



**San Francisco Safe Drug Disposal Stewardship Ordinance  
Fourth Biennial Report to the San Francisco Board of Supervisors  
December 2023**

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The San Francisco Board of Supervisors passed the Safe Drug Disposal Stewardship Ordinance (“the Ordinance”) in March 2015, with an effective date of April 25, 2015. The Ordinance requires pharmaceutical manufacturers (called “Producers” in the Ordinance) that sell over-the-counter and prescription medicines in San Francisco to provide residents with a free, safe, and convenient way to dispose of their unwanted and expired medicines. Section 2214(c) of the Ordinance requires the San Francisco Environment Department (“the Department”) to report biennially to the Board of Supervisors on the implementation status of the Ordinance and any recommended changes to the Ordinance. This is the fourth Biennial Report the Department has submitted to the Board in accordance with Ordinance requirements and covers the period of October 2021 to November 2023.

**Ordinance Implementation Highlights**

- Inmar Intelligence (“Inmar”) and the Medication Education & Disposal Project (“MED-Project”) operate the two approved Stewardship Programs that provide San Francisco residents medicine collection services at no charge. MED-Project’s Stewardship Program was first approved by the Department in July 2016 and currently operates medicine collection kiosks at 62 sites. Inmar’s Stewardship Program was first approved

by the Department in November 2020 and currently operates a medicine collection kiosk at one site.

- The Ordinance establishes a minimum “Convenience Standard” that requires each approved Stewardship Program to provide five medicine collection kiosk sites in each Supervisorial District (“District”). As of October 2023, MED-Project is meeting the Convenience Standard in nine of 11 Districts. Inmar is not meeting the Convenience Standard in any District. See Table 1 for a count of the medicine collection services currently available by District.
- Participating medicine collection kiosk sites include CVS Pharmacy, Kaiser Permanente, North East Medical Services, Walgreens, and numerous independent pharmacies. Although all pharmacies in San Francisco have been offered the opportunity to host a collection kiosk through both Inmar’s and MED-Project’s Stewardship Programs, Costco, California Pacific Medical Center, and Safeway have so far declined.



**Photo 1.** MED-Project collection kiosk  
Mission Wellness Pharmacy, 2424 Mission Street



**Photo 2.** Inmar collection kiosk  
Lucky Supermarket Pharmacy, 1750 Fulton Street

- Requirements from the federal Drug Enforcement Agency (“DEA”) and the California State Board of Pharmacy limit what types of sites can host medicine collection kiosks due to the expected presence of controlled substance medications among medicines that are collected in kiosks.
- Walgreens joined MED-Project’s Stewardship Program in January 2023 and currently hosts medicine collection kiosks at 24 of its 48 San Francisco pharmacies. Prior to joining MED-Project’s Stewardship Program, Walgreens was operating its own self-funded medicine collection program at nine of its San Francisco pharmacies.
- The Ordinance requires City-operated pharmacies to participate as medicine collection kiosk sites. Community Behavioral Health Services’ outpatient pharmacy hosts a kiosk

through Inmar’s Stewardship Program and Zuckerberg San Francisco General Hospital’s outpatient pharmacy hosts a kiosk through MED-Project’s Stewardship Program.

- All ten San Francisco Police Department stations host medicine collection kiosks through MED-Project’s Stewardship Program, as does the San Francisco Sheriff’s Office at its Community Programs Building in the South of Market neighborhood.
- The Ordinance requires approved Stewardship Programs to supplement medicine collection kiosk service with medicine mail-back services and/or collection events in Supervisorial Districts where a Stewardship Program fails to meet the Convenience Standard. Both Inmar and MED-Project provide mail-back envelope distribution sites – locations where residents can obtain free postage-paid medicine “mail-back” envelopes to return unwanted medicines for disposal – to meet this requirement.
- As of October 2023, Inmar provides 152 mail-back envelope distribution sites and MED-Project provides 12 mail-back envelope distribution sites. Photo 3 shows a standard medicine mail-back envelope, which residents can pick up at mail-back envelope distribution sites free of charge. Standard mail-back envelopes can be used for collection of all prescription and over-the-counter medicines except medicines dispensed in a pre-filled injector or inhaler dosage form.



**Photo 3.** Postage-paid standard medicine mail-back envelopes are available to residents free-of-charge at mail-back envelope distribution locations and by request through the resident-facing website and call center.

