



SF Environment

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A Department of the City and County of San Francisco

Mark E. Farrell
Mayor

Deborah O. Raphael
Director

Notice of Determination - Product Stewardship Plan Review

San Francisco Safe Drug Disposal Stewardship Ordinance

(Ordinance No. 31-15, San Francisco Environment Code, Chapter 22, Section 2200 through 2219)

PLAN NAME: San Francisco MED-Project, A Product Stewardship Plan for Unwanted Medicine from Households, dated May 31, 2018

PLAN OPERATOR: San Francisco MED-Project, LLC
Victoria Travis, National Program Director
1800 M Street NW, Suite 4005
Washington, DC 20036
844-677-6532
sanfrancisco@med-project.org

DETERMINATION:

The San Francisco MED-Project Stewardship Plan dated May 31, 2018, is APPROVED subject to the following conditions:

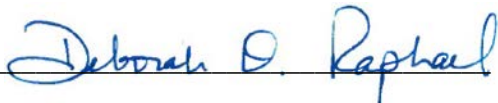
1. Within 45 days of this determination, the Producers represented by the San Francisco MED-Project (MED-Project), through their Plan Operator, shall make the Standard Mail-Back Services for Iodine-Containing Medications, Injector Mail-Back Services for Pre-Filled Injector Products, and Inhaler Mail-Back Services for Inhalers available to San Francisco residents through the Call Line and MED-Project website.
2. Within 90 days of this determination, the Producers represented by MED-Project, through their Plan Operator, shall update the Promotion System to educate residents about the availability and use of all types of Mail-Back Services. Specific elements of the Promotion System that shall be updated include the Call Center, MED-Project website, and all Educational Materials such as the kiosk drop-off site signage and brochure. The new/updated Educational Materials must be provided to all kiosk drop-off sites and mail-back distribution locations within 120 days of this determination.
3. Within 30 days of this determination, the Producers represented by the MED-Project shall provide, through their Plan Operator, a written description of a standard process that will be used when making the non-substantive changes listed in Section 2212(c) of the Ordinance. At minimum, the written notification shall include the location name, location address, and service provided and shall describe how MED-Project will provide information on the change(s) to the public.
4. Within 60 days of this determination, the Producers represented by MED-Project shall propose, through their Plan Operator, a service log or other system to track receipt and completion of all service requests received

from participating kiosk drop-off sites and mail-back distribution locations. The service log or other system documentation shall be submitted to the Department on a quarterly basis and shall also be available upon request.

5. Within 60 days of this determination, the Producers represented by the MED-Project shall implement, through their Plan Operator, a systematic process for determining if new Pre-Filled Injector Products and/or Inhaler Products brought to market contain Schedule II to V Controlled Substances, and accordingly require handling by a DEA-registered reverse distributor. MED-Project shall provide the Department with a written description of the process. At minimum, the process shall be conducted on a quarterly basis to ensure that all entities participating in the Stewardship Program comply with all federal laws and regulations pertaining to the handling of Covered Drugs. MED-Project shall notify the Department in writing of the results of each quarterly determination within 10 business days of the end of each quarter.

6. By October 25, 2020, the Producers represented by the MED-Project shall submit, through their Plan Operator, an updated Stewardship Plan to the Director. The Director shall review the updated Stewardship Plan according to all requirements in Environment Code Chapter 22 and Regulation #SFE-16-01-SDDSO.

The above conditions of approval shall be incorporated in the Stewardship Plan approved by this Notice of Determination. In the event that any of the above conditions of this determination are not met, the Producers represented by the San Francisco MED-Project are in violation of Environment Code Chapter 22 and subject to the provisions of Environment Code Section 2213, unless otherwise determined by the Director in her sole discretion.

Signed:  Plan Approval Date: 07/03/2018

Deborah O. Raphael
Director
San Francisco Department of the Environment