
EXTENDED PRODUCER RESPONSIBILITY WORKSHOP: EXPLORING SOLUTIONS FOR SHARPS

WEDNESDAY, JANUARY 18, 2012

ON SITE PARTICIPANTS: 45

CONFERENCE LINE PARTICIPANTS: 71

This document is intended as a brief overview of the EPR workshop on sharps. For further details, please refer to [presentation links](#).

Welcome

Heidi Sanborn, Executive Director of the California Product Stewardship Council – welcomed workshop attendees. The goal of this workshop is to come up with action steps we can all make towards better stewardship of used household sharps. This workshop is an opportunity to share information and use that to discuss ideas for sharps programs and a sustainably funded solution for the statewide management of sharps.

Terry Walker, Providence Saint Joseph Medical Center – Providence has a long history of community service, so partnership with CPSC to develop sharps EPR in protection of our communities and the environment is a natural fit to partner in hosting this workshop.

Kreigh Hampel, City of Burbank, Board Member CPSC – The City of Burbank recycling center takes questions almost daily from the public asking how they should dispose of used sharps. Just yesterday an elderly woman called asking if she could throw used sharps in the recycling bin. On average, the recycling center collects enough sharps from the sorting line to fill an entire garbage can each week. Exposing staff to waste sharps will increase needle sticks if we don't reach a solution for the proper management of sharps as a community which is why we are all here today.

Why We Are Here

Tedd Ward, Del Norte Solid Waste Management Authority – Sharps are a health and safety concern to everyone, a security issue, and a cost issue.

Characteristics of a successful sharps program:

- All sharps distributed should come with an FDA approved container and instructions for proper disposal
- As we build momentum for programs going forward, we do not want to develop behaviors that we will just have to change in the long run. We need long-term and permanent solutions.

Barriers to Participation

- Local health and safety concerns drive home generated sharps collection points to be at local

government facilities (placing the burden of management and disposal on local governments and taxpayers).

- Retailers and distributors of sharps are mostly interested in reducing their costs without increasing risks or hassles, so most are not interested in take back.
- Producers refuse to help with the cost of sharps collection and management.
- We need to establish a program that recovers at least 80% of sharps
- We need to underscore the importance of prompt action on this issue. We want to form new partnerships to increase sharps recovery.

Recommendations – Lack of support from producers and retailers to establish take back programs leaves us with 4 options:

- Local government can “dig in deeper” by establishing costly, ineffective programs and infrastructure for hazardous products it does not design, distribute, or sell.
- Local government can abdicate responsibility for the management of sharps and allow the problem to worsen in hopes of motivating the public for a better solution.
- Local mandate by ordinance for retailer take-back
- Statewide mandate by legislation for producer responsibility

[Update on Sharps Discussions and Programs in California and the U.S.](#)

Heidi Sanborn, California Product Stewardship Council – played a [video](#) to illustrate the danger of the situation. A Washington MRF (materials recovery facility) has seen an increase of 3 to 5 times as many sharps showing up on the sorting line. In addition to being a health and safety issue, this is also an efficiency issue (the sorting line must be completely shut down and all processes halted every time sharps appear on the sorting line.)

The Problem:

- SB 1305 was passed in 2006 to establish a disposal ban, container requirements, and management and disposal requirements for home generated sharps.
- Enforcement of SB 1305 is unclear and may only be done through a local ordinance. It can't be enforced through the Medical Waste Management Act because home generated sharps waste is excluded from the definition of medical waste.
- We need a sustainably funded system: Local governments do not have the funds to manage proper disposal for sharps or other products covered under the universal waste ban.
- Disposal bans without management plans are not cost effective or effective for the proper management of these products.
- 33% of sharps are ending up in trash; 36% are in containers ending up in trash; Mail back programs receive 2% of sharps; Pharmacies receive 2%; 19% of sharps are returned to medical providers.
- Total cost of dealing with needle sticks nationally is \$226 million/year and \$4.6 million/year in California according to CalRecycle.

Barriers to proper disposal:

- 20% of the problem is that retail stores will not take back sharps
- 30% of the problem is that consumers who want to do the right thing, don't know where to take back sharps

- We can easily solve 50% of the problem by establishing retail take back locations (by incentivizing take back programs for retailers) and conducting point-of-sale education/instruction to the consumer for the proper disposal of sharps.
- Most consumers receive misinformation about what to do with sharps.