- Inmar and MED-Project will also mail three different types of mail-back packages directly to a resident’s home, free of charge, by request through the resident-facing website and call center. The mail-back packages available include: a standard mail-back envelope for pills, liquids, and creams; an injector mail-back package for unused pre-filled injector products such as EpiPens®; and an inhaler mail-back package for medicines dispensed in an inhaler.
- In calendar year 2021, MED-Project’s Stewardship Program collected 24,010 lb. of medicine through its medicine collection services, an increase of 9% from 2020. In 2022,

MED-Project's Stewardship Program collected 26,141 lb., an increase of 10% from 2021.

- There are only two years of collection data available for Inmar's Stewardship Program because Inmar's Stewardship Plan was first approved in November 2020 and did not start operating until early 2021. In calendar year 2021, Inmar's Stewardship Program collected 380 lb. of medicine through its medicine collection services. In 2022, Inmar's Stewardship Program collected 791 lb., a 108% increase from 2021. See Table 3 for a breakdown of each Stewardship Program's collection results by year and collection service.
- The Department projected a small increase in the combined collection results of Inmar's and MED-Project's Stewardship Programs in 2021 and 2022 as collection levels returned to pre-pandemic levels. The combined collection results increased 11% from 2020 to 2021 and 12% from 2021 to 2022. The Department anticipates the combined collection results to continue to increase in 2023 and 2024 due to increases in program participation and the number of collection kiosk sites.
- The medicine collection kiosks continue to be San Francisco residents' preferred collection service. Collection kiosks accounted for 96% of the combined collection results of Inmar's and MED-Project's Stewardship Programs in 2021 and 2022, with the remaining 4% collected through medicine mail-back packages.
- According to the results of the most recent Biennial Survey of residents, which was completed in February 2022, 23% of San Francisco residents indicated they were aware of the medicine collection kiosk sites. This represents a 21% decrease from the previous Biennial Survey of residents, which was completed in February 2020. The next Biennial Survey of residents will be conducted in the first calendar quarter of 2024.
- Inmar and MED-Project are required by the Ordinance to operate a single coordinated system of promotion to broadly promote their Stewardship Programs' collection services to residents, pharmacies, and the healthcare community. To meet this requirement, Inmar and MED-Project have implemented a coordinated design for their collection kiosks, use the same printed outreach materials, and operate a single resident-facing website.

### **Ordinance Background**

Prior to passage of the Ordinance, San Francisco residents had long desired a sustainably-funded program for safely disposing of their unwanted medicines, which cannot be lawfully collected through San Francisco's Household Hazardous Waste Programs operated by Recology. Improper disposal of medicines by flushing down the toilet or drain or placing medicines in the household trash can harm the environment and public health. Wastewater treatment plants are not designed to remove pharmaceutical chemicals, so many flushed medicines pass untreated into surrounding waterbodies and contaminate drinking water sources. Disposal in any of San Francisco's three refuse collection bins is also problematic

because it can lead to accidental poisonings, diversion of medicines for illegal use, or harm to sanitation workers. When disposed in the landfill, medicines may still pollute waterbodies through discharge of landfill leachate to wastewater treatment plants.

## **Ordinance Overview**

The Ordinance is based on an Extended Producer Responsibility (EPR) policy model in which manufacturers of products that are difficult or expensive to dispose of are responsible for the costs of collection and disposal at the end of their product's useful life. Under an EPR approach, all members of the product chain – producers, retailers, consumers, and governments – participate in one or more product stewardship programs to ensure problem products are managed to protect public health and safety and the environment. Since the 1990s, highly effective product stewardship programs have been implemented in Europe, Canada, and most recently the United States to manage a wide range of products such as batteries, printed paper and packaging, pesticides, automotive tires, appliances, and many more.

### *Producer Requirements*

Under the Ordinance, pharmaceutical Producers that sell their products into San Francisco are required to fund and operate a Department-approved product stewardship program (“Stewardship Program”) that provides a free safe medicine collection system for San Francisco residents. A Producer can operate its own Stewardship Program individually, jointly with other Producers, or designate a third-party product stewardship organization to operate a Stewardship Program on the Producer's – or a group of Producers' – behalf. Each Stewardship Program is required to meet all requirements of the Ordinance, regardless of which entity operates the Stewardship Program or the number of Producers participating in it.

### *Stewardship Program Requirements*

Any entity that intends to operate a Stewardship Program is required to submit a written Stewardship Plan describing the proposed Stewardship Program for safe medicine disposal. The Department is responsible for evaluating the proposed Stewardship Plan for compliance with the Ordinance and either approves, approves with conditions, or rejects the proposed Stewardship Plan based on its determination. The Ordinance outlines specific collection system, promotion system, and reporting requirements a Stewardship Plan must meet for approval.

