

# The Drug Takeback Solutions Foundation State of California Stewardship Plan for Covered Drugs 2023 Annual Report

Reporting Period: 01/01/23 through 12/31/2023

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## I. Contact Information

14 CCR section 18973.4(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 Mailing: P.O. Box 997, Winston-Salem, NC 27102 Physical: Takeback Solutions Foundation 3929 West Point Blvd, Ste D, Winston-Salem NC 27103 Phone Number: (336) 770-3550 Email Address: Lee.Smith@takebackfoundation.org Website: https://www.takebackfoundation.org/

Primary contacts for The Foundation have not changed in the Reporting Period.



## II. Executive Summary

PRC 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 18973.4: 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 18973.4(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, achievement of the Convenience Standards pursuant to subsection (1)(F) of subdivision (a) of section 42032.2 of the Public Resources Code, education and outreach efforts, and ways in which challenges are being addressed.

The Drug Takeback Solutions Foundation ("The Foundation") operates a Product Stewardship Plan for Covered Drugs ("Plan") under Chapter 2 (commencing with section 42030), Part 3, Division 30 of the California Public Resources Code ("PRC"), and the California Code of Regulations ("CCR") Title 14, Division 7, Chapter 11, Article 4 ("the Regulation") (collectively the "Drug Take-Back Laws"). The Director of the California Department of Resources Recycling and Recovery ("CalRecycle") approved The Foundation's Stewardship Plan for Covered Drugs on December 20, 2022.

Pursuant to PRC section 42033.2(a)(1) and 14 CCR section 18973.4(b), this 2023 Annual Report ("Report") for Covered Drugs summarizes the program implementation and operation activities between January 1, 2023, and December 31, 2023 ("Reporting Period"). 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**

The Foundation's primary focus during the Reporting Period was to expand the geographical spread of Collection Receptacles by educating potential Authorized Collectors about the Product Stewardship Program ("Program") and to make continual progress towards the Convenience Standard. To that end, The Foundation conducted outreach via mail, email, and telephone communications to potential Authorized Collectors to make reasonable efforts to gain their participation in the Program pursuant to PRC section 42032.2(b)(2).

During the Reporting Period, The Foundation enrolled 52 new Authorized Collection Sites for a total of 457 Authorized Collection Sites in the Program. However, of the 457 Authorized Collection Sites, six locations closed their Pharmacy during the Reporting Period and are no longer participating in the Program. Accordingly, at the end of the Reporting Period, The Foundation had 451 active Authorized Collection Sites. The Foundation secured an additional 27 Mail-Back Distribution Sites, for a total of 622 Mail-Back Distribution Sites to supplement Collection Receptacles in counties that do not have the minimum number of Authorized



Collection Sites due to circumstances beyond The Foundation's control.

The Authorized Collection Sites collected 2,131 Inner Liners, which is 37% more than in the previous year. This equates to 69,000.44 pounds of Unwanted Covered Drugs, which is 36% more than in the previous year. There were 6,688 Mailers returned, which is 290% more than in the previous year. Collected drugs from all Mailer types totaled 2,800.45 pounds, which is 223% more than in the previous year. The total weight of collected Unwanted Covered Drugs through all forms of collection was 71,800.89 pounds, which is approximately 28% more than in the previous year.

The primary challenge The Foundation faced in meeting the Convenience Standard was the inability to place additional Collection Receptacles at Authorized Collection Sites due to circumstances beyond The Foundation's control. Authorized Collectors provided the following reasons for not permitting Collection Receptacles to be placed at their Authorized Collection Sites: safety and diversion concerns, space constraints, internal take-back programs, lack of interest or response, improper licensing, no public access, fear or desire to avoid interactions with the California Board of Pharmacy, and pharmacists' responsibility or potential liability for supporting the Program. Additionally, The Foundation was told that it is contractually prohibited from approaching three of the five major Pharmacy Retail Chains, resulting in an available Authorized Collector pool that is not large enough to meet the Convenience Standard. Accordingly, The Foundation is utilizing Mail-Back Distribution Sites as a supplemental service in some counties, and The Foundation will work in collaboration with CalRecycle to establish Mail-Back Distribution Sites in other counties that do not have the minimum number of Authorized Collection Sites due to circumstances beyond The Foundation's control. The Foundation continues to evaluate additional Authorized Collection Sites to increase the number of Collection Receptacle Sites in these counties.

The Foundation conducted a comprehensive education and outreach program in accordance with the approved Plan, as detailed in Section IX of this Report. Education and outreach conducted in the Reporting Period consisted of programmatic advertising, influencer media campaigns, social media, direct mail to Ultimate Users, and traditional media campaigns designed to ensure that Ultimate Users, Authorized Collectors, and other parties easily and widely understand where and how to return Covered Drugs.



#### III. Collection System

14 CCR section 18973.4(c)(1) Describe How ultimate users had an opportunity to dispose of their covered drugs as described in the approved stewardship plan.

During the Reporting Period, Ultimate Users were able to dispose of Covered Drugs at 457 Authorized Collection Sites in the State. Ultimate Users also had the opportunity to receive Mailers from 622 Mail-Back Distribution Sites, through the Program website, or by dialing the toll-free number. These mechanisms allowed Ultimate Users to dispose of their Unwanted Covered Drugs through USPS at no cost.

#### A. Establishing Authorized Collection Sites

14 CCR section 18973.4(c)(2) Efforts between the program operator and potential authorized collectors to establish authorized collection sites, including, but not limited to:

(A) Pursuant to section 18973.2(d)(2), efforts to notify potential authorized collectors of the opportunity to serve as an authorized collector for the stewardship program in the counties in which the program operated, and the list of potential authorized collectors that were notified.

(B) Pursuant to section 18973.2(d)(3), the process by which good faith negotiations with potential authorized collectors were conducted.

(C) Pursuant to section 18973.2(d)(4), efforts to work with retail pharmacies and retail pharmacy chains to fulfill the requirement in section 42032.2(b)(2) of the Public Resources Code, if applicable.

(D) Pursuant to section 18973.2(d)(5), efforts to incorporate potential authorized collectors that submitted a written offer to join the stewardship program, and the list of potential authorized collectors that submitted written offers.

(E) Pursuant to section 18973.2(d)(6), a list of potential authorized collectors that submitted a written offer to join the stewardship program and were rejected, and the reason(s) for each rejection.

(F) Description of how the program operator complied with the requirement in section 18973.2(d)(7).

During the 2023 Reporting Period, The Foundation continued to engage with potential Authorized Collectors to establish additional Authorized Collection Sites in the State. Outreach was performed via letters, calls, and emails to 9,655 Potential Authorized Collector under the Plan. The Foundation identified retail pharmacies and retail pharmacy chains in accordance with 42032.2(b)(2) to work towards a minimum of five authorized collection sites or one authorized collection site per every 50,000 people. The Foundation explained to retail pharmacies and retail pharmacies and retail pharmacies during the Public Resources Code to participate in a drug stewardship Program. The list of potential Authorized Collectors who were contacted is provided in Attachment A: Potential Authorized Collectors Notified.

Negotiations with potential Authorized Collectors were conducted via telephone according to the process described in the Plan, Section VI(c)(1). These discussions covered, among other topics, the DEA requirements for proper placement, installation,



and operation of the Collection Receptacle. Once an understanding of operational needs was reached with an Authorized Collector, The Foundation confirmed interest and executed an agreement to establish the potential collector as an Authorized Collector. The Foundation worked with the Authorized Collector to modify its DEA registration, where necessary, and provided training materials on Collection Receptacle operations and general Program information for the pharmacy staff.

The Foundation received seven written offers from potential Authorized Collectors to participate in the Stewardship Program during the Reporting Period. The Foundation accepted two of the offers and provided each site with a Collection Receptacle. One offer from a potential authorized collector site was not accepted because the site was a grocery store with no on-site pharmacy. This site was not added as a potential authorized collector as they do not meet the requirements for hosting and were informed as such via a phone call. The Foundation contacted the remaining four interested potential collection sites but was unable to make contact with the site after initial contact was made. The Foundation is actively trying to re-establish contact with each of these potential Authorized Collectors. A full list of written offers to participate is provided in *Attachment B: 2023 Collection Information, Tab (D) Written Participation Offers*.

The Foundation's service provider participated in a Request for Proposal ("RFP") with several retailers in an effort to establish additional Authorized Collection sites. This effort was unsuccessful due to contractual obligations with those retailers' existing provider.

Good faith negotiations were initiated with all potential Authorized Collectors who expressed interest in participating within 30 days as required by 14 CCR section 18973.2(d)(3).

#### B. Convenience Standard

14 CCR section 18973.4(c)(3) How the Convenience Standards pursuant to subsection (1)(F) of subdivision (a) of section 42032.2 of the Public Resources Code were met. Include necessary changes to calculations that account for changes in the number of authorized collection sites and most recent publicly available population calculations from the State of California Department of Finance. If the Convenience Standards were not met, describe efforts made to achieve compliance.

The Foundation met the Convenience Standard in 28 counties in which it operates.

 The Foundation established the required number of Authorized Collection Sites in six counties.



• The Foundation provided supplemental service, Mail-Back Distribution Sites, in 22 counties that do not have the minimum number of Authorized Collection Sites due to circumstances beyond The Foundation's control.

