



**DRUG TAKEBACK SOLUTIONS**  
FOUNDATION

# The Drug Takeback Solutions Foundation State of California Home-Generated Sharps Waste 2022 Annual Report

Reporting Period: 2/16/2022 through 12/31/2022

Operational Dates: 11/13/2022 through 12/31/2022

Submitted on: 3/31/2023

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## I. Contact Information

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

Officer responsible for overseeing the Stewardship Plan:

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Officer responsible for overseeing the Program Budget:

Drug Takeback Solutions Foundation  
Lee Smith, Treasurer  
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Primary contacts for the Foundation have not changed in the Reporting Period.

## II. Executive Summary

*PCR Section 42033.2(a): On or before March 31, 2022, and each year thereafter, a program operator shall prepare and submit to the department both of the following:*

*(1) A written report describing the stewardship program activities during the previous reporting period of one year.*

*14 CCR Section 18973.5: On or before March 31, 2022, and each year thereafter, a program operator shall prepare and submit an annual report to the department.*

*14 CCR 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.*

The Drug Takeback Solutions Foundation (“The Foundation”) operates a Stewardship Plan for Home-Generated Sharps Waste (“Plan”) pursuant to California Senate Bill No. 212, Chapter 2 (commencing with Section 42030) to Part 3 of Division 30 of the Public Resources Code, relating to solid waste (the “Public Resource Code” or “PRC”) and the California Code of Regulations Title 14 Division 7 Chapter 11, Article 4, (“the Regulation”) for the management, collection, transportation, and disposal of Home-Generated Sharps Waste from Ultimate Users. The Director of the California Department of Resources Recycling and Recovery (“CalRecycle”) conditionally approved the Foundation’s Plan on February 16, 2022. The Foundation submitted a revised Plan on May 17, 2022 and October 15, 2022. CalRecycle fully approved the Foundation’s Stewardship Plan for Home-Generated Sharps Waste on December 20, 2022.

This 2022 Annual Report (“Report”) for Home-Generated Sharps Waste summarizes the program implementation and operation activities between February 16, 2022 and December 31, 2022 (“Reporting Period”). The Foundation’s Plan was in the implementation stages for the first 270 days after approval and the Plan became fully operational on November 13, 2023. All capitalized terms not defined in this Report are the same as those used in the Foundation’s approved Plan dated October 15, 2022.

### **Reporting Period Summary of Operations**

Pursuant to PRC section 42032(g) and 14 CCR Section 18973.1(m) of the Regulation, the Drug Takeback Foundation’s Stewardship Plan for Home-Generated Sharps Waste was fully implemented by November 13, 2022. The Foundation’s primary focus for the Reporting Period was to be fully operational by the required deadline, to educate Point of Sale Locations and Covered Entities of their obligation to participate in the program, as well as expand the geographic spread of Mail-Back Unit Distribution Locations.

The Foundation worked with Pharmacies and other Point of Sale Locations, encouraging them to participate in the program and providing educational materials on program requirements. The Foundation utilized the California Board of Pharmacy resources to identify other potential Point of Sale Locations across the state, as well as identifying online Pharmacies that distribute Sharps into the state of California.

The Foundation provided outreach to Covered Entities informing them of the requirement to identify where their Covered Product is sold. The Foundation's outreach was specific to Covered Entity and included the Covered Products by NDC code. The Foundation intended to utilize this information to target the locations where Covered Entities' Covered Products were being distributed. However, due to the nature of the pharmaceutical supply chain, the Foundation had difficulty identifying product placement even with the help of the Covered Entities.

Despite the challenges faced determining the specific locations where the Foundation's Covered Entities' Covered Products were sold, the Foundation was able to secure 127 Point of Sale Locations during the Reporting Period. Of the 127 Locations, 31 Locations elected to initiate the order of Sharps Waste Containers on behalf of Ultimate Users. The remaining 96 Point of Sale Locations elected to keep Sharps Waste Containers on-site to distribute to Ultimate Users at the Point of Sale, including one online pharmacy that distributes Sharps into the state of California.

