January 14, 2016

Submitted via Electronic Mail to EPR@lacounty.gov

Pharmaceutical Working Group
c/o Angelo J. Bellomo, REHS, QEP,
Deputy Director for Health Protection
5050 Commerce Drive
Baldwin Park, CA 91706

Subject: California Association of Sanitation Agencies (CASA) Support for the Los Angeles County EPR Pharmaceuticals and Sharps Ordinance

Mr. Bellomo,

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the most recent Draft Los Angeles County EPR Pharmaceuticals and Sharps Ordinance (“Draft Ordinance”) released on January 5, 2016. For 60 years, CASA has been the leading voice for public wastewater agencies on regulatory, legislative and legal issues. We are an association of local agencies, engaged in advancing the recycling of wastewater into usable water, generation of renewable energy, and other valuable resources for millions of Californians. Dave Pedersen of the Las Virgenes Municipal Water District, a CASA member agency, currently represents CASA on the stakeholder group reviewing the Draft Ordinance. Many other CASA members are very interested in seeing this important pollution prevention effort move forward, and we urge the County to move forward with adoption as soon as possible.

Pollution prevention efforts such as the development of stewardship plans, as called for in the Draft Ordinance, are among the most straightforward and achievable methods of keeping pharmaceuticals out of wastewater and the environment. Unused and expired medications are frequently (and improperly) flushed down the toilet and make their way into wastewater treatment streams and ultimately the environment. Many CASA member agencies already engage in public awareness and communication efforts such as the “No Drugs Down the Drain” campaign. While these are an important component of addressing proper pharmaceutical disposal, a comprehensive take back system to address unused and expired medications would be a significant step toward effective pollution prevention and is a necessary compliment to existing communication programs. This represents the “low hanging fruit” in the drive to keep these compounds out of the environment.

In order to be effective, the Draft Ordinance must create take back mechanism that is safe, convenient, and free for the public. The Draft Ordinance has a number of elements that will help achieve that goal, including the development of a secure collection system for all unwanted medications and sharps used in the home, an emphasis on the manufacturers of pharmaceuticals and sharps as having the primary financial responsibility for collection and safe disposal of their products, and a program must be promoted to County residents and the health care community. CASA also appreciates that the Draft Ordinance also provides for an ongoing review process that
includes public comment opportunities and assistance with plan review and revision. Finally, though it does not appear to be specifically addressed in the revised Draft Ordinance, consistent with our previous comments, we would encourage the County to consider the process and timeline for cities to opt in to the program being developed and be come “Participating Cities.” Most of the population in Los Angeles County is located in cities, so it is critical to have the ordinance apply to as much of the County as possible, which will be crucial in the implementation phase.

CASA again applauds the County for engaging in a stakeholder process that has been highly transparent and inclusive, with more than adequate outreach and opportunities for comment by affected stakeholders and members of the public. We urge the County to continue forward on its existing schedule by bringing the Ordinance before the Los Angeles County Board of Supervisors on February 16, 2016 for their consideration.

Should you have any questions, please do not hesitate to contact me at (916) 446-0388 or alink@casaweb.org, and we look forward to engaging in the process as it progresses.

Sincerely,

Adam D. Link
Director of Government Affairs

David W. Pedersen
General Manager, Las Virgenes Municipal Water District