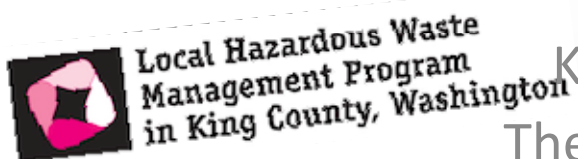


The Rx on Pharmaceuticals: Effective Collection of Left-Overs



Dave Galvin



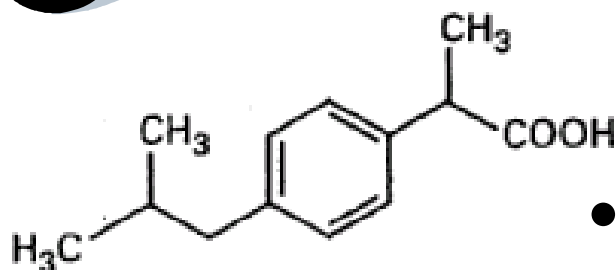
King County, Washington, and

The Product Stewardship Institute

NACWA – May 17, 2013 – Portland, OR



Pharmaceuticals



- Wide range of biologically-active chemicals
- Three classes by sale/regulation:
 - Over The Counter
 - Prescription (or “Legend”)
 - Controlled Substances
- Some designate as hazardous waste

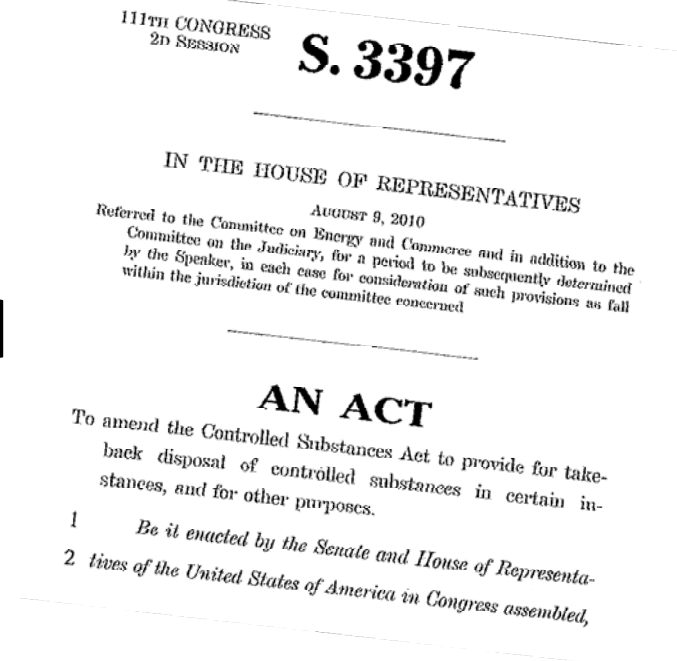
Pharmaceuticals (cont'd)

- **Controlled Substances** – regulated by the Federal Drug Enforcement Administration due to potential for abuse
 - Schedule I – illegal drugs (ex., heroin, cocaine)
 - Schedule II – morphine, OxyContin, codeine, Demerol, Ritalin, amphetamines, fentanyl
 - Schedule III – Tylenol with codeine, Vicodin
 - Schedule IV – benzodiazepines, Valium, Darvon
 - Schedule V – codeine cough syrups

Controlled Substance barrier

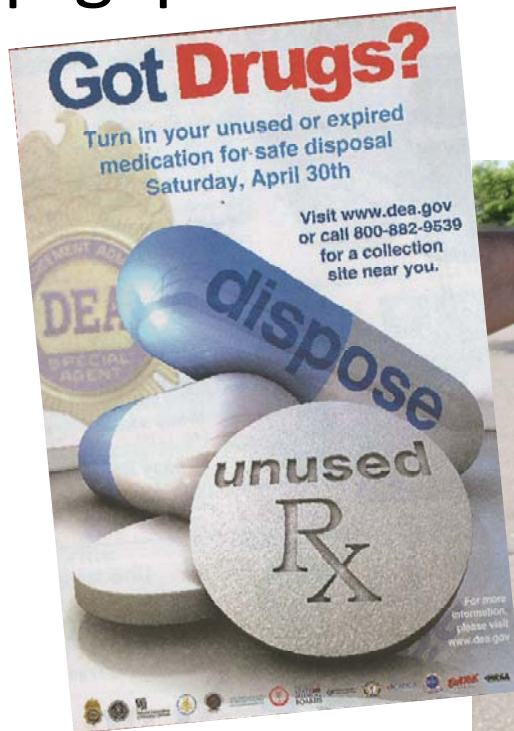
Currently...