The Foundation distributed a total of 3,823 Sharps Waste Containers during the Reporting Period. Of the 3,823 Sharps Waste Containers that were distributed, the Foundation received 11 Sharps Waste Containers back for destruction. The 11 Sharps Waste Containers will be covered in the 2023 Annual Report.

Additionally, The Foundation is actively expanding the program by working with Household Hazardous Waste Facilities (HHW) throughout the state of California to participate in the Foundation's Stewardship Plan.

The following information within the Report addresses the reporting requirements outlined in PRC Section 42033.2 and 14 CCR Section 18973.5 of the Regulation.

### III. Collection System

*14 CCR Section 18973.5(c)(1) Describe how ultimate users had an opportunity to dispose of their home-generated sharps waste as described in the approved stewardship plan*

During the Reporting Period, Ultimate Users were able to dispose of Home-Generated Sharps Waste via Sharps Waste Containers and prepaid Mailers that were provided free of charge. Ultimate Users in the State were able to 1) Receive Mail-Back Units at 96 Points of Sale Locations 2) Have Mail-Back Units arranged to be sent to them and arrive within five business days of the request at 31 Points of Sale Locations, and 3) order Mail-Back Units via the program website or toll-free 24/7 telephone number also to be delivered within five days of the request.

The Foundation's stewardship program had an operational deadline of 11/13/22. The Foundation was able to successfully initiate the program and begin fulfilling Sharps Waste Container orders on 10/31/2022. Prior to the program initiation date, the Foundation actively sought out Point of Sale Locations including but not limited to: Pharmacies, online pharmacies, clinics,

prescribing infusion centers, homeless shelters, local continuum of care facilities, among other retailers that prescribe or distribute Sharps. This outreach included approximately 1,000 calls and 17,000 letters to secure Point of Sale Locations to establish participation in the program for the distribution of or initiation of the distribution of Sharps Waste Containers and Mailers on behalf of Ultimate Users.

Outreach to Point of Sale Locations consisted of program awareness, education, and the conveying of opportunity to participate. Point of Sale Locations were provided two different options for participation including 1) Initiating the distribution of Sharps Waste Containers on behalf of Ultimate Users or 2) Ordering inventory to keep Sharps Waste Containers on-site and physically distribute them at the Point of Sale. The Foundation fulfilled the first bulk order on November 3, 2022. Point of Sale Locations that elected to order bulk Sharps Waste Containers committed to providing these containers to Ultimate Users on-site at the Point of Sale.

In order to make the program fair and equitable to all Ultimate Users, the Foundation researched local Continuum of Care organizations, Homeless Service Authorities, and other organizations with deep connections to underserved and homeless communities in order to educate and offer disposal options. The Foundation researched household hazardous waste facilities (“HHW”) that accept and dispose of Home-Generated Sharps Waste. The Foundation is actively working with these facilities to engage participation in the Program. HHW facilities historically have received full Sharps waste containers from Ultimate Users in the form of rigid plastic containers, such as shampoo bottles or laundry detergent bottles. The Foundation is providing an opportunity to HHW facilities to distribute FDA approved Sharps waste containers to Ultimate Users, as well as reimbursing these facilities for the destruction costs of Home-Generated Sharps Waste.

## A. Distribution of Sharps Waste Containers

*14 CCR 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:*

- (A) Provided at point of sale*
- (B) Initiated at point of sale*
- (C) Website requests*
- (D) Toll-free telephone number requests*

During the Reporting Period, The Foundation secured 127 Point of Sale Locations across the state of California for Ultimate Users to receive or initiate the delivery of Sharps Waste Containers and Mailers for disposal of their Home-Generated Sharps Waste.

The below table provides the amount of Sharps Waste Containers distributed by county.

