

Program Modification Plan for the Collection of Mercury Added Thermostats in California

Presented to

California Department of Toxic Substances Control
(DTSC)

Submitted by

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(TRC)

Prepared by

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Please note: Formatting has been altered to meet accessibility standards for State documents (Section 11546.7 of the California Government Code). Content has not been modified.



Thermostat Recycling Corporation (“TRC”) submits this Program Modification Plan in accordance with Paragraph B-1.5 of Exhibit B – Respondents’ Plan for Compliance to that certain Consent Order dated February 10, 2016 by and among Respondents and the California Department of Toxic Substances Control (the “CO”).

Paragraph B-1.5 of Exhibit B of the CO requires that Respondents’ Program Modification Plan (“PMP”) provide the following information:

1. Specific proposals to modify TRC’s existing Program¹
2. For each such proposed modification, provide
 - a. The specific data or information the proposed modification (“PM”) is based on;
 - b. The anticipated impact on mercury-added thermostat collections;
 - c. The data and information that Respondents will collect to assess effectiveness of the PM in yielding increased Program participation and mercury-added thermostat collections; and
 - d. Respondents’ proposed schedule for implementation of the PM.

In addition to proposing PMs for DTSC’s review and approval, Paragraph B-1.5 requires that Respondents include in the PMP each element of Respondents’ current Program that is proposed to remain unchanged, together with specific data or information that supports continuation of such Program element without change.

The Program Modification Plan is respectfully submitted by Thermostat Recycling Corporation on behalf of the following Consent Order Respondents; Bard Manufacturing Company, Inc., Burnham Holdings, Inc., Carrier Corporation, Chromalox, Crane, Climate Master, Inc., Empire Comfort Systems, General Electric Company, Honeywell International Inc, Hunter Fan Company, Invensys, Inc., ITT Corporation, Johnson Controls, Lear Siegler, Lennox International Inc., Lux Products Corporation, The Marley Wylain Company, Nortek Global HVAC LLC, Sears Holdings, Thomas & Betts Corporation, Trane Residential Systems, Uponor, Inc., Valliant Corporation, W.W. Grainger, and White-Rodgers.

¹ California Health and Safety Code section 25214.8.11, subdivision (a) defines “Program” as “a system for the collection, transportation, recycling, and disposal of out-of-service mercury-added thermostats that is financed, as well as managed or provided, by a manufacturer or collectively with other manufacturers.”

OVERVIEW

PROPOSED PROGRAM MODIFICATIONS

The following document lays out the review of TRC's program elements and potential program modifications that TRC sees would be valuable in helping to increase the overall collection of mercury-added thermostats in California. In conducting this review, TRC has examined all of our current program elements and examined data from both ongoing program efforts and the approved outreach and pilot efforts that were put in place during in the fourth quarter of 2016.

The document is broken into two parts:

- 1) Proposed new or enhanced elements of the program that we are recommending for modification
- 2) Elements of the program that we are recommending to continue implementing

In evaluating all of these elements, we are considering both quantitative data obtain through implementation (such as, thermostats collected, bins placed, incentive payments, online analytics, etc.) and qualitative data (such as, audience feedback gleaned from meetings, interviews, conferences, information exchanges, etc.). In addition, we have also pulled in academic research and industry best practices to provide additional information, when data may be difficult to ascertain to help us evaluate different program elements.

Overall, we are recommending the addition of 12 new or enhanced program elements to further expand the program. And we are recommending the continuation of all existing elements (that are not being enhanced) remain in place. No elements are recommended to be reduced or discontinued.

Note, the Consent Order calls for data from the program, outreach and pilot efforts to substantiate the continuation or modification of all program elements. In some cases, hard data was not present to fully justify keeping certain part of the program in place, however best practices indicated that we should, so in those cases we kept those elements in place. For example, with multi-channel outreach, it was not always apparent which channel ultimately caused a thermostat to be returned, but conventional wisdom in the marketing industry suggests that the use of various modes of communication and repeating your message is more likely to result in an action taken. The data to continue each element may not be there, but overall it seems to make for a more effective program mirroring best practices from the marketing industry, so we recommended continuing with each of the individual outreach channels.

