

Secure Medicine Return Proposed Policy Overview

October 2017

Whatcom County Health Department

Overview

There are several places in Whatcom County where residents can drop-off their unwanted medicine for safe disposal. However, these locations are not convenient for many people and lack sufficient and sustainable financial resources. At the request of the Whatcom County Health Board, the Health Department is preparing legislation for the Board's consideration that will create and fund a comprehensive medicine return system. The proposed policy will be modeled on regulations passed by the local boards of health in King, Snohomish, Kitsap, and Pierce Counties.

Proposed Policy Goals

- **Expand secure medicine disposal options** for Whatcom County residents to reduce risks of medicine poisonings and misuse, and reduce pollution from waste pharmaceuticals
- **Improve convenience for residents** by expanding the number of locations where people can drop off their unused medicines
- **Ensure financial sustainability** through a pharmaceutical industry-financed system

Proposed Policy Components

Medicine Accepted

Every collection site must accept the following medicines used in the home:

- Prescription medicines, including legally prescribed controlled substances (e.g. narcotics and stimulants)
- Over-the-counter medicines
- Includes brand name and generic medicine in all forms, and pet medicines used in the home

Medicine NOT Accepted:

- Over-the-counter medicines that are also regulated as cosmetics by Food and Drug Administration (FDA,) like toothpaste and sunscreen
- Vitamins and supplements
- Pharmaceutical wastes from businesses
- Other specific exempted drugs

Collection Systems

The medicine collection system must provide reasonably convenient and equitable access for all residents. Through this system:

- Any Drug Enforcement Administration (DEA) authorized pharmacy, hospital, or any law enforcement facility that volunteers to host a drop box will be able to participate.
- A minimum number of drop boxes is required in every city and in unincorporated areas with a pharmacy, hospital, or a law enforcement facility.
- In areas without enough drop boxes, collection events or prepaid return mailers must be provided.
- Prepaid return mailers must also be available upon request for homebound or disabled residents.

Pharmaceutical Stewardship

The proposed policy requires the companies who manufacture medicines – the producers - to develop and pay for a comprehensive medicine return system. Residents cannot be required to pay a fee for this service when purchasing or returning medicines. This concept is called **pharmaceutical stewardship**.

Pharmaceutical producers can combine their resources and hire a company, or **stewardship organization**, to coordinate the system. In the proposed policy, stewardship organizations will be required to develop a stewardship plan that includes the policy components listed below. The Whatcom County Health Department will review the plan and oversee the approved program for safety and compliance.

Secure Handling and Packaging

Stewardship organizations must handle collected medicines securely and confidentially. They must:

- Comply with all applicable state and federal laws, including the DEA's security procedures.
- Protect patient confidentiality.
- Recycle packaging, when possible.

Disposal

Collected medicines must be destroyed at an Environmental Protection Agency (EPA) approved hazardous waste facility. The Health Department may approve the following alternative methods:

- A large municipal waste combustion facility
- Other disposal technologies that are safer for the environment and human health

Education and Outreach

Stewardship organizations must:

- Promote safe storage of medicine and use of the secure medicine return system.
- Provide educational materials to stakeholders, including a website and a toll-free phone number.
- Discourage disposal of medicine in the trash.
- Use consistent-looking secure drop boxes, and clear instructions on how to use them.

Reporting and Evaluation

Stewardship organizations must evaluate the program and report on it at least annually. The report must include:

- Pounds of medicine collected, per collection method
- Program operations and activities
- Program costs
- Effectiveness of the program and promotions

Producer Costs

Pharmaceutical producers are responsible for all costs relating to:

- Secure drop boxes and collection supplies
- Transportation and final disposal of medicines
- Program promotion and evaluation
- Administrative costs
- Fees to the Health Department for plan review and annual oversight

Implementation Timeline

The regulation will define deadlines for development and implementation of the secure medicine return system.

- Six months after regulation is adopted: stewardship plan(s) submitted to the Health Department
- Three months after plan approval: program operations begin
- Every four years: stewardship plans must be updated

Oversight and Enforcement

The Health Department will:

- Review and approve the stewardship plan(s).
- Ensure stewardship organizations are following the regulation.
- Investigate complaints and enforce regulations.

