## DRUG TAKEBACK SOLUTIONS FOUNDATION

The Drug Takeback Solutions Foundation State of California Home-Generated Sharps Waste 2023 Annual Report

Reporting Period: 1/1/2023 through 12/31/2023

Submitted on: 3/29/202401
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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.

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Foundation Website: https://www.takebackfoundation.org/
Program Website: www.sharpstakebackcalifornia.org

Officer responsible for overseeing the Program Budget:

Drug Takeback Solutions Foundation
Lee Smith, Treasurer
Mailing: P.O. Box 997, Winston-Salem, NC 27102
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Email Address: Lee.Smith@takebackfoundation.org
Foundation Website: https://www.takebackfoundation.org/
Program Website: www.sharpstakebackcalifornia.org

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

## II. Executive Summary

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") under Chapter 2 (commencing with section 42030), Part 3, Division 30 of the California Public Resources Code, 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 Plan on December 20, 2022.

Pursuant to PRC section 42033.2(a)(1) and 14 CCR section 18973.5, this Annual Report ("Report") for Home-Generated Sharps Waste summarizes the operational activities between January l, 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.

The Foundation continued to implement its Plan during the Reporting Period. The Foundation focused heavily during the Reporting Period on increasing the number of Point of Sale locations providing or initiating Mail-Back Units to Ultimate Users. The Foundation conducted outreach efforts to Point of Sale locations that included telephone calls, emails, letters, and in-person visits. The Foundation increased the number of Point of Sale locations that distribute Mail-Back Units by 83 locations, as described in "Section III. Collection System" of this Report. Additionally, The Foundation also distributed Mail-Back Units to Ultimate Users by placing Mail-Back Units in County offices and health departments, household hazardous waste facilities, Continuum of Care organizations, homeless shelters, and other community organizations deeply rooted in California communities, and some of which provide care to historically underserved communities.

Challenges faced include that certain Point of Sale locations told The Foundation they are not required to participate, do not have space to store Mail-Back Units, and have concerns regarding personnel constraints related to initiating the ordering of Mail-Back Units for Ultimate Users. Accordingly, The Foundation continues its efforts to overcome these challenges through education and outreach activities to Point of Sale locations, as described in this Report, to achieve increased participation.

The Foundation also expanded the geographic spread of the Sharps Take-Back Program ("Program") by distributing Mail-Back Units in 50 of the 54 participating counties, though the distribution of some Mail-Back Units did not occur until 2024. The Foundation continues its efforts in rural counties that have not requested Mail-Back Units (Alpine, Colusa, Mono, Sierra) through outreach and education to potential Point of Sale locations in those counties.

The Foundation continued its outreach and marketing efforts to provide Ultimate Users with information on how to order Mail-Back Units through the website or toll-free number, resulting in a month-over-month average increase of $4-5 \%$ in Mail-Back Unit orders. During the Reporting Period, The Foundation implemented multiple marketing campaigns via social media, direct mail, newspaper campaigns, digital billboards, a cross-device media campaign, and a targeted audio campaign, all of which are outlined in detail in "Section X. Educational Efforts and Public Outreach."

The Foundation received 32,711 requests for Mail-Back Units via all ordering mechanisms and distributed 32,088 Mail-Back Units. The difference between the number of Mail-Back Unit requests and the number distributed is because Mail-Back Units requested with less than five business days left in the Reporting Period were distributed in 2024. Mail-Back Units distributed in 2024 will be reflected in the 2024 Annual Report.

The Foundation destroyed 2,196 Mail-Back Units totaling 3,180.97 pounds of Sharps. Fewer Mail-Back Units were destroyed than distributed because there is a delay between the date the Ultimate User receives the Mail-Back Unit and the date it is returned for destruction. The detailed accounting of Mail-Back Unit distribution and destruction can be found in "Section III. A. Opportunity to Dispose and Distribution of Mail-Back Units."

The Foundation coordinated with the other Program Operator to initiate the jointly operated toll-free number and neutrally branded website for Ultimate Users to request Mail-Back Units which went live on October 26, 2023.

## 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.

The Foundation implemented systems to provide Ultimate Users Mail-Back Units, for in-scope purchases of covered products, and at no cost to the Ultimate User. Mail-Back Units were distributed or initiated at the Point of Sale. If the Ultimate User refused or was not in need of a Unit at that time, Ultimate Users could order Mail-Back Units via the neutrally branded website and/or jointly operated toll-free number. The Foundation also conducted outreach and education focused on Point of Sale locations and Ultimate Users as described below.

