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March 25, 2014

Senator Hannah-Beth Jackson
State Capitol, Room 5080
Sacramento, CA 95814
Sent via Fax: 916-651-4919

Re: Senate Bill 1014, Safe Medication Management - Support

Dear Senator Jackson:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to express support for Senate Bill (SB) 1014, which would require that producers of pharmaceuticals create, finance, and manage an extended producer responsibility (EPR) system for consumers to safely and conveniently dispose of expired and unwanted pharmaceuticals. NACWA and its nearly 300 public wastewater treatment utility members across the United States are concerned about the potential environmental and human health impacts of unused pharmaceuticals that are inappropriately disposed of into the sewer system, and support efforts such as SB 1014 to establish unused pharmaceutical collection programs.

NACWA members, along with their counterparts in the drinking water community, face growing pressure from ratepayers, the press, Congress, and the U.S. Environmental Protection Agency (EPA) to address the issue of pharmaceuticals in water. Wastewater treatment facilities, however, were not designed to remove pharmaceuticals from wastewater. Although some treatment or removal may occur, trace amounts of unused pharmaceuticals that are flushed into sewer systems may pass through treatment facilities and be discharged into the receiving waters. Take-back programs for unused pharmaceuticals are one of the few tools utilities currently have to reduce pharmaceuticals in wastewater. These programs also have the benefit of raising public awareness of the environmental impacts of other consumer products that inappropriately end up in the sewer system.

While take-back programs operated by local utilities are effective for many types of unused pharmaceuticals, their reach is limited because non-registrants cannot collect pharmaceuticals that are regulated under the federal Controlled Substances Act. Communities across the country are struggling with the environmental

consequences as well as the public health challenges (e.g., diversion) related to unused pharmaceuticals, and how to appropriately respond to these problems. SB 1014 will remove the burden from California municipalities and set an example for the rest of the country. Requiring producers of pharmaceuticals to design and create collection systems will allow consumers to safely and conveniently dispose of their unused pharmaceuticals, which will in turn decrease diversion of these pharmaceuticals for illicit use and decrease the potential impacts on water quality.

Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions regarding NACWA's support of SB 1014.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia A. Finley".

Cynthia A. Finley, Ph.D.
Director, Regulatory Affairs

cc: Heidi Sanborn, California Product Stewardship Council, email: heidi@calpsc.org