

**MED-Project**<sup>®</sup>

Medication Education & Disposal

# MED-Project 2021 Annual Report

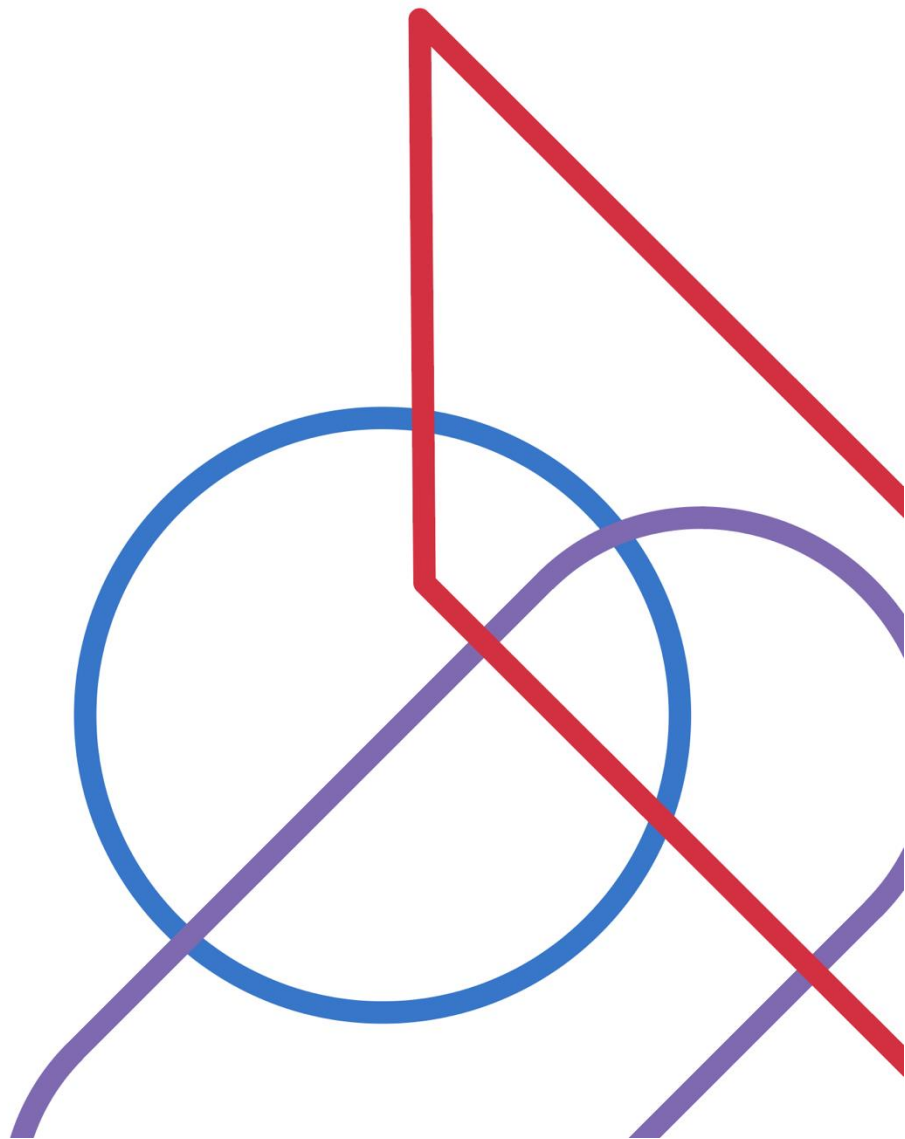
**REDACTED| FOR PUBLIC RELEASE**

State of California, Home-Generated Sharps Waste

March 31, 2022; Revised August 12, 2022

**Prepared By:** MED-Project USA

**Submitted To:** California Department of Resources Recycling and Recovery



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## I. Executive Summary

**California Code of Regulations, Title 14, (“Regulation”) Section 18973.5(b):** *“Executive Summary. A concise summary of the information contained in the report that includes, but is not limited to, the highlights, outcomes and challenges, education and outreach efforts, and ways in which challenges are being addressed.”*

MED-Project USA (“MED-Project”) operates a Product Stewardship Plan for Home-Generated Sharps Waste in the State of California (“State”) under Chapter 2 (commencing with section 42030), Part 3, Division 30 of the California Public Resources Code. On December 9, 2021, the Director of the California Department of Resources Recycling and Recovery (“CalRecycle”), conditionally approved the MED-Project plan dated September 14, 2021 (the “Approved Plan”).