In addition, there are elements that we looked at incorporating into the program, but did not find supporting evidence or enough information to justify inclusion at this time. In the case

where data was available, but it was either inconclusive or did not support incorporation into the program, we did leave out for now, but as more data emerges from the implementation of the Group A Outreach and Pilot Plans and later implementation of Group B and C Plans, we will re-evaluate the data and make new recommendations as the data would support. The best example of this is the consideration of Statewide incentive programs being incorporated into the plan. Currently, incentives are being implemented through pilot efforts with contractors, HHW programs, retailers and wholesalers (note, all pilots are to continue for a year). Through the first quarter of 2017 only six entities returned bins for incentive payments (all from either contractors or wholesalers). While this number Statewide is very low, we feel the program has not been in place long enough to make an accurate and complete assessment on the program's effectiveness. In addition, currently we are testing both immediate and delayed incentives and while intuitively, immediate incentives seem like a better way to motivate action, the logistics of an immediate program (specifically for HHWs – the only audience with delayed incentives) is logistically difficult and so we want to collect more data regarding the current program with the HHWs before we implement any changes at this point. With that said, all of the the Pilot and Outreach efforts will continue and we will look for ways to increase the promotion of these incentives to ensure audiences are aware of their availability. At the same time, we will continue to collect data from exiting efforts, plus new data will be collected once these proposed modifications and the Group B and C Plans are put into place. And with all these efforts, we will continue to gather more robust data to better judge the Program's effectiveness at increasing the collection of mercury-added thermostats and look for opportunities to modify and improve the program.

PART 1

PROPOSED PROGRAM MODIFICATIONS

The following are the proposed program modification to TRC's existing California Mercury-added Thermostat Collection program.

Modification #1 - Background/Finding:

During outreach phone calls to contractors (Group A Outreach Plan implementation), it was periodically reported that the large bins were inconvenient (the implication was because of size) for them to have in their trucks or offices due to space restrictions and the limited number of thermostats they encountered in the field. This issue also came up a few times during conversations with Household Hazardous Waste staff (during calls and at the HHW Information Exchanges) that rural sites, mobile sites or satellite locations didn't always see enough thermostats to warrant a large separate bin (just for thermostats). And lastly, retail locations had the same concern within their stores. A specific example was Cole's Hardware in the Bay Area, which did not want a bin at each location because of space constraints, however a smaller container could be useful in consolidating thermostats received through their six locations.

Proposed Modification #1: Provide smaller recycling pails to requesting locations.

- a. This proposal is based on TRC discussions with regulators, current collection locations, and other interested stakeholders in which it became apparent that a smaller recycling pail could help resolve rural and infrequent collection issues and provide an additional, perhaps desirable collection mechanism for others.
- b. TRC anticipates that collections from rural areas may modestly increase, but in light of a diminishing state-wide population of uncollected mercury thermostats, this cannot be guaranteed.
- c. TRC will review and assess collections which come through the new, smaller pails and compare those collection rates with previous collection levels from the same or similar areas which used the larger collection bins.
- d. This PM has already been implemented nationwide.

Modification #2-5 Background/Finding:

Social science research supports the benefits of using prompts in order to increase behavior change. The two key aspects that are important for prompts to work are frequency (multiple reminders) and time/place (proximity of a prompt to a point in time or place when the desired action is to occur). Professor Doug McKenzie-Mohr (Fostering Sustainable Behavior, 2011)² emphasizes that prompts (or reminders) increase likelihood of the audience to engage in that desired behavior. The literature suggests using a prompting strategy when individuals forget to act in the targeted behavior may increase the likelihood that the individual will engage in the desired behavior.

