What is the Product Stewardship Institute?

- Non-profit founded in 2000
- Membership
  - 45 States
  - 100+ Local governments
  - 50+ Corporate, Organizational, Academic Partners
- Board of Directors: 7 states, 4 local agencies
- Multi-stakeholder product stewardship network
Today’s Topics

- Status of the Issue
- Disposal Recommendations – Who says what?
- Source Reduction
- Federal Legislation to Amend the CSA
- State-level Extended Producer Responsibility
What is the size of the problem?

The Problem

Disposal Options for Waste Pharmaceuticals

Flushing (some)

Household Trash Disposal

Take-backs

Source Reduction

Reduce Regulatory Barriers to Cut Cost, Ensure Safety, Enhance Environment

Preferred Disposal Facilities
Federal Guidelines:

Do not flush prescription drugs down the toilet accompanying patient information specifically. For information on drugs that should be flushed:

City of Boise.org

MEDICATIONS DISPOSAL

It is no longer acceptable for residents to flush their unused or outdated prescriptions and over-the-counter medications into the sewer system. Medications may enter the environment by passing through wastewater treatment plants or septic systems virtually untreated. To protect our water quality, bring outdated/unused prescriptions (excluding controlled substances) to any Boise Household Hazardous Waste Collection Sites.

Federal regulations prohibit any of the household hazardous waste collection sites or the Ada County Hidden Hollow Sanitary Landfill from accepting controlled substances. A controlled substance is a drug which, due to its abuse potential, is regulated by the U.S. Drug Enforcement Administration. If you are unsure if your prescription is a controlled substance, ask your pharmacist to assist you in determining if your prescription qualifies as a controlled substance.

If you have a controlled substance, do not flush it down the toilet or drain. Instead, follow these guidelines:

1. Take drug(s) out of original container.
2. Mix drug(s) with an undesirable substance such as coffee grounds or kitty litter.
3. Put mixture in a nondescript container, such as empty cans or sealable bags (to further ensure drugs are not diverted or accidently ingested by children or pets).

For a list of controlled substances, refer to the U.S. Drug Enforcement Agency’s:

Kansas Department of Health and Environment
Bureau of Waste Management
1000 SW Jackson, Suite 320, Topeka, Kansas 66612-1366

Disposal Options for Expired or Surplus Medications/Pharmaceuticals
Technical Guidance Document SW 07-01
## What’s a consumer to do?

<table>
<thead>
<tr>
<th>States &amp; locals</th>
<th>Federal government</th>
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</thead>
<tbody>
<tr>
<td>• Many say do not flush</td>
<td>• Use take-back programs</td>
</tr>
<tr>
<td>• Vary somewhat in first choice given</td>
<td>• Trash disposal</td>
</tr>
<tr>
<td>○ Take-back</td>
<td>○ “Undesirable substance”</td>
</tr>
<tr>
<td>○ Trash disposal</td>
<td>○ FDA list of drugs to be flushed</td>
</tr>
<tr>
<td>• Don’t distinguish different types of drugs</td>
<td></td>
</tr>
<tr>
<td>○ Ex: Take-back programs vary</td>
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Source Reduction

- PSI Workgroup: need for “Source Reduction Summit”
  - Philadelphia, Oct 2010
- Dr. Julie Becker’s qualitative research
  - Pennsylvania
  - Florida
  - Illinois
- Many others advancing this issue
  - Alliance for the Great Lakes summer meeting
“Source Reduction”: For discussion

- Reducing direct-to-consumer advertising
- Re-examining the expiration date
- Improved inventory management
- Database of prescriptions
- Changing co-pay structures
- Restricting automatic re-fill mail-order programs
- Limit amount dispensed at first (certain medications)
- Voucher program for sample medications
Buuuttt…

- Considering environmental/toxicity data when prescribing

- Still need to figure out how to make these things happen – time for the nitty-gritty
Controlled Substances Act

• Leads us to law enforcement as the only take-back option for a small # of important drugs
• Works for some, but not all
• Confuses messaging to public
• Costs money
• Competing with other local law enforcement priorities
# Federal Legislation: Changing the CSA

<table>
<thead>
<tr>
<th>HR 1191 &amp; S 1336</th>
<th>HR 1359 &amp; S 1292</th>
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<tbody>
<tr>
<td>• More prescriptive</td>
<td>• More prescriptive</td>
</tr>
<tr>
<td>• Specifies range of people able to dispose</td>
<td>• Favored by DEA</td>
</tr>
<tr>
<td>• Requires different collection methods</td>
<td>• “Ultimate user” &amp; long-term care facilities</td>
</tr>
</tbody>
</table>
  - Urban/rural
  - Cost | • What would the regulations look like? |
Extended Producer Responsibility Legislative Landscape (1993)

Product Categories
- Batteries

Number of Product Categories Covered by EPR Law
- Zero
- One
- Two
- Three
- Four
- Five
Extended Producer Responsibility Legislative Landscape (1997)

Product Categories
- Primary Batteries
- Rechargeable Batteries

Number of Product Categories Covered by EPR Law
- Zero
- One
- Two
- Three
- Four
- Five
Extended Producer Responsibility Legislative Landscape (2001)

Product Categories
- Primary Batteries
- Rechargeable Batteries

Number of Product Categories Covered by EPR Law
- Zero
- One
- Two
- Three
- Four
- Five
Product Categories
- Auto Switches
- Batteries
- Electronics
- Fluorescent Lighting
- Mercury Thermostats
- Paint
- Pesticide Containers

Number of Product Categories Covered by EPR Law

Other laws authorizing agencies to require EPR, including Framework laws; See List Below for Details.
Thank you

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