This 2021 State of California Annual Report (“Report”) describes MED-Project’s activities in the State between December 9, 2021, and December 31, 2021 (the “Reporting Period”). The Approved Plan was in the beginning stages of implementation during this Reporting Period. As such, beginning with the Plan approval on December 9, 2021, MED-Project began implementation of the Program timeline discussed in Appendix J of the Approved Plan. The following Sections of the Report address the specific reporting requirements in Regulation Section 18973.5 and/or Public Resources Code (“Code”) Section 42033.2 and activities that occurred during the Reporting Period. Each section of the Report restates the corresponding Code or Regulation requirement and provides the required information. Numbers in the Report have been rounded to the nearest tenth place. All Capitalized terminology not defined in this Executive Summary is derived from the Approved Plan.

## II. Program Expenses

**Regulation Section 18973.5 (q):** “A list of all actual expenses incurred during the previous reporting period. Expenses shall be summarized in accordance with the budget categories specified in section 18973.6(b).”

### Annual Expenses

The following are the actual expenses incurred during the Reporting Period:

- Capital costs: [REDACTED]
- Costs of collection, transportation and disposal of covered products: \$97,750
- Administrative costs: \$188,826
- Education and outreach costs: \$38,114
- Costs related to grants, loans, sponsorships, or other incentives as part of program implementation: \$0

## III. Program Contact Information:

**Regulation Section 18973.5(a):** “(a) Contact information pursuant to section 18973.3(a) including any changes or updates to this information.

The primary contact person for “MED-Project during the Reporting Period, was:

Jim Wilson  
Lead Director, Legal and Compliance  
MED-Project USA  
1800 M Street, NW  
Suite 400 South  
Washington, DC 20036  
Phone: 1 (833) 633-7765  
Fax: 1 (866) 633-1812  
[california@med-project.org](mailto:california@med-project.org)  
[www.med-projectusa.org](http://www.med-projectusa.org)

The M street address is the mailing and physical address. The above contact information has not changed since submission of the Approved Plan.

## IV. Collection System

**Regulation Section 18973.5 (c)(1):** Describe “[h]ow ultimate users had an opportunity to dispose of their home-generated sharps waste as described in the approved stewardship plan.”

MED-Project will provide or initiate distribution of Sharps Mail-Back Packages to Ultimate Users at or prior to the Point of Sale of In-Scope Purchases and through the Website and Call Center consistent with the Approved Plan. During the Reporting Period, MED-Project engaged with vendors to design and develop the system for initiating Sharps Mail-Back Packages at the Point of Sale for In-Scope Purchases and for distributing Sharps Mail-Back Packages to Point of Sale Sites to provide to Ultimate Users at the Point of Sale for In-Scope Purchases. MED-Project also performed outreach and education about the Program with Covered Entities and Point of Sale Sites.

### A. Sharps Containers and Mail-Back Distribution

**Code Section 42033.2 (b)(5):** “For a stewardship plan for home-generated sharps waste, information on the mail-back program.

**Regulation Section 18973.5 (c)(2):** “Amount of sharps waste containers and mail-back materials distributed as required in the stewardship plan pursuant to section 18973.3(f)(6), per county, through each of the following methods:

- (1) Provided at point of sale
- (2) Initiated at point of sale
- (3) Website requests
- (4) Toll-free telephone number requests.”

MED-Project did not distribute sharps waste containers or Sharps Mail-Back Materials during the Reporting Period. As of the end of the Reporting Period, MED-Project had not implemented the Mail-Back Program.

### B. Mail-Back Returns

**Regulation Section 18973.5 (c)(3):** “Amount of home-generated sharps waste returned through the mail-back program, as required in the stewardship plan pursuant to section 18973.3(f)(6).”

No Home-Generated Sharps Waste was returned during the Reporting Period. As of the end of the Reporting Period, MED-Project had not implemented the Mail-Back Program. MED-Project will implement a Mail-Back Program in 2022 under the Approved Plan.

## C. Supplemental Forms of Collection and Disposal

**Regulation Section 18973.5 (c)(4):** *“Supplemental collection method(s) of home-generated sharps waste that were provided in addition to, but not in lieu of, the mail-back program, pursuant to section 18973.3(f)(5). Include a list of dates and locations of take-back events that occurred pursuant to section 18973.3(f)(5)(B), if applicable”*

**Regulation Section 18973.5 (c)(5):** *“If applicable, amount of home-generated sharps waste collected through supplemental collection method(s), as required in the stewardship plan pursuant to section 18973.3(f)(7)”*

MED-Project did not use supplemental collection methods to collect sharps waste during the Reporting Period.