Note: The Foundation's website and toll-free number provided this same service until the neutrally branded website and jointly operated toll-free number became operational.

A. Opportunity to Dispose and Distribution of Mail-Back Units<br>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:<br>(A) Provided at point of sale<br>(B) Initiated at point of sale<br>(C) Website requests<br>(D) Toll-free telephone number requests

Point of Sale locations increased to 203 locations across the State. The amount of Mail-Back Units distributed in each County, by distribution method, is provided in "Attachment C: Mail-Back Unit Distribution by County."

Ultimate Users had the opportunity to dispose of their Home-generated Sharps Waste through the following options:

## 1. Provided at Point of Sale Locations

The Foundation enrolled 203 Point of Sale locations which were provided an on-site ordering portal, including written instructions on how to use the ordering portal, and written instructions for keeping Mail-Back Units on-site for distribution to Ultimate Users in quantities appropriate for the Ultimate Users they serve. Point of Sale locations were provided the opportunity to place an initial order of up to four cases of 24 Mail-Back Units (for a total of 96 units per order). Point of Sale locations are also able to place subsequent orders as frequently as needed, and there are no restrictions on the number of Mail-Back Units that may be ordered at one time. Thus, Point of Sale locations are able to order the appropriate volume needed to distribute Mail-Back Units to the Ultimate Users they serve. The Foundation provided 20,472 Mail-Back Units to Point of Sale Locations to distribute to Ultimate Users.

## 2. Initiated at Point of Sale Locations

The Foundation provided Point of Sale locations with an ordering mechanism via the neutrally branded website, www.sharpstakebackcaliforia.org, whereby Point of Sale locations order Mail-Back Units on behalf of Ultimate Users that are shipped to arrive within 5 business days. Point of Sale locations may order Mail-Back Units in quantities of three per form submission. However, if Ultimate Users require more Mail-Back Units, they can submit the form as many times as needed to obtain the quantity of Mail-Back Units necessary to accommodate their sharps usage, without any limits on the number of form submissions. There were 277 Mail-Back Units initiated at Point of Sale locations.

## 3. Website and Toll-Free Number

Ultimate Users and Point of Sale locations are also given the option to order Mail-Back Units via the neutrally branded website www.sharpstakebackcalifornia.org or the jointly operated toll-free number 844-482-5322. There were 11,419 Mail-Back Units requested
via The Foundation's website and the neutrally branded website and 543 Mail-Back Units requested via The Foundation's toll-free number and the jointly operated toll-free number.
Note: The Foundation's individual website and toll -free number provided this service until the neutrally branded website and jointly operated toll-free number became operational on October 26, 2023.

## 4. Household Hazardous Waste Facilities

The Foundation contacted over 400 Household Hazardous Waste facilities ("HHW") via direct mail, letters, and email providing Program information on distributing Mail-Back Units. The Foundation offered the HHW sites the opportunity to provide FDA-cleared Mail-Back Units to Ultimate Users and offered reimbursement for the destruction costs of Home-Generated Sharps Waste per $\S 18973.3(\mathrm{~g})(1)$ and $\S 18973.3(\mathrm{~g})(2)$. The outreach to HHWs garnered approximately 20 unique requests for more information and/or requests for reimbursement; however, not all HHWs elected for the reimbursement. A list of all reimbursement requests is provided in "Section XIV: Local Agency Requests."

The Foundation solicited Point of Sale locations to participate as Mail-Back Distribution Sites by telephone, email, in-person visits. and through Program education and awareness materials. To make the Program accessible to all Ultimate Users, The Foundation researched and provided outreach to local Continuum of Care organizations, Homeless Service Authorities, and other organizations with deep connections to underserved and homeless communities to educate Ultimate Users on disposal options.

## 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).

During the Reporting Period, The Foundation received 2,196 Mail-Back Units returned, equating to 3,180.97 pounds of home-generated sharps waste destroyed.

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

[^0][^1] supplemental collection method(s), as required in the stewardship plan pursuant to section 18973.3(f)(7)

The Foundation did not 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

Each Mail-Back Unit is tracked via its serialized barcode imprinted on the outside of each Unit. All Mail-Back Units were tracked and transported per the approved Plan. All returned Mail-Back Units are transported, via USPS, directly to a Plan-approved service provider and handled in accordance with applicable legal requirements. The receiving service provider records all metrics including: date received, serialized barcode label information, USPS shipping tracking number, weight and date transported to disposal facility, disposal date, and manifest number (if applicable). All information recorded is transmitted to the Program Operator daily for tracking of each Mail-Back Unit returned.