TRC currently sends out “miss you” postcards to current collection locations and have found that those mailers have anecdotally caused an uptick in phone calls to the program.

In addition, during implementation of the Outreach Plan to Group A, emails were sent to contractors (HVAC, General and Demolition). TRC found an email open rate of 16.7% and then 18.3% of those that open/read the email proceeded to click through to the designated contractor landing page to find out more information on obtaining a collection bin. In addition, using phone calls to contact contractors, TRC was able to in certain cases increase the placement of bins with the target audience. Note, this didn’t occur with all audiences, but did occur with the audiences TRC has historically found to be most likely to encounter thermostats – HVAC contractors. The bin placement rate was the following: 0% demolition contractors, 0.9% general contractors, 0.3% environmental contractors; and 7.1% HVAC contractors. So while calls in general are not as effective (as emails), the more targeted they are to individuals engaged with thermostats the more likely they are to be effective prompts.

Proposed Modification #2: Move “miss you” postcards sent from 3 times a year to 6 times a year to current collection locations.

- a. In the 2016 California annual report, page 10, TRC details the activity of sending postcards 3 times per year. This PM follows marketing best practices, which suggest that frequently reaching customers through various mediums including physical postcards can be an effective prompt. Sending direct marketing postcards 6 times per year acts as a more frequent reminder to collection locations that they should be shipping bins back to TRC at least every year.
- b. There are two results which are an effect of sending postcards. First, it allows TRC to confirm participation, contact information, and address of the location. In addition, it is a friendly, less intrusive means of reminding collection locations of the program requirement to ship collection bins more frequently than once a year. Moving this process from 3x a year to 6x a year will capture new locations as the next mailing list is run. It is estimated to modestly increase collection rates.

² McKenzie-Mohr 2011, Fostering Sustainable Behavior: An Introduction to Community-Based Social Marketing

- c. TRC will review collection data from the locations that postcards sent and examine the return rate of bins.
- d. Upon approval of the PM, this modification will be implemented immediately.

Proposed Modification #3: Send quarterly reminder shipment emails to all collection locations not returning a container in 6 months.

- a. This is a new TRC PM element. Email communication is a cost-effective means for communicating with collection locations. TRC enjoys a higher open rate than industry averages. And common marketing wisdom is that varying the method of communications to collection locations will increase the likelihood that thermostats will be returned more frequently.
- b. This PM should modestly increase mercury thermostats collected along with increasing participation rates.
- c. TRC will review collection data from the locations that postcards sent and examine the return rate of bins.
- d. Upon approval of the PM, this modification will be implemented immediately.

Proposed Modification #4: Call all collection locations 4 times a year that haven't shipped a bin in 6 months.

- a. Phone calling is also a cost-effective means for communicating with collection locations. Other state collection programs benefit greatly when direct outreach is conducted to a collection location via telephone. A phone call is a disrupter to daily operations and has the ability to instruct locations on how to ship the container. The results of calling for bin placement was modest, however getting collection locations already in the program to return bins should have a higher success rate due to the fact that one is a "warm" call that the audience has already opted into and the other was a cold call soliciting an action that required a new commitment.
- b. This modification should modestly increase collection results because it directly effects the return of thermostats.
- c. TRC will review collection data from the locations that postcards sent and examine the return rate of bins.
- d. Upon approval of the PM, this modification will be implemented immediately.

Proposed Modification #5: Begin offering a merchandising display to all wholesale or retail locations visited during store sweeps.

- a. Cutting through the clutter of in-store advertisements does two specific things. It raises visibility to customers and also acts as a reminder to store associates to ship containers. Instead of containers being buried in the warehouse, having merchandising displays professionalizes the TRC recycling experience for stakeholders.

- b. It is unknown specifically how many thermostats will derive as a direct correlation to this activity.
- c. TRC will examine collection numbers from store locations both and after set up of merchandising displays to see if the displays increase the collection of thermostats. TRC will also look at the number of successful placements of the merchandising display compared against the base.
- d. Upon approval of the PM, this modification will be implemented immediately.