### Sharps Distributed by County

County	Provided at POS	Initiated at POS	Website Requests	Toll-Free Number Requests	Total
Alameda	96	3	1	0	100
Calaveras	0	0	2	0	2
Humboldt	24	0	0	0	24
Kern	192	6	6	0	204
Los Angeles	2,040	3	4	0	2,047
Marin	0	0	3	0	3
MERCED	0	3	0	0	3
Monterey	240	0	0	0	240
Orange	288	0	6	0	294
Riverside	0	3	0	0	3
Sacramento	408	0	11	0	419
San Bernardino	336	0	0	0	336
San Diego	96	0	1	0	97
San Mateo	0	0	3	0	3
Ventura	24	0	0	0	24
Online	24	0	0	0	24
<b>Total</b>	<b>3,768</b>	<b>18</b>	<b>37</b>	<b>0</b>	<b>3,823</b>

\*POS - Point of Sale

### B. Return of Home-Generated Sharps Waste

*14 CCR 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)*



### Total Sharps Distributed and Returned

Type	# Distributed	# Received at Destruction	# Destroyed	Total Pounds Destroyed
Sharps Waste Containers	3,823	11*	0	0

\*11 containers received for destruction in 2022, however none were destroyed. They will be included in the 2023 Annual Report.

### Sharps Waste Destruction by Method

Type	# Distributed	# Received at Destruction	# Destroyed	Total Pounds Destroyed
Website Request	37	1	0	0
Initiated at POS	18	0	0	0
Distributed at POS	3768	10	0	0
Toll-Free Number	0	0	0	0
<b>Total</b>	<b>3823</b>	<b>11</b>	<b>0</b>	<b>0</b>

\*POS - Point of Sale

### C. Supplemental Collection Method(s) for Home-Generated Sharps Waste

14 CCR 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

14 CCR 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)

The Foundation did not host any take-back events or participate in any supplemental collection methods during the Reporting Period.

## IV. Transporters and Disposal Facilities

*14 CCR 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*

The Foundation has a serialization system in place that allows for the tracking of Sharps Waste Containers Mailers from initial shipment through destruction. This process is described in detail in the Foundation's approved Plan, Section VII.

A list of Transporters and Disposal Facilities can be found in an accessible Excel spreadsheet titled *Attachment A: Service Providers and Weights*.

## V. Policies and Procedures

*14 CCR Section 18973.5(e). 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*

Policies and procedures for collecting, transporting, and disposing of Home-Generated Sharps Waste as established in the Stewardship Plan were followed correctly. There were no instances of noncompliance, therefore no corrective actions taken.

## VI. Description of Updates

*14 CCR 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*

Since The Foundation's Plan for Home-Generated Sharps Waste was approved by the Department, the Foundation has implemented the following updates:

- The Foundation is constantly evaluating plan operational efficiency and exploring opportunities to run more effectively. Recently, the Foundation's selected Service Provider added a new destruction location in California for Sharps Waste Containers to be autoclaved. The Foundation is in the process of seeking approval from the California Department of Public Health (CDPH) for the addition of this location as the Foundation

strongly believes that having fulfillment and destruction of Sharps Waste Containers within the state of California results in efficiency, as well as reducing the carbon footprint in the state of California.

In the upcoming Reporting Period, the Foundation plans to implement the following updates:

- Providing Ultimate Users with tracking information once an order for Sharps Waste Containers has been received
- Implementing an auto-replenishment system for interested Point of Sale Locations. The Foundation is exploring this option for Ultimate Users as well. The auto-replenishment option would occur once a Sharps Waste Container is received for destruction. The Foundation believes this system would prevent down time and forecast usage trends. This will be done by analyzing the rate of usage and ordering from Point of Sale Locations.
- The Foundation is exploring the option of providing Household Hazardous Waste (HHW) facilities with larger container options. This will be driven by feedback from Ultimate Users and HHW facilities. This will also be evaluated on an as-needed basis.
- The Foundation is working with Ulti-Med as a participating Covered Entity commencing January 1, 2023. Disposal locations previously approved in Ulti-Med's plan will be incorporated into the Foundation's plan and reported on accordingly.