## V. Transportation and Disposal System

**Regulation Section 18973.5 (d):** *“Transportation and Disposal. Descriptions of the methods used to transport and dispose of consolidated home-generated sharps waste, including the following:*

- (1) *Mechanism(s) used to track the collection, transportation, and disposal of home-generated sharps waste*
- (2) *Name and mailing address of each service provider used to transport or process home-generated sharps waste*
- (3) *For each disposal facility, include the following:*
  - (a) *Name of facility*
  - (b) *Mailing and physical address*
  - (c) *Total weight of material disposed”*

No service providers were used to transport, process, or dispose of Home-Generated Sharps Waste during the Reporting Period.

MED-Project did not collect, transport, or dispose of Home-Generated Sharps Waste under the Approved Plan during the Reporting Period. Accordingly, MED-Project did not use a tracking mechanism or service providers for the transportation, processing, or disposal of Home-Generated Sharps Waste during the Reporting Period.

## VI. Policies and Procedures

**Code Section 42033.2 (b)(6):** *“Whether policies and procedures for collecting, transporting, and disposing of covered products, as established in the stewardship plan, were followed during the reporting period and a description of each instance of noncompliance, if any occurred.”*

**Regulation Section 18973.5 (e):** *“Policies and Procedures. Pursuant to subdivision (b)(6) of section 42033.2 of the Public Resources Code, provide the following:*

- (1) *Description of whether policies and procedures for collecting, transporting, and disposing of home-generated sharps waste, as established in the stewardship plan, were followed during the reporting period*
- (2) *Description of each instance of noncompliance from stewardship plan policies and procedures, if any occurred*
- (3) *Corrective actions taken, or that will be taken, if the program operator discovered critical instances of noncompliance with stewardship plan policies and procedures”*

**Regulation Section 18973.5 (f):** *“Description of updates, that have been made or will be made, to the processes and policies followed to safely and securely collect, track, and properly manage home-generated sharps waste from collection through final disposal.”*

MED-Project did not collect, transport, or dispose of Home-Generated Sharps Waste under the Approved Plan during the Reporting Period. During the Reporting Period, MED-Project did not make or initiate updates to the Approved Plan processes and policies to safely and securely collect, track, and properly manage Home-Generated Sharps Waste from collection through final disposal.

## VII. Repeal of Local Ordinances

**Regulation Section 18973.5 (g):** *“Ordinance Repeal. Pursuant to subdivision (e) of section 42032.2 of the Public Resources Code, description of processes, logistics, and timing of implementation that will be necessary for the stewardship program to expand into jurisdictions not previously included in the stewardship plan, in the event of the repeal of a local stewardship program ordinance.*

Effective November 15, 2021, San Luis Obispo County withdrew from the San Luis Obispo County Integrated Waste Management Authority, which administered a local stewardship program ordinance. Pursuant to PRC 42032.2(e) and 42036.2, MED-Project is expanding the Program into the unincorporated areas of San Luis Obispo County.

Because the Program had not yet been approved as of November 15, 2021, MED-Project is implementing the Approved Plan across the State, including in the unincorporated areas of San Luis Obispo County, in accordance with the timeline in Approved Plan Appendix J.

## VIII. Safety and Security Incidents

**Code Section 42033.2 (b)(7):** *“Whether any safety or security problems occurred during collection, transportation, or disposal of collected covered products during the reporting period and, if so, what changes have been or will be made to policies, procedures, or tracking mechanisms to alleviate the problem and to improve safety and security.”*

**Regulation Section 18973.5 (h):** *“Safety and Security. Describe the general nature of any incidents with safety or security related to collection, transportation, or disposal of home-generated sharps waste. Explain the corrective actions taken or that will be taken to address the issue and improve safety and security. Additionally, the following specific information about any incident(s) shall be made available to the department, upon request, and shall include, but not be limited to:*

- (1) Location and date
- (2) Description of specific incident
- (3) Cause(s) of specific incident



- (4) *Parties involved*
- (5) *Regulatory or law enforcement agencies involved and any litigation, arbitration, or other legal proceedings that result from each incident.”*

MED-Project did not collect, transport, or dispose of Home-Generated Sharps Waste under the Approved Plan during the Reporting Period.

## **IX. Education and Outreach**

**Regulation Section 18973.5 (i):** *“Education and Outreach. Description and evaluation of the comprehensive education and outreach activities pursuant to section 18973.3(i), including, but not limited to, the following:*

- (1) *Electronic examples of promotional marketing materials*
- (2) *Numerical results of the education and outreach metrics outlined in the stewardship plan, pursuant to section 18973.3(i)(5)*
- (3) *A discussion of what the metrics, described above in section 18973.5(i)(2), reveal about the performance of the comprehensive education and outreach program, including, but not limited to, ultimate user awareness, program usage, and accessibility*
- (4) *Description of how the requirement in section 42031.6(b) of the Public Resources Code was met”*

MED-Project began preparatory work toward the 2022 outreach and education campaign during the Reporting Period. MED-Project did not begin an education and outreach campaign during the Reporting Period. Per Appendix F of the Approved Plan, MED-Project will begin initial media and outreach activities 210 days after approval of the initial Plan on December 9, 2021, with the launch of a social media campaign.

