



LOS ANGELES AREA
CHAMBER OF COMMERCE

November 24, 2015

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

RE: **Los Angeles County Extended Producer Responsibility
Pharmaceuticals and Sharps Ordinance**

Dear Mr. Bellomo:

On behalf of the Los Angeles Area Chamber of Commerce, we appreciate the opportunity to provide comments in response to Los Angeles County's Extended Producer Responsibility (EPR) Pharmaceuticals and Sharps Ordinance. The Chamber represents over 1,600 businesses throughout LA County, many of which would be impacted by this ordinance.

Los Angeles County released a preliminary draft ordinance in November 2015, known as the Extended Producer Responsibility Pharmaceuticals and Sharps Ordinance. According to the preliminary ordinance, the draft places the entire burden of the program, including the design, implementation and cost, on the pharmaceutical industry. We believe best practices and results are achieved when government and business interests work collaboratively to find common solutions; the draft falls a bit short of that.

The model LA County used for the draft is based on Alameda County's program, which has not proven to be effective. It also includes private right of action language that will allow anyone to sue the industry over this proposed program. A proposal that places 100% of the cost and responsibility solely on one industry, when many industries are involved, is not an efficient solution.

Industry stakeholders have been making an effort to offer alternative solutions to educate consumers on the proper and convenient way to dispose of unwanted or unused medicines. We urge the county to take the industry up on their offer to form a partnership. To collectively design a program that is reasonable, fair, workable and will ensure results.

The Chamber requests continued stakeholder engagement with all parties to develop more equitable solutions. Thank you for your consideration. If you have any questions, please contact Sarah Rascon, Public Policy Manager at 213.580.7573 or strascon@lachamber.com.

Sincerely,

A handwritten signature in cursive script that reads "Gary Toebben".

Gary Toebben
President & CEO