In addition to the 28 counties in which The Foundation met the Convenience Standard, The Foundation also operates in 22 counties that did not have the minimum number of Authorized Collection Sites, due to circumstances beyond The Foundation's control, nor sufficient Mail-Back Distribution Sites.

- In 17 counties, The Foundation established either Authorized Collection Sites and/or Mail-Back Distribution Sites, but these counties did not meet the minimum number of Authorized Collections Sites and/or Mail-Back Distribution Sites during the Reporting Period.
- In the remaining 5 counties, there are no Authorized Collection Sites or Mail-Back Distribution Sites, but 2 counties that were in this category in the prior Reporting Period (Colusa and Plumas) now each have one Authorized Collection Site.

In these 22 counties, The Foundation continues its efforts to establish Authorized Collection Sites. The Foundation conducted extensive outreach during the Reporting Period, as detailed below. The Foundation will also work collaboratively with CalRecycle to establish Mail-Back Distribution Sites to supplement service in the 22 counties that do not have the minimum number of Authorized Collection Sites due to circumstances beyond The Foundation's control, nor sufficient Mail-Back Distribution Sites.

On January 8, 2024, CalRecycle indicated that The Foundation had provided sufficient information to describe the circumstances beyond its control to establish Mail-Back Distribution Sites in 38 counties.

The circumstances beyond The Foundation's control are detailed below in <u>Efforts To</u> <u>Achieve Convenience Standard.</u>

At the end of the Reporting Period, The Foundation's Program had 451 Collection Receptacles and 622 Mail-Back Distribution Sites totaling 1,071 sites. A list of potential Authorized Collection Sites can be found in *Attachment A: Potential Authorized Collectors Notified*, which includes the corresponding method of outreach. This list encompasses both potential Authorized Collectors and Mail-Back Distribution Sites.

During the Reporting Period, The Foundation established new Authorized Collection Receptacles and Mail-Back Distribution Sites in the following counties:



County	# Collection Receptacle	# Mail-Back Distribution Sites
Amador	1	0
Butte	0	1
Calaveras	1	0
Colusa	1	0
Contra Costa	0	1
Del Norte	0	1
Kern	0	8
Fresno	1	5
Los Angeles	14	0
Madera	3	0
Monterey	4	0
Nevada	1	0
Placer	1	0
Plumas	1	0
Riverside	5	4
Sacramento	3	1
San Bernardino	1	2
San Diego	3	2
Shasta	1	0
Solano	1	0
Sonoma	0	1
Sutter	1	0
Ventura	1	0
Yuba	0	1
Total	44	27

#### New Disposal Options Secured by County During the Reporting Period

#### Efforts To Achieve Convenience Standard

The Foundation focused its efforts to achieve the Convenience Standard by prioritizing counties that do not have the minimum number of Authorized Collection Sites due to circumstances beyond The Foundation's control. In the Reporting Period, these efforts included: conducting research via internet searches, using available internal sales tools,



and leveraging current retail partners to identify potential pharmacies and law enforcement agency sites to serve as additional Authorized Collection Sites. The Foundation also evaluated alternative types of Authorized Collectors such as Long-Term Care Facilities.

The Foundation has made progress toward the Convenience Standard by establishing 52 Authorized Collection Sites for a total of 457 Authorized Collection Sites in California. However, of the 457 Authorized Collection Sites, six locations closed their Pharmacy. At the end of the Reporting Period, The Foundation had 451 active Authorized Collection Sites.

The Foundation also made progress in working towards meeting the Convenience Standard in the counties that did not meet the minimum number of Authorized Collection Sites due to circumstances beyond The Foundation's control.

The circumstances beyond The Foundation's control include the following:

- There are a limited number of pharmacies in the following 13 counties: Alpine, Colusa, Del Norte, Glenn, Inyo, Lassen, Mariposa, Modoc, Mono, Plumas, San Benito, Sierra, and Trinity. The Foundation is identifying potential alternative Authorized Collector locations to increase the number of sites in these rural counties. Because both Program Operators must meet the Convenience Standard independently, in rural counties with less than 50,000 people, there would need to be <u>ten</u> Authorized Collection Sites, rather than five.
- When The Foundation reached out to the limited number of potential Authorized Collectors in these 13 counties, they declined to place Collection Receptacles for the following reasons: safety and diversion concerns, space constraints, internal take-back programs, lack of interest or response, improper licensing, no public access, fear or preference against interactions with the California Board of Pharmacy, and not wanting to take on additional pharmacist responsibilities.
- In addition, the other Program Operator has contractual agreements with three of the five largest Retail Pharmacy chains in these counties. Accordingly, The Foundation is contractually prohibited from approaching these chains for expansion at a site-by-site level. This significantly and materially limits The Foundation's ability to establish Authorized Collection Sites in these counties.
- There are also challenges created by the closure of many pharmacies in California.<sup>1</sup> As pharmacies close, this limits potential opportunities for establishing new Authorized Collection Sites.

<sup>&</sup>lt;sup>1</sup> For example, in March 2024, <u>Rite Aid</u> announced it was closing 22 stores in California and <u>CVS</u> announced it would close dozens of stores nationwide which may include stores in California.



#### Convenience Standard Calculation

The Foundation utilized the State of California Department of Finance 2023 publicly available reported population data to re-calculate the current Convenience Standard per county. This data was used in determining if changes to the number of Authorized Collection Sites were necessary.

Based on the data, the Convenience Standard has been adjusted in the following Counties:

- <u>Los Angeles County:</u> The population decreased to 9,825,708. When factoring five Authorized Collection Sites per 50,000 people, the number of required Authorized Collection Sites decreases to 197.
- <u>Orange County:</u> The population decreased to 3,142,277. The adjusted total of Authorized Collected Sites is now 63, down from 65.
- <u>Placer County</u>: The population increased to 410,706. The adjusted total of Authorized Collection Sites increased by one, which is now a total of nine.
- <u>Sacramento County:</u> The population increased to 1,581,831. The adjusted total of Authorized Collection Sites is now 32, increasing from 31.
- <u>San Diego County</u>: The population decreased to 3,297,860. The adjusted total of Authorized Collection Sites is down to 66 from 67.
- <u>Sonoma County:</u> The population decreased to 479,826. The adjusted total of Authorized Collection Sites is now 10, down from 11.
- <u>Stanislaus County:</u> The population decreased to 545,704. The adjusted total of Authorized Collection Sites is now 11, down from 12.
- <u>Ventura County:</u> The population decreased to 825,937. The adjusted total of Authorized Collection sites is now 17, down from 18.

Taking into consideration the State of California Department of Finance reported population, the total number of Authorized Collection Sites for the State has decreased by 14 Authorized Collection Sites, totaling 771 Authorized Collection Sites. Due to the reduction in population and The Foundation's outreach to potential Authorized Collectors, the Convenience Standard is now met in Ventura County.

#### C. Authorized Collection Sites

- 14 CCR section 18973.4(c)(4) For each participating authorized collection site, include the following: (A) Name and physical address
- (B) Amount of covered drugs collected, as required in the stewardship plan pursuant to section 18973.2(g)(4)
- (C) Number of instances that collected covered drugs were picked up for disposal
- (D) Number of receptacle liners picked up for disposal
- (E) Number of instances and corresponding amount of time the secure Collection Receptacle was not



available to the public during business hours. For each instance, provide a description of why the secure Collection Receptacle was not available.

The name and physical address of each participating Authorized Collection Site, and collection data for each participating Authorized Collection Site, including the number of Inner Liners collected and corresponding weight, are provided in *Attachment B: 2023 Collection Information*. The Foundation uses the number of Inner Liners collected to calculate the number of times Unwanted Covered Drugs were picked up from each Site. Per Section XI(A)(1)(b)(ii) of the Plan, The Foundation uses the average collection weight metrics from each Authorized Collection Site to determine when an Authorized Collection Site needs additional outreach efforts to increase collection utilization or if additional CRCKs are needed beyond the standard allocation.

The Foundation was not notified of any instances of Collection Receptacle temporary closures during the Reporting Period. Accordingly, The Foundation was not alerted to any instances of Collection Receptacles being unavailable to the public. Per Section XI(A)(1)(a) of the approved Plan, The Foundation requires that all Collection Receptacles be unlocked and accessible to the public during all operating hours.

#### D. Mail-Back Distribution Sites

14 CCR section 18973.4(c)(5) For each type of mail-back service utilized, include the following, as applicable: (A) List of distribution locations

(B) Mechanism(s) of distribution

(C) Amount of mail-back materials distributed, as required in the stewardship plan pursuant to section 18973.2(g)(6)(E)

(D) Amount of mail-back material returned, as required in the stewardship plan pursuant to section 18973.2(g)(6)(E)

<u>List of Distribution Locations</u>: The list of Mail-Back Distribution Sites is provided in Attachment B: 2023 Collection Information. During the Reporting Period, The Foundation operated Mail-Back Distribution Sites in 40 counties in the State to supplement the Collection System.

The Foundation began the Reporting Period with 606 established Mail-Back Distribution Sites and added 27 Mail-Back Distribution Sites during the Reporting Period, for a total of 622 Mail-Back Distribution Sites during the Reporting Period.

<u>Mechanisms of Distribution</u>: The mechanisms of distribution for the mail-back service were: Mail-Back Distribution Sites, toll-free number requests, and website requests.



