

From: Kesablyan, Armine [akesablyan@dpw.lacounty.gov]
Sent: Thursday, August 12, 2010 6:01 PM
To: Lucy, Burke
Cc: Proano, Pat; Ruiz, Carlos; Hajjaliakbar, Bahman; Skye, Coby; mikemohajer@yahoo.com
Subject: Pharmaceutical waste collection programs
Importance: High

Hi Burke,

On behalf of the County of Los Angeles Department of Public Works and in response to your request for information regarding the management of home-generated pharmaceutical waste, we would like to provide general comments and recommendations about what in our view is needed to effectively manage these wastes.

The Problem with Pharmaceutical Waste

As you know, the presence of pharmaceutical waste in the environment is an issue of growing concern. Major national studies have found that an alarming percentage of streams (as high as 80 percent of the streams surveyed) had measurable concentrations of prescription and nonprescription drugs, steroids, and reproductive hormones. Exposure, even at low levels, to medications threatens the marine environment and public health. The presence of these medications in surface waters across the nation has been associated with increased bacterial resistance to antibiotics, as well as interference with growth and reproduction in aquatic organisms such as fish and frogs. Therefore, measures are urgently needed to prevent these pollutants from entering the water stream, and failure to do so can have serious consequences for public health and safety, as well as the environment.

Need for Local Efforts and Take Back Programs

Consistent with efforts to educate and assist residents with the proper disposal of pharmaceuticals, the County is a partner in The No Drugs Down the Drain outreach program. Through this public outreach program California residents are alerted about the problems associated with flushing unused, unwanted, and expired medications down the toilet or drain and are educated on safe and proper disposal choices.

Los Angeles County, with a population of 10 million residents and boundaries of over 4,000 square miles has one of the largest HHW/E-Waste Collection Programs in the nation. We conduct free, mobile collection events every weekend at a different location within the County. The County's Household Hazardous and Electronic Waste (HHW/E-waste) mobile collection events are one option for residents to safely dispose of expired and unused pharmaceuticals. However, although large at scale, these collection events are not the most practical nor convenient outlets for residents to dispose of this waste. Non-controlled, expired or unused home-generated medications/pharmaceuticals are one of the many items that are accepted for disposal at these events. Pharmaceutical waste collected at these events accounts for an insignificant percentage of all the pharmaceutical waste being generated. More importantly, local governments do not have the necessary resources to expand collection opportunities to meet the need for proper management of these materials.

If disposal outlets are made more convenient and practical, a higher percentage of home-generated pharmaceutical waste will be properly captured. The most logical and convenient collection sites for residents to bring their home-generated pharmaceutical waste for easy disposal are at the point of sale or procurement, such as the pharmacies, health clinics, and hospitals.

EPR: The Solution

With implementation of Extended Producer Responsibility and the producers taking accountability over disposal costs, we will be able to have better control over the safe management of home-generated pharmaceutical waste. Consistent with the Extended Producer Responsibility (EPR) Framework adopted by the preceding Integrated Waste Management Board in January 23, 2008, in order to secure effective services, the focus of managing home-generated pharmaceutical waste should be geared toward ensuring a network of conveniently located collection sites and a source of sustainable funding. The focus of CalRecycle's efforts should not be shifted back to local government programs but consistent with the EPR Framework, CalRecycle should work with legislature to enact legislation that provides authority for and establishes mandatory take-back programs for pharmaceutical waste by the producers. By shifting costs and responsibilities of these product discards to the producers and others who directly benefit, the objective to better manage home-generated pharmaceutical waste

will be more efficiently achieved. Furthermore, EPR provides an incentive to eliminate waste and pollution through product design changes, as well as minimize the negative impacts on human health and the environment.

Armine Kesablyan

HHW Program Manager
County of Los Angeles
Department of Public Works
(626) 458-3548, (626) 458-3593 fax
akesablyan@dpw.lacounty.gov
www.CleanLA.com