The Foundation was notified by their Service Provider that one additional disposal facility, Covanta - Hayward / Biologic Environmental Services \& Waste Solutions, was used to treat waste during the Reporting Period. The attached list of disposal facilities reflects this update.

A list of Transporters and Disposal Facilities is included at Attachment A: Service Providers and Disposal Facilities.

## 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 Plan were followed. There were no instances of noncompliance; therefore, no corrective actions were 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

No changes were made to the processes and policies followed to safely and securely collect, track, and manage home-generated sharps waste from collection through final disposal.

The Foundation received feedback from Ultimate Users that the current sharps container may be too small for some sharps. The Foundation will work collaboratively with CalRecycle to implement the distribution of a larger Sharps Waste Container, 1.5 quart, with a wider lid opening to accommodate larger sharps.

## VII. Ordinance Repeal

14 CCR section $18973.5(\mathrm{~g})$ : 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 local stewardship program ordinances repealed in the State of California during the Reporting Period, so it was not necessary for The Foundation to expand into jurisdictions not previously included.

## 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 were no safety or security concerns for the Reporting Period, and therefore no corrective actions needed.

## 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

The Foundation provided educational materials in accordance with the approved Plan, Section VIII, to Point of Sale locations participating in the Program. The Foundation also provided materials, upon request, to persons authorized to prescribe drugs, hospitals, Pharmacies, pharmacists, and Ultimate Users.

The educational materials were intended to educate the Point of Sale locations on Program participation, general Program information, ordering instructions and information about providing the number of Mail-Back Units required to accommodate Ultimate Users for their in-scope purchase of covered products.

Educational materials provided to Ultimate Users included how to locate and order Mail-Back Units, general Program information, education on the implications of improper Sharps disposal, and guidance on the separation of Covered Products from non-Covered Products.

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 (Spanish, Hindi, Chinese, Japanese, Khmer, Korean, Tagalog, Thai, and Vietnamese).

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 637,106 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 on the Home-Generated Sharps Take-Back Program to a targeted audience through blogs and social media outlets.
- 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 driving 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 286 impressions.
- The Foundation ran several social media influencer campaigns concurrently with other traditional and digital media campaigns. Digital 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 more heavily on underserved areas and areas that have lower volume of Mail-Back Unit requests.
- A copy of the direct mail postcard can be found in Appendix A Figures 2 and 3. 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 as 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, the 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 4,5 and 6. 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.
- The 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 $1,325,049$.
- Once it identified these trends, The Foundation refocused efforts to serve targeted media through the two highest targeted media methods, retargeting and behavioral targeting. An example of the cross-device display advertisement can be found in Appendix A 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 124,045.
- This campaign is ongoing and will continue through early 2024.
- 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 172,086.
- 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.

The Foundation continuously analyzes our marketing data to identify the location of low volume Mail-Back Unit requests. This data is particularly important in identifying rural and historically underserved populations and counties, enabling The Foundation to better target marketing efforts to those populations that may need more information and education on the Home-Generated Sharps Disposal Program.

The direct mail campaign was the most successful outreach activity in increasing Ultimate User engagement as follows:

- Data was analyzed immediately prior to the beginning of the campaign and one month after the campaign ended.
- From January to April, approximately 1,500 Mail-Back Units were shipped per month. The month of May yielded 5,110 Mail-Back Units shipped. From June until December 31, 2023, there were 3,626 Mail-Back Units shipped per month.
- Overall, the direct mail campaign resulted in a $142 \%$ increase in Mail-Back Units ordered, increasing the average number of Mail-Back Units ordered each month of the Reporting Period by 4-5\%.

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

## Annual Survey - Providers

In accordance with the Plan, The Foundation completed a survey of 500 healthcare providers to measure public awareness and use of the Home-Generated Sharps Disposal Program.

