes back these items, but some said they are very loyal to the stores they currently shop at (especially grocery stores) and participating in a take back program would not change their loyalty to a different store. Several said they are not loyal to any store.

Retailers that do not currently take back products all believed participation in such a program would increase customer loyalty.

J. IMPACT OF PROGRAMS ON EMPLOYEES

Generally, **retailers** that already have take back programs did not think the programs had any effect on employee morale, either positive or negative. It is considered part of their jobs, and at the smaller stores the managers do most of the work. Likewise, the non-participants said they would not be persuaded to join the program because of an anticipated positive impact on employee morale.

Comments by retailers with take back programs:

“I (manager) take care of it, so it doesn’t impact the employees. (several)”

“My employees take them, but I finish it off. They don’t mind it; it’s part of the job.”

“It’s just a program. When you hire someone you train them it’s part of what we do, part of the job, so I don’t think they have an opinion one way or the other.”

“They (employees) see how much of this stuff comes in and knowing it would normally go into the trash if they weren’t bringing it in of course that’s going to make a difference.”

K. POTENTIAL BARRIERS TO RETAILERS' PARTICIPATION IN PILOT TAKE BACK PROGRAM

The moderator described the logistics of the proposed pilot battery and mercury lamp take back program. The issue of who will pay for the program or how much it will cost was not included in the initial description or the discussion.

The **retailers** that do not currently participate in a take back program were immediately concerned about:

1. Safety of handling hazardous materials

"What if the employees get hurt?"

"I'm concerned about shipping broken fluorescent tubes or leaky batteries. That's open hazardous materials. The fines for knowingly sending these are huge."

"The consumers should pack the things."

"What about when a consumer brings a broken lamp into your store?"

2. Storage space

"I recycle cardboard but it doesn't get picked up fast enough. I get so much cardboard in one day I don't have a place to put all of it. If you want to make the program easy, don't make it so that we have to store it. That's why you get push-back and why programs fail."

3. Employee time required for handling the materials

4. Cost of shipping

"Shipping hazardous materials is a lot of money."

5. Need for corporate permission/buy-in

"Getting corporate permission. It takes an act of God to do something at the district or regional level. [Rite Aid]"

6. Need for good marketing to inform consumers of program

"They have to advertise. Just sticking a bin in the store, people will walk by it."

"Make it [the logo or seal] professional, so people know it's legitimate."

After the **retailers** that do not currently participate in a take back program expressed their concerns about shipping, safety and storage, more detail about program structure was provided including:

- a. A shipping service will be contracted to pick up the materials when the retailer calls them. This precludes the need for significant storage space.
- b. The containers and plastic bags meet hazardous materials handling regulations. This would address concerns regarding hazardous shipping issues.
- c. Plastic disposal bags hang from the collection bins for customers to seal their items before placing in the bin. This reduces store employee time/involvement.

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In general, their major concerns and barriers were alleviated once they fully understood the logistical details of the program. However, they still had some concerns about customers handling the items correctly.

“I don’t think I’d want the customer being unattended doing that because who’s to say they will actually do it correctly? And I’m the one who will be handling it at the end and am the one who could be injured.”

Retailers that currently participate in take back programs were asked to identify barriers they thought non-participants might perceive as an issue. The only barrier they identified was lack of understanding of the benefits of the program.

Comments by retailers with take back programs:

“As long as it’s simple, I don’t see any barriers.”

“Only ignorance of the situation. If you don’t know, you’re going to fear it. The first thing they will ask is “How’s it going to benefit me?” If they don’t know the benefits, it will be a big barrier. But if they understand, I don’t see a problem with it.”

Asked specifically to address the concerns about space brought up by the non-take back group, the **retailers** that currently participate in take back programs said space is not an issue, due to rapid pick-up and/or good planning.

Comments by retailers with take back programs:

“Once you organize it, it doesn’t take a lot of room.”

“The turn-around is pretty quick for pick-up. You just keep the box until it fills up and then ship it.”

“When we have a recycling event, it takes a couple of pallets, but I know how to juggle things and can get things done pretty quickly to get the space back. Just do it and it will work out fine. [Staples]”

Additionally, **retailers** that currently participate in take back programs were asked to share the challenges of their current programs. Most cited time as the biggest challenge, but they were willing to devote the time because of the community and business benefits. Another issue is that people sometimes bring in large quantities of products or drop off products the store does not take back.

Comments by retailers with take back programs:

“People taking advantage of the programs. Even contractors bring in tons of stuff, and they’re not even there to shop.”



“We received 300 8-foot fluorescent lamps and had to close the business down and leave the building.”

Asked about the cost of their programs, only one retailer could answer. He paid about \$300 annually for pick up. The large chain stores said the cost does not show on their profit and loss statements. The costs for smaller stores participating in the City of Pasadena program were completely subsidized and there were no direct costs to those stores.

