



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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July 16, 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 UltiMed Stewardship Plan SB212
Submitted July 2, 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 UltiMed Stewardship Plan SB212 submitted July 2, 2021 and released for comment. We appreciate the opportunity to comment on this draft Sharps Stewardship Plan 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:

Mail back containers

- Does the public have the option to get a container if they don't have a prescription or request additional containers, if needed?
- Can the mail back containers be pre-printed with the mail back address?
- Can the mail back container indicate on it that it can be used to dispose of *any/all* sharps?
- What does the sharps collection process look like (i.e. accessibility and mailing back) for homeless and homebound individuals?
- 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?

Brochure

- Mail back brochure font should be larger for the visually impaired. Additionally, a URL to the website should be included on the brochure that links directly to clear instructions on how to return the container. These mail back instructions should also be easily accessible from the main website homepage.

Agency and Program Partners

- What is the plan for other facilities receiving sharps via this UltiMed containers, such as Household Hazardous Waste Facilities (HHW)?
- How will overlap between prescribed brands be addressed in the collection (i.e. the prescription vendor changes but container is still fillable)? How will we avoid confusion to the public? A collaborative comprehensive program approach would be more functional, easier to understand and therefore more manageable.
- Are there opportunities for local programs to review reports and collaborate with UltiMed?
- Is outreach to veterinarians included?

Section specific comment and Questions:

- **7.7. Metrics for Measuring Sharps Waste by Household Hazardous Waste Facilities Operated by Local Agencies.** There needs to be a plan for reimbursing labor, equipment, shipping, disposal, and supplies for HHW receiving sharps. What method for shipping should be utilized?
- **Section 8. Local Agency Requests.** How will UltiMed address sharps that are in the market *before* the program?

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