#### Amount of Mail-Back Materials Distributed and Returned

The Foundation distributed all three types of Mail-back options, Standard Mail-Back Envelopes, Inhaler Mail-Back Envelopes, and Combination Product Mail-Back Packages (those utilized for medications with a sharps component) (jointly, "Mailers") to Ultimate Users during the Reporting Period as follows:

- 1690 Standard Mail-Back Envelopes provided by distribution sites
- 44 Standard Mail-Back Envelopes requested via the toll-free number
- 731 Standard Mail-Back Envelopes requested via the website
- 69 Inhaler Mail-Back Envelopes requested from the website
- 408 Combination Product Mail-Back Packages requested from the website
- 23 Combination Product Mail-Back Packages requested from the toll-free number

This resulted in the disposal of 2,704.45 pounds of collected drugs through the return of 6,688 Standard Mail-Back Envelopes, and 61 Combination Product Mail-Back Packages. No Inhaler Mail-Back Envelopes were returned during the Reporting Period.

There is a difference between total distributed and total Mail-Back Envelopes returned due to the fact that there were 606 operational Mail-Back Distribution Sites prior to the Reporting Period, resulting in a large number of Mailers being distributed prior to the Reporting Period, but returned during this Reporting Period.

Per Section XI(A)(2) of the approved Plan, The Foundation uses Mailer return metrics to adjust the number of Mailers distributed to meet the needs of each location.

#### E. Alternative Forms of Collection and Disposal

14 CCR section 18973.4(c)(6) For each alternative form of collection and disposal, include the following, as applicable:

- (A) Method(s) of collection
- (B) Name and address of location(s)
- (C) Number of collections
- (D) Amount of materials distributed, as required in the stewardship plan pursuant to section 18973.2(g)(6)(E)
- (E) Amount of material collected, as required in the stewardship plan pursuant to section 18973.2(g)(6)(E)

# The Foundation did not have any alternative forms of collection or disposal during the Reporting Period.



## IV. Transporters and Disposal Facilities

14 CCR section 18973.4 (d) Transportation and Disposal System. Description of the methods used for transportation and disposal of covered drugs, including the following:

(1) Mechanism(s) for tracking the collection, transportation, and disposal of covered drugs

(2) Name and mailing address of each service provider used to transport or process covered drugs

(3) For each disposal facility, include the following:

(A) Name of disposal facility

(B) Mailing and physical address

(C) Weight of covered drugs disposed

A list of Transporters and Disposal Facilities is provided at *Attachment C: Service Providers*. The weights disposed of at each of the disposal facilities is at *Attachment D: Weights by Disposal Facility*.

The Foundation utilizes a serialization unique identification system imprinted on every Inner Liner and Mailer to track Inner Liners and Mailers from initial shipment through destruction as described in the approved Plan, meeting all federal, state, and local regulatory requirements.

Tracking of Covered Drugs from Collection Receptacles begins with the shipment of the Collection Receptacle Supply Bundle (CRSB) to the Authorized Collector and concludes with the destruction of the collected Covered Drugs at the destruction facility.

Authorized Collectors are required to maintain the Serialization Tracking Form for each Collection Receptacle Collection Kit (CRCK) received at their Authorized Collection Site. The Serialized Tracking Form documents the unique ID of the Inner Liner, as well as the Inner Liner's initiation, removal, packaging, and hand-off to the common carrier (FedEx) for transport, per DEA requirements.

To ensure compliance with Plan safety and operating procedures, the Serialization Tracking Form is validated with the names and signatures of a minimum of two Authorized Collection Site employees and reviewed by the Program Operator and the Authorized Collector.

Serialization Tracking Form data elements tracked include but are not limited to the following:

- Name and address of the Authorized Collector
- Size of Inner Liner
- Pharmacy DEA # (if applicable)
- Name and address of Reverse Distributor/Disposal Site
- Reverse Distributor/Disposal Site DEA #
- Serial Number of CRCK
- Date CRCK received (i.e., date Inner Liner acquired)
- Date Container installed in Collection Receptacle
- Date Container removed from Collection Receptacle



- Date Container transferred to storage
- FedEx tracking number
- Date Container shipped to the licensed DEA Reverse Distributor-Collector Service Provider.

Collection Receptacle contents are packaged and sent by the Authorized Collector using the Service Provider's Department of Transportation (DOT) Special Permit #20499, from the Authorized Collector via FedEx to the Plan's licensed DEA Reverse Distributor-Collector Service Provider. Authorized Collectors retain a copy of the Serialization Tracking Form, a copy of the FedEx tracking information (from when the FedEx representative takes possession of the Container at the Authorized Collection Site and delivers it to the Service Provider), and any other records on file at the Authorized Collection Site for a minimum of three (3) years. Upon receipt of the full Inner Liner(s) shipped from Authorized Collectors, the licensed DEA Reverse Distributor-Collector Service Provider will record all required data, as outlined in the approved Plan, and transmit and track the following data elements for each CRCK:

- Date received
- Number and size of Containers received and destroyed
- Serialized barcode label information
- Serialization Container tracking number
- Method of delivery, signature of individuals delivering Containers and employees who received the Container
- Weight
- Date transported to destruction facility
- Place and method of destruction
- Destruction date
- Manifest number (if applicable)
- Name and signature of the two DEA registrant employees witnessing destruction

All information recorded is transferred to the Program Operator daily. Any discrepancies observed by the licensed DEA Reverse Distributor-Collector Service Provider are recorded on discrepancy reports and corrective action is taken according to Program procedures.

Tracking of Mailers containing Covered Drugs begins with the distribution of Mail-Back Starter Kits (MBSK) to the Mail-Back Distribution Sites and concludes with the destruction of the full Mailer collected at the destruction facility. The full Mail-Back solution, from the Ultimate User, is directly shipped via USPS, to the licensed DEA Reverse Distributor-Collector Service Provider who records the following data elements for each Mailer:

- Date received
- Number and type of Mailer received and destroyed
- Serialized barcode label information



- Serialization Mailer tracking number
- Method of delivery, signature of individuals delivering
- Weight
- Date transported to destruction facility
- Place and method of destruction
- Destruction date
- Manifest number (if applicable)
- Name and signature of the two DEA registrant employees witnessing destruction. .

All information recorded is transmitted to the Program Operator daily for tracking of the Mailers returned using the MBSK's distribution system.

## V. Policies and Procedures

14 CCR section 18973.4(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 covered drugs, 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

Per sections VII (A) and XIII of the Plan, The Foundation followed policies and procedures for collecting, transporting, and disposing of covered drugs. There were no instances of noncompliance, and therefore no corrective actions taken.

## VI. Description of Updates

14 CCR section 18973.4(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 covered drugs from collection through final disposal

There were no updates that were made or will be made to the processes and policies followed to safely and securely collect, track, and properly manage Covered Drugs from collection through final disposal.

## VII. Ordinance Repeal

14 CCR section 18973.4(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. The description shall include an explanation of how the stewardship program will meet the Convenience Standards, pursuant to subsection (1)(F) of subdivision (a) of section 42032.2 of the Public Resources Code.

There were no instances of ordinance repeal in the State of California during the Reporting



Period.

## VIII. Safety or Security Concerns

14 CCR section 18973.4(h) Safety and Security. Describe the general nature of any incidents with safety or security related to collection, transportation, or disposal of collected covered drugs. Explain what corrective actions were taken or will be taken to address the issue and improve safety and security. In addition, 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

There were no Safety or Security Concerns during the Reporting Period.

## IX. Educational Efforts and Public Outreach

14 CCR section 18973.4(i) Education and Outreach. Description and evaluation of the comprehensive education and outreach activities pursuant to section 18973.2(j), 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 18973.2(j)(5)

(3) A discussion of what the metrics, described above in section 18973.4(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 of section 42031.6(b) of the Public Resources Code was met.

The Foundation provided educational materials to Authorized Collection Sites and Mail-Back Distribution Sites that participated in the Program. These educational materials were intended to educate the Authorized Collectors and Ultimate Users on how to find Collection Receptacles and order Mailers and provide information on the Program, drug abuse statistics, and the dangers of improper disposal of unwanted medications.

Sample educational and promotional material can be found in *Appendix A Figure 1*. 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.

In accordance with the Plan, The Foundation implemented the following educational efforts and public outreach:

- Programmatic Advertising
  - Provides targeted display ads on browser sites on internet capable devices (smart phones, computers, tablets, etc.).