Methods for managing home-generated sharps:

- Home-generated sharps waste shall only be transported in a sharps container or other containers approved by the enforcement agency and shall only be managed at any of the following:
 1. Household Hazardous Waste Facility
 2. Consolidation Point
 3. Medical Waste Generator's Facility
 4. Mail-back

Stakeholder Recommendations in Sonoma County:

- Establish drop-off points throughout Sonoma County
- Provide containers at point of sale
- Provide public education at point of sale
- Make program easy and convenient
- Use same containers for all users to reduce “stigma” and increase compliance
- Encourage kiosk sponsorship (no one volunteered)
- Start education and collection with veterinary offices and health facilities

State Legislation: Medical Sharps

- Several states have laws related to sharps disposal, including
 - Disposal bans (ex: MA, CA)
 - Hospitals and nursing homes required to accept sharps (ex: NY)
- Colorado – There is a bill to require pharmaceutical companies to submit plans describing how they are promoting safe disposal (passed Senate, but not the House in 2011)
- Maine - LD 1412/HP 103 Act to Promote the Proper Disposal of Sharps (EPR legislation)
- Washington - S.563 An Act Relating to the Disposal of Residential Sharps Waste (EPR legislation)

Results From Local Government Sharps Programs

Natalie Jimenez, Los Angeles County Department of Public Works – presented overview of the [Los Angeles Countywide Sharps Waste Management Program](#):

Program Goal:

- Provide convenient and accessible means for residents to properly dispose of home-generated sharps waste:
 - Convenience is key to success of the program
 - Partnerships are critical to leverage limited resources
 - Protect the environment and public health and safety.

Program Overview:

- Establishment of a mail back program was important to meet the needs of disabled, elderly and home-bound residents.
- Today they have over 100 collection sites, including mobile collection events
- Successful and innovative partnership includes: LA County Sheriff's Department (established drop boxes for drugs and sharps), LA County Department of Health Services, The LA County Community and Senior Services Department, LA County Department of Public Works, and Goodwill Industries
- Public outreach efforts include media releases, newspaper articles and advertisements, brochures, posters, and a dedicated [website](#).
- Efforts have resulted in the collection of 26,000 pounds of sharps waste annually.

Future goals for the program:

- Partnerships with pharmacies, medical facilities, and retail stores
- Public education – many people do not know that it is illegal to dispose of sharps in the trash.
- Increase collection

Q. How will you expand outreach to the Hispanic communities in Los Angeles County?

A. Outreach materials are bilingual in English and Spanish, and any media outreach materials are also in Spanish.

Jeffrey Smedberg, Recycling Programs Coordinator for Santa Cruz County – Provided an overview of the [Sharp Solutions for Home Medicines Program](#) (includes programs for both sharps and medicines)

- People really want convenient and free take back locations. Retail is the most logical and cost effective option for take back.
- All local jurisdictions in Santa Cruz County have joined in this program.
- Locally owned retail pharmacies also participate in the take back program. Locally owned pharmacies receive the highest quantities of sharps waste in the county.
- Program overview:
 - Program in operation for 3.5 years
 - 33 take back sites
 - 896 pickups
 - 21,388 lbs. of sharps collected
 - 29,955 lbs. of pharmaceuticals collected
 - 51,343 lbs. of total collections
 - Cost of pickups is \$73,740

Q. Could you expand on your relationship with Walgreens and CVS?

A. We are on very good terms with both retail stores. CVS was willing to take back sharps but would not take back pharmaceuticals. Walgreens was willing to take back both sharps and pharmaceuticals.

Bill Worrell, San Luis Obispo County – Presented overview of the [San Luis Obispo County Sharps Retail Take-Back Program](#)

- Why mandatory take-back?
 - No retailers would sign up for a voluntary program
 - Convenient for the public
 - Reduces local governments HHW management costs
 - Can be implemented by local government
- Retailers are not in the business of taking products back. Local governments must make things easy (providing collection containers, take-back location identification stickers, brochures and other bilingual education/outreach materials)
- IWMA Collection Service is a fee-based service for retail take back locations but retailers can use other vendors as well
- Program Success: Easy for retailers, easy for consumers!

Q. Who funds the free containers?

A. free containers were part of a grant. San Luis Obispo County bought 60,000 of them initially and will continue to provide free sharps collection containers and spend about \$30,000 per year to do so. The cost will be incorporated into the collection fee that we charge retailers.

Q. Are the sharps collection containers reusable?

A. No, once they are locked they cannot be opened. Containers are treated to destroy any pathogens and disposed of in accordance with appropriate regulatory guidance.