- Only the ultimate-user or law enforcement can legally possess a CS drug once dispensed
- Take-back programs thus must involve police or sheriffs
- “Secure and Responsible Drug Disposal Act of 2010” enacted to allow more flexibility



DEA Take-Back Events

- Twice-a-year, 4 hrs on a Saturday
- Most recent: April 27, 2013
- Stop-gap measure until ongoing programs are in place



DEA Proposed Rule



- Allows for 3 collection options:
 - Take-back events
 - Mail-back programs
 - Collection receptacles (secure drop-boxes at retail pharmacies and law enforcement offices)
- Co-mingling is allowed: controlled-substance drugs can be mixed with non-CS/OTC, ...

DEA Proposed Rule (cont'd)

- All collected drugs must be destroyed: rendered non-retrievable
- “Flushing and mixing controlled substances with coffee grounds or kitty litter... do not meet the non-retrievable standard.”
- Destruction methods must meet all applicable federal, state, tribal and local laws and regulations.



DEA Proposed Rule (cont'd)

- Inventorying of collected drugs is not allowed
- Pharmacies can set up collection receptacles at long-term care facilities
- All collection is voluntary
- No funding is available



DEA Proposed Rule (cont'd)

- Draft rule was published in the *Federal Register* on 12/21/2012
- Comments were due on 2/19/2013
- 194 comments were received
- No telling how long it will be before we see a final rule, or how much it might change.



Best approach: Product Stewardship

Waste Management Act

BRITISH COLUMBIA

POST-CONSUMER RESIDUAL STEWARDSHIP PROGRAM REGULATION
(includes amendments up to B.C. Reg. 21)

Contents

Part 1 — Introduction

- 1 Definitions
- 2 Duty of a brand-owner
- 3 Duty of an association
- 4 Annual report by the director

Part 2 — Stewardship Program

- 5 Approval of a stewardship program
- 5.1 Exemption of paint stewardship program under the Stewardship Program Regulation from refiling the
- 6 Timelines
- 7 Written reasons required

Part 3 — Stewardship Requirements

- 8 Application of stewardship requirements

Product Category
Solvent and flammable liquids
Pesticide
Gasoline
Pharmaceutical
Lubricating oil
Empty oil container
Oil filter
Paint



About Us | Background | Consumer Awareness | Collections | Protocols | Media Releases | Links | Contacts

Unwanted Medicines are a Household Hazard

The National Return and Disposal of Unwanted Medicines Ltd. known as the RUM program, is a national not-for-profit company, set up to enable consumers to return unwanted or out-of-date medicines to any pharmacy, at any time. The medicines returned are in no way reused or recycled.

COLLECTION PROTOCOL
Consumers will be encouraged to return their unwanted and out of date medicines to their local pharmacies.

PROTOCOL FOR PHARMACISTS
At commencement of the



PRODUCT STEWARDSHIP INSTITUTE

Sustainable Solutions to Protect Our Environment

Product Stewardship

- Those with the greatest ability to influence the life-cycle impacts of a product have the greatest responsibility.
- It's about long-term sustainability, zero waste, materials management, “ownership.”
- Full life-cycle responsibility, even for left-overs



Product Stewardship Works

Many Products

- Pharmaceuticals
- Paint
- Electronics
- Cell phones
- Batteries
- Thermostats
- Tires
- Mercury Switches in Cars
- Pesticides
- Vehicles
- Beverage Containers
- Packaging
- and more



Many Places

- BC
- And all across Canada
- European Union
- Japan
- Taiwan
- South Korea
- Australia
-and more



Washington State program

- Pharmacy take-back demonstration + law enforcement and other options
- Operating for more than 6 years, now with 48 pharmacies state-wide
- All voluntary, locally-funded (not sustainable)
- More than 251,000 pounds of medicines collected, with little advertising

⊕ Pharmacy (9 counties)

★ Law Enforcement (11 counties)

○ Other Locations (occasional one-day events, etc.)



King County makes no representations or warranties, express or implied, as to accuracy, completeness, timeliness, or rights to the use of such information. King County shall not be liable for any general, special, indirect, incidental, or consequential damages including but not limited to, lost revenues or lost profits resulting from the use or

Washington State (cont'd)



take back
YOUR MEDS



King County initiative

- King County Board of Health is considering adoption of a local rule-and-regulation on secure medicine return
- Product stewardship model: program proposed to be funded and operated by drug producers
- Retail pharmacy and law enforcement collection sites, with mail-back and event options
- Public hearing: 5/16/2013
- More info at:
<http://www.kingcounty.gov/healthservices/health/BOH/MedicineTakeback.aspx>

For more information

- **Nationally:** www.takebacknetwork.com/
- **Washington State:** www.takebackyourmeds.com
- **King County (WA):**
<http://www.kingcounty.gov/healthservices/health/BOH/MedicineTakeback.aspx>
- Dave.Galvin@kingcounty.gov



