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## SB 486 Safe Needle Disposal Plan

### Introduction:

SB 486 (Simitian – Chapter 591, Statutes of 2009) requires a pharmaceutical manufacturer that sells or distributes medications in California that are self-injected at home to submit a plan describing how the manufacturer supports the safe collection and disposal of sharps. The required plans must include a description of the actions, if any, to:

- Provide for safe collection and disposal of sharps;
- Educate consumers about safe management and collection opportunities; and
- Support efforts by other organizations to promote the safe management of sharps.

As California's leading provider of comprehensive recycling and solid waste services, Waste Management (WM) is **voluntarily** submitting our current plan describing the company's on-going efforts to:

- Educate the public on safe needle disposal;
- Work cooperatively with public agencies to expand the infrastructure for the safe management of sharps waste; and
- Provide each of our California employees and their families with a free, safe and convenient program for the collection and disposal of sharps wastes.

### An Urgent Need for Coordinated Action and Shared Responsibility:

An unintended consequence of California's outstanding success in diverting 65% of the state's solid waste stream is the increased incidence of needle stick injuries at material recovery facilities (MRFs). Despite the disposal prohibitions enacted by SB 1305 (Figueroa – Chapter 64-Statutes of 2006), **large quantities of needles still appear every day on recycling sort lines throughout the state.**

For the past nine years, Waste Management has been working closely with a leading manufacturer, HexArmor, on the development of puncture and needle resistant personal protective equipment including gloves and sleeves to protect our employees. After more than a dozen generations of specialized products, we believe we are using one of the best puncture resistant gloves available today. Yet, despite the use of advanced personal protective equipment and specific protocols for stopping and safely removing needles from our sort lines, **needle stick injuries continue to be the number one reported injury at our MRFs.** Needle stick injuries also continue to occur during routine collection, transfer and disposal activities. Preliminary nationwide data suggests there are approximately 267,000 preventable community-based needle injuries in the U.S. each year, and the annual cost of needle stick injuries runs about \$175 million, including costs for injured individuals infected with blood borne pathogens such as HIV and hepatitis.

## **Our SB 486 Plan:**

### **I. Free and Convenient Sharps Program for Waste Management Employees**

#### **A. Workplace Sharps Containers -- Leading by Example**

While most of our major facilities have had on-site sharps containers for several years, in 2010 we installed sharps containers in at least one set of men's and women's restrooms at every one of Waste Management's 110 operational locations. These containers provide a free, convenient, and safe disposal option for any employee who is required to self-inject a medication. The ongoing administration of this program is managed by our Environmental Protection Department.

#### **B. WM Employees and Families**

Starting in 2009, all of WM employees and their families were given free access to products from WM Healthcare Solutions including fully approved sharps mail back containers<sup>1</sup>. This sharps program is part of our overall comprehensive wellness program for employees and their families and is administered in a manner that protects medical privacy.

### **II. Education, Coordination and Community Involvement**

#### **A. California Sharps Coalition:**

In the fall of 2001, Waste Management joined the Alameda County Sharps Coalition to help promote safe needle disposal in Alameda County. Waste Management worked closely with the County and the Coalition in highlighting the risks of unsafe needle disposal and the need to close the gap in state law that allowed needles to be legally placed in municipal solid waste and recycling containers. These efforts led to the enactment of SB 1305 that prohibited the placement of sharps into the municipal waste stream effective September 1, 2008.

By 2009, membership in this coalition attracted a larger geographic audience and the organization became the California Sharps Coalition. The Coalition remains a diverse advocacy group including representatives of local and state government, patient advocacy groups, environmental health and health care organizations, and the solid waste industry.

#### **B. Coalition for Safe Community Needle Disposal:**

In 2002, Waste Management's CEO directed the company to take a leadership role in reducing the number of needles improperly placed in solid waste and recycling containers. In August of the same year, the company helped establish the Coalition for Safe Community Needle Disposal, a collaboration of businesses, public health organizations, and patient advocacy groups organized to promote coordinated solutions for safe needle disposal and collection. For more than ten years, both through the Coalition and independently, Waste Management has actively supported new policies, specific legislative, regulatory, and community initiatives that will better protect our employees and the communities we serve from preventable needle stick injuries.