[Sharps Management Models in Canada and Elsewhere](#)

Tom Erickson, UltiMed – Provided overview of UltiMed Company:

- UltiMed is a big promoter of the producer responsibility concept. This company is the only sharps producer supporting EPR because it is privately held and owners think its important.
- The solution to safe and proper sharps management must provide sharps users with a free collection container. Can be made for less than \$1 per container.
- Pen Needles with insulin cartridges are the future of sharps and nearly 90% of diabetic sharps users in Europe have switched from syringes to pens. Syringes will soon become obsolete.
- Pen Needles can be more dangerous than syringes because they are very small and made with transparent plastic (they are not easily spotted).
- Diabetics generate well over 90% of home generated sharps waste.

The Problem:

- 93% of diabetics throw used, unprotected sharps into the trash
- 3% flush them down the toilet
- 4% put them in puncture-resistant container
- A needle stick injury can cost up to \$3,000 for follow up care

Three elements of a successful disposal program:

- Sharps containers
- Convenient collection sites
 - Hospitals, physician offices, health clinics, fire departments, point-of-purchase sites, and

- medical waste facilities
 - Mail back
- No cost to the sharps user
- Provided overview of types of FDA approved sharps containers.
- Local Program, Sioux Falls – has over 90% compliance and has the lowest percentage of sharps waste in landfills in the U.S. Community is relatively small with 150,000 people and a city staff person was accidentally stuck and got very sick which is what drove this community to action.
- Why is the U.S. falling behind?
 - Political pressure from sharps manufacturers, pharmacies, pharmaceuticals companies (when threatened with the cost for the disposal of sharps), and medical waste disposal companies
- In Canada, Stericycle supplies sharps containers and has pickup for used sharps and unused medications at nearly every pharmacy and vet clinic in Canada
 - Steripacks for sharps
 - Buckets for unused medications

Current Situation in California on Sharps Management

Nancy Parris, Director of Epidemiology, Providence Saint Joseph Medical Center – [Needlesticks and Bloodborne Pathogens](#)

- Following exposure, risk of infection depends upon:
 - The pathogen involved
 - The type of exposure
 - The amount of blood involved in the exposure
 - The amount of virus in the patient's blood at the time of exposure
- Bloodborn pathogens and characteristics of infection:
 - Hepatitis B Virus
 - Hepatitis C Virus
 - Human Immunodeficiency Virus (HIV)
 - Tetanus
- What to do if a needle stick occurs
 - Wash area with soap and water
 - No scientific evidence for use of antiseptics or squeezing the wound
 - Do NOT use bleach or other caustic agent
 - Report the exposure IMMEDIATELY

Janine Hamner, Waste Management – [Sharps Disposal: Managing Household Generated Sharps](#)

- 1.75 - 3.75 billion dollars a year are being spent on treating needle stick injuries.
- Needle stick injuries are one of the top three injuries reported at MRFs (materials recovery facilities)
- Each time needles are found on the sorting line, the entire process must be stopped, resulting in an enormous loss of productivity for MRFs.
- Waste Management makes huge investments to protect employees, including strict protocols for recycling centers, transfer station, and landfill workers as well as investing in protective gear design and purchase for recycling center workers.
- Methods of protection against needles are extremely expensive – Waste Management greatly

supports EPR for sharps and is eager to find solutions for sharps disposal.

James Weglarz, Republic Services – Presented overview of [Residential Sharps Mail Back Program](#)

Why develop a sharps program?

- To Service the needs of customers: Customers express the need and desire for sharps take back program.
- To keep communities safe
- To protect employees
- Republic Services believes that using a sharps container protects both people and the environment and is the responsible way to dispose of a needle
- Republic Services has aligned with an industry leader in medical sharps disposal, Stericycle, to deliver a convenient, efficient, compliant and safe way for customers to dispose of medical sharps from the convenience of their homes
- Each Mail Back Kit includes:
 - Sharps Container
 - Shipping both ways
 - Pre-paid treatment/disposal
 - Customer manifest/Proof of treatment/Disposal Document

John Katchka, Stericycle – [Solutions for Home Sharps Collections](#)

- Disposal solutions for home users include mail back kits and community collection.
- Needle drop boxes for community collection are safe and affordable

Garen Hovagimyan, Burbank Tower Pharmacy

- Reviewed improper methods of sharps disposal relayed to him by customers at his pharmacy including throwing them in the trash
- Home delivery sharps mail back programs may not be the most cost effective collection method
- Solutions:
 - Educating people more on the dangers of improper household sharps disposal
 - Getting local pharmacies involved more in household sharps disposal programs
 - Creating federal, state or local level programs to pay for sharps disposal for those patients that qualify

Comment: The entire medical community is starting to realize the severity of the issue of improper sharps disposal. The public and elected officials listen to the medical community. Partnerships with the medical community are important to reach solutions to the problem.

