September 23, 2015

Submitted via Electronic Mail to EPR@lacounty.gov

Subject: California Association of Sanitation Agencies Support for Los Angeles County EPR Pharmaceuticals and Sharps Ordinance Development

To Whom It May Concern,

The California Association of Sanitation Agencies (CASA) writes in support of the Los Angeles County (County) proposal to develop an ordinance which requires manufacturers and producers of prescription and non-prescription drugs to develop pharmaceutical take back programs for County residents. CASA is a statewide association representing more than 115 municipalities, special districts, and joint powers agencies that provide wastewater collection, treatment, clean energy and water recycling services to millions of Californians. As a statewide representative of the wastewater community, we support the County’s decision to move forward on this very important pollution prevention effort. CASA appreciates the County’s invitation to serve on the Technical Advisory Group, and going forward we will be represented by Dave Pedersen, General Manager of the Las Virgenes Municipal Water District.

CASA was a strong supporter of previous state legislative efforts to require producers of pharmaceuticals to create, finance and manage a collection system for California consumers to safely and conveniently dispose of expired and unwanted pharmaceuticals. CASA is also supportive of efforts in California counties to develop similar ordinances, including Alameda, San Francisco, Marin, Santa Clara, and others.

We also appreciate that the ordinance development process includes a stakeholder engagement component, and acknowledges the need to generate awareness about the collection program, which is often the key to success for these types of endeavors. The current lack of reliable and readily accessible disposal mechanisms in many communities’ leads to consumers often choosing less than desirable options, including flushing medications down the toilet. The producer responsibility model being considered by the County is the most straightforward and cost-effective way to reduce the flow of pharmaceuticals to wastewater treatment plants, and ultimately our environment.

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