



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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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: **Comments of the California Association of Sanitation Agencies
(CASA) on the Draft Los Angeles County EPR Pharmaceuticals and
Sharps Ordinance**

Mr. Bellomo:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the Draft Los Angeles County EPR Pharmaceuticals and Sharps Ordinance (“Draft Ordinance”). 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. Dave Pedersen of the Las Virgenes Municipal Water District, a CASA member agency, currently represents CASA on the stakeholder group reviewing the Draft Ordinance, and several CASA member agencies are very interested in seeing this important pollution prevention effort move forward.

CASA would like to reiterate its strong support for this initiative and we urge the working group to move forward expeditiously in reporting back to the County Board of Supervisors with a robust EPR ordinance. Pollution prevention is the best way to keep pharmaceuticals out of wastewater and the environment, and this ordinance is necessary to achieve that goal. Unused and expired medications are frequently (and improperly) flushed down the toilet and make their way into wastewater treatment streams and ultimately the environment. Increasing public awareness and communication such as the “No Drugs Down the Drain” campaign is a good start to addressing these issues, but a comprehensive take back program to address unused and expired medications would be a significant step toward pollution prevention. This represents the “low hanging fruit” in the drive to keep these compounds out of the environment, and in order to be effective, the Draft Ordinance must create a take back mechanism that is safe, convenient, and free for the public.

We have identified several provisions of the Draft Ordinance that should be examined before another draft is released. Specifically, the Draft Ordinance should specifically address the process and timeline for cities to opt in to the program being developed, and for the EPR plans to be made applicable to 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. In addition, the definition of “manufacture” on line 7, Page 4 of the ordinance appears to be missing some words. Finally, as it relates to the proposed reporting requirements, the Draft Ordinance does not specify

whether packaging weight is to be included when reporting the amount by weight of covered drugs and sharps collected. This issue should ultimately be raised and addressed, if not in the ordinance itself then in the implementation regulations that follow.

CASA also appreciates that the stakeholder process thus far has been highly transparent, with more than adequate outreach and opportunities for comment by affected stakeholders and members of the public. We would urge the working group to move forward with urgency and meet the deadlines set forth in the Board of Supervisors Ordinance for bringing back a proposed ordinance by early 2016. CASA looks forward to reviewing subsequent drafts of the ordinance and will continue to participate in the process through our representative, Dave Pedersen.

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