- $67 \%$ stated that they were aware of the Program for Ultimate Users to safely dispose of Sharps
- $61 \%$ of respondents were exposed to the Program via The Foundation's outreach mechanisms (direct mail, letters, newspaper, email, signs/posters, pharmacies and health related clinics, and online resources)
- Only $19 \%$ stated they were not aware of the Program
- $14 \%$ reported that they were unsure of their awareness of the Program
- $75 \%$ of respondents stated that the Program is convenient
- $73 \%$ stated that they would be likely to ask their patients to utilize a drop-off box to discard their unwanted needles or sharps.


## Annual Survey - Residents

The Foundation also conducted a survey of 1,000 residents, using the same questions as those surveys sent to providers, regarding awareness, knowledge and attitudes, to see if any knowledge could be gained and utilized to improve our Plan as well as the Program in general.

The Foundation is continuing to evaluate the data from both surveys to determine if any of the data indicates opportunities for improvement.

The metrics listed in Appendix A, Table 1 may 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). The line 'Total Metrics' is reflective of the total number of impressions across all outreach activities. The Foundation plans to focus educational efforts with providers on simply increasing the percentage of providers aware of the Program and equipping them to talk with their patients about the safety and availability of using Mail-Back Units to return unwanted Sharps.

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

PRC 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 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 Attachment B: Covered Entities and Covered Products - Sharps.

## XII. Service Provider Selection Process

14 CCR section 18973.5 (I) 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.

## 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.

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 March 3, 2023 and work began April 12, 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 on October 26, 2023. The neutrally branded website is www.sharpstakebackcalifornia.org and the jointly operated toll-free number is 844-482-5322. They offer all required language options, live human operators and translators (toll-free number), Google translate languages (website), information on accepted products, and links to social media as outlined in the Plan. The website is neutrally branded by utilizing an agreed upon logo created for the website.

The toll-free number was created for Ultimate Users to call and inquire about locations to dispose of Home-Generated Sharps, request that Mail-Back Units be mailed 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. The neutrally branded website allows Ultimate Users to order Mail-Back Units, 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.

Both Program Operators agree to meet immediately to discuss any confusion experienced by Ultimate Users or Program participants. Program Operators agree to take action to address any confusion.

## 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 15 local agency requests during the Reporting Period. The Foundation accepted all requests and processed reimbursement within the timelines specified in 14 CCR section $18973.3(g)(2)$. The local agency requests, reimbursement amounts, and corresponding destroyed sharps waste poundage is listed in the table below.

Local Agency Requests During the Reporting Period

| Request <br> Date | Name | Location | Reimbursement | Collected (Lbs) | Accepted/ Rejected |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1/19/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 356.00 | 163 | Accepted |
| 1/20/2023 | Thousand Oaks HHW | 2100 E. Thousand Oaks Blvd. Thousand Oaks, CA 91362 | \$ 3,825.00 | 1507 | Accepted |
| 2/16/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 314.00 | 235 | Accepted |
| 3/16/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 372.00 | 256 | Accepted |
| 4/13/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 372.00 | 263 | Accepted |
| 5/11/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 372.00 | 250 | Accepted |
| 6/8/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 198.00 | 135 | Accepted |


| 7/6/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 198.00 | 112 | Accepted |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 8/3/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 198.00 | 123 | Accepted |
| 8/31/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 314.00 | 195 | Accepted |
| 9/28/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 488.00 | 361 | Accepted |
| 10/26 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 546.00 | 456 | Accepted |
| 11/2/23 | Upper Valley Waste Management Agency | 1195 3rd Street, Suite 101 Napa, CA 94559 | \$ 4,400.00 | 557 | Accepted |
| 11/27/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 372.00 | 276 | Accepted |
| 12/21/2023 | Recology Butte Colusa Counties | PO Box 1512 <br> Oroville CA 95965 | \$ 314.00 | 206 | Accepted |
| Total |  |  | \$ 12,639.00 | 5,095 |  |

## 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 shows 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 | $\$ 0$ |
| Total Expenses for Reporting Period | $\$ \mathbf{9 8 8 , 5 5 3 . 6 8}$ |

## 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.

The Foundation received the following State Agency Determinations during the Reporting Period. Copies of the determinations are provided in Attachment D: 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 Home-Generated Sharps Waste
- June 22, 2023 - CalRecycle's Completeness Determination of The Foundation's 2024 Annual Program Budget for Home-Generated Sharps Waste
- August 15, 2023 - Request for Action - Consideration of The Drug Takeback Solutions Foundation's 2024 Annual Program Budget for Home-Generated

Sharps Waste (CaIRecycle Approval)