- The Foundation ran ads across a prequalified list of over 200,000 domains including a variety of retail websites, Google, and Facebook.
- Ads ran for six weeks, the first in April and the second in October.
- There were a total of 659,500 impressions from both advertisements. Impression metrics are reported directly from the individual websites on which the ads are placed and are reported on a per campaign basis. See *Table 1 in Appendix A* for reported metrics.
- Influencer Programs
  - Influencer marketing is a content creation tactic used to drive awareness and education to a targeted audience through blogs and social media outlets.
     Influencers create authentic content around their everyday lives and interests while weaving the story of prescription drug take-back into their content.
  - Influencer content is converted into paid ad units across social platforms and then targeted to community members across the state of California.
  - Paid advertisements for influencer content were run on a variety of platforms including Google, Instagram and Facebook and drove towards a specified impression goal.
  - Social Media posts were run on three different social media platforms (X, Facebook, and Instagram) twice monthly for a total of 24 posts and 269 impressions.
  - The Foundation ran several social media influencer campaigns concurrently with other traditional and digital media campaigns. Digital media campaigns yielded 3,442,693 impressions. The dates and results of each campaign are listed in *Appendix A Table 1.*
- Direct Mail Campaigns
  - The Foundation sends an average of 400,000 direct mail postcards twice annually, April 2023 and December 2023, directly to Ultimate User's homes as well as continuum of care organizations and homeless shelters throughout the state of California.
  - Used as a means of reaching historically underserved and rural communities which may lack access to computers and the internet, as well as reported low income, racial and ethnic minorities, and other health related disparities.
  - After each direct mail campaign, The Foundation has adjusted the targeted homes for counties having limited disposal options.
  - The Foundation also uses the reported zip codes from the direct mail campaign to shift focus on underserved areas and areas that have lower volume of Mailer requests.



- A copy of the direct mail postcard can be found in *Appendix A Figure 5*. Total number of direct mail postcards along with the corresponding dates can be found in *Appendix A Table 1*.
- Newspaper Advertisements
  - The Foundation utilized three different newspapers to target the three most densely populated areas in California. There was one advertisement in each newspaper on Sundays from December 10, 2023, through December 31, 2023 for three total insertions per newspaper since Sundays have the highest circulation. The Foundation intentionally skipped the Sunday insertions during Holiday weekends due to changes in priorities and work schedules. Newspapers included:
    - The Sacramento Bee, covering Sacramento County, circulates 56,031 newspapers every Sunday, resulting in 168,093 impressions.
    - The LA Times, covering Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County, circulates 481,547 newspapers every Sunday, resulting in 1,444,641 impressions.
    - The San Diego Union Tribune, covering San Diego County, circulates
       137,138 newspapers each Sunday, resulting in 411,414 total impressions.

Together, all three newspapers garnered a total of 2,024,148 impressions, meaning that 2,024,148 readers were served the advertisement. A breakdown of the circulation and total impressions can be seen in *Appendix A Table 2*. Examples of newspaper excerpts can be found in *Appendix A Figures 10, 11, and 12*. This campaign is ongoing and will continue through early 2024.

- Targeted media
  - Cross device display: The Foundation uses contextual targeting and advertising by targeting users based on categories allowing us to reach users as they are actively consuming relevant content such as Drug Safety, Local News, and Healthy Living. This is done by placing media on pages adjacent to content containing specific keywords such as Consumer Drug Takeback, prescription drug disposal, pharmacy services, medication disposal services, and medication disposal locations.
    - The cross-device display targeted media campaign started on November 27, 2023, and ran through December 31, 2023.
    - This campaign is ongoing and will continue through early 2024.
    - Our click through rate is 0.15%, which is well above the industry benchmark click through rate of 0.08% - 0.10%. The most successful tactic deployed was Retargeting, the action of users who click on the



advertisement and are served the ad more frequently, is 0.5%, five times higher than the industry benchmark.

- The second most successful targeted media tactic deployed was behavioral targeting, action of users being served the advertisement based on where they are visiting online, such as health related websites. Users were served the advertisement on average 2.5 times and total impressions were 456,681.
- Once identifying these trends, The Foundation refocused efforts to serve targeted media to the two highest targeted media methods, retargeting and behavioral targeting. An example of the cross-device display advertisement can be found in *Appendix 1 Figure 7*.
- Audio: The Foundation utilized targeted audio via streaming platforms such as Spotify, Pandora, TouchTunes, iHeartRadio, PodcastOne, SoundCloud, TuneIn and more. Some of these streaming platforms also incorporate local radio streaming options.
  - Audiences are targeted behaviorally (similar to methods used in cross-device display tactics) by users that stream genres such as medical drugs, prescription drugs, medical services, health, science and medicine.
  - The targeted audio campaign started on November 27, 2023, and ran through December 31, 2023.
  - Success is measured in terms of audio completion, meaning the listener completes listening to the advertisement. Audio completion rate for targeted audio advertisements was 99%, meeting the high end of the industry benchmark, meaning 99% of listeners listened to the entire advertisement. On average, listeners heard the advertisement 3.3 times and total impressions were 123,387.
- Digital out-of-home advertisements: The Foundation utilized digital billboards and other digital advertising platforms outside of the home around high-traffic areas of the day to reach audiences at the most impactful moments in their day.
  - This reaches on-the-go Ultimate Users across different digital out-of-home media.
  - The digital out-of-home campaign started on November 27, 2023, and ran through December 31, 2023.
  - The digital billboard advertisements were served on movie theaters, sports venues, gyms, office buildings, and most effectively on gas station TVs which garnered the highest number of impressions.
  - Total number of impressions across all the digital out-of-home advertising platforms was 172,244.



• This campaign is ongoing and will continue through early 2024. An example of the digital billboard advertisement can be found in *Appendix A, Figure 8.* 

Table 1 in Appendix A provides a high-level overview of the outreach activities performed.

The metrics listed in Appendix A, Table 1 can be used to evaluate performance of the education and outreach program including Ultimate User awareness, Program usage, and accessibility in accordance with section 18973.3(i)(5). Line 'Total Metrics' is reflective of the total number of impressions across all outreach activities.

Of the outreach activities, the direct mail campaign was among the most successful in increasing Ultimate User engagement as follows:

- Data was analyzed immediately prior to the direct mail postcard being mailed and again one month after Ultimate Users received their direct mail postcard to understand the difference in Mailers requested.
- From January to April, there were an average of eight Mailer requests per month. From June through December, that average jumped from eight requests per month to 101 requests per month which is a 1,163% increase in Program usage.

The Foundation continuously analyzes data from all of The Foundation's outreach and education activities to identify low volume Mailer requests. This is important to better identify where marketing efforts should be focused to increase participation by both Authorized Collectors and Ultimate Users, especially in rural and historically underserved populations and counties.

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.

#### Annual Survey - Providers

The Foundation completed a survey of 500 providers to measure public awareness and use of the Covered Drugs disposal Program. The results showed:

- 62% stated they were aware of the Program for residents to safely dispose of expired or unwanted medication
- 55% of respondents stated that they were made aware of the Program through The Foundation's outreach mechanisms (direct mail, letters, newspaper, pharmacies and health related clinics, signs/posters and online resources)
- 68% stated they have used the Program
  - 45% using a Collection Receptacle
  - 23% using Mailers



- 61% stated using a Collection Receptacle was convenient
- 65% stated using Mailers was convenient

#### Annual Survey - Ultimate Users

The Foundation completed a survey of 1,000 Ultimate Users to measure public awareness and use of the Covered Drugs disposal Program. Ultimate User respondents come from the survey application publishers with which they are partnered, and respondents are invited to take the survey once they have expressed interest. The survey platform partners with over 120,000 partner applications to easily distribute surveys to target demographics. The survey platform validates all user credentials to ensure the correct demographic is being targeted. To all provider survey respondents. Residents were asked the same questions as providers:

- 55% stated they were aware of the Program for residents to safely dispose of unwanted medication
- 21% stated they have used the Program
  - 16% stated they have used a Collection Receptacle
  - 5% stated they have used Mailers
- 73% stated that taking medication to a Collection Receptacle is convenient
- 76% stated using prepaid Mailers is convenient
- 56% of respondents were exposed to the Program via The Foundation's outreach mechanisms (direct mail, letters, newspaper, pharmacies and health related clinics, signs/posters and online resources)

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. Participating Covered Entities

14 CCR section 18973.4(j) Covered Entities, Covered Products, and Authorized Collectors. List of the following: (1) Participating covered entities covered by the stewardship plan and their contact information including, but not

limited to, the following:

(A) Name of covered entity

(B) Mailing and physical address

(C) Contact name and title

(D) Email address

(2) 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.

- (3) Authorized collectors and their contact information including, but not limited to:
- (A) Name of authorized collector
- (B) Mailing and physical address
- (C) Contact name and title

(D) Email address



A list of participating Covered Entities and corresponding product list is provided in *Attachment E: Covered Entities and Product List.* Unless otherwise indicated in *Attachment E*, mailing and physical addresses are the same.

A list of the Authorized Collectors and their contact information is provided in a separate attachment, *Supplement: Confidential Collection Information*.

## XI. Service Provider Selection Process

14 CCR section 18973.4 (k) Description and evaluation of the process for selecting service providers, if applicable.

The Foundation has not added or changed any service providers for the Reporting Period.

## XII. Incentives

14 CCR section 18973.4(1) 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.

## XIII. Staffing Changes

14 CCR section 18973.4 (m) Description of changes in staffing of the stewardship program.

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



## XIV. Expenses

14 CCR section 18973.4 (n) 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	\$ 66,436.53	
Operational Costs	\$ 398,817.14	
Education and Outreach	\$ 244,590.05	
Administrative Costs	\$ 460,350.13	
Grants, Loans, Sponsorships and Other Incentives	\$ O	
Departmental Administrative Fees	\$ 2,316,503.36	
Total Expenses for Reporting Period	\$ 3,486,697.21	

## XV. Coordination Efforts

14 CCR section 18973.4 (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 covered drugs are in operation concurrently or new stewardship programs begin operating.

The Foundation communicated regularly with the other Program Operator regarding coordination efforts during the Reporting Period.

