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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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June 27, 2016

The Honorable Luis A. Alejo, Chair  
Assembly Environmental Safety and Toxic Materials Committee  
1020 N Street, Room 171  
Sacramento, CA 95814

Dear Assembly Member Alejo:

**SENATE BILL 423 (AMENDED JUNE 21, 2016)  
PHARMACEUTICAL AND CONSUMER PRODUCT WASTE: MANAGEMENT**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **opposes** Senate Bill 423 (SB 423). This bill applies to any “pharmaceutical that is offered for sale without a prescription,” i.e. any over the counter (OTC) drug. If enacted, among other things, the legislation would reclassify the unwanted or unused OTC pharmaceutical drugs as hazardous waste and in some cases as solid waste. However, the proposal is contrary to the existing state law which was specifically formulated to define unwanted or unused OTC pharmaceutical drugs as medical wastes in order to protect public health and the environment, emphasis added. By doing so, the proposal also shifts the management of these wastes from pharmaceutical industries or the producers of these products to local governments, an unfunded state mandate, emphasis added.

Adding the OTC drugs to the HHW definition also contradicts recommendations by CalRecycle to develop Extended Producer Responsibility (EPR) policies to handle difficult to handle types of waste such as pharmaceutical drugs. Since 2008, the Task Force has been an active supporter of EPR policies in order to lessen the financial burden placed on local governments’ programs while providing their residents with increased convenient options to properly dispose of unwanted product waste. The continued support is based on the notion that local governments cannot address these wastes on their own and that industry has an appropriate role based on their expertise and their accessibility to consumers through retailers who sell their products.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), 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.

The Task Force apologizes for missing Tuesday's deadline to submit our opposition letter, since the bill was just amended on Tuesday, but we would appreciate the Committee's consideration of our concerns.

For the foregoing reasons, the Task Force **opposes** SB 423. Should you have any questions regarding this matter, please contact Mr. Mike Mohajer 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

cc: Senator Pat Bates  
Each Member of the Assembly Environmental Safety and Toxic Materials  
Committee  
Paige Brokaw, Environmental Safety and Toxic Materials Committee Consultant  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each member of the Los Angeles County Board of Supervisors  
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