## - Annual Reporting

- May l, 2023 - CalRecycle's Completeness Determination of The Foundation's 2022 Annual Report and 2024 Annual Program Budget for Home-Generated Sharps Waste
- June 20, 2023 - Consideration of The Drug Takeback Solutions Foundation's 2022 Annual Report for Home-Generated Sharps Waste (CalRecycle Disapproval)
- November 9, 2023 - Consideration of The Drug Takeback Solutions Foundation's Revised 2022 Annual Report for Home-Generated Sharps Waste (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 Home-Generated Sharps
- August 11, 2023 - Notice of Violation for Noncompliance with the California Pharmaceutical and Sharps Waste Stewardship Law Regarding the 2022 Annual Report for Home-Generated Sharps Waste
- 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 Home-Generated Sharps Waste for October 2021 through March 2023 (Invoice \#: 0000001518736)


## 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.


Chris Smith, R.Ph.
Foundation President
P.O. Box 997

Winston-Salem, NC 27102
Phone Number: (336) 631-7602
Email Address: Chris.Smith@takebackfoundation.org

## 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 | $1 / 1 / 2023$ | $12 / 31 / 2023$ | 286 | 24 |  |
| Influencer Media | Digital Promotion | $3 / 4 / 2023$ | $12 / 1 / 2023$ | $3,442,693$ | 4 |  |
| Programmatic Media | Digital Promotion | $4 / 10 / 2023$ | $12 / 31 / 2023$ | 637,106 | 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 | $12 / 10 / 2023$ | $12 / 31 / 2023$ | $2,024,148$ | 9 |  |
| Cross Device Display | Targeted Digital Media | $11 / 27 / 2023$ | $12 / 31 / 2023$ | $1,325,049$ | $\mathrm{~N} / \mathrm{A}$ |  |
| Advanced Audio | Targeted Audio Media | $11 / 27 / 2023$ | $12 / 31 / 2023$ | 124,045 | $\mathrm{~N} / \mathrm{A}$ |  |
| Digital Out of Home | Digital Billboards | $11 / 27 / 2023$ | $12 / 31 / 2023$ | 172,086 | $\mathrm{~N} / \mathrm{A}$ |  |
| Total Metrics | All | $1 / 1 / 2023$ | $12 / 31 / 2023$ | $6,740,974$ | $\mathrm{~N} / \mathrm{A}$ |  |

Table 1 - Outreach Activities During the Reporting Period

| Newspaper | \# Insertions | Circulation Per Insertion | Total Impressions |
| :---: | :---: | :---: | :---: |
| The Los Angeles Times | 3 | 481,547 | $1,444,641$ |
| The San Diego Union Tribune | 3 | 137,138 | 411,414 |
| The Sacramento Bee | 3 | 56,031 | 168,093 |
| Total | 9 | 674,716 | $2,024,148$ |

Table 2 - Newspaper Outreach

## 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.


MAIL-BACK


LOCAL HOUSEHOLD HAZARDOUS WASTE FACILITY

Go to sharpstakebackcalifornia.org or call (844) 482-5322 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.

Figure 1 - Educational Brochure - Front

## SAFELY DISPOSE OF SHARPS

Protect Your Families, Communities and the Environment

## DISPOSAL OPTIONS



VISIT YOUR LOCAL HOUSEHOLD HAZARDOUS WASTE FACILITY

Go to sharpstakebackcalifornia.org or call (844) 482-5322 to learn more.


DRUG TAKEBACK SOLUTIONS FOUNDATION

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.

Figure 1 - Educational Brochure - Back


## DRUG TAKEBACK SOLUTIONS

 FOUNDATIONSAFE DISPOSAL OF MEDS AND SHARPS IS FREE!
¡DESECHAR EN FORMA SEGURA
MEDICAMENTOS Y OBJETOS PUNZOCORTANTES ES GRATUITO!