An agreement was signed between each Program Operator and a third-party vendor on September 11, 2023, and work began in November 2023 on the jointly operated toll-free number and neutrally branded website. Implementation of the jointly operated toll-free number and neutrally branded website was completed in early 2024.

The jointly operated toll-free number was created for Ultimate Users to call and inquire about locations to dispose of Covered Drugs, request that Mailers be sent directly to the Ultimate User, and to access other Program information including educational materials. The neutrally branded website serves as a single source of information for Ultimate Users. Both Program Operators agree to meet immediately to discuss any confusion of Ultimate Users or Program participants. Program Operators agree to take action to address any confusion. The website is



neutrally branded by utilizing an agreed-upon logo created for the website.

The neutrally branded website allows Ultimate Users to order Mailers, view Program information, educational information, and other Program advocacy. The Foundation and the other Program Operator will each distribute 50% of the Mailers via a rotating button that directs Ultimate Users to each Program Operator every other time.

## XVI. State Agency Determinations

14 CCR section 18973.4 (p) State Agency Determinations pursuant to section 42032.2(a)(1)(C) of the Public Resources Code. Submit all agency determination(s) of compliance, noncompliance, and superseding determinations of compliance, if any, for the reporting period.

The Foundation received the following State Agency Determinations during the Reporting Period. Copies of the determinations are provided in *Attachment F: State Agency Determinations* 

- Program Budget
  - May 1, 2023 CalRecycle's Completeness Determination of The Foundation's 2022 Annual Report and 2024 Annual Program Budget for Covered Drugs (Incomplete)
  - June 22, 2023 CalRecycle's Completeness Determination of The Foundation's 2022 Annual Report and 2024 Annual Program Budget for Covered Drugs (Complete)
  - August 15, 2023 Request for Action Consideration of The Drug Takeback Solutions Foundation's 2024 Annual Program Budget for Covered Drugs (CalRecycle Approval)
- Annual Reporting
  - May 1, 2023 CalRecycle's Completeness Determination of The Foundation's 2022 Annual Report and 2024 Annual Program Budget for Covered Drugs (Incomplete)
  - June 22, 2023 CalRecycle's Completeness Determination of The Foundation's 2022 Annual Report and 2024 Annual Program Budget for Covered Drugs (Complete)
  - August 15, 2023 Request for Action –Consideration of The Drug Takeback Solutions Foundation's 2022 Annual Report for Covered Drugs (CalRecycle Disapproval)
- Noncompliance
  - March 14, 2023 Notice of Violation for Noncompliance with the California Pharmaceutical and Sharps Waste Stewardship Law Regarding the 2022 Annual Program Budget for Covered Drugs
  - August 15, 2023 Request for Action Consideration of the Drug Takeback Solutions Foundation's 2022 Annual Report for Covered Drugs



- August 24, 2023 Notice of Violation for Noncompliance with the California Pharmaceutical and Sharps Waste Stewardship Law Regarding the 2022 Annual Report for Covered Drugs
- November 6, 2023 Notice of Violation of Public Resources Code (PRC) section 42034.2(a) for Non-Payment of Pharmaceutical and Sharps Waste Stewardship Program Departmental Administrative Fee for Covered Drugs for October 2021 through March 2023 (Invoice #: 0000001518735)

## XVII. 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.

Mstort And

Chris Smith, R.Ph. Foundation President P.O. Box 997 Winston-Salem, NC 27102 Phone Number: (336) 631-7602 Email Address: <u>Chris.Smith@takebackfoundation.org</u>



Appendix A - Educational Materials, Outreach, and Electronic Examples of Promotional Materials

Outreach Activity	Type of Media	Start Date	End Date	Impressions	Frequency
Social Media Posts	Digital Promotion	1/1/2023	12/31/2023	269	24
Influencer Media	Digital Promotion	3/4/2023	12/1/2023	3,442,693	4
Programmatic Media	Digital Promotion	4/10/2023	12/31/2023	659,500	2
Direct Mail Campaign	Direct Mail	4/1/2023	6/1/2023	550,008	1
Direct Mail Campaign	Direct Mail	12/1/2023	1/31/2024	353,828	1
Newspaper Advertisements	Print Ads	12/10/2023	1/28/2024	135,957	9
Cross Device Display	Targeted Digital Media	11/27/2023	2/25/2024	456,681	N/A
Advanced Audio	Targeted Audio Media	11/27/2023	2/25/2024	123,387	N/A
Digital Out of Home	Digital Billboards	11/27/2023	2/25/2024	172,244	N/A
Total Metrics	All	1/1/2023	12/31/2023	5,894,567	N/A

Table 1 - Outreach Activities Overview

Newspaper	# Insertions	<b>Circulation Per Insertion</b>	Total Impressions
The Los Angeles Times	6	481,547	2,889,282
The San Diego Union Tribune	6	137,138	822,828
The Sacramento Bee	6	56,031	336,186
Total	18	674,716	4,048,296

Table 2 - Newspaper Outreach



## PROTECT YOUR FAMILIES, COMMUNITIES, AND THE ENVIRONMENT SAFELY DISPOSE OF UNUSED MEDICINES

#### WHAT SHOULD YOU DO WITH YOUR EXPIRED OR UNWANTED MEDICINES

There are a number of ways to dispose of expired or unwanted medications.

Go to www.safemedicinedrop.com to learn more.





CONVENIENT KIOSK LOCATIONS

MAIL-BACK

For more information about the program, go to www.safemedicinedrop.com or call 1-888-371-0717







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

Proper disposal of unused drugs saves lives and protects the environment.

- Unused or expired prescription medications can lead to accidental poisoning, overdose, and abuse.
- Unused prescription drugs thrown in the trash can be retrieved and abused or illegally sold.
- Unused drugs that are flushed contaminate the water supply.

HC-MLR-I3117 032423

Figure 1 - Educational Brochure - Front



## PROTECT YOUR FAMILIES, COMMUNITIES, AND THE ENVIRONMENT SAFELY DISPOSE OF UNUSED MEDICINES

#### BEFORE DISPOSAL CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package or package insert, please follow those instructions.

#### **DISPOSAL OPTIONS**



#### CONVENIENT KIOSK DROP OFF LOCATIONS

To find drug disposal kiosk drop-off sites in your area, visit www.safemedicinedrop.com.



#### MAIL-BACK ENVELOPES

Mail-Back Services for Unwanted Medicines. Visit the Mail-Back section of **www.safemedicinedrop.com** to order a Mail-Back Package.

For more information about the program, go to www.safemedicinedrop.com or call 1-888-371-0717





#### ACCEPTED:

Medications in any dosage form, except for those listed below, in their original container or sealed.\*

\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging



#### NOT ACCEPTED:

Herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercurycontaining thermometers, sharps, and illicit drugs.



HC-MLR-I3117 032423

Figure 1 - Educational Brochure - Back





# MAIL-BACK PACKAGE IS FOR UNWANTED OR EXPIRED MEDICATIONS



### ACCEPTED

Medications in any dosage form, except those listed below, in their original container or sealed bag.\*

\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.

## **NOT ACCEPTED**

Herbal remedies, vitamins, supplements, cosmetics, other personal care products, inhalers, medical devices, batteries, mercury-containing thermometers, sharps, pet medication, and illicit drugs.

To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.



Figure 2 - Mail-Back Insert for Medication





# MAIL-BACK PACKAGE IS FOR



## ACCEPTED

Inhalers

## **NOT ACCEPTED**

Unwanted medicines that are not inhalers, herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

Note: Only place undamaged inhalers in their original containers in the Inhaler Mail-Back Package. Inhaler Mail-Back Packages can only be used for inhalers and cannot accept other types of items.

To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.



Figure 3 - Mail-Back Insert for Inhalers





## MAIL-BACK PACKAGE IS FOR PRE-LOADED PRODUCTS CONTAINING A SHARP AND AUTO-INJECTORS

#### ACCEPTED

Pre-loaded products containing a sharp and auto-injectors.

### **NOT ACCEPTED**

Unwanted medicines that are not pre-loaded products containing a sharp or auto-injectors, inhalers, herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

Note: Injector Mail-Back Packages can only be used for pre-filled injector products and cannot accept other types of items.