L. RETAILER INTEREST IN PARTICIPATING IN PILOT PROGRAM

After they understood the logistical details of the program (with the exception of cost), the **retailers** that do not currently participate in a take back program all indicated the program sounded “doable” from their perspective as local store managers. They thought the program would be relatively easy to implement, with the possible exception of sealing the lamps and batteries, depending on volume. However, several indicated they would need corporate level decision for adoption.

The two wholesalers that participated in the focus groups were also interested in implementing a program. However, because of the volume of materials they would receive from contractors, the program would need to be adjusted to fit their needs.

Retailers that already participate in take back programs thought non-participating businesses would be likely to join once informed of the benefits.

Comments by retailers with take back programs:

_“They will want to know, what’s the benefit to them? What are they going to get out of this? We do it for customer base and customer service. Will they do it for that? For advertising? Money?”

“If I were my own boss and didn’t have a program, hopefully most people in our position and our intelligence who own their own businesses would want to go green and would want to go for the customer service avenue of it. If someone is actually setting it up for them and making it real easy...eventually there will be a good view of the business.”

Comments by retailers without take back programs:

_“It would be OK for my store because it is a community place, but you would have to go to corporate to arrange it.”

“Right now we have a container for plastic bags. As long as we have some kind of container and customers walk in and dump them [batteries and mercury lamps] there, that would be good.”



M. MARKETING THE PROGRAM TO BUSINESSES

Both groups of **retailers** asserted that businesses will participate in the program if they are convinced there is a benefit to them in participating and if they believe the program is simple and easy to implement. The retailers that already take back products listed the benefits they thought would be persuasive:

“Tell them it’s a win-win.”

“There’s nothing bad about it.”

“Once you get into it, it’s easy. It’s not hard to manage.”

“There will be more traffic to your store.”

“It’s good for your store image.”

“[You’ll be] helping the environment.”

“It’s service to your customers.”

The **retailers** that do not currently participate in a program also mentioned some of the benefits above, but they focused more on financial benefits than did those already implementing programs. Specifically, they wanted to hear that sales will increase and/or they will get free advertising. A few suggested that participation be limited so that those who join have a competitive advantage over those who do not, due to the free advertising.

Comments by retailers without take back programs:

“You have to tell them how it is going to benefit them, and that is sales, because no one cares about anything else but sales.”

“It gives [customers] an incentive to go to your business. It’s sales for you. You’ll have more customers and while they’re there they will buy something.”

“From a corporate perspective, they are going to be interested in how you are going to advertise their name. The rest of it is secondary.”

“Promote a save the environment message.”

N. PUBLIC EDUCATION AND INCENTIVES TO MOTIVATE PROPER DISPOSAL

Based on the **consumer** focus groups, the most effective way to motivate people to properly dispose of these hazardous items would be a combination of education on the harmful effects of the products plus a financial incentive. Most of these participants were unaware of the dangers of mercury lamps or household batteries. Once informed, almost all said they would make the effort to dispose of them properly. It is also important that disposal is convenient.



Consumer comments:

“Everyone knows what second-hand smoke does, but nobody knows what battery acid does to the environment.”

“It’s multi-faceted. People who don’t care [about the environmental effects] will care about their pocketbook. Use both messages to reach people where they individually live. There are people who really care about the environment and there are people who really care about their pockets.”

“Do lots of advertising to inform people, like the Census.”

“The risks and dangers to health and the effect on the environment.”

“Show where it goes, what it does. It pollutes the soil...How it affects you, how it affects your kids. Show the effects on your lungs.”

“I think money is the biggest incentive. That’s why so many people recycle bottles and cans now.”

“For me it’s convenience. If you have a drop off in the parking lot, I’ll do it.”

“It’s so much easier for me to toss it in my trash. I’m not going to remember. I’m never going to do it. It’s not as convenient as just tossing it in the trash. You need to criminalize it.” [Opinion of a single participant.]

One **consumer** suggested that a recognizable logo be designed to market the program.

“Design a symbol like the recycle symbol but with a CFL lamp in the middle of the recycle arrows. That will brand it into people’s heads. Put the symbols on stickers.”

The **consumer** groups also discussed the proper timing of any education campaign. There was consensus that education was most effective at the time of purchase. Most recommended labeling on the package informing them of the need to properly dispose of the item and providing a website listing disposal locations.

The **consumers** were asked to “vote” on their top three preferences of media to inform consumers of the proper way to dispose of batteries and fluorescent lamps and of locations accepting them for disposal, with the results below. Their top choice was on the packaging (directing them to a web page for more information), followed by stories on the local television news and inserts in utility bills. Several people mentioned the *Pasadena Weekly* paper as a good place to promote the program.

