



MARK PESTRELLA, CHAIR  
MARGARET CLARK, VICE - CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
900 SOUTH FREMONT AVENUE, ALHAMBRA, CALIFORNIA 91803-1331  
P.O. BOX 1460, ALHAMBRA, CALIFORNIA 91802-1460  
[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

May 23, 2017

The Honorable Lorena S. Gonzalez Fletcher, Chair  
Assembly Appropriations Committee  
State Capitol, Room 2114  
Sacramento, CA 95814

Dear Assembly Member Gonzalez Fletcher:

**OPPOSE UNLESS AMENDED ASSEMBLY BILL 444 (AMENDED APRIL 18, 2017) –  
MEDICAL WASTE: HOME-GENERATED MEDICAL WASTE**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) respectfully **opposes** Assembly Bill 444 (AB 444), as amended April 18, 2017, **unless amended to address the concerns expressed in this letter**. If enacted, AB 444 would authorize the California Environmental Protection Agency (CalEPA) to create a Statewide and an undefined State funded program for the collection of home-generated medical waste, including pharmaceutical and sharps waste.

The Task Force appreciates the Author's recognition of the long-standing issue posed by uncollected and/or improperly disposed home-generated medical waste. A solution does need to be determined, either statewide or on a per County basis for the several issues associated with medical waste such as underage access and overdose from stockpiled unused pharmaceuticals, improperly disposed sharps infecting sanitation workers, and environmental impacts of pharmaceuticals within water sources. A statewide solution is preferable in order to have a uniform message, and collection and disposal options; however, a State or government funded program is not a reasonable approach.

Multiple Countries such as Canada and Mexico, numerous local jurisdictions such as Alameda County, San Francisco County, San Mateo County, and Santa Clara County, as well as the State Department of Resources Recycling and Recovery (CalRecycle) have all determined the most sustainable approach to providing a solution to the home-generated medical waste issues is for the manufactures of the products to develop and fund the collection and safe disposal program(s) in coordination and consultation with local government. This approach shifts main responsibilities on to manufacturers which

incentives them to design their products in a manner to most practically be collected and disposed. This approach is otherwise known as Extended Producer Responsibility (EPR). AB 444 as currently written is inconsistent with EPR and should not become the standard for home-generated medical waste in California. AB 444 should be amended to include that the statewide collection, transportation, and disposal of home-generated medical waste be funded by the manufacturers of the subject waste.

The pharmaceutical industry has consistently posited the argument that EPR policies result in increased costs that are passed on consumers; however, the industry remains one of the most highly profitable sectors, domestically and globally. The cost the industry would incur from collection programs would amount to less than significant impact on the industry's margins or growth potential. Thus, it is recommended that the authors consider amendments to include the industry manufactures bear the majority of the program costs.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

For the foregoing reasons, the Task Force respectfully **opposes unless amended** AB 444 as amended on April 18, 2017. Should you have any questions regarding this matter, please contact Mr. Mike Mohajer, a Member of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Council Member, City of Rosemead

JJ:kk

P:\eppub\EnvAff\EA\TF\TF\Letters\2017\May\AB444OpposeLtr(asamended4-18-17).doc

The Honorable Lorena S. Gonzalez Fletcher

May 23, 2017

Page 3

cc: Assembly Members Adam Gray and Philip Ting  
Each Member of the Assembly Appropriations Committee  
Assembly Appropriations Committee Chief Consultant, Pedro R. Reyes and  
Jennifer Galehouse  
Director Scott Smithline, CalRecycle  
California Product Stewardship Council  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each member of the Los Angeles County Board of Supervisors  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Integrated Waste Management Task  
Force