Figure 4 - Mail-Back Inserts for Combination Product Mail-Back Package



from a loved one.\*

\*samhsa.gov



#### **¡DESECHAR EN FORMA SEGURA MEDICAMENTOS Y OBJETOS PUNZOCORTANTES ES GRATUITO!**

Protect our families, communities and the environment



an overdose\* \*cdc.gov

Figure 5 - Direct Mail Postcard - Front

to needlestick injuries.\*

\*ca.gov





FIND A LOCAL KIOSK OR GET A SHARPS CONTAINER! WWW.SAFEMEDICINEDROP.COM 1-888-371-0717

#### DRUG TAKEBACK SOLUTIONS FOUNDATION

\*Inmar Rx Solutions is the service provider for The Drug Takeback Solutions Foundation

#### **HOW IT WORKS**



#### **Getting a Sharps Container:**

- 0] Go to www.safemedicinedrop.com or scan QR code Visite www.safemedicinedrop.com o
- 02 Enter zip code and select "California Sharps Program" Ingrese el código postal y seleccione "California Sharps Program" | Programa de objetos punzocortantes de California]
- 03 Enter info, select "user" and submit Ingrese la información, seleccione "user" [usuario] y envie

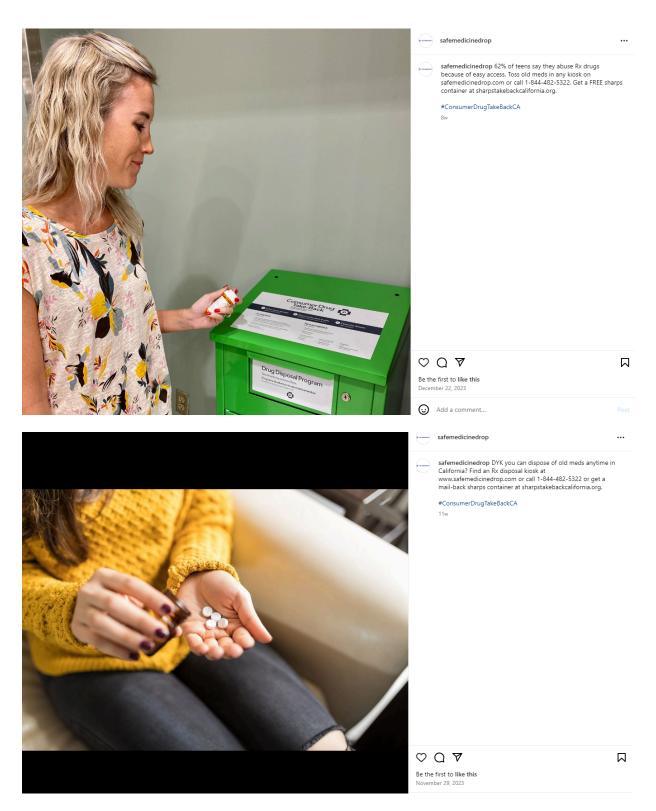


A

For more information, or to find this material in additional languages, scan the above QR code to visit www.safemedicinedrop.com.

Figure 5 - Direct Mail Postcard - Back





Figure(s) 6 - Social Media Posts - Instagram. These images were shared on the same dates on



X (Formerly Twitter) and Facebook



WE'VE MADE MEDICATION DISPOSAL FREE AND EASY!

FIND LOCATION

Visit SafeMedicineDrop.com



Figure 7 - Digital Media Displayed in Targeted Media



Figure 8 - Digital Media Displayed on Digital Billboards



DRUG TAKEBACK SOLUTIONS FOUNDATION



# TIME TO CLEAN OUT YOUR MEDICINE CABINET!

Help prevent drug misuse, and protect our water supply from improper drug disposal. Safely dispose of unused or expired medications. Find a location near you at SafeMedicineDrop.com or call 888-371-0717.

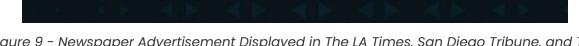


Figure 9 - Newspaper Advertisement Displayed in The LA Times, San Diego Tribune, and The Sacramento Bee



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Ă Ŭ Đ Đ	<ul> <li>seek out converts -</li> <li>the unconventional</li> </ul>	- add to persona			The second	dency, Judaism began ap- pearing more and more in his distances is 1 act spring
CNPA Advertising Inmar Consumer Main News/A004/ Time To Cleanord	8 vision pundit who		o becomes president of Argen this's resting place in New Yo	tina on Sunday, has made pol & Like most Argentines, he	Amount Ernami Amount Pro-	he told the newspaper La Macida, "My main reference, to whom I refer continually, is Mases."
	and inflation that of exceeds 107% a year	powerty arrently followed Milei saying in as interview about his oppo at who nexts: "We don't only bear	<ul> <li>Shimon Axel Wahaish and began meeting frequently with him to study Judaism.</li> </ul>	Jens, most living in Baenos Aires, are politically diverse, and while Jenish politicians	AMIA Jewish community center. Both crimes remain unsolved. In 2026, the lead	Milei has made at least three tripasince July to visit the grave of the Robbe, who transformed the Chabad-
Zon	speaks invingly at among the	rdo and them is productivity, we are out his morally superior, we are new s, Milei, thetically superior, we are adam as the best in everything, and	<ul> <li>Miles tool Radio Jai that the rabbi "gives me a lot of spir- itual tranquility in a moment when Tranquility or the</li> </ul>	have held high-ranking posi- tions, the Jestish votecarries minimal weight on a na- tional level.	prosecutor in the AMIA in- vestigation was found dead with a gunshot wound to the head hours before he was	Lubaviteh Hasidie more- ment into a major force in Jourish life by dispatching representatives across the
olient name: Advertiser: Section/Page/Zone	a right against the eite, whom he dub	political that hurts them." led "the Cloblestein called a chain- Tommy Pener, director o	attacked by the 'political caste.' (Wahaish declined to be interviewed for this	"Of course we've happy that we have a fature presi- dent who has deep faith in thed, is shorey, spiritual."	acheduled to testify that he believed then-President Cristina Penaindez de Etchner constitued with	ward to bring Jens closer to their fath. On Mile's most recent plantages to not Mile's
ollent Name Advertiser: Section/Page	bis proposed bradge Despite such stances as promisis	extreme indications. atodol- "Jarley Milei is not as	the president-elect unan't available.) Mince then, Milei has	and Rabis Test Orushiat, the head of the Argentine branch of Chabed-Lubey-	Stan to cover up its alleged role in the bombing. Some remain wary about	mon Jacobson, the head of a New York spiritual center who told Milei about having
Culent Nam Advertiser: Section/Paç	Tengets such dances as promisis larits: the economy the Agentine page atis: and suggest propie be allowed	"deplar- he's a good friend of the ing that Jews," Pener said thold to sell estels toldhim.	<ul> <li>Is interest in Autains and has even expressed inten- tions to support. He says</li> </ul>	Ech, the traditionalist more- ment long led by Rabbi Bithmeerson that favors a mystical approach, empha-	Mile'spublic displays. "If things go badly [for Milei], there are sectors that are autisendic, and the first	been an oral arithe far the Relate — a job that establed memorizing hours of his speeches on the Rabhath
2 0 2 0 2	But perhaps the	a. Miles They organized a meeting at Aritha, a Misromaa most un- log at Aritha and Ar	<ul> <li>that he has a rabbs, not a priest, speaks adminingly about Moses during inter- tieves, and has blasted the</li> </ul>	suing prayer and joyfully to- lowing the Toruh and adher- ing to strict rules on mod- esty peoples percention	thing they will do is say this in the fault of Mile's relation- ship with the Jews," said Pablo Gorodneff, the serve-	and holidays when record- ings and notes are forbid- den. Milei was so fascinated that he scole about the en-
	disk Judaism in p	Ortho- youths 'to show that what redonti- uns being said was false, within Prove and Milei and Walds	t sounds of the shafat, the reason have blown on Jewish High Halidays, before thera-	during synagogue services and detary restrictions. The ultrant Jewish com- munity in Argentina dates	tary general of Llamandento Argentino Judio, a prog- ressive Jestah group in Barnos Alzes.	oscaterbackin Argentina. "He's declared linucitan open layer of lanael and Ju- dalane," said Alejandro
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/ 96065/-1 3 x 5.2500 4 Colore	a Jestich member o campaign. The rom	f Milets Miletalan developed a re partness lationship with Asilta Rabb	Israel from Tel Aviv to	communities, including one called Moiols Tille, and oth- ers artified in urban areas. The country also, however,	largely remained publicity apolitical around the elec- tion, but the country's lead- ing Jostish association, Knownawthe DAIA, accused	but the Western world will be more than positive." According to campaign member Childentein, Milei
3x 33	eording to Julio clo a Jordin menibero campaign. The some How	to contact us	saless "use the capital sho- ses by King David." (Donald Transp. to whom Milei has	or, became a haves for Natio is hiding after World War II, including Adolf Echemany	Milei of trivializing the Holo- caust after he compared Ar- centious, COVID-9, health	uses the mark how as a stir- ring symbol to show "the facing of likely that can be
L.		(BOO) LATIMES International (20) 107404	welcomed comparisons, moved the U.S. Embassy to Jerusalem during his presi- dency:) As Augentine media	who was captured in a Risense Airee suburb in 1940 by Mossad agrents and berought to torset for bial be- fue being executed in 1942.	pass, which let people go to certain events, to the Star of David that Jews were forced to wear in Naci Oermany.	union inside every person." At a campaign rally in October, a luge somes with the image of a man weating a Jestah prayer shard and biowing a shofar suddenly li-
, Å	To the second se	idelinery, Inside, or Hospital Requests For-Operaphics in our articles, in our splottes, prophers and page reproductions, e-mail splottes, prophers and page reproductions, e-mail splottes, productions, e-mail (20) 107 446.	eagerly cover Mile's outings to Jeansh events, including a recent Mardalah ceremony in Buenos Aires where a	face being executed in 1982. Anachevitz de ath camp doc- tar Jusef Mengele also hid in Argentina. In the early 2006, two ter-	In Stephender, several throasand Awas signed a let- br asping that Milei "doesn't represent us," volting Their conners with his "expres-	blowing a shofar suddenly in huminated the stadium. The askind of the instrument played before a video show-
on Nu	Ch. Millionet and Allinet	dial Thread in Coloradian	rabbi gave him his blessing, people close to Milei say that his interest in Judakon is genuine, not political. Ar-	norist attacks in Buenos Al- res shock the Jestah com- munity — with a total of Bit people killed in bumbings of	done of hate" and his "politi- cal use of Judaices, its texts and its symbols." They have also annuard his vice pred-	ing buildings crashing down and bombs exploding. Moments lates, Milei united outtage to the sound
Ad Number: Insertion Number Size: Color Tuno:	To Hand to write a lette	rom. To get the digital Las Augstes Thurs at no wie here nerespaper based tracking per and balances new file, are read balances new file are read balances.	gentine's estimated 75,000	the Israeli Embassy and the	deut, Vistaria Villamuel, of	of blasting rock music.
Ad Nu Inserti Size: Color	Printen jaurenten pår Printen som för Printen som för	ers. The Herrereise dative Room surveiling important or or enducidances? Send a shore lands arrive for all discuss ramiting. Theorem a description goals for reverses and description all	Record de	ath toll for	journalists	in Gaza
	5 and practices, our of		AMOUNTATION PROPERTY	nalists said Fiday that 94 journalists had been killed so far this year and almost	ering the Israel-Hamas unit disce the militant group at- tasked Israel on Oct. 7	group said, adding that deaths have come at "a scale and pare of loss of media
52	Security of the security of th	104-2000 Per satisfie media reguesia 104-2000 and inquistes, e-mail commodersi () (101 investore, t.A. Times Hare	ESITUBLE - A leading organization representing journalists worldwide ex-	at the this year and among dithad been imprisoned. The group called for bet- ber protection for media unchess and/or their attack-	more than one a day and 17% of all media deaths world- wide. It said the year major-	professionals' lives without precedent." Utraine also "remains a
2		Rearch architers, see chandler and local pages at loca, go to billions, see billions.	pressed deep concern at the number of media profe- sionals killed worldende do- ing their jobs is 2022, with 2s-	ers to be held to account. "The imperative for a new stobal standard for the pro-	By of them were Palestinian journalists in the Gasa Strip, where Jarael formes continue their air bombard-	dangerous country for jour- nalists" almost two years af- ter Russia's invasion, the or- gunization said. It said three
8 8		is Angeles Climes aldenia Clime Politication Provided No. 4 (19) Internation 7	ing their jobs is 2022, with lo- rase's war against Marsan claiming more journalists than any conflict in more than 20 years.	tection of journalists and ef- tective international en- tamement has never been greater," 192 President	ment and ground attacks. "The war in thata has been more deadly for jour- values than any single con-	reporters and media work- ers had been killed in that war so far this year. The organization also de-
13	COOLS See Provide all states	Microla, Microla, Microla, Milli anti-al procession (Control and Control and All All Statement) (Microla, Microla, Microla, Microla (Microla, Microla, Microla, Microla (Microla, Microla, Microla, Microla (Microla, Microla, Microla, Microla (Microla), Microla, Microla (Microla), Microla, Microla (Microla), Microla, Microla (Microla), Microla), Microla (Microla), Microla), Microla (Microla), Microla), Microla (Microla), Microla), Microla (Microla), Microla), Microla (Microla), Microla), Microla), Microla (Microla), Microla),	In its annual rount of me- dia-worker deaths, the Inter- national Pederation of Jour-	Dominique Pendalté said. The group said 68 jour- sullats had been killed cov-	flist since the IFJ began re- ourding journalists killed in the line of duty in 1890," the	piored media deaths in Af- ghanistan, the Philippines, India, China and Rangladesh.
	rises hereing hereingen	Analysis in     Analysis in the second				It supressed concern that orimes against media work- ers are going unpusished and urged governments "to
32	Personal and a second s	Construction     C		TAKEBACK SOLUT	IONS	and urged governments "to shed full light on these mur- dens and to put in place mea- sures to ensure the safety of twomaints."
2	<u>ה</u> בי					It noted a drop in the number of journalists killed in North and Bouth Ameri- ca, from 29 hat year to arren
হ				TIME TO		to, non 2022, The group said the three Mexicans, one Par- agaajan, one Ocatemalan, one Colombian and one
<u>ਤ</u>		Download the app. Discover more.	2004	CLEAN OU		one Cotomban and one American were stain while investigating armed groups or the embeddement of pub- in funds.
E	5 🎽 🛛 👬	Les Angeles Eimes	6	MEDICINE Help prevent dr	rug misuse,	drive remained the re- gion least affected by deaths of journalists, but the or-
os Angeles				and protect our from improper	drug disposal.	generation highlighted what it described as "three par- ticularly shorking murders" in Cameroon and Lesotho
32		PEDIC	-	Safely dispose or expired med Find a location	ications.	that it said have yet to be fully investigated. In all, 202 media workers
9		New & Lited		SafeMedicineD or call 888-371-	rop.com	far this year, the group said. The biggest number were juiled in China and Hong Europ – B yourvalids – ba- inwed by 14 in Myanmar, 41
	LÉ 📉	Buy, Sell & Trade Rent, Own & Finance USED 1/2 OFF				in Turkey, 40 in Blassis and onrupied Climeain Ukraine, 35 in Belarus and 23 in
	Stair Lifts I Sin	000 405 5040				R@96.