## VII. Ordinance Repeal

*14 CCR Section 18973.5(g): 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.*

There were no ordinance's repealed in the state of California during the Reporting Period, therefore it was not necessary for the Foundation to expand into jurisdictions not previously included in the Stewardship Plan.

## VIII. Safety or Security Concerns

*14 CCR 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.*

There are no Safety or Security Concerns for the Reporting Period.

## IX. Educational Efforts and Public Outreach

*14 CCR 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*

During the Reporting Period, the Foundation provided educational materials in accordance with the approved Plan, Section VIII to Point of Sale Locations that participated in the Program and upon request, to persons authorized to prescribe drugs, hospitals, Pharmacies, pharmacists, Ultimate Users and other locations as necessary.

These educational materials were intended to both educate the Point of Sale Locations and Ultimate Users on how to find and order Sharps Waste Containers, as well as provide information on the Program, education about the implications of improper Sharps disposal and guidance on separation of Covered Products from non-Covered Products. The Foundation plans to initiate twice monthly social media posts on three different platforms, quarterly influencer posts, bi-annual Programmatic Advertising, as well as bi-annual direct mail campaigns.

Sample educational and promotional material can be found in Appendix A. Samples are provided in English and Spanish but all educational and promotional documents are produced in accordance with the languages outlined in the Foundation's approved Plan.

Due to the short timeframe available in the Reporting Period for outreach, the Foundation is unable to make determinations on the metrics and what they reveal about overall public awareness. The Foundation will be implementing an annual survey beginning in 2023 to better ascertain the results of outreach efforts.

In accordance with PRC Section 42031.6(b), the Foundation ensured that all education and outreach material was consistent with services offered to Ultimate Users during the Reporting Period.

## X. List of Participating Covered Entities

*Senate Bill No. 212 Chapter 1004 Article 4 Section 42033.2(b)(1): An annual report submitted pursuant to paragraph (1) of subdivision (a) shall include, at a minimum, all of the following for the prior year. A list of covered entities participating in the stewardship organization.*

*14 CCR 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

A list of participating Covered Entities can be found in the accessible Excel spreadsheet titled *Attachment B: Covered Entities and Covered Products – Sharps*.

## XI. Covered Products

*14 CCR 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.*

A list of Covered Products can be found in the accessible Excel Spreadsheet titled *Attachment B: Covered Entities and Covered Products – Sharps*.

## XII. Service Provider Selection Process

*14 CCR Section 18973.5 (l) Description and evaluation of the process for selecting service providers, if applicable.*

The affairs and operations of the Foundation are managed by, or under the control of the Governing Board on behalf of the Covered Entities. The Governing Board has elected three officers to manage day-to-day matters of The Foundation: Chris Smith, R.Ph, President, Lee Smith, Treasurer, and Jon Pierce, Secretary. The Foundation and the Covered Entities recognize they are ultimately responsible for the performance and execution of the services described in the Plan in accordance with the Drug Take-Back Laws.

To meet certain of those obligations, the Foundation has entered into a service agreement with Inmar Rx Solutions (“Inmar”), who will provide services that contribute to satisfying certain Program requirements. The Foundation has made a determination, based on good business judgment, that Inmar was a commercially reasonable choice for providing the needed services. These services include:

- Identifying and soliciting Point of Sale Locations and managing agreements
- Handling and disposal of Covered Products including transportation and destruction
- Oversight of alternative forms of collection:
  - Managing collection events
- Education and outreach, including Program educational materials, promotional activities, Program website and toll-free number

Selection of Service Providers must be brought before The Foundation's Governing Board and passed by unanimous vote.

The Foundation contracts with Inmar to conduct a formalized Service Provider selection process. This process typically consists of a request for proposal for a specific service to known service providers. Interested parties are given the opportunity to indicate their interest and

prepare a presentation, as well as answer questions developed by the Foundation to better understand the service provider's capabilities. The Foundation then selects a Service Provider based on a competitive pricing analysis, regulatory compliance, security, safety and services standards.