Modification #6 Background/Finding:

TRC has periodically conducted sweeps of existing wholesale collection locations in California. Due to the sweep of collection locations, TRC obtained an uptick in the number of thermostats collected during the months of the sweeps. During the first quarter of 2017 when TRC did its most recent sweep, quarterly collection of thermostats from wholesalers increased significantly. In 2016, the average number of thermostats collected per quarter was 3,288, which subsequently increased to 4,752 thermostats collected in the first quarter of 2017 the quarter sweeps were conducted.

In addition, contractors conducting the sweeps provided the added benefits of serving as a reminder of the program to the wholesalers, were able to answer questions store staff had regarding the program and the sweeps verified information on collection locations/business operations (this information is critical in administering effective sweep operations and maintaining TRC's communications/marketing database).

Proposed Modification #6: Execute site visit sweeps 2 times a year to clean out locations with a minimum visit of 100 locations each sweep.

- a. This PM would be an enhancement to current activities. On page 48 of the California 2016 Annual Report, TRC demonstrated that site visits do in fact increase collections. The graph depicts in May 2016 an increase in visits with a corresponding increase in thermostats. That month there were the second most returned mercury thermostats received by TRC. Site visit sweeps have been a staple activity and provides necessary collection location support with on the ground services. All collection locations collect thermostats as a by-product of their business. By focusing on customer service with an in-person visit, it allows for questions and assistance on shipping recycling containers. Collection locations are eligible for visitation by the following criteria: stores would be selected based on their history of compliance with bin return policy and effective participation in the program. The criteria would prioritize stores that are out of compliance with return requirements, have long intervals for returns or no returns. And stores collecting and returning bins frequently and at regular intervals would be de-prioritized. Site visits serve two main purposes; to act as a customer service courtesy for questions/answers and to ship recycling containers.

- b. This modification should modestly increase collection results because it directly effects the return of thermostats.
- c. TRC will evaluate the collection rate of thermostats from stores that were part of the sweep and evaluate the total amount of thermostats collected for the quarter and the year overall.
- d. Upon approval of the PM, this modification will be implemented immediately.

Modification #7 Background/Findings:

In the State of California, lower middle income class households are a key target. This audience is likely have the capacity to purchase homes but may be less likely to have the means to make improvements to their homes including their heating and ventilation systems. The Pew Research Center defines the lower middle income class as those with an annual income between \$40,127 and \$60,190 for the state of California. In California Latinos make up 39% of the population according to 2014 figures put out by Pew Research Center and urban and suburban household have an annual income of approximate \$45,000-50,000 per year (rural household had a median income under \$40,000). Latinos as a group have a 42% homeownership rate. In addition, approximately three quarters speak a language other than English at home (the vast majority Spanish). Based on this demographic information, Latino households (especially in urban and suburban areas), seems to be an important sub-audience of consumers that may remove mercury-added thermostats from their home.

Proposed Modification #7: Ensure all marketing collateral include a version in Spanish.

- a. Based on the research completed in the pilot study and approximations regarding State demographics and the types of homes most likely to contain mercury-added thermostats, there seems to be a correlation with those most likely to have mercury-added thermostats in their homes and Latino residences who speak Spanish. Given this correlation, producing materials that include both English and Spanish should improve the communication of our message to the consumer and perhaps contractor audiences that we are trying to reach in the State.
- b. This modification should modestly increase collection results because it directly effects the return of thermostats.
- c. TRC will evaluate the collection rate of thermostats from stores that were part of the sweep and evaluate the total amount of thermostats collected for the quarter and the year overall.
- d. Upon approval of the PM, this modification will be implemented immediately.