Figure 10 - Newspaper Advertisement - The LA Times 12/10/2023 Insertion





Figure 11 - Newspaper Advertisement - The San Diego Tribune 12/10/2023 Insertion

#### THE SACRAMENTO BEE

### 300 travelers from India detained in French airport

BY CHRISTOPHE ENA AND ANGELA CHARLTON TATRE, FRANCE

Ab at 300 Indian citi-About 300 Indian citi-zens heading to Central America were sequestered in a French airport for a third day Saturday after a dramatic police operation prompted by a tip that those aboand might be victims of human traffick-ing anthorities soli

ng, authorities said. Those aboard included children and families. The oungest passenger is a toddler of 21 months, and among the children are several unaccompanied minors, according to the local civil protection agen-

cy. Two of the passengers have been detained as part of a special investigation into suspected human trafficking by an organized criminal group, according the Paris prose-cutor's office. Prosecutors wouldn't comment on what kind of trafficking was alleged, or whether the ultir the ultimate destination was the U.S., which has seen a surge in Indians crossing the Mexico-U.S. border this year. French authorities hung

white tarps across the soaring bay windows of the small Vatry Airport in Champagne country to ensure privacy for the passengers held inside. The unmarked A340 plane, grounded since Thursday, can be seen parked near the terminal. Other flights were can-celed or rerouted as the airport was transformed into the hub of a vast trafficking investigation. The 15 crew members of the Legend Airlines char-ter flight - en route from

Managua, Nicaragua -were questioned and rewere questioned and a leased, according to a lawyer for the Roman based airline. A surreal holiday week-end scene has been unend scene has been un-folding in the Vatry Air-port since Thursday. The flight stopped for refuel-ing, and was grounded by French police based on an anonymous in that it

Fujairah airport in the United Arab Emirates to

French police based on an anonymous tip that it could be carrying victims of human trafficking, the prosecutor's office said. The unusual and sudde probe disrupted air travel as police cordoned off the airport and flights were disrupted, according to the administration for the Marne region. The airfield is used primarily for char-ter and cargo flights. Police sequestered the

Police sequestered the passengers in the airport, where they spent two nights on camp beds while the investigation contin-ues, according to an offi-cial with the Marne administration. The official said the passengers initial-ly remained in the plane, surrounded by police on the tarmac, but were then transferred into the main hall of the airport to sleep. Emergency workers, a doctor and local volunteers are on the scene and the passengers are being given regular meals, med-ical care and access to

teal care and access to toilets and showers, said Patrick Jaloux, head of the regional civil protection service. A special section of the terminal has been continued for families or one terminal has been equipped for families. As the ordeal drags on, "we are trying to find ways to help them pass the time" and reduce their distress, Jaloux told the Associated Press.

S SALLARS 0-Taxa and e S RO G et CORP. F. BUKATY &

### Authorities knew Maine shooter was a threat

BY PATRICK WHITTLE AND HOLLY RAMER Associated Press

PORTLAND, MAINE

confront an Army reservist in the weeks before he in the weeks before he killed 18 people in Maine's deadliest mass shooting feared that doing so would feared that doing so would "throw a stick of dynamite on a pool of gas," accord-ing to video released Fri-day by law enforcement. The video, which was released to the Portland Press Herald and then sent to The Associated Press, documents a Sept. 16 call between Sagadoc County Sheriff's Sgt. Aa-ron Skolfield and Army Reserve Capt. Jeremy Reamer. Skolfield was ollowing up with Reamer bouwing up with locamer about the potential threat posed by Robert Card, 40, who carried out the Oct. 25 attacks at a bowling alley and a restaurant. He was found dead two days



had access to weapons and that he had threatened to "shoot up" an Army reserve center in Saco, a city in southern Maine. The sheriff's department responded by briefly staking out the Saco facility and going to Card's home in Bowdoin for what Reamer de-scribed as a "welfare

check." "The only thing I would ask is if you could just document it," Reamer said. "Just say, 'He was there, he was uncooper-ative. But we confirmed that he was alive and check.' that he was alive and breathing." And then we can go from there. That's, from my end here, all we're really looking for."