TABLE 5: PREFERRED MEDIA

Media	First Preference	Second Preference	Third Preference
On package	9	3	1
TV (local news)	6	6	2
Insert in utility bill	3	3	1
Web page (noted on package)	0	4	3
Flier at store	2	0	4
Signs in stores	0	2	4
Radio	0	2	2
Billboards	0	0	4
Newspaper ads	1	1	0
Bus signs	0	1	0
Newspaper articles	0	0	1

Only two of the twenty **consumers** were aware of the website www.earth911.com , where people can search for disposal sites in their area, but once informed, they all thought it was a good idea.

O. MARKETING BUSINESSES’ PARTICIPATION IN PROGRAM

The **retailers** discussed how to inform consumers about their participation in the proposed pilot take back program. Because every store is organized differently, they suggested that the program offer a menu of options and have businesses complete a short questionnaire to indicate which would work best in their location. The menu should include:

1. Window stickers. This was the most requested item. The stickers should be relatively small, but big enough to be noticed as customers enter the store. They suggested a logo be developed which consumers will recognize over time. However, not all businesses would use window stickers, either due to space constraints or corporate policy.

“Every square inch of my walls is covered with merchandise, so the windows are the only place I can advertise anything.”

“Getting a recognizable sticker out there is an awesome idea. It shouldn’t be huge, just a glance for a customer to look, like do they take Visa.”

“My walls are way in back. Give me a little decal to hang in my window.”

2. Wall posters. Some stores have wall space for modest sized posters.

“I like a certificate I can hang on my wall.”

3. Launch banners. Some retailers thought banners or easel signs outside their stores at launch would be effective, although there are local ordinances prohibiting this type of advertising in some areas.



4. Shelf hangers/stickers. Many retailers would use shelf stickers or hangers, depending on design and space.
5. Fliers. Some stores would have space for educational/instructional fliers on counters or attached to the collection bins.
6. Local publications. Publications mentioned for promoting the program included the “Pasadena Weekly,” the “Recycler,” and the “Clipper.”

P. FREE PUBLICITY FOR PARTICIPATING BUSINESSES

The **retailers** endorsed as much free publicity as possible for the program participants, as it would serve as a motivator to participate. They deemed the proposed “Good Steward” designation an effective idea that would encourage businesses to participate.

Retailers’ comments:

“That’s key. Free press is always good.”

“Someone is mentioning your name. You have the city government saying ‘Berg Hardware is doing this and Staples and Walgreens, hey, go there.’ That would cost my company \$1.5 million in advertising.”

“That will be a huge motivator.”

“You get bags with your name on them circulating through the entire community? Sign me up!”

“[A seal recognizing stores as a “Good Steward”] would be a major positive, showing they have been recognized for going green, recycling, good for the environment, upstanding in the community.”

Q. START-UP HELP

The **retailers** that already have programs recommended that brief training modules be provided. Some larger retailers preferred an electronic medium, such as a DVD, instead of a paper handbook. Both groups reviewed the table of contents of the sample handbook (Attachment A) and found it comprehensive. One modification that was suggested was to highlight the benefits of the program and to give resources for where to send materials not collected at that site.

R. REACTION TO RETAILER CONTRIBUTION TO COST OF PROGRAM

When the issue of cost was raised, most of the retailers had not considered that the stores would be asked to contribute in this capacity. When they were asked if they would share in the cost – specifically with the cost of the collection materials and mailing costs – most of the **retailers** were opposed to contributing more than their labor cost, and some expressed surprise and concern at being asked to consider it. Indeed, the retailers that are already participating in the City of Pasadena’s free take back program were more upset at the idea of sharing in the cost than the retailers that do not currently have programs.



Some of the **retailers** that do not already have take back programs were willing to consider sharing in the costs if they were convinced, via a cost/benefit analysis, that there would be equivalent value to them in the program's marketing their names or in increased business. However, some assumed that their names would be on a website rather than in print or radio media, which is not worth much in terms of advertising. Others stated the marketing would have no benefit if their competitors were also participating and benefitting from the marketing.

A handout was provided with cost estimates (see Attachment B). Many retailers translated the costs into payroll hours and stated they could not afford to pay them.

Comments by retailers with take back programs:

“Not a chance in Hell.”

“We already are [contributing], by taking the time to do the program.”

“I think we're all costed out.”

“And it's not just the labor costs we're donating. We're also doing an acceptable risk, and I can guarantee you insurance changes dramatically once you start taking hazardous materials. Then you have the training and everything else.”

“Shipping hazardous materials costs more than just shipping paper.”

“God forbid one of your 20 year old associates makes a mistake. Do you understand what that fine is? They could put most little Mom and Pops stores out of business.”