Protect our families,
communities and
the environment


EVERY 5 MINUTES
an American dies of
an overdose*
*coc.gov


43\% OF ALL
California self-injectors throw needles in the trash, leading to needlestick injuries.*
*ca.gov


47\% OF PEOPLE
who misuse Rx pain meds receive, buy or take them from a loved one.*
*samhsa.gov

Figure 2 - Direct Mail Postcard - Front - English/Spanish (Prior to established neutrally branded website and jointly operated toll-free number with the other Program Operator)


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 Tokeback:
Solutions Foundation

HOW IT WORKS


Medication Disposal:
01 Pull drawer open
Abra el cajón
02 Place medications inside Coloque los medicamentos en su interior

03 Close the drawer Cierre el cajón


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


## Getting a Sharps Container:

01 Go to www.safemedicinedrop.com or scan QR code
Visite www.safemedicinedrop.com o escanee el código QR

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

Figure 2 - Direct Mail Postcard - Back - English/Spanish (Prior to established neutrally branded website and jointly operated toll-free number with other Program Operator)

## HOW IT WORKS



## Medication Disposal:

01 Find a local kiosk at medtakebackcalifornia.org Encuentre una caseta local en medtakebackcalifornia.org
02
Pull drawer open
Abra el cajón
03 Place medications inside
Coloque los medicamentos en su interior

04 Close the drawer
Cierre el cajón


## Getting a Sharps Container:

01 Go to sharpstakebackcalifornia.org or scan QR code
Encuentre una caseta local en sharpstakebackcalifornia.org

02 Click "Order A Sharps
Mail-Back Package"
Haga clic en "Solicite un paquete de devolución por correo de objetos punzocortantes"

## 03 <br> Complete the request form

Complete el formulario de solicitud


For more information, or to find this material in additional languages, scan the above QR code to visit medtakebackcalifornia.org.


For more information, or to find this material in additional languages, scan the above QR code to visit sharpstakebackealifornia.org.

Figure 3 - Direct Mail Postcard - Back - English/Spanish (Once collaboration with the other Program Operator was complete. The front of the postcard remained the same as Figure 2 Front)

## Symbol of rebirth from fire tops Notre Dame in Paris

Ev veromas abasesom Ambluted hew
naks
Notre Dame Cathedral fort its moster back Saturday, in a pivotal moment for the Paris landmark's restoration.
The installation by a crane of a Bew golden rooster, reimagined as a dramatic phoenix with leking, flamed feathers, poes beyond being fuat a weathervane atop ther Gathedral spire. It symbou ces resifience amid deatruction after the devaslating April 2019 fire - as estoration officials also eveated an anti-fire mis ting system is being kitted out under the cathedral's roof.
Chief architect Philippe villeneuve, who designed this new rooster, stated that the original rooster's
survival signified a say of light is the catastrophe. "That there was hope. that not everything was lost. The beauly of the (edd) hattered roester expressed the ory of the exthedral weffering in flames," Villenewve said. He described the new work of art, approsimately half a meter lone and gleaming in the December sua behind Noere Dame Cathedral, as his "phoenik."

Villemerve elaboritel oa the new monter's sige niflcance, saying "Since. (the flim) we have worled en this roweter (the) wit cessar, which wees the fime carried to the toped the cathetrat as it was before, more than 9s meters from the ground - It is a fire of resurrection." In lighthearted comments, the architect said that the process of desifn


The new golden rooiter cortaing melyous relics is ithed by crave on Saturday to be instaled atop the spire of Notre Dume Cathedrad in Raris Anchitect Milippe Villenevve devoibed the new work of art, glearing in the December sul. as has "phoente."
mas se intense he mighe have to speak to his ther-

Before ascenfling to its verch, the moster -a french emblien of vigiFinct and Corlot's rever rection - was Hessed by Faris Archbishop Larent

Unikh in a wpare behind the monsument. Ulikh fored uncmed refir in hole imide the roower's beast, inclaling frap mests of Christ's Crown of Thoms and remains of Se. Dents and 9 Geseviere, influling the scelpture with
erlipioss importance. The rooster's installstus tumenim $\#$ mine arconsurnicted from Eu. genevaliefle-Dac's 19 it erntury desien, is a poigrant reminder of its meGeval origins as a symbol of hope and faith.

Its longatanding assocition with the French nation simee the Bemais: ance further salds to its historical and cultural Ugnificance, marking a new chapter of renewnd and hope for Notre Dame and the French people.


During the Boston Tea Party of Dec. 15, TTT3-depicted in this undated engreving - patriots in costume demped 34 chests of tea overboard from three Brkish ships to chests of teation without representation it was one of the defining moments that preceded the Revolitionary War

Boston Tea 250 with re
$\qquad$
mosnos
Patrictic mols and harbortivacai mots and hartio Roston on Sifuntay as the dity marked the 250 th the diny marked the 2Soth anniversary of the revolur ed America's indepens) ence.
The.