SUNDAY DECEMBER 24, 2023 | PAGE 9A

Auburn City Councilor Leroy Walker, Sr., whose son Joseph Walker was killed in the shootings expressed frustration with police after seeing the video. Joseph Walker was the manager of Sche-mengoren Bar & Geill, where part of the attack took place. "I would like to know what we trait these neored "I would like to know what we train these people to dn. Is it just to deliver mail? Or stop innocent people that may be driving II milies (per hour) over the speed limit?" Walker said in a text message, noting that watching the video made him "sick." In the video, Skolfield referred to the Carda as "a big family in this area," big family in this area," and said he didn't want to publicize that police were visiting the home. He told Reamer he would reach out to Card's brother. Ryan, to ensu re family mbers had taken Card's guns, and a second video shows an officer at the father's home. After Card's father said he hadn't spoken with Ryan in several days, the officer said he would try again later.

"I just wanted to make sure Robert doesn't do anything foolish at all," he said.

A report released last week by Sheriff Joel Merry made clear that local law enforcement knew months before the attack that Card's mental health was deteriorating. Police were aware of reports that he was paranoid, hearing voices, experiencing psy chotic episodes and pos-sibly dealing with schize

herry and Lewiston city officials declined to com-ment on the release of the videos.

THE SACRAMENTO BEE Extra news. No extra charge. Read bonus eEdition sections at:

hurdle we have to deal

with. But at the same

time, we don't want to

throw a stick of dynamite

on a pool of gas, either --make things worse," he

Reamer expressed simi-lar concerns. "I'm a cop myself," he said. "Obvi-ously, I don't want you

guys to get hurt or do anything that would put you guys in a compromis ing position."

said.

sacbee.com/eedition/extraextra



Figure 12 - Newspaper Advertisement - The Sacramento Bee 12/24/2023 Insertion



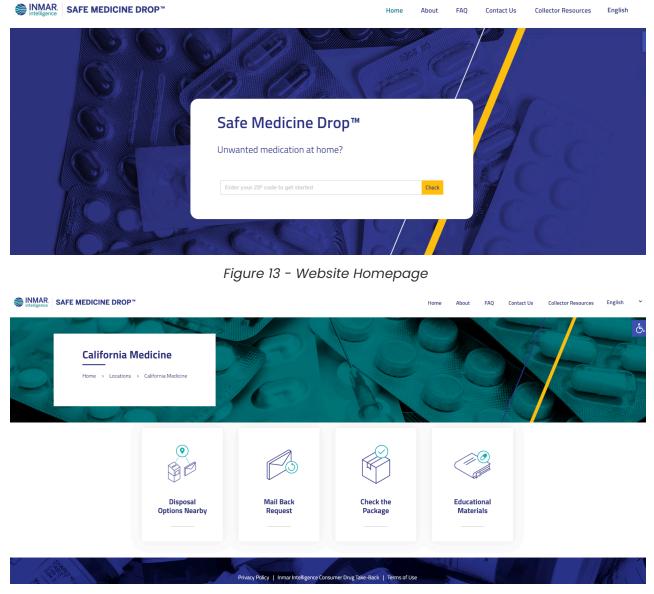


Figure 14 - Website - California Medicine Landing Page



INMAR. intelligence	SAFE MEDICINE DROP™			Home	About	FAQ	Contact Us	Collector Resources	English	~
	Mail Back Request	ick Request				7	1			È
			Ter-		Y					
					/					
	Choose your pa	ickage type	How many packages do you	need						
	Medicine	~	1			~				

споозе уош раскаде суре		поч тапу раскае	jes do you need	
Medicine	~	1	~	
Contact Information		1 2 3		
First Name*	Last Name*		Email Address*	
Address Line 1*		Address Line 2		
City*	CA		90210	
				_
	Submit			

### Figure 15 - Website - Mail-Back Request Form

Inhaler Auto-Injector Package			
First Name*	Last Name*		Email Address*
Address Line 1*		Address Line 2	
City*	СА		90210
	Sub	mit	

Inmar provides the following different types of Mail-Back Packages at no charge to residents. All Mail-Back Packages are pre-addressed with prepaid postage. Please submit a separate request for each Mail-Back Package needed or call **1-888-371-0717** for assistance.

Inhalers and injectors must be mailed in separate packages and cannot be combined with other unwanted medicines.



Figure 15 - Website - Mail-Back Request Form Continued



Inmar provides the following different types of Mail-Back Packages at no charge to residents. All Mail-Back Packages are pre-addressed with prepaid postage. Please submit a separate request for each Mail-Back Package needed or call **1-888-371-0717** for assistance. Inhalers and injectors must be mailed in separate packages and cannot be combined with other unwanted medicines.

#### - MEDICINE MAIL-BACK SERVICES

Mail-Back Services for expired or unwanted

medicines are available, free of charge, to all

residents upon request. Medications in any

dosage form, except for those identified as

Not Accepted below, in their original container

NOTE: The following items are not accepted in

#### - INHALER MAIL-BACK SERVICES

Mail-Back Services for inhalers are available, free of charge, to all residents upon request.

NOTE: Only place undamaged inhalers in their original containers in the Inhaler Mail-Back Package. Inhaler Mail-Back Packages can only be used for inhalers and cannot accept other types of items.

#### - AUTO-INJECTOR MAIL-BACK SERVICES

Mail-Back Services for pre-filled injector products are available to all residents upon request.

NOTE: Auto-Injector Mail-Back Packages can only be used for pre-filled injector products and cannot be used for inhalers or other types of unwanted medicines or items

herbal remedies

or sealed bag are accepted.

Standard Mail-Back Envelopes:

- vitamins
- supplements
- cosmetics
- other personal care products
- medical devices
- batteries
- mercury-containing thermometers
- inhalers
- used or empty syringes
- sharps and injectors
- illicit drugs

Back To California Medicine

Figure 15 - Website - Mail-Back Request Form Information (Continuation on Request Form

Page)





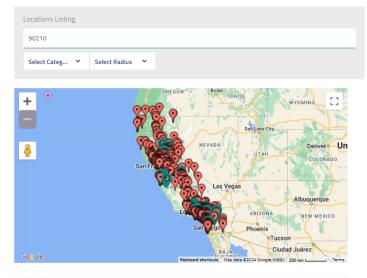


Figure 16 - Website - Search Disposal Locations



Locations Listing	
90210	
Select Categ Y Select Radius	
Coocle	AH COLORADO AH COLORADO Albuquerque ONA NEW MEXICO NK oTucson Ciudad Juárez
3M Get Directions and Location Information 8981 US HIGHWAY 395 OAK HILLS California 92344	mail-back supply location
3M Get Directions and Location Information V 18750 Minnesota Road Corona California 92881	mail-back supply location
SM OCCUPATIONAL MEDICINE Get Directions and Location Information  2724 S. Peck Road Monrovia California 91016	mail-back supply location
986 PHARMACY Get Directions and Location Information Q 2001 Santa Monica Bivd, Ste 100-W Santa Monica California 90404	mail-back supply location
986 PHARMACY Get Directions and Location Information	Medicine Kiosk

Figure 17 - Website - Disposal Options Listed





### How To Dispose of Medications:





2. Mail-Back Envelope a. Request a mail-back envelope b. Put medications in the envelope and seal it c. Mail it back to the address on the envelope

Figure 18 - Website - Educational Materials



### ACCEPTED:

- Unused or expired prescription medication (Including Schedule II-V controlled substances)
- Unused or expired over-the-counter medication

### **NOT ACCEPTED:**

- Schedule I controlled substances
- Illegal Drugs

EDUCATIONAL MATERIALS: English | Español | Tiếng Việt | 中国人 | 탾리 | 한국인 | 日本 | Tagalog | 译유 i | ແມນ ໃ พย | EDUCATIONAL MATERIALS POSTCARD : English | Español | Tiếng Việt | 中国人 | 탾리 | 한국인 | 日本 | Tagalog | 译유 i | ແມນ ໃ พย | MAIL BACK INSERTS MEDICINE : English | Español | Tiếng Việt | 中国人 | 탾리 | 한국인 | 日本 | Tagalog | 译유 i | ແມນ ໃ พย | MAIL BACK INSERTS INHALER : English | Español | Tiếng Việt | 中国人 | 탾리 | 한국인 | 日本 | Tagalog | 译유 i | ແມນ ໃ พย | MAIL BACK INSERTS AUTO-INJECTOR : English | Español | Tiếng Việt | 中国人 | 탾리 | 한국인 | 日本 | Tagalog | 译유 i | ແມນ ໃ พย |

Back To California Medicine



Figure 18- Website - Educational Materials



**Contact Us** 

Home > Contact Us





## **Get In Touch**

If you have any questions, or if you are a pharmacy or retailer and would like to learn more about the Consumer Drug Take-Back Program, Please write to us at take-back@inmar.com

If you are an authorized collector and your collection receptacle needs maintenance or servicing, please contact us at take-back@inmar.com or call 800-350-0396



Figure 19 - Website - Contact Us



Home	About	FAQ	Contact Us	Collector Resources	English	~
	About	FAQ	Contact Us	Collector Resources	Select Lang الحريبة 可Rem 简体中文 English Filipino Kreyol ayis 同子 다 Italiano 日本語 ภาសា ខ្មែរ 한국어 Polski	yen
	Id leaf					

Figure 20 - Website - Required Languages