California Sharps Coalition Report

Tom Campbell, [California Sharps Coalition](#)

- Diverse membership of businesses, community groups, non-profit organizations and governments.
- California Sharps Coalitions estimates that 90% of self-injectors dispose of home-generated sharps in trash

- Recent history of sharps legislation in CA
 - SB 486 required drug manufactures to submit plans outlining what (if anything) they do to help their customers safely dispose of their home injected products
- Voluntary compliance with the law isn't working or producing measurable results. When manufacturers were invited to work with the California Sharps Coalition to develop a successful plan, the Coalition received no response.

Next Steps:

- Legislation: Senate Bill 419
- Membership: Continued growth
- Expansion: Sharing ideas with other advocates nationally

Q. What were the components of sharps programs which received high grades from the SB 486 Evaluation Team?

A. Sharps mail back programs that are convenient for sharps users and generally received a high grade.

Facilitated Discussions on Removing Barriers, Pilots/Partnerships, and Next Steps

– Heidi Sanborn, CPSC, Facilitator

Recommendations/Ideas for Follow-Up from Audience and Speakers

1. One part of the problem is that needle users in California are required to use an approved container to dispose of sharps, which presents a cost barrier.
 - a. One option is to provide a container when needles are first purchased such as is done with Ultimed.
 - b. Another option is working with an HMO to provide sharps containers for low-income medical patients when they are given a prescription for sharps (Santa Clara County example).
2. Del Norte County is still eager to establish a pilot program. One opportunity may be to collect and consolidate sharps and bring them to a local hospital with an autoclave, which would significantly reduce the cost for end of life disposal.
3. SB 41 is a three year program which allows every pharmacist in CA to sell up to 30 syringes without a prescription. In order to do that, they must also provide a program for collection of used sharps (a sharps collection container). Each jurisdiction should communicate with their city and county health officers to inquire about how they are enforcing SB 41, which could be part of the long term solution. This may help pharmaceutical companies better understand why we need a stewardship program for sharps.
4. There are some local pharmacies and veterinary clinics which do provide sharps take back services because they want to satisfy customers and meet their needs. Identifying and supporting those businesses could be a start.

5. We need to show the public that there are people hand sorting through their recyclables and that sharps exposure and needle sticks are a serious problem. This can be done through the media.
6. Churches are where people go for information. We can also ask churches to provide sharps take back and education materials to members of their congregations.
7. Legislation could remove barriers to hospitals and other medical facilities that wish to take back sharps.
8. If you are a pharmacy selling sharps in California, you have to take back sharps containers for free. If you sell sharps online, you have to provide mail back. Pharmacies will also gain more foot traffic if they provide in-store sharps take back.
9. Educate the professionals: Doctors, pharmacists, the California Medical Association, the California Nurses Association, Infection Prevention experts, and community Environmental Service Directors to establish partnerships to support the solution.
10. A true producer responsibility program would incorporate the cost of disposal into the product price of sharps and cause the producers to rethink design to reduce waste and lifecycle impacts. Janine with Waste Management commented that their recovery process does include recycling of the plastic after it has been through the autoclave.
11. In the hospital, safety devices for sharps must be used. Could develop legislation to mandate that every sharp produced has a safety device. This would eliminate unsafe sharps in the hands of the public.
12. Draft legislation that all internet sales must also pay for mail back container. This would appeal to chain pharmacies who are losing business to the internet and incentivize them to provide in-store take back to win the customers back. They are losing important customers in their stores (especially diabetics) to mail back services.
13. Retailers and pharmacies are reluctant to provide take back because they are afraid of dealing with the disposal costs and must be educated.

[How to Support Sharps Take-Back Program through Procurement](#)

Donna Sneeringer, CPSC – How to “vote with your dollars” to provide producer responsibility for sharps.

- Local governments and organizations can be proactive through procurement and purchasing practices.
- EPP = Environmentally Preferable Purchasing. We can drive producers to make a better product by purchasing from manufacturers who are doing the right thing and designing products which are environmentally preferable.
- Local governments and large purchasers can incorporate key language in procurement policies that address product specifications such as minimization of waste in product design, materials

content, and end-of-life management such as providing a self contained “FDA approved” safety container to manage all sharps.

Workshop Wrap-Up and Next Steps – Heidi Sanborn, CPSC

- We will provide the notes and video of the event and look forward to working with all of you on future projects identified in this workshop!