



MEMBER AGENCIES

- City of Cloverdale
- City of Cotati
- City of Healdsburg
- City of Santa Rosa
- City of Sebastopol
- City of Ukiah
- County of Mendocino
- County of Sonoma
- Sonoma County Water Agency
- Town of Windsor

ANDY RODGERS Executive Director

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September 29, 2021

SENT VIA: EMAIL

California Department of Resources Recycling and Recovery
(CalRecycle)

1001 I Street
Sacramento, CA 95812

pharmasharps@calrecycle.ca.gov

SUBJECT: Comments on MED-Project Covered Drugs
From Households Stewardship Plan SB212
Submitted September 14, 2021

Dear CalRecycle:

This letter presents comments from the Russian River Watershed Association's (RRWA) Safe Medicine and Sharps Disposal Collaborative Subcommittee - Operations Group on MED-Project Stewardship Plan SB212 submitted September 14, 2021 and released for comment. We appreciate the opportunity to comment on this draft Stewardship Plan for covered drugs from households which has implications for our member agencies.

RRWA formed in 2003 and is a coalition of 10 cities, counties, and agencies within the 1,485 square mile Russian River watershed that work together for clean water, habitat restoration, and watershed enhancement. RRWA has been a convening and collaborating with the Subcommittee since 2007. Zero Waste Sonoma is a Subcommittee member and a co-signer of this letter.

We offer the following general comments and questions:

Kiosks and Mail back Services

- In order to provide safe and convenient collection services to the Russian River region, mail-back envelopes must be made available at collection sites and/or the pharmacies in which kiosks are located. Anyone who wants an envelope should have access to one.
 - For pharmacies who do not have take-back bins (for spacing issues or otherwise), they will need to be provided with mail-back envelopes.
 - Pharmacies who request mail-back services should be provided with envelopes.
- It is not clear from the plan what the collection process looks like (i.e., accessibility and mail-back envelope distribution) for homeless and homebound individuals.

- Does the public have the option to get container if they don't have a prescription or permanent address? For example, social service centers, home health or hospice, etc. can be provided with mail-back containers.
- Can mail back containers be mailed from anywhere or do they need to be sent from a post office? Will the mail back containers fit into mailboxes?

Outreach

- What is the frequency and means of outreach (media and promotion) during year one? Year two?
- We request that materials include information that distinguishes which locations, if any, cannot take controlled substances.
- We request that clear labeling address how Med-Project addresses sharps that also contain medicine (epi-pens)—through the drug kiosks or the sharps program.
- Will there be one interactive map that identify both drug and sharps locations?

RRWA supports SB212 Stewardship Plans for the Russian River Watershed but requests that CalRecycle consider the above comments, questions, and recommendations. If you have any questions or concerns about RRWA's position, please do not hesitate to contact me at (707) 508-3670.

Sincerely,



Andy Rodgers, RRWA Executive Director



Leslie Lukacs, Zero Waste Executive Director