A central concept of the Ordinance is the “Convenience Standard,” which establishes the minimum number of medicine collection kiosk sites a Stewardship Program must provide. The Convenience Standard is based on Districts, with each approved Stewardship Program required to provide at least five medicine collection kiosk sites in each District, geographically distributed to promote convenient and equitable service. Due to federal DEA requirements, only pharmacies, hospitals or clinics with a pharmacy, law enforcement agencies, and narcotics treatment programs can lawfully host medicine collection kiosks. These DEA-eligible locations participate in a Stewardship Program by voluntarily hosting medicine collection kiosks for residents to securely dispose of their unwanted medicines. The Stewardship Program Operator (“Program Operator”) is responsible for implementing all elements of the approved Stewardship

Plan. This includes recruiting DEA-eligible medicine collection sites into their Stewardship Program, providing and paying for the collection kiosks and ongoing disposal service, training staff at the collection kiosk sites, and providing troubleshooting and other support to Stewardship Program participants as needed. If a Program Operator is unable to meet the Convenience Standard in a District, that Program Operator is required to supplement collection kiosk service with one-day medicine collection events and/or permanent medicine mail-back envelope distribution sites. Each Program Operator is also required to provide medicine mail-back envelopes – postage pre-paid packages that residents can use to return their unwanted medicines through the mail for proper disposal – to home-bound or reduced mobility residents free of charge.

The Ordinance's promotion system requirements provide guidance to Program Operators on how to promote their Stewardship Programs to ensure residents, pharmacies, and the healthcare community are broadly aware of the medicine collection services available to residents. The overarching promotion system requirement is that all approved Program Operators must coordinate with each other to develop a single system of promotion that will be used by all Stewardship Programs. To that end, Program Operators are required to work together to create standardized instructions and a readily recognizable design for the collection kiosks. Program Operators are also required to jointly operate a single telephone call center and website for residents to locate medicine collection services and other pertinent information. The Ordinance also requires Program Operators to conduct multi-language outreach in five languages – English, Spanish, Chinese, Russian, and Tagalog – and distribute printed outreach materials to residents, pharmacies, and the healthcare community.

Finally, the Ordinance requires each Program Operator to prepare and submit an Annual Report describing their Stewardship Program's activities during the previous calendar year and establishes what information the Annual Report must include.

#### *Environment Department Oversight*

The Department's role is to provide oversight to ensure that each Program Operator operates its Stewardship Program in accordance with Ordinance requirements and as described in its approved Stewardship Plan. This starts with initial Stewardship Plan review, where a prospective Program Operator submits its written Stewardship Plan to the Department for review. The Department reviews the proposed Stewardship Plan against the Ordinance requirements and either approves, approves with conditions, or rejects the Stewardship Plan. Once a Stewardship Plan is approved, the Program Operator has 90 days to fully implement and operate the Stewardship Program. Beyond initial Stewardship Plan review and approval, the Department is responsible for providing ongoing oversight to ensure each Stewardship Program is implemented as described in the approved Stewardship Plan. The Department is authorized to impose fees on Producers and/or Program Operators to recover costs incurred in overseeing the Ordinance. The Department also has enforcement authority under the Ordinance.

### *Ordinance Outreach Regulations*

In July 2016, the Department adopted outreach regulations to provide Program Operators additional guidance on how to design and implement the single system of promotion required in the Ordinance (“Outreach Regulations”). The Outreach Regulations prescribe detailed outreach requirements, including sections on outreach program design, reporting, effectiveness, and coordination. Among other things, the Outreach Regulations establish outreach performance metrics that a Stewardship Program must meet and require that at least 50% of San Francisco residents be aware of the Program, as measured by the results of the most recent Biennial Survey of residents.

### **Ordinance Implementation Status**

#### *Two Approved Stewardship Programs*

MED-Project is the first product stewardship organization approved by the Department to operate a Stewardship Program in San Francisco. MED-Project is a business association created by Producers to meet the requirements of the Ordinance and similar pharmaceutical EPR ordinances adopted by other Bay Area counties. MED-Project has 493 Producers participating in its Stewardship Program per its most recent list of Producers submitted in October 2023. MED-Project has operated in San Francisco since October 2016 and was the only approved Program Operator until November 2020.