“At the end of the line, some [recycling] company is making a lot of money and any costs involved in this should probably be covered by that company. If MDS is the company that is recycling the materials, they're making a fortune.”

“I couldn't see incurring any more costs.”

“It's a bad idea. It's silly to even ask.”

“I won't accept the stuff, if I have to pay for the shipping. We [spend] our own money on taking the time to return those items to try to do the right thing. For anyone to say we want to charge you for trying to do the right thing, then forget it. I'll just stop selling them, period.”

“I think it's kind of unrealistic to ask small companies to pay this. We're supposed to do all the work and pay for it?”

Comments by retailers without take back programs:

“No.”

“There would need to be a cost/benefit analysis for the corporate office to answer that question. If we participate in this program, what are the benefits to us? [For example:]”

Even though it's difficult to measure, we anticipate a 3% growth in this particular category."

"If we're going to receive more than [the cost of disposal] in additional business because of it, then it would be doable. I can't imagine corporate okaying anything without a cost/benefit analysis. It's irresponsible. Every vendor that has ever wanted me to carry something gives me a cost/benefit analysis. Even for one garden hose versus another they tell me the expected revenues and costs. If you can't provide that, I'm not even going to give you the time of day."

"In the end, we're all tax payers and we have to pay for it anyway. Either we [businesses] are going to have to do it, or the whole state will have to do it together. So you're asking business to do it. I guess I don't mind pitching in, but it's kind of tough. It's a lot to ask."

"The only possible way of getting around that is to show some proof of the actual amount of advertising you are going to provide that company. Without seeing sales figures, just knowing what advertising does for us as a corporation, we could look at that and say that's a worthwhile investment. But there will have to be commitment to that [advertising]."

"The advertising won't do us any good if everyone participates. It has to be selective."

S. RETAILER CONTRIBUTION TOWARD INCENTIVIZING CONSUMERS WITH STORE COUPONS

Although the **retailers** were not willing to help subsidize the costs of collection materials and mailing fees, several were interested in incentivizing consumers to participate by offering store coupons for replacement products or on any merchandise in the store. This would be a "win-win" as it would increase sales while providing an incentive for consumers to properly dispose of the items. Some of the retailers that currently have take back programs already offer such coupons. Several suggested that the manufacturers partner by providing free or discounted replacement products for the coupon program. Some manufacturers already do this with incandescent lamps replaced by mercury lamps.

The **consumers** also suggested coupons as a good motivator (see page 14 above).

Comments by retailers without take back programs:

[If there were a CRV] "That allows me to be creative. I can double the redemption value if they spend it in my store. Now you're forced to spend it in my store. I'm good with that."

T. CONSUMERS' PREFERENCES TO ENCOURAGE PROPER DISPOSAL

Consumers were asked whether they would be willing to pay a small fee to pay for disposal

when they drop off their batteries and mercury lamps, and they responded with a resounding “No.” They indicated that charging a drop-off fee would result in people not recycling at all.

Consumer comments:

“People won’t drop them off. They’ll be discouraged from dropping them off at all.”

“The stuff will end up in the land fill.”

“Nobody will do it.”

“I think they should reward you [not charge you].”

The other options to encourage proper disposal considered in the consumer focus groups were:

- A CRV-style deposit paid on purchase and returned to the consumer when product is disposed of properly
- Adding the cost of managing disposal/recycling to the purchase price of the product; then it would be the producer’s responsibility to manage the end –of-life of the product.
- Significant increase in taxes and/or garbage rates

Of these options, all the **consumers** preferred the CRV-style deposit as a means to increase proper collection. The second choice of the vast majority was producer responsibility, with only two respondents preferring tax payer responsibility.

Consumer comments:

“If I have to go out of my way to take it somewhere, give me something for my trouble.”

“We’re trying to help the environment, so to encourage people pay [them a little money]. It’s not going to be much, just to thank them for bringing it in.”

“Make the deposit/return amount enough so people will be motivated to do it.”

“It will have [good] repercussions down the line because consumers will wonder why it costs them that much money to buy batteries. Eventually it will trickle down to the manufacturer, and the consumer will push either for legislation or for manufacturers to find better ways to produce the product. You hurt people’s pockets, action happens.”

U. AWARENESS OF WHO IS PAYING FOR END-OF-LIFE PRODUCT MANAGEMENT

Both the consumers and the retailers were asked who they thought is paying to manage collecting, recycling and disposing of hazardous waste. Most participants indicated that this was not an issue that they had considered before. Nevertheless, all but one of the **consumers** concluded the tax payers are paying now. A few also mentioned garbage rate payers.

Most of the **retailers** also assumed the tax payers or rate payers are paying now.



V. WHO SHOULD FUND END-OF-LIFE PRODUCT MANAGEMENT?

Each focus group ended with a discussion of who should be responsible for paying for the proper handling of hazardous products at the end of life. Again, this was not a topic they had thought about before, but the discussions were very thoughtful.

The **consumers** articulated that in the end consumers always pay. After much back and forth, all but two of them came to the conclusion that the fairest approach is to add the cost of end-of-life management to the price of the product rather than spread it over all tax and rate payers. They concluded that this would have the two-fold effect of fairly allocating the cost to the user and of incentivizing manufacturers to develop safer products. A few of the consumer participants suggested a shared responsibility, with tax/rate payers carrying some of the cost.

The two **retailer** groups also discussed the same question of who should pay for end-of-life management of hazardous products and came to the same conclusion as the consumers. After much discussion among themselves, all but one retailer stated that the cost of disposal should be added at the front end to the cost of the product. Some of the retailers focused on the ethical responsibility of manufacturers to clean up their hazardous products and to take responsibility for designing safer products. Some thought it might only be a few cents added to the price of the products and consumers would willingly pay the modest price increase. Some also asserted they would prefer to see the cost in the price of the product rather than spread over all tax or rate payers.

One distinct retailer asserted that the recycling/disposal companies should pay for it because, he believed they were profiting from recycling.

Consumer comments:

“Ultimately the consumer will pay because the company will make a profit regardless. Ultimately we all are paying for it.”

“I don’t care if it’s the government or corporations. Both of those will always bring it back to us. So the real question is, when do we want to pay? When we pay the government, when we buy the product or when we get rid of it? Because if we have the government involved, then really the government is dispersing over everybody, but if we pay for it either when we are buying the product or getting rid of it, then it’s only to those individuals who are actually using the product.”

“If they’re [other consumers] buying the CFLs and I don’t care and buy the regular [incandescent] lamps, then they can pay for what they’re using and I’ll pay for what I’m using. I’d prefer not to have to pay taxes on it or to have my tax money going to that.”

“I’m going to pay for it either way, so I’d rather pay for it when I’m buying it [rather than in my taxes or rates].”

“I think we should pay for it when we buy it. If you just don’t use batteries, I don’t think you should have to pay for it. The more you use an item that has the potential to harm the

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environment, the more you should be taking the responsibility. So our responsibility would go up and down based on our usage.”

“The more I use [these products] the more I am a person who is potentially involving the use of these chemicals in the environment; therefore I [should] take a little more of the cost of the disposal of the item.”

“[If you pay when you buy it] you have a choice. I don’t buy them as often, so I should be paying when I purchase them, not a flat fee for everyone.”

“Ideally I think the manufacturers should carry it all, but realistically it’ll probably come back to us.”

“Maybe it will incentivize the producers to find other products that don’t pollute as much.”

“Use that money to do some R&D to make CFLs that don’t produce all that mercury.”

“I think that whether you’re a huge corporation or a small business, whatever you’re putting out there you need to be responsible for. So I like the idea of the money going toward R&D and the company using that to look for better ways.”

“If they pass it on to us, as things get so expensive, there’s going to be a lot more outcry from the public for other technology. So I think there would be a push, if it got that expensive, to find other technology.”

“We consume whatever the manufacturers produce for us to use so why can’t the producers of these CFLs and batteries make a battery or light lamp that doesn’t produce these chemicals? They’re producing it so they should bear the cost of it, right?”

“I would split [the end of life cost] maybe, to encourage more research and development with products that don’t use those types of items [toxic substances] and then pass along a little bit of a surcharge because you don’t want the price of XYZ product to rise dramatically to cause a drop in sales. I would kind of attack the industry that’s [making them] a little and then levy a small tax on the general taxpayer.”

“Why can’t it be mixed? Maybe the government, maybe the manufacturers and the people buying them. I think everyone should bear the costs on that.”

“I think it should be half the consumers and half the manufacturers because we are the ones actually using them and disposing of them. However, on the other hand, the manufacturers need to do their part in making the product either safer or more efficient or find some way to replace what’s dangerous.”

“I don’t think the entire responsibility should be placed on the producers because for every location the cost of handling the trash differs, I think, for each state or each city. So I think just having a tax would give the option of raising or lowering it.”

Comments by retailers without take back programs:

“I’m curious about the involvement of Eveready and Duracell. If they’re the major contributor to [manufacturing] these things, maybe they should be the major contributor to these things [disposal programs].”

“The manufacturers are the ones producing the hazardous material. The cost of making a battery is very, very little compared to what they retail for...If they’re going to be manufacturing these things, they need to be responsible. It’s an ethical argument and ... they violate all [types of ethics] by not being responsible for their actions. They need to help with that...If you want to encourage particular behavior it has to be incentivized...There’s a lot of battery technology out there...They are years ahead in technology, but we’re not seeing it because it’s more cost-effective for them to just make the alkaline batteries. You have to incentivize that and some of it is, they have to pony up the cost of recycling, and I mean cost as far as the advertizing and everything else that goes on, and not depend on us.”

“I agree. Charge Duracell, charge GE, charge all of them.”

“They’re the ones making this junk, they should clean up their act and help us tax payers pay for it.”

“If you’re just looking for partial funding, I understand they will increase the price. Just take one cent and tack it on to every battery. We tell the manufacturers, “Your part is you have to give us a penny for every battery you sell.” We as consumers will overlook that [extra penny]. The funding for the program would be buried in the cost of the batteries.”

“People will buy batteries anyway, whether it’s [an extra] nickel or dime.”

[The manufacturer] should have some responsibility. Impose a tariff – you can’t sell your batteries in California unless you’re ponying up some of the responsibility. If they’re having to pay – call it a tariff – to sell their batteries in California because of the waste, but if they introduce some of this newer technology that is less waste...we’ll charge you [less tariff]. That will incentivize them to create less waste.”

“It’s only fair. If I buy less of these things and I have to pay the same as someone who uses more of them, I’d rather pay for what I use and let them pay the higher cost.”

“Adding the cost to the purchase price would be better...People hate tax increases.”

Comments by retailers with take back programs:

“The private sector should pay for it. They are the ones making the money. It’s their profit. If they want it from us, they should pay. I think making it a generalized tax for everybody is wrong... If you want to add a deposit fee to a certain item, that’s fine...In California, we’re pretty green and we pay enough for that, [so] I think it [responsibility for funding end-of-life] should be private.”

“The manufacturers are the ones making billions and billions of dollars in profits off the consumers and making the hazardous products we’re consuming. I think they should be



held responsible...It seems like there's so much [toxic material] already out there and they're taxing us for it when the manufacturers are the ones doing the wrong."

"The manufacturers are the ones that are purchasing mercury for their product...Phillips, General Electric, Sylvania and then the battery manufacturers, they're as big as Home Depot, they are doing okay [financially]. They're making the money off of it."

"I have to agree with everyone here. I think it should be the private sector, the manufacturer that produces the product. They're the one that's making a profit and they're the ones that are letting these products out. It's their responsibility to take it back. The costs shouldn't be pushed to the stores that are trying to collect it for them."

"The manufacturers. They sell them, they should take them back."

"I guarantee if you told the manufacturers, "You're going to pay for the recycling at the end of their lives," they'd figure out how to make them toxic-free."

"If all of a sudden we make the manufacturers pay and then all of a sudden we don't have to pay all that in taxes, I don't see too many Californians getting upset about that."



ATTACHMENT A

Retailer Handbook Table of Contents

1. Overview of Take Back Program
2. Purpose of Program
3. Unacceptable Materials
4. Employee Responsibilities
5. Store Manager Responsibilities
6. Program Materials and Equipment
7. Materials Handling
 - a. Linear Tubes
 - b. CFLs
 - c. Batteries
8. How to handle leaking batteries
9. How to clean up broken bulbs
 - a. Mercury Spill Kit
10. Shipping Instructions
11. Ordering Additional Boxes/Pails
12. Personal Protective Equipment
13. Promotional Materials
14. Contact Information

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ATTACHMENT B

Retailer Cost Estimates Developed by Grant Team

Monthly Cost Estimates

A. Item	B. Collection Container	C. Unit Price	D. Assumed No. of Units / Mo.	E. Total Monthly Cost
Rechargeable Batteries		\$0		\$0
Single Use Batteries	Pail holding 70 lbs.	\$67	3	\$201
CFLs	Pail holding 60 CFLs	\$59	2	\$118
Linear Lamps – 4 ft	Box holding 32 lamps	\$42	3	\$126
Linear Lamps – 8 ft	Box holding 24 lamps	\$58	1	\$58
TOTAL		\$226	9	\$503

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ATTACHMENT C

Consumer Focus Group Discussion Guide

1. What do you usually do with used batteries/burned out CFLs?
2. What do you think is the proper way to dispose of batteries/CFLs?
3. Is there any reason they should not be put in your regular household trash?
What are those reasons?
To your knowledge, is there anything toxic or hazardous in batteries/CFLs?
4. Do you know if it is legal or illegal to dispose of rechargeable and alkaline batteries/CFLs in the regular household trash?
5. Are you aware of any place you can properly dispose of batteries/CFLs? Where?
Have you ever disposed of them there? Why?
Are you aware of any recycling opportunities for these products?
6. Why do you think people dispose of hazardous items improperly or illegally?
What can be done to encourage people to dispose of them properly?
7. If you were asked to design the ideal system for properly disposing of batteries/CFLs, what would it look like?
What would be most convenient for you as the user? What does “convenient” look like?
What would you be most likely to actually do consistently?
8. In some communities, some retail stores take back these items and recycle them or properly dispose of them. (It doesn't have to be the same store where the item was purchased.) What is your first reaction to this idea?
What are the pros and cons?
9. What kinds of stores would you expect to participate in such a take back program?
10. Test attractiveness specific types of stores as take back locations. Why would this be a good or bad place for a take back program?
National home chains (Home Depot)
National electronics chains (Radio Shack, Best Buy)
Local hardware stores
Office supply stores (Staples)
Grocery stores (Ralphs, Whole Foods)
Convenience stores (Circle K, 7-11)
Auto supply stores (Kragen)

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11. Would you take your batteries/CFLs to a retail store for disposal? Why or why not?
12. If you had the choice of taking batteries/CFLs to a retail store or a transfer station or other solid waste facility, which would you prefer?
Why?
13. If you knew that a store takes back batteries or CFLs, how would that impact your opinion of that store?
14. Would you be more likely to shop at a store that has a take back program? Would it make you a more loyal customer? Why or why not?
When you brought your items in for disposal, would you be likely to also purchase something at the store while you were there? Why or why not?
15. What would motivate you to dispose of batteries/CFLs properly? What message would be most likely to convince you to dispose of them properly?
16. When is the best time to inform you and other consumers about the proper way to dispose of batteries/CFLs? When in the process of buying and owning the item would you notice and pay attention to information how to dispose of it?
17. What media would be the best way to inform you and other consumers about the proper way to dispose of batteries/CFLs, and to let you know which retailers are taking back these items?
18. Have you ever heard of the website Earth 911?
19. There are several ideas being considered for funding these programs. What is your reaction to:
 - Consumers pay a small fee when they drop off the item to cover the cost of disposing or recycling
 - A deposit system like that for bottles and cans (e.g., pay an extra \$.05 for the product and get it back when return item)
 - Add the cost of managing disposal or recycling to the purchase price of the product. Then it would be the producer's responsibility to develop a take back program.
20. Who do you think should bear the cost of properly collecting and recycling/disposing of hazardous waste?



ATTACHMENT D

Retailer Focus Group Discussion Guides

RETAILERS THAT CURRENTLY HAVE TAKE BACK PROGRAMS

1. Does your store accept hazardous materials for recycling or disposal?
What kinds of materials?
How long have you had that program in place?
2. How does the program work?
3. Do you know if it is legal or illegal to dispose of rechargeable and alkaline batteries/CFLs in the trash?
4. Who pays the cost of managing hazardous waste like batteries and CFLs?
5. Why did your store decide to do a take back program? What was the motivation?
What was the number one motivator?
6. Overall, how is the program going?
7. What are the pros?
What benefits did you expect?
What benefits have you seen?
8. Do you have evidence of increased sales or increased consumer traffic since starting the program?
9. What are the cons?
10. What problems, if any, have you run into?
How did you address those problems?
11. Have you incurred costs? What are they?
12. What has been the customer reaction?
13. Have you surveyed or talked to your employees about how they like the program?
Has it been a morale booster?

The San Gabriel Valley Council of Governments has received a grant to develop a pilot retailer take back program for batteries and fluorescent lights. They will set it up so it will be very easy

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to participate. They will provide marketing materials such as customer flyers, PR, bins and materials for collecting the items, and an instruction manual for employees on how to safely handle and package the items. The stores will collect the items, package them safely and ship them to the recycler. Additional bins will be sent to replace those used.

14. How receptive do you think area businesses will be? Why?
15. How likely would your store be to expand your program to participate in this take back program for alkaline batteries and CFLs? Why or why not?
16. What are the barriers to participating?
How could those barriers be overcome?
17. How do you think the SGVCOG should market the program to get businesses to participate?
What kind of information will be important to convince businesses to participate?
What kind of incentives might be needed to encourage businesses to participate?
18. Do you think local businesses would be more likely to participate if they had data from area stores like yours that are already doing a program? What kind of data?
Would you be willing to provide data to the SGVCOG for them to use in motivating local businesses to join in?
19. The SGVCOG will be generating a lot of free press for merchants who participate in the program. Do you think this will help motivate businesses to participate?
20. What kind of press would most motivate local businesses to participate?
Probes, if not mentioned:
 - Interviews with businesses participating in the program, newspaper articles, radio stories.
 - Good Steward awards will be issued with attending press
21. What can the SGVCOG provide you and/or other retailers to help with the program?
22. Some of the items the SGVCOG is considering providing are _____. What is your reaction to each?
 - Window stickers identifying the business as a good steward drop-off point
 - Shelf-talkers
 - Posters
 - Handbook on how to implement the program, train employees.
 - Will be named on county website and linked to their own website
23. [Have the participants review the retailer handbook.]
Does it cover everything it should?
What else should be included?