### XIII. Incentives

*14 CCR Section 18973.5(m) Description of any grants, loans, sponsorships, reimbursements, or other incentives provided, as applicable.*

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

### XIV. Staffing Changes

*14 CCR Section 18973.5 (n) Description of changes in staffing of the stewardship program.*

There were no staffing changes in the Stewardship Program during the Reporting Period.

### XV. Coordination Efforts

*14 CCR 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.*

Due to the operational date of November 11, 2022, The Foundation was unable to coordinate with existing Program Operators during the Reporting Period. However, The Foundation is currently working with other Program Operators to establish a neutrally branded mutual website, neutrally branded Program logo, and toll-free telephone number. The Foundation plans to meet all educational and outreach efforts individually, but is willing and able to collaborate on these items as well. An agreement was signed between Program Operators on March 3, 2023 and work will begin 4/12/2023. In order for all Program Operators to coordinate, there will be a third-party vendor for the toll-free phone number and neutrally branded website contracted individually by all Program Operators. Once the contracting process with the third-party is complete, the development work will begin.

The toll-free phone number will be created in order for Ultimate Users to call and inquire about locations to dispose of Home-Generated Sharps, request Sharps Waste Containers be mailed directly to the Ultimate User, and other Program information.

The mutually branded website will serve as a single source of information for Ultimate Users to avoid any confusion regarding multiple Program Operators. The website will be mutually branded by utilizing an agreed upon logo created for the joint website. The website will allow Ultimate Users to order Sharps Waste Containers, view Program information, educational information, and other Program advocacy. The Foundation will be distributing Sharps Waste

Containers equally amongst other Program Operators.

## XVI. Local Agency Requests

14 CCR Section 18973.5(p) 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).

The Foundation received one local agency request during the Reporting Period. The Foundation accepted this request and processed reimbursement within the timelines specified in 14 CCR Section 18973.3(g)(2).

Request Date	Name	Location	Reimbursement	Collected (Lbs)	Status
11/29/2022	Recology Butte Colusa Counties	PO Box 1512 Oroville CA 95965	\$778	516	Accepted

## XVII. Expenses

14 CCR 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).

The table below represents actual expenses during the Reporting Period.

Expense Category	Total Expense
Capital Expenses	\$ 0
Operational Costs	\$ 578,203.47
Education and Outreach	\$ 42,040.00
Administrative Costs	\$ 368,310.21

Grants, Loans, Sponsorships and Other Incentives	\$ 0
Departmental Administrative Fees	\$ 0
<b>Total Expenses for Reporting Period</b>	<b>\$ 988,553.68</b>

## XVIII. State Agency Determinations

*14 CCR 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.*

There were no state agency determinations of compliance, noncompliance, and superseding determinations of compliance for the reporting period.

## XIX. Certification Statement

As required by 14 CCR Section 18973(e), I hereby declare, under penalty of perjury, that the information provided in this document is true and correct, to the best of my knowledge.



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## Appendix A – Educational and Printed Materials



### California's Sharps Waste Stewardship Retailer FAQ

#### 1. What is California's Sharps Waste Stewardship Program?

The Sharps Waste Stewardship Program, introduced under SB 212, provides Californians with a program to discard home-generated sharps waste. This program requires manufacturers of certain pharmaceutical and sharps products to provide or fund disposal solutions. This is accomplished through their participation in a stewardship organization, which manages the collection of home-generated sharps waste.

California's related legislation states "a stewardship program, under which a manufacturer or distributor of covered drugs or sharps, or other entity defined to be covered by the bill, would be required to establish and implement, either on its own or as part of a group of covered entities through membership in a stewardship organization, a stewardship program for covered drugs or for sharps, as applicable." 2017 Cal SB 212, ch. 1004.