Modification #8-9 Background/Findings:

During the implementation of the Pilot efforts to Group A, non-monetary messages were tested via online media. Four message categories were tested based on the social framework of Maslow's hierarchy model. Based on the results of the multivariate testing of the four messages (Safety/Family; Awareness/Toxicity; Environmental Protection; Social Norm/Belonging), the message that resonated most effectively with consumers was a message of safety/family. This message resulted in six times as many online ads to obtain more information as the next highest message (Awareness/Toxicity) and three times as many clicks on the consumer microsite to obtain a disposal location as the next highest message (Awareness/Toxicity).

Proposed Modification #8: Produce a California specific YouTube pop-up advertisement for specific Google AdWords key terms which is informed by the non-monetary message testing from Group A pilot plan.

- a. YouTube pop-up advertisements have gained in popularity and TRC in the past has deployed them. The Group A outreach has informed TRC regarding which key terms and messages have the most success rate of click through's and impressions. This PM will directly link Google key words to YouTube results.
- b. It is unknown what direct impact this will have on collections.
- c. TRC will evaluate overall collection data and other metrics such as landings on the TRC website will help quantify it's effect. TRC will then examine online metrics verses collection rates to analyze if there are any trends or correlation that might indicate effectiveness.
- d. Upon approval of the PM, this modification will be designed immediately but with a full implementation by end of 2017.

Proposed Modification #9: Change California specific marketing collateral to include messaging which are informed by the non-monetary message testing from Group A pilot plan.

- a. During Group A's outreach and pilot efforts, it was discovered that one particular type of messaging worked overwhelmingly better than others. The messaging related to family and safety and resulted in higher click through rates for electronic advertisements. As a result, electronic advertisements will include messaging focused on family and safety.
- b. Retention of messaging leads to higher calls of action. Changing messaging could result in an increase in collection results.
- c. TRC will evaluate overall collection data to examine any correlations between improved marketing messaging and increase collections rates, however, this analysis may have difficulty in finding a cause and effect relationship with the change.
- d. This PM will be implemented by the end of 2017. As the consent order is still ongoing, TRC needs to gather more data but early results point to a change in messaging may increase effectiveness of message retention and results on click-thru rates.

Modification #10 Background/Finding:

In California, there are several programs that are working on various different types of Extended Producer Responsibility from addressing paint (i.e., Paintcare) to addressing batteries (i.e., Call2Recycle) and others. TRC can learn and share information with other organizations that could be helpful to the overall efficiency and effectiveness of the Program's implementation. Currently, TRC informally reaches out to the other programs, but creating a more formal information exchange would be helpful in continual improving the Program.

Proposed Modification #10: Once a year, meet with other Extended Producer Responsibility (EPR) groups which operate in California to discuss best practices and ways to improve outreach.

- a. In other states, TRC has arranged a meeting with EPR groups to learn tactics and marketing concepts which they have deployed in response to regulations. The collective group has a short history of developing joint marketing and other synergies because often times the audiences targeted are similar.
- b. TRC anticipates that shared knowledge will lead to further program modifications which in turn will increase collections, but this cannot be guaranteed.
- c. Not applicable.
- d. Upon approval of the PM, this modification will be implemented immediately.

Modification #11 Background/Finding:

HVAC wholesalers are far and away the largest source of collected mercury-added thermostats for TRC. In 2016, wholesalers collected over 13,000 mercury-added thermostats (the next highest source was HHW programs at around a tenth that amount – 1,300). Currently, there are 37 individual wholesaler stores that sell HVAC in California that are not in the program collecting mercury-added thermostats. Currently, TRC sends them periodic letters to inform them of their requirement to act as a collection point for mercury-added thermostats. Together these stores would expand the geographic coverage in areas of southern, central and northern California and would provide additional drop off options for contractors and consumers across the State.

Proposed Modification #11: Reach out to all HVAC wholesale locations across the State that are not currently collecting mercury-added thermostats.

