

REQUEST FOR APPROVAL

To: Rachel Machi Wagoner
Director

From: Zoe Heller
Acting Deputy Director, Materials Management and Local
Assistance Division
Deputy Director, Policy Development and Analysis Office

Request Date: August 9, 2022

Decision Subject: Consideration of MED-Project's 2021 Annual Report for Covered
Drugs

Action By: August 30, 2022

Summary of Request

MED-Project USA (MED-Project) resubmitted its 2021 annual report titled, *MED-Project 2021 Annual Report, State of California, Covered Drugs (2021 Annual Report)* on June 1, 2022, as required by statute. This Request for Approval presents staff's analysis and compliance recommendation regarding MED-Project's resubmitted *2021 Annual Report*.

Background

MED-Project is a stewardship organization that represents more than 200 covered entities. On December 9, 2021, the Department of Resources Recycling and Recovery (CalRecycle) conditionally approved MED-Project's *A Product Stewardship Plan for Covered Drugs from Households (Plan)* pursuant to Public Resources Code (PRC) section 42032(d)(1) and Title 14, California Code of Regulations (14 CCR) sections 18973.1(e) and (g). MED-Project's *2021 Annual Report* covers the period of time its *Plan* was conditionally approved in calendar year 2021 (December 9, 2021, through December 31, 2021).

PRC section 42033.2(a)(1) states that, on or before March 31, 2022, and each year thereafter, a program operator shall submit to CalRecycle a report that describes the stewardship program activities during the previous reporting year. CalRecycle determined MED-Project's 2021 annual report was incomplete on May 2, 2022 and required MED-Project to revise and resubmit its 2021 annual report to CalRecycle within 30 days. MED-Project resubmitted its *2021 Annual Report* on June 1, 2022. CalRecycle determined the *2021 Annual Report* was complete and notified MED-Project on July 1, 2022, pursuant to PRC section 42033.2(d)(1) and 14 CCR section 18973.1(b). CalRecycle has 90 days from the date MED-Project submitted its complete *2021 Annual Report* to approve, disapprove, or conditionally approve the *2021 Annual Report* pursuant to PRC section 42033.2(d)(2) and 14 CCR section 18973.1. Staff's analysis of MED-Project's *2021 Annual Report* is summarized below.

Staff Analysis

1. Program Activities

Requirements: A written report describing the stewardship program activities during the previous reporting period of one year pursuant to PRC sections 42033.2(a)(1) and 42033.2(b) and 14 CCR sections 18973 and 18973.4.

Result: Met requirements

MED-Project's *2021 Annual Report* states that the *Plan* was in the beginning stages of implementation during the December 9, 2021, to December 31, 2021, reporting period.

MED-Project entered into agreements with 1,579 authorized collectors and established collection receptacles at 291 authorized collection sites and received expressions of interest in participation from 880 potential authorized collectors prior to the end of the reporting period. By the end of the reporting period, MED-Project stated it provided a geographic spread of authorized collection sites so that greater than 90 percent of ultimate users live within a 15-mile drive of an authorized collection site. The *2021 Annual Report* states that MED-Project is making progress toward meeting the convenience standards in PRC sections 42032.2(a)(1)(F)(i) and (iii). MED-Project reported that 8,460.2 pounds of covered drugs were collected from authorized collection sites and that MED-Project did not distribute or collect mail-back materials during the reporting period.

MED-Project states in the *2021 Annual Report* that it did not begin education and outreach efforts during the reporting period and that it will begin outreach activities 180 days after conditional approval of its *Plan* with the launch of its social media campaign.

MED-Project submitted a list of covered entities participating in its program during the reporting period, the list of covered products sold or offered for sale by each participating covered entity, and a list of authorized collectors participating prior to the end of the reporting period with the *2021 Annual Report*.

MED-Project provided its actual expenses incurred during the reporting period in the *2021 Annual Report* pursuant to 14 CCR section 18973.4(n).

Summary of Staff Analysis

CalRecycle staff reviewed MED-Project's *2021 Annual Report*, which describes MED-Project's program activities in its 2021 reporting period (December 9, 2021, through December 31, 2021), and found it met all material requirements in PRC sections 42033.2(a)(1) and 42033.2(b), 14 CCR sections 18973 and 18973.4, and MED-Project's conditionally approved *Plan*.

Action

Based on the information and analysis in this Request for Approval, I hereby approve MED-Project's *2021 Annual Report*.

Dated: August 16, 2022

Signed by: Rachel Machi Wagoner, Director

Attachments:

Documents listed below are posted to CalRecycle's website. To request documents that are referenced in this report but are not listed below, please submit a Public Records Act request (<https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/>).

1. [*MED-Project 2021 Annual Report, State of California, Covered Drugs*](#) (June 1, 2022)
<https://www2.calrecycle.ca.gov/Docs/Web/121743>
 - a. [*Attachment A – Notified Potential Authorized Collectors*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/121731>
 - b. [*Attachment B – Covered Entities List*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/121734>
 - c. [*Attachment C – Covered Products List*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/121737>
 - d. [*Attachment D – Participating Authorized Collectors*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/121740>
2. [*A Product Stewardship Plan for Covered Drugs from Households*](#) (September 14, 2021)
<https://www2.calrecycle.ca.gov/Docs/Web/119601>
 - a. [*Appendix A - Participating Covered Entities*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/119604>
 - b. [*Appendix B - Covered Products*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/119607>
 - c. [*Appendix C - Participating Authorized Collection Sites*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/119610>
 - d. [*Appendix E - Potential Authorized Collectors*](#)
<https://www2.calrecycle.ca.gov/Docs/Web/119613>