## **X. Participating Covered Entities and Their Covered Products**

**Code Section 42033.2 (b)(1):** *“A list of covered entities participating in the stewardship organization.”*

**Code Section 42033.2 (b)(2):** *“The updated and reverified list provided pursuant to paragraph (2) of subdivision (a) of Section 42031 of covered*

*products that each covered entity subject to the stewardship plan sells or offers for sale.*

**Regulation Section 18973.5 (j):** *“Covered Entities. Participating covered entities covered by the stewardship plan and their contact information, including, but not limited to, the following:*

- (1) Name of covered entity*
- (2) Mailing and physical address*
- (3) Contact name and title*
- (4) Email address*

**Regulation Section 18973.5 (k):** *“A copy of the list of covered products submitted to the Board of Pharmacy pursuant to subsection (2) of subdivision (a) of section 42031 of the Public Resources Code.”*

The list of Covered Entities Participating During the Reporting Period is provided in an accessible Excel spreadsheet attached in the submission of this Report. See Attachment A.

The list of Covered Products sold or offered by sale by each participating Covered Entity is provided in an accessible Excel spreadsheet attached in the submission of this Report. This list was previously submitted to the Board of Pharmacy by January 15, 2022.

## **XI. Selection of Service Providers**

**Regulation Section 18973.5 (l):** *“Description and evaluation of the process for selecting service providers, if applicable.”*

MED-Project did not select any service providers during the Reporting Period.

## **XII. Incentives Provided**

**Regulation Section 18973.5 (m):** *“Description of any grants, loans, sponsorships, reimbursements, or other incentives provided, as applicable.”*

There were no grants, loans, sponsorships, reimbursement, or other incentives provided during the Reporting Period.

## XIII. Staffing Changes

**Regulation Section 18973.5 (n):** “Description of changes in staffing of the stewardship program.”

MED-Project identifies two staff contacts in the Approved Plan. There were no changes to those staff during the Reporting Period.

## XIV. Coordination

**Regulation Section 18973.5 (o):** “Description of how the program operator coordinated with other program operators to avoid confusion to the public and all program participants in the event that multiple stewardship programs for home-generated sharps waste are in operation concurrently or new stewardship programs begin operating.”

Another Program Operator was conditionally approved on December 27, 2021. MED-Project did not conduct any coordination efforts during the Reporting Period.

## XV. Local Agency Requests

**Regulation Section 18973.5 (p):** “Local Agency Requests. For each local agency that has requested removal or reimbursement, pursuant to the requirements in subsection (1)(F)(ii) of subdivision (d) of section 42032.2 of the Public Resources Code, provide details including, but not limited to:

- (1) Name of local agency, or agent acting on behalf of the local agency.
- (2) For each household hazardous waste facility:
  - (a) Facility location
  - (b) Reimbursement payment amount, as applicable
  - (c) Amount of home-generated sharps waste collected, as required in the stewardship plan pursuant to section 18973.3(f)(8)
- (3) Any requests that were rejected and the reason(s) each request was rejected.
- (4) Any requests where response, removal, or reimbursement was performed outside of the timelines specified in section 18973.3(g)(2).”

Consistent with Code Section 42032.2(d)(1)((F)(ii)(IV) and its Approved Plan, MED-Project received no requests for removal or reimbursement from Local Agencies during the Reporting Period.

## **XVI. Plan Compliance**

**Code Section 42033.2 (b)(8):** *“How the program operator complied with all elements in its stewardship plan.”*

**Regulation Section 18973.5 (r):** *“State Agency Determinations pursuant to section 42032.2(d)(1)(B) of the Public Resources Code. Submit all agency determination(s) of compliance, noncompliance and superseding determinations of compliance, if any, for the reporting period.”*

MED-Project complied with all elements in the Approved Plan during the Reporting Period. There were no state agency determinations for the Approved Plan pursuant to Code section 42032.2(d)(1)(B) during the Reporting Period.

## Appendix A

### Certification

As Required by 14 CCR ss 18973.2 (e), I hereby declare under penalty of perjury, that at the time of submission to the Department, the information provided in this document is true and correct, to the best of my knowledge.



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