- a. This PM would be an enhancement to the current activity of sending letters out to HVAC wholesalers not currently collecting mercury-added thermostats in the State. In building out this effort, TRC would use the tactics mentioned in modifications #2-#6 (calls, emails, postcards and site visits) in an attempt to encourage these locations to participate in the collection program.
- b. This modification should increase collection results because it increases the coverage area across the State and provides additional options to HVAC contractors coming across mercury-added thermostats in their field of work.
- c. TRC will evaluate the number of new wholesalers collecting mercury-added thermostats and evaluate the overall return numbers.
- d. Upon approval of the PM, this modification will be implemented immediately.

Modification #12 Background/Finding:

In implementing the Group A Outreach Plan, TRC has found opportunities to continue to expand its geographic coverage within the State by providing additional bin locations with HVAC contractors, HHW programs not currently enrolled in the program, retail locations and HVAC wholesalers. It is not clear if these bin placements, dilute or expand collection of thermostats in the State. TRC will continue reaching out to these audiences through the Outreach Program efforts to place bins and through the modifications listed above will look to increase the bin return rate. To help collect more data and assess bin coverage effectiveness, TRC proposes to include GIS mapping of collection locations to analyze if bin collection gaps are present in the State and try to identify strategic areas where bin location coverage is lacking.

Proposed Modification #12: Review all collection locations' geographic coverage with GIS mapping software. The findings are to be published in each year's annual report submission. Where gaps in coverage are discovered, TRC will implement a campaign to target placing recycling containers in the region.

- a. This PM would incorporate additional analysis and reporting into the annual report. And based on the findings would help direct efforts to ensure collection locations across the State.
- b. TRC anticipates that increased analysis will lead to better knowledge on the adequacy of the program collection infrastructure. This modification may lead to further program modifications which in turn may increase collections, but this cannot be guaranteed.
- c. TRC will evaluate the bin locations by area and by population and look to decrease the number of areas without bins in the state. TRC will use year over year data on bin placement coverage to evaluate progress.
- d. Upon approval of the PM, this modification will be implemented immediately and then annually in each annual report.

PART 2

UNCHANGED PROGRAM ELEMENTS

In its 2016 Annual Report, TRC reported its series of outreach and marketing activities completed throughout the calendar year. These activities serve to educate, inform, and increase the collections of mercury thermostats. TRC believes that these activities are relevant to the state of California and do not warrant any further modification as a basis for its program. These unchanged program elements refer to activities which have been and will continue to be done for as long as the collection program operates. It is important for the program to note that it is the intention for TRC to continue to review and look for ways to enhance collections. Because specific actions don't appear on this document shouldn't be the basis for not pursuing new ideas. TRC functions best when it is fluid to changing markets, generator's fickle recycling behaviors, and the decrease of available mercury thermostats to recycle. TRC will act in accordance to the intent of the regulation to collect mercury thermostats in the best and most effective ways possible.

Element #1: Program Education & Outreach

TRC recommends all Program Education & Outreach items as unchanged program elements;

- a. Develop and execute a trade show schedule in which TRC employees attend.
 - a. Attending trade shows allows the program to identify potential new targets and hear first-hand how the program is perceived. These networking events provide an ample learning opportunity to better improve program performance and inject that into its activities.
- b. Develop and executive a trade show schedule in which TRC employees exhibit.
 - a. Exhibiting at trade shows allows the TRC program to inform attendees of its program, regulations, and other aspects to its program. TRC finds that exhibiting is a necessary function to promote the program effectively.
- c. Search for and present webinars via phone or in person presentations.
 - a. As a communications strategy, educating via presentations has marketing benefits. TRC has found that organizations have a need for content and one in which we fulfill by offering
- d. Focus on the HVAC industry (contractors and wholesalers)
 - a. Focus on the HVAC industry of contractors and wholesalers is based on data collected from thermostat collection information and bin placement information. After conducting Group A outreach to various contractor audiences (HVAC, General, Demolition), retail locations and HHW facilities, wholesalers were by far the most likely source for receiving mercury-added thermostats (as shown in the background/finding for Modification #11). In addition, in our effort to reach out

to the various Group A audiences, the HVAC contractors were the most willing source to accept a bin for collection.

