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April 13, 2009

Senator Brannigan, Chair
Representative Perry, Chair
Committee on Health and Human Services
100 State House Station
Augusta, ME 04333-0100

RE: Support for LD 821, An Act To Support Collection and Proper Disposal of Unwanted Drugs

Dear Senator Brannigan, Representative Perry and members of the Committee:

The Product Stewardship Institute (PSI) is writing to express our support of LD 821, *An Act To Support Collection and Proper Disposal of Unwanted Drugs* that will create a take-back program for the safe disposal of unwanted drugs from residential sources through a product stewardship system. PSI appreciates the Committee's efforts to understand this complex issue. We urge you to continue Maine's leadership on product stewardship by passage of LD 821.

PSI is a national non-profit organization with membership from 45 state governments, 70 local agencies, and over 45 businesses, environmental groups, and other organizations that have pledged to work together to reduce the health and environmental impacts from consumer products. These stakeholders work cooperatively, through PSI, to develop and implement product stewardship solutions that share responsibility for safely managing consumer products across their entire life cycle, from design to reuse, recycling, or disposal.

The use of pharmaceutical drugs in America is growing quickly as our population ages and an ever-expanding range of drugs is developed to ease physical and mental health conditions. At the same time, new research is detecting pharmaceutical compounds in our waterways and soils, and the abuse and misuse of prescription drugs is increasing. Reducing the quantity of *unwanted* pharmaceuticals in our nation's medicine cabinets and ensuring their safe disposal will reduce the chances for illegal diversion and accidental poisoning, and lower risks to aquatic species and human health.

The pharmaceutical industry has taken a lead in shifting drug disposal recommendations for the general public from flushing to trash disposal for most drugs, and believes strongly in the need to reduce the quantity of pharmaceutical waste going down the drain. However, industry does not believe that the benefits of drug take-back (as compared to trash disposal) warrant the additional cost of setting up and running a take-back system. Conversely, many

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state and local agencies around the country believe that safe and convenient take-back programs are the only way to address public concerns about drinking water, aquatic impacts, drug abuse, and poisonings.

While it is imperative that we continue to research the complex questions regarding the environmental and health impacts of waste pharmaceuticals, PSI supports our state and local government members in their efforts to devise and implement sustainable solutions to problems within their jurisdictions. PSI believes that it is time for a state to implement a product stewardship system for waste pharmaceuticals. While there may be other viable options, only by testing solutions can we get the best possible information about what system provides the greatest public benefit.

LD 821 is fully aligned with the mission of our organization, and the basic approach we take to finance the end-of-life management of difficult-to-manage wastes. By requiring manufacturers to internalize the cost of disposing of their products, it provides a direct financial incentive for them to reduce the amount of the product that becomes waste. These systems also save money for local governments by relieving them of the financial responsibility to pay for and manage the collection and safe disposal of unwanted pharmaceuticals.

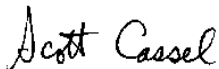
In 2008, PSI convened two national stakeholder meetings, called the “National Dialogue on Waste Pharmaceuticals,” that included representatives of local, state, and federal government; drug manufacturers; retail and consultant pharmacy associations; reverse distributors and the waste industry; drug diversion investigators; and environmental groups. PSI’s meeting documents, including agendas and participant lists, are available online at:

- <http://www.productstewardship.us/PharmaceuticalMeetingSacramentoCA>
- <http://www.productstewardship.us/PharmaceuticalMeetingWashingtonDC>
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PSI continues to convene the national dialogue, and is in the process of addressing key policy questions related to source reduction and disposal.

In closing, let me again express PSI’s appreciation for the Committee’s time and attention to this complex environmental and public safety issue. I urge you to support passage of LD 821.

Sincerely,



Scott Cassel
Executive Director/Founder

cc: Senator Lisa T. Marraché	Representative Peter C. Stuckey
Senator Peter Mills	Representative Sarah O. Lewin
Representative Patricia Jones	Representative James J. Campbell, Sr
Representative Mark Eves	Representative Henry L. Joy
Representative Matthew J. Peterson	Representative Meredith n. Strang Burgess
Representative Linda F. Sanborn	Representative Donald G. Soctomah