Figure 4 - Newspaper Advertisement - The Sacramento Bee


Figure 5 - Newspaper Advertisement - The San Diego Tribune

|  | THE NATION |  |
| :---: | :---: | :---: |

## Miscarriage leads to criminal charges in Ohio



Figure 6 - Newspaper Advertisement - The LA Times

DRUG TAKEBACK SOLUTIONS
FOUNDATION


Figure 7 - Digital Media Displayed in Targeted Media


Figure 8 - Digital Media Displayed on Digital Billboards


> DISPOSING OF NEEDLES AND SHARPS IS AS EASY AS 1, 2, 3!
> Now you can safely dispose of your unwanted and expired needles and sharps through the mail, in three easy steps.

> Step 1: Visit SharpsTakeBackCalifornia.org
> Step 2: Select "Order A Sharps
> Mail-Back Package"
> Step 3: Click Submit!

The best part? It's free! For more information visit SharpsTakeBackCalifornia.org or call (844) 482-5322.

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

## 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 (844) 482-5322.

Ordering online?
1 Go to sharpstakebackcalifornia.org or scan the QR code

2 Enter your information
(3) Complete the request form

For more information about the program, go to sharpstakebackcalifornia.org or call us at (844) 482-5322.
*Sharps include: hypodermic needles, pen or intravenous needles, lancets and other devices that penetrate the skin to deliver medication.

Figure 10 - Pharmacy Flier

safemedicinedrop
safemedicinedrop C'mon California! Join the fight against $R x$ drug abuse. Find a convenient safe disposal kiosk at www.safemedicinedrop.com or or by calling 1-844-482-5322 or get a FREE sharps disposal container at
sharpstakebackcalifornia.org.
\#ConsumerDrugTakeBackCA
13w
$\bigcirc \bigcirc \nabla$ ■
Be the first to like this
November 28, 2023

*- salemedicinedrop
*- safemedicinedrop $62 \%$ of teens say they abuse Rx drugs because of easy access. Toss old meds in any losk on safemedicinedropcom or call 1-64t-482-5322 Get a FREE sharps cortainer at sharpstakebackcalifornia.arg.
*ConsumerDruglakeBackCA
10 m
$\circ \circ \nabla$
Be the first to like this
December 22, 2023

Figure(s) 11 - Social Media Posts - Instagram. These images were shared on the same dates on X (Formerly Twitter) and Facebook


Figure 12 - The Foundation's individual website homepage (Prior to creation of neutrally branded website on 10/26/2023)


Figure 13 - Ordering Page

DRUG TAKEBACK SOLUTIONS FOUNDATION


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 (844) 482-5322 for assistance.

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

## - MEDICINE MAIL-BACK SERVICES

* INHALER MAIL-BACK SERVICES
- AUTO-INJECTOR MAIL-BACK SERVICES

If you are ordering on-site containers in bulk, click here https://portal.americanrxgroup.com/inmar

Figure 14 - Ordering Form


Figure 16 - FAQ

```
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 (844) 482-5322 for assistance.
Inhalers and injectors must be mailed in separate packages and cannot be combined with other unwanted medicines.
- MEDICINE MAIL-BACK SERVICES
- INHALER MAIL-BACK SERVICES
- AUTO-INJECTOR MAIL-BACK SERVICES
If you are ordering on-site containers in bulk, click here https:/portal.americanrxgroup.com/inmar
```

Frequently Asked Questions (FAQ) EDUCATIONAL MATERIALS

## Back To Home

Figure 17 - Educational Materials/ FAQ Location at the Bottom of the Ordering Form


Figure 18 - Educational Materials Page

## 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
$f \quad \geqslant \quad$ in 0

Figure 19 - The Foundation's individual website - Contact Us

Home About FAQ Contact Us Collector Resources | English |
| :--- |

Figure 20 - The Foundation's individual website - Required Languages

Safely dispose of your homegenerated sharps waste

Order a sharps mail-back package to be shipped directly to your residence for free. Click the button to order now. For
more information on how to order a sharps mail-back
package by phone, please
call (844) 4-TAKE-BACK or (844) 482-5322.

Order A Sharps Mail-Back Package
Order A Shar Mailen


Figure 21 - Neutrally branded Website Live on 10/26/2023


[^0]:    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

[^1]:    14 CCR section 18973.5(c)(5) If applicable, amount of home-generated sharps waste collected through