A program must "provide that a stewardship program for home-generated sharps waste shall be a mail-back program for home-generated sharps waste that complies with this chapter and that meets all the following requirements: (i) The program provides or initiates distribution of a sharps waste container and mail-back materials at the point of sale, to the extent allowable by law. Containers and mail-back materials shall be provided at no cost to the ultimate user. The program operator shall select and distribute a container and mail-back materials sufficient to accommodate the volume of sharps purchased by an ultimate user over a selected time period." Cal. Pub. Res. Code § 42032.2(d)(1)(F)(i).

#### 2. What is a covered sharps product?

"Covered product" means a covered drug or home-generated sharps waste.

"Home-generated sharps waste" has the same meaning as defined in Section 117671 of the Health and Safety Code.

"Sharps" means hypodermic needles, pen needles, intravenous needles, lancets and other devices that are used to penetrate the skin for the delivery of medications.

Cal. Pub. Res. Code § 42030(g),(l)(1) and (u).

#### 3. Who is a covered entity?

"Covered entity" means the manufacturer of covered products sold in or to the state. Or, if no entity meets that definition in the state, "covered entity" means the distributor of covered products that are sold in or to the state that is licensed as a wholesaler, as defined in Section 4043 of the Business and Professions Code. This does not include a warehouse of a retail pharmacy chain that is licensed as a wholesaler if it engages only in intracompany transfers between any division, affiliate, subsidiary, parent, or other entity under complete common ownership and control. Cal. Pub. Res. Code § 42030(f)(1).

#### 4. What is a point of sale?

"Point of sale" means the point in time at which an ultimate user purchases a covered drug or sharp at a pharmacy or other retailer, including but not limited to an online retailer. Cal. Code Regs. tit. 14, § 18972.1(a)(9).

Figure 1 – FAQ Sheet for Point of Sale Locations – Front



### **5. What is the responsibility of the point-of-sale?**

The point of sale must:

- (A) Provide a sharps waste container and mail-back materials to the ultimate user, at the point of sale or prior, at no cost to the ultimate user; or,
- (B) Arrange, at the point of sale or prior, for a sharps waste container and mail-back materials to be sent to the ultimate user and arrive within five (5) business days at no cost or inconvenience to the ultimate user; or,
- (C) Execute other methods of providing a sharps waste container and mail-back materials to the ultimate user at the point of sale or prior, at no cost to the ultimate user, if the method identified in subpart (A) above is not allowed by law and if the method identified in subpart (B) above is not allowed by law. These methods must be approved by the department in a stewardship plan and result in substantially the same level of convenience to the ultimate user as the methods identified in subparts (A) and (B) above.

Cal. Code Regs. tit. 14, § 18972.1(a)(10)

*Figure 1 - FAQ Sheet for Point of Sale Locations - Back*



# RETURNING SHARPS

MAKE IT EASY FOR YOUR PATIENTS

## California Sharps Waste Stewardship Program

CalRecycle is now mandating the distribution of sharps waste containers to customers at point-of-sale locations. Retailers like you are required to offer, provide, or initiate the distribution of these containers to customers who are prescribed sharps products.



**The Drug Takeback Solutions Foundation's program makes it easy and is provided at no cost to you!**

This free program enables everyone in your community to safely and easily dispose of sharps products in their own homes.

FOR QUESTIONS, EMAIL:

**INFO@TAKEBACKFOUNDATION.ORG**

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RX-SS-12512-COTB 08232022

### PROGRAM OPTIONS:

- **Bulk Shipment to Your Location:** Supply of sharps waste containers shipped to your location to be distributed in-store.
- **Ship Direct to Consumer:** A stress-free way to initiate orders for your customers. Sharps waste containers sent directly to the customer via online order placed in store.

### HOW DO I GET STARTED?

- For enrollment, contact **info@takebackfoundation.org** with your store location, address, phone number, contact name, and your preferred program option. We'll reply with what you need to set up and participate in either (or both!) of the options above.
- You'll be provided with instructions on how to start your program and pamphlets that explain the program to customers.



**Each year, 936 million needles are used by self-injectors in California, with approximately 24,000 needlesticks occurring outside the healthcare industry.**

Your participation helps reduce the number of accidental needlesticks in California.

Figure 2 - Program Information Sheet for Point of Sale Locations

## SAFELY DISPOSE OF SHARPS

Protect Your Families, Communities  
and the Environment

### WHAT SHOULD YOU DO WITH USED OR UNWANTED SHARPS?

Choose safe disposal!  
Check out these easy options.



**1**

**MAIL-BACK**



**2**

**TAKE-BACK  
EVENTS**



**3**

**LOCAL  
HOUSEHOLD  
HAZARDOUS  
WASTE  
FACILITY**

Go to [www.safemedicinedrop.com](http://www.safemedicinedrop.com)  
or call **1-888-371-0717** to learn more.





To find this material in  
additional languages, scan this QR code.



**DRUG TAKEBACK SOLUTIONS  
FOUNDATION**



### WHY IS SAFE SHARPS DISPOSAL IMPORTANT FOR PUBLIC HEALTH?

Proper disposal of sharps saves lives and protects the environment.

- 43% of California's self injectors throw needles in the trash.
- In 2020, one million people reported abusing injectable drugs.
- Placing sharps in a trash bin can cause needlestick injuries and spread infectious diseases like HIV or hepatitis.

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of The Drug Takeback Solutions Foundation

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Figure 3 – Educational Brochure – Front



## SAFELY DISPOSE OF SHARPS

Protect Your Families, Communities  
and the Environment

### DISPOSAL OPTIONS



#### MAIL-BACK SERVICES

To request mail-back services for used or unwanted sharps, visit [www.safemedicatedrop.com](http://www.safemedicatedrop.com) or call 1-888-371-0717.



#### TAKE-BACK EVENTS

Local take-back events offer residents a convenient way to dispose of used or unwanted sharps. To find a take-back event near you, visit [www.safemedicatedrop.com](http://www.safemedicatedrop.com) or call 1-888-371-0717.



#### VISIT YOUR LOCAL HOUSEHOLD HAZARDOUS WASTE FACILITY

Go to [www.safemedicatedrop.com](http://www.safemedicatedrop.com)  
or call 1-888-371-0717 to learn more.



## WHAT CAN YOU DISPOSE OF IN A SHARPS WASTE CONTAINER?



### ACCEPTED:

Hypodermic, pen, and intravenous needles, lancets and other devices used to penetrate the skin.

### NOT ACCEPTED:

Medical devices not used to penetrate the skin, herbal remedies, vitamins, supplements, cosmetics, other personal care products, batteries, mercury-containing thermometers, illegal drugs and pet pesticide products.

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Figure 3 - Educational Brochure - Back



**DRUG TAKEBACK SOLUTIONS  
FOUNDATION**



## **FREE SHARPS DISPOSAL**

### **DISPOSE OF YOUR SHARPS\* SAFELY THROUGH OUR FREE PROGRAM**



**Request a container today!  
Pick the option best for you:**

- 1 Directly from the pharmacy. See pharmacist for details.
- 2 Call us at 1-888-371-0717.
- 3 Order online for home delivery.

**Ordering online?**

- 1 Go to [www.safemedicedrop.com](http://www.safemedicedrop.com) or scan the QR code
- 2 Enter your zip code
- 3 Select 'California Sharps Program'
- 4 Enter your information
- 5 Select 'User' and submit

**For more information about the program, go to  
[www.safemedicedrop.com](http://www.safemedicedrop.com) or call us at 1-888-371-0717.**

\*Sharps include: hypodermic needles, pen or intravenous needles, lancets and other devices that penetrate the skin to deliver medication.

Figure 4 - Pharmacy Flier - English





**DRUG TAKEBACK SOLUTIONS  
FOUNDATION**



**ELIMINACIÓN GRATUITA DE  
OBJETOS PUNZOCORTANTES**  
**DESECHE SUS OBJETOS PUNZOCORTANTES\***  
**DE FORMA SEGURA A TRAVÉS DE NUESTRO  
PROGRAMA GRATUITO**



**¡Solicite un contenedor hoy mismo!**  
**Elija la opción que más le convenga:**

- 1 Directamente de la farmacia.  
Consulte al farmacéutico para más detalles.
- 2 Llámenos al teléfono 1-888-371-0717.
- 3 Haga su pedido por internet para recibirlo en su domicilio.

**¿Pedido por Internet?**

- 1 Visite [www.safemedicinedrop.com](http://www.safemedicinedrop.com)  
o escanee el código QR
- 2 Ingrese su código postal
- 3 Seleccione "California Sharps Program"  
[Programa de objetos punzocortantes de California]
- 4 Ingrese sus datos
- 5 Seleccione "User" [Usuario] y envíe

**Para obtener más información, visite [www.safemedicinedrop.com](http://www.safemedicinedrop.com)  
o llámenos al teléfono 1-888-371-0717.**

\* Los objetos punzocortantes incluyen agujas hipodérmicas, agujas de pluma o agujas intravenosas, lancetas y otros dispositivos que penetran la piel para administrar medicamentos.

Figure 4 - Pharmacy Flier - Spanish



**DRUG TAKEBACK SOLUTIONS  
FOUNDATION**

**SAFELY DISPOSE OF YOUR SHARPS\***



**STEPS TO ORDER YOUR SHARPS WASTE CONTAINER:**



- 1** Go to [www.safemedicedrop.com](http://www.safemedicedrop.com) or scan the QR code
- 2** Enter your zip code
- 3** Select 'California Sharps Program'
- 4** Enter your information
- 5** Select 'User' and submit

or call us at: **1-888-371-0717** to request your sharps waste container today!

\*Sharps include: hypodermic needles, pen needles, intravenous needles, lancets, and other devices used to penetrate the skin for the delivery of medication.

*Figure 5 – Staple to Script – English*



**DRUG TAKEBACK SOLUTIONS  
FOUNDATION**

**ELIMINE DE FORMA SEGURA SUS  
OBJETOS AFILADOS\***



**PASOS PARA PEDIR SU CONTENEDOR DE RESIDUOS AFILADOS:**



- 1** Vaya a [www.safemedicedrop.com](http://www.safemedicedrop.com) o escanee el código QR
- 2** Ingrese su código postal
- 3** Seleccione 'California Sharps Program' [Programa Sharps de California]
- 4** Ingrese sus datos
- 5** Seleccione 'User' [Usuario] y envíelo

o llámenos al teléfono: **1-888-371-0717** ¡para solicitar su contenedor de residuos afilados hoy mismo!

\*los objetos afilados incluyen: agujas hipodérmicas, agujas de pluma, agujas intravenosas, lancetas y otros dispositivos utilizados para penetrar la piel para la administración de medicamentos.

*Figure 5 – Staple to Script – Spanish*



# SAFELY DISPOSE OF YOUR SHARPS

\*Sharps include:  
hypodermic needles,  
pen needles, intravenous  
needles, lancets, and other  
devices used to penetrate  
the skin for the delivery  
of medication.



Figure 6 - Ultimate User Pamphlet - Front - English



**DRUG TAKEBACK SOLUTIONS  
FOUNDATION**

**STEPS TO ORDER YOUR SHARPS WASTE CONTAINER:**



- 1 Go to [www.safemedicinedrop.com](http://www.safemedicinedrop.com) or scan the QR code
- 2 Enter your zip code
- 3 Select 'California Sharps Program'
- 4 Enter your information
- 5 Select 'User' and submit

or call us at: 1-888-371-0717 to request your sharps waste container today!  
\*Inmar Rx Solutions is the service provider for The Drug Takeback Solutions Foundation

Figure 6 - Ultimate User Pamphlet - Back - English