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VIA ELECTRONIC DELIVERY

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Russ Carter
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RE: Pharmaceutical and Sharps Waste Stewardship (SB212) Informal Rulemaking Workshop on
January 30, 2019

Dear Mr. Carter:

On behalf of the Collaborative for Effective Prescription Opioid Policies (CEPOP), we are writing to encourage your organization to include safe, at-home disposal of prescription medications as an appropriate option for all consumers as CalRecycle begins implementation of Senate Bill 212 (Chapter 1004, Statutes of 2018).

Since launching in 2015, CEPOP has convened over 80 national organizations to develop, share, and advocate for best practices to reduce opioid misuse, abuse, and diversion. We know, of course, that the path to addiction, overdose, and other tragic consequences too often begins in the home when unused and unwanted prescription medications are diverted by others for illicit use or profit. In July 2017, CEPOP held a [briefing](#) in the U.S. Capitol focused specifically on controlled substance diversion prevention with a core focus on safe storage and disposal strategies.

Our review of the current landscape for pharmaceutical disposal options indicates there are evidence-based systems on the market today which can substantially improve on the nation's experience with safe disposal of excess drugs and provide more patients and caregivers the opportunity to rid medicine cabinets of pharmaceutical products that may be prone to misuse or diversion. We know that many people simply will not or cannot participate in take-back initiatives, so we need to employ a comprehensive, multi-faceted approach around what works for the broadest array of individuals, which we hope would include at-home drug disposal.

Effective at-home disposal is a convenient option alongside National Drug Takeback Days and drug takeback boxes, leading to higher uptake. When these pharmaceutical products are rendered non-retrievable and unrecoverable through use of a bioavailable disposal unit, the process remains environmentally sound. As you may know, Section 3032 of the recently-enacted Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment (SUPPORT) for Patients and Communities Act ([P.L. 115-271](#)), also embraces safe disposal technologies and incorporates the definition of what constitutes "non-retrievable" as defined in section 1300.05 of Title 21 in the Code of Federal Regulations.

Put simply, we believe both federal and state initiatives around safe disposal of unused or unwanted prescription medications have a unique opportunity to embrace innovative, at-home systems to significantly lower the risk of misuse, abuse, or diversion of these products. We urge the State of California and CalRecycle to use the opportunity of SB212 implementation to move a significant portion of the country forward on this pathway.

Thank you for the opportunity to submit these comments and for your consideration in advance of the January 30th public meeting on SB212. We stand ready to serve as a resource to you and your colleagues as you consider additional proposals and feedback received during the public workshop.

Sincerely,

AmerisourceBergen Corporation
Community Anti-Drug Coalitions of America, *CEPOP Co-Convenor and Steering Committee Member*
Kentucky Office of Drug Control Policy, *CEPOP Steering Committee Member*
Mothers Against Prescription Drug Abuse
National Association of Drug Diversion Investigators
National Athletic Trainers' Association
National Safety Council
SAFE Project
Shatterproof
The Gerontological Society of America
The Honorable Mary Bono, *CEPOP Co-Convenor and Steering Committee Member*