- e. Continue to invite non-participating HVAC wholesalers to use the program.
 - a. Analysis of the available HVAC wholesalers to add as collection points has demonstrated to TRC that remain a handful of non-compliant locations participating as a collection point for mercury thermostats. Informing them on the legal requirement to act as a collection point will continue to be the basis of the messaging. Where applicable, TRC will continue to work with the regulatory agency DTSC to enforce willful compliance. (Also, note, TRC has added additional tactics to this effort of outreaching to HVAC wholesalers – see Modification #11).

Element #2: Marketing

TRC recommends all Program Marketing items as unchanged program elements;

- a. Use A/B testing messaging on direct marketing initiatives.

A/B Testing allows TRC to ad placements, audiences, messaging, and calls to action. All provide data on how the target audience response to the Program’s efforts and allows the Program to fine-tune and optimize the marketing materials. In this way, the program can be continuously improved without having to undergo expensive measurement efforts
- b. Periodically refresh marketing collateral.

It is important that TRC message and brand stay relevant to TRC’s target audiences. TRC will periodically look for content that no longer fits with the messaging, but is still showing up on brochures, emails, or website. Once TRC has identified old content that is no longer applicable, it should be decided whether to eliminate it or to replace it with newer, more relevant content, so materials are less likely to be ignored.
- c. Purchase advertising in both electronic and print mediums.

Because there are now so many opportunities to communicate to TRC audiences in an ongoing capacity, it is no longer as simple as just placing a print ad. The advertising industry best practice is that TRC needs to develop a strategic, multi-channel advertising plan that encompasses the right mix of print and digital media to maximize its target audience reach and is more likely to motivate engagement.
- d. Offer promotions specific to HVAC wholesalers, namely the “Big Man on the Planet” promotion.

TRC will offer promotional materials to HVAC wholesalers to distribute to their customers. Promotions help create engagement and awareness of the importance of

recycling mercury-added thermostats, while offering an easy solution and a financial incentive to do so.

e. Maintain a TRC website with collection location finder.

TRC launched a new website in March 2014. The website should be maintained with new and relevant content. New website included a location finder that assists homeowners, contractors/technicians in identifying convenient collection sites. Future enhancements could be made to improve the User Experience for desktop and mobile visitors.

f. Pursue and publish earned media.

The thermostat outreach campaign is different than a traditional branding campaign. Companies use earned media as a key tool in generating large impressions. TRC will continue to pursue earned media, which provides third-party voices (via the media outlets publishing the information) and further encourages the proper disposal of mercury-added thermostats.

g. Develop and send direct marketing to collection locations.

TRC will continue to print and mail direct mail pieces to collection locations informing them of the TRC program and contractors' legal requirements to properly manage end-of-use mercury thermostats. Letters will be also mailed to HVAC wholesalers in the state that currently do not participate in the TRC program.

h. Highlighting high performers of recycling mercury thermostats on its website and via social media.

Laud the accomplishments of top performers who have collected the most thermostats. This can include highlighting the total bins returned, total thermostats, and average number of thermostats per bin by these leaders. By highlighting successes, this encouraging peer to perform similarly by modeling the behavior we want and creating a social norm effect that social psychology sees as an effective tactic at motivating change.

CONCLUSION

Overall, we are recommending the addition of 12 new or enhanced program elements to further expand the program. And we are recommending the continuation of all existing elements (that are not being enhanced) remain in place. No elements are recommended to be reduced or discontinued.

In addition, there are elements that we looked at incorporating into the program, but did not find supporting evidence or enough information to justify inclusion at this time. In the case where data was available, but it was either inconclusive or did not justify incorporation into the program, we did leave out for now, but as more data emerges from the implementation of the Group A Outreach and Pilot Plans and later implementation of Group B and C Plans, we will re-evaluate the data and make new recommendations as the data would support.