24. Would your company be willing to help pay for this program? Do you think other retailers would?

- One idea is that the cost of marketing materials (flyers, window stickers, PR and press about the program) would be covered by the grant monies but the retailers would be asked to pick up the cost of the collection bins (which will contain the plastic bags for safely handling the materials) and of shipping the items to the recycler.
- Most stores already have a contract with a hazardous waste collector for items in their store. Would you be willing to use your current waste collector for these additional products and cover the additional cost?
- Bottom line: Will you participate if you have to pick up some of the cost?

25. Let's talk briefly about the policy issue of who should bear the cost of handling hazardous products in general at the end of their lives.

- Who is paying those costs now?
- Who should pay those costs?
- It ultimately comes down to private versus public responsibility. If it is private responsibility, the producers would include the cost of end of life management in the cost of the product to be paid for by the consumer who chooses to buy the product. If it is public responsibility, taxes and/or garbage rates would be increased for everyone regardless of how much of the products they purchased.



RETAILERS THAT CURRENTLY DO NOT HAVE TAKE BACK PROGRAMS

1. Have you heard of any area retailers that are taking back hazardous materials for recycling or disposal? What are you aware of?
Who is participating?
How do the programs work?
 2. Has your store considered accepting hazardous materials for recycling or disposal?
What was your thinking on the pros and cons?
 3. Let's talk specifically about batteries and CFLs. Are these products considered to be toxic or hazardous?
 4. Do you know if it is legal or illegal to dispose of rechargeable and alkaline batteries/CFLs in the regular trash?
 5. Who pays the cost of managing hazardous waste like batteries and CFLs?
 6. What would you say are the pros and cons of a retailer's participating in a take back program?
What are the benefits?
What are the barriers?
What could be done to help overcome those barriers?
 7. How do you think participating in a program might impact a retailer's image with consumers?
 8. Do you think consumers might be more loyal to a retailer who participates in a take back program? Why or why not?
- The San Gabriel Valley Council of Governments has received a grant to develop a pilot retailer take back program for batteries and fluorescent lights. They will set it up so it will be very easy to participate. They will provide marketing materials such as customer fliers, PR, bins and materials for collecting the items, and an instruction manual for employees on how to safely handle and package the items. The stores will collect the items, package them safely and ship them to the recycler. Additional bins will be sent to replace those used.
9. How receptive do you think area businesses will be? Why?
 10. How likely would your store be to participate in this take back program? Why or why not?
 11. What are the barriers to participating?
How could those barriers be overcome?
 12. How do you think the SGVCOG should market the program to get businesses to participate?

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What kind of information will be important to convince businesses to participate?
What kind of incentives might be needed to encourage businesses to participate?

13. Do you think local businesses would be more likely to participate if they had data from area stores that are already doing a program? What kind of data?

14. The SGVCOG will be generating a lot of free press for merchants who participate in the program. Do you think this will help motivate businesses to participate?

15. What kind of press would most motivate local businesses to participate?

Probes, if not mentioned:

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- Good Steward awards will be issued with attending press.

16. What can the SGVCOG provide you and/or other retailers to help with the program?

17. Some of the items the SGVCOG is considering providing are _____. What is your reaction to each?

- Window stickers identifying the business as a good steward drop-off point
- Shelf-talkers
- Posters
- Handbook on how to implement the program, train employees.
- Will be named on county website

18. [Have the participants review the retailer handbook.]

Does it cover everything it should?

What else should be included?

19. Would your company be willing to help pay for this program? Do you think other retailers would?

- One idea is that the cost of marketing materials (flyers, window stickers, PR and press about the program) would be covered by the grant monies but the retailers would be asked to pick up the cost of the collection bins (which will contain the plastic bags for safely handling the materials) and of shipping the items to the recycler.
- Most stores already have a contract with a hazardous waste collector for items in their store. Would you be willing to use your current waste collector for these additional products and cover the additional cost?
- Bottom line: Will you participate if you have to pick up some of the cost?

20. Let's talk briefly about the policy issue of who should bear the cost of handling hazardous products in general at the end of their lives.

- Who is paying those costs now?
- Who should pay those costs?

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- It ultimately comes down to private versus public responsibility. If it is private responsibility, the producers would include the cost of end of life management in the cost of the product to be paid for by the consumer who chooses to buy the product. If it is public responsibility, taxes and/or garbage rates would be increased for everyone regardless of how much of the products they purchased.
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