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April 29, 2016

Hilda L. Solis, Chair
Board of Supervisors
County of Los Angeles
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 856
Los Angeles, CA 90012

RE: LOS ANGELES COUNTY PHARMACEUTICALS AND SHARPS COLLECTION AND DISPOSAL STEWARDSHIP ORDINANCE – SUPPORT

Dear Supervisor Solis,

The Hospital Association of Southern California (HASC), which represents over 85 hospitals in Los Angeles County, appreciates the opportunity to comment on the Los Angeles County Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance. HASC commends the stakeholder process that was convened, and the willingness of Public Health and Public Works staff to address concerns outlined in our comment letter to the Pharmaceutical Working Group dated January 15, 2016.

Foremost, the final draft Ordinance provides clarity when **Responsible Steward** is defined as a “Manufacturer of a Covered Drug or Sharp”. This definition is further clarified to address the unintended consequence associated with hospitals that repackage, prepackage and/or operate an on-campus hospital retail pharmacy, including those in an outpatient medical office. As a result, HASC supports this ordinance which would establish community collection sites that offer consumers both a safe and convenient method to dispose of sharps and unwanted or expired drugs. These collection sites financed by producers and manufacturers also address the public health, environmental and occupational safety concerns that result from inaction. Hospitals agree to post information approved by the Director of Public Health on the nearest collection site and will continue to assume responsibility for managing the disposal of pharmaceutical waste and sharps that is internally generated in accordance with federal and state requirements.

Finally, hospitals are committed to the health and safety of their patients. Patients are counseled on medications being prescribed, and this education extends to all Emergency Departments that voluntarily adopted the Safe Pain Prescribing Guidelines. A key goal of this initiative is to prevent prescription drug misuse in order to combat the growing opiate abuse that resulted in over 8,000 unintentional drug related deaths in Los Angeles County between 2000 and 2009. Hospitals look

forward to working with the Safe Med L.A. coalition to reduce drug abuse deaths by 20 percent over the next five-year course of the plan which can be achieved through a coordinated and multifaceted countywide effort.

The Hospital Association of Southern California respectfully requests that your Board approve this Ordinance.

Sincerely,



JAIME GARCIA

Regional Vice President – Los Angeles Region

Cc: Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael D. Antonovich
Mr. Angelo J. Bellomo, EPR Working Group