C. Product Stewardship Institute:

Beginning in 2007 WM became a major sponsor of the Product Stewardship Institutes' efforts to bring pharmaceutical manufacturers and healthcare professionals to discuss methods for advancing safe disposal practices for sharps.

D. California Product Stewardship Council

In 2010 WM joined the California Product Stewardship Council (CPSC). The council had made proper disposal of sharps a top priority in past years, and continues to advocate for policies to ensure used sharps are properly managed. Waste Management was a featured presenter at the CPSC's Managing Sharps Workshop held in early 2012.

E. Public Education:

In February 2004, Waste Management widely publicized the U.S. EPA's new guidance for the safe disposal of home-generated sharps, which no longer included placement of sharps in a "sturdy household container, and disposal in household garbage." The company prepared and issued press releases on the new EPA guidelines and briefed local officials throughout the state on approaches for complying with the EPA guidance.

Later that year Waste Management began educating our municipal customers on the scope of the needle waste problem, options for safe community needle disposal, and the need to incorporate free or subsidized needled collection and disposal programs into the overall solid waste services provided to residential households.

F. Coordination with Public Agencies:

WM co-sponsored legislation (SB 1362 – Figueroa, Chapter 157, Statutes of 2004) to allow local household hazardous waste programs to accept home-generated sharps consistent with existing requirements for state-approved needle consolidation locations. This legislation significantly increased the number of safe needle disposal locations available to residents throughout the state.

In 2005, Waste Management worked with Cathedral City to establish one of the first free programs to help residents safely dispose of hypodermic needles, syringes, and lancets. Under the new pilot program, all residents received a postcard they could take to a participating local pharmacy to pick up an approved free mail-back sharps container.

Since the Cathedral City pilot program Waste Management's public sector team has worked with our municipal customers to help establish various types of convenient needle collection programs in the following cities:

Arcadia	Lake County
Agoura Hills	La Mirada
Baldwin Park	La Palma
Beaumont	Manhattan Beach
Belmont	Menlo Park
Carlsbad	Merced County
Castro Valley	Mission Viejo
Central Contra Costa County	Monrovia
Chino	Moreno Valley
Chula Vista	Murrieta
Costa Mesa	Newport Beach
Covina	Norco
Cupertino	Norwalk
Cypress	Oceanside
Danville	Palmdale
Del Mar	Rancho Mirage
Diamond Bar	Rolling Hills Estates
East Palo Alto	San Carlos
Foster City	San Dimas
Fowler	San Mateo
Hayward	San Ramon
Hillsborough	Santa Ana
Huntington Park	Santa Clarita
Indian Wells	South Gate
Indio	Stanton
Inglewood	Westlake Village
Irvine	
Laguna Beach	

In December, 2010 WM acquired Curbside Inc., which manages hazardous waste generated by households and small businesses. The company, now named *At Your Door Special Collection (AYD)*, was founded in 1995 and was a pioneer in collecting household hazardous waste directly from homes. AYD works in conjunction with WM Healthcare Solutions to provide a range of programs to safely manage sharps. AYD's sharps collection program includes mail back as well as home collection of sharps. In addition, AYD has expanded its number of sharps drop boxes it provides to fifty (50) locations throughout California, including sheriff's stations, pharmacies and senior centers. AYD also instituted a program at its two transfer stations where home healthcare aides can drop off sharps from their resident patients.

#### G. Support for SB 486

In 2009, WM also worked closely with the Multiple Sclerosis Society, California Sharps Coalition, local governments, the Alameda County Sharps Coalition, and many others in supporting SB 486 to ensure shared responsibility for safe needle disposal. WM also supported legislation (SF 1323 enacted in Minnesota) that is nearly identical to SB 486.

<sup>1</sup> The U.S. Postal Service and the California Department of Public Health have approved the mail-back sharps containers provided by WM Healthcare Solutions.