In November 2020, Inmar became the second product stewardship organization approved by the Department to operate a Stewardship Program in San Francisco. Inmar is a privately held company specializing in logistics, including providing pharmaceutical returns services to pharmacies, pharmaceutical manufacturers, and healthcare providers. Inmar has prior experience running medicine collection programs, having operated its own retailer-funded medicine collection program prior to its entry in San Francisco. Inmar has 71 Producers participating in its Stewardship Program per its most recent list of Producers submitted in May 2023.

#### *62 Collection Kiosk Sites Available*

San Francisco residents can use any of the 62 collection kiosk sites operated by either Inmar or MED-Project to conveniently dispose of their unwanted medicines. See Table 1 below for a breakdown of Inmar and MED-Project’s medicine collection services by District.

MED-Project’s Stewardship Program, now in its seventh full year of operation, currently operates 61 collection kiosk sites in San Francisco. MED-Project’s participating kiosk sites include CVS Pharmacy (seven sites), Kaiser Permanente (three sites), North East Medical Services (four sites), Walgreens (24 sites), the outpatient pharmacy at Zuckerberg San Francisco General Hospital, and various local retail pharmacies. MED-Project has also partnered with the San Francisco Police Department (“SFPD”) to place collection kiosks at all ten SFPD stations and with the San Francisco Sheriff’s Office to host a kiosk at its Community Programs Building in

the South of Market neighborhood. Under its current kiosk deployment, MED-Project meets the Ordinance’s Convenience Standard of at least five collection kiosk sites in nine of 11 Districts.

In a notable development, Walgreens joined MED-Project’s Stewardship Program in January 2023, placing collection kiosks at 24 of its 48 San Francisco pharmacies. Walgreens’ participation is significant because of the company’s prominence as the largest pharmacy operator in San Francisco and because Walgreens operates the only pharmacies in many neighborhoods. This dynamic – combined with DEA restrictions on which locations can lawfully collect medicines – means that Walgreens pharmacies are often the only eligible medicine collection locations in many neighborhoods. As a result, when Walgreens joined MED-Project’s Stewardship Program, new collection kiosks became available in neighborhoods such as the Bayview, Outer Mission, and Outer Sunset that previously had few collection options. Except for Walgreens, MED-Project’s collection kiosk network has remained stable over the past two years. The Department does not anticipate significant changes in the number of MED-Project collection kiosks in the near future, and MED-Project’s focus has largely shifted from recruiting additional collection kiosk sites to ongoing operation and promotion of its Stewardship Program.

Inmar’s Stewardship Program, now in its third year of operation, currently operates one collection kiosk site at Community Behavioral Health Services Outpatient Pharmacy, a City-operated pharmacy located in the South of Market neighborhood. Inmar previously operated collection kiosks at the two Lucky Supermarket stores in San Francisco. However, Inmar removed the medicine collection kiosks when Lucky permanently closed its in-store pharmacies in August 2022. As of December 2023, Inmar has not been able to establish additional collection kiosk sites. Under its current kiosk deployment, Inmar does not meet the Ordinance’s Convenience Standard of at least five collection kiosk sites in any District.

**Table 1: Medicine Collection Services by Supervisorial District as of November 2023**

Supervisorial District	Collection Kiosk Sites		Mail-Back Envelope Distribution Sites		Total Collection Services
	Inmar	MED-Project	Inmar	MED-Project	
1	0	6	9	0	15
2	0	7	20	0	27
3	0	6	15	0	21
4	0	6	13	0	19
5	0	6	12	0	18
6	1	4	19	3	27
7	0	7	16	0	23
8	0	5	11	3	19
9	0	6	12	0	18
10	0	6	14	0	20
11	0	2	11	6	19
Total	1	61	152	12	---
<b>Grand Total</b>	<b>62</b>		<b>164</b>		<b>226</b>



The primary challenge that Inmar has encountered in its attempts to establish additional kiosk sites is that MED-Project, as the incumbent, has already secured many of the pharmacy and law enforcement locations that are eligible and willing to host medicine collection kiosks, leaving few DEA-eligible collectors for Inmar to recruit. In Districts nine, ten, and 11, for instance, each District has three or fewer DEA-eligible collector locations that do not currently participate in MED-Project's Stewardship Program. Inmar has also identified pharmacy staffing limitations as a barrier, as pharmacies are unwilling to take on additional responsibilities when they are already short-staffed. Inmar may be able to add some collection kiosk sites with increased chain pharmacy participation but cannot reach the Convenience Standard requirement in each District through collection kiosks alone.

#### *164 Standard Mