

## REQUEST FOR APPROVAL

**To:** Rachel Machi Wagoner  
Director

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

**Request Date:** November 2, 2022

**Decision Subject:** Consideration of MED-Project's Revised 2021 Annual Report for Home-Generated Sharps Waste

**Action By:** November 16, 2022

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### **Summary of Request**

MED-Project USA (MED-Project) submitted a revised 2021 annual report, titled, *MED-Project 2021 Annual Report, State of California, Home-Generated Sharps Waste (Revised 2021 Annual Report)* on August 18, 2022, as required by statute. This Request for Approval presents staff's analysis and compliance recommendation regarding MED-Project's *Revised 2021 Annual Report*.

### **Background**

MED-Project is a stewardship organization that represents more than 50 covered entities. On December 9, 2021, the Department of Resources Recycling and Recovery (CalRecycle) conditionally approved MED-Project's *A Product Stewardship Plan for Home-Generated Sharps Waste (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 *Revised 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. MED-Project submitted its *MED-Project 2021 Annual Report, State of California, Home-Generated Sharps Waste (2021 Annual Report)*, on March 31, 2022. CalRecycle conditionally approved the *2021 Annual Report* and notified MED-Project on June 23, 2022. CalRecycle provided MED-Project 60 days to submit a revised 2021 annual report that addressed the condition specified in the June 23, 2022, Request for Approval.

MED-Project submitted its *Revised 2021 Annual Report* on August 18, 2022. Staff's analysis of MED-Project's *Revised 2021 Annual Report* is summarized below.

## **Staff Analysis**

The condition in the June 23, 2022, Request for Approval that CalRecycle required MED-Project to address, is listed below, followed by a summary of staff's analysis of MED-Project's *Revised 2021 Annual Report* submitted on August 18, 2022.

### **1. Education and Outreach**

Requirement: CalRecycle required the *Revised 2021 Annual Report* to meet the following condition pursuant to 14 CCR section 18973.5(i):

- a. Provide sufficient description of all education and outreach efforts performed by MED-Project consistently throughout its annual report.

Result: Condition 1(a) met

MED-Project's *2021 Annual Report* contained inconsistent descriptions of education and outreach efforts during the reporting period. The *Revised 2021 Annual Report* clarifies that MED-Project began preparatory work toward the 2022 outreach and education campaign during the December 9, 2021, to December 31, 2021, reporting period and reported incurred expenses of \$38,114 for education and outreach costs but did not begin its education and outreach campaign. MED-Project began its initial media and outreach activities 210 days after the December 9, 2021, initial conditional approval of its stewardship *Plan* with the launch of a social media campaign as outlined in the Appendix F timeline of its stewardship *Plan*. MED-Project's *Revised 2021 Annual Report* met condition 1(a).

## **Summary of Staff Analysis**

CalRecycle staff reviewed MED-Project's *Revised 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 pursuant to PRC sections 42033.2(a)(1) and 42033.2(b) and 14 CCR section 18973.5, and MED-Project's conditionally approved *Plan*.

## **Action**

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

**Signed by:** Rachel Machi Wagoner, Director

**Dated:** November 15, 2022

## **Attachments:**

Documents listed below are posted to CalRecycle's website. To request the MED-Project *2021 Annual Report* (March 31, 2022), please submit a [Public Records Act request](https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/) (<https://www2.calrecycle.ca.gov/Forms/ContactUs/PublicRecordsRequest/>).

1. [A Product Stewardship Plan for Home-Generated Sharps Waste](https://www2.calrecycle.ca.gov/Docs/Web/119592) (September 14, 2021)  
<https://www2.calrecycle.ca.gov/Docs/Web/119592>
  - a. [Appendix A – Participating Covered Entities](https://www2.calrecycle.ca.gov/Docs/Web/119595) (September 14, 2021)  
<https://www2.calrecycle.ca.gov/Docs/Web/119595>
  - b. [Appendix B – Covered Products](https://www2.calrecycle.ca.gov/Docs/Web/119598) (September 14, 2021)  
<https://www2.calrecycle.ca.gov/Docs/Web/119598>

2. [Consideration of MED-Project's 2021 Annual Report for Home-Generated Sharps Waste](https://www2.calrecycle.ca.gov/Docs/Web/121677) (June 23, 2022)  
<https://www2.calrecycle.ca.gov/Docs/Web/121677>
3. [MED-Project 2021 Annual Report, State of California, Home-Generated Sharps Waste](https://www2.calrecycle.ca.gov/Docs/Web/122127) (August 18, 2022)  
<https://www2.calrecycle.ca.gov/Docs/Web/122127>
  - a. [Attachment A – Participating Covered Entities](https://www2.calrecycle.ca.gov/Docs/Web/122130) (August 18, 2022)  
<https://www2.calrecycle.ca.gov/Docs/Web/122130>
  - b. [Attachment B – Covered Products](https://www2.calrecycle.ca.gov/Docs/Web/122133) (August 18, 2022)  
<https://www2.calrecycle.ca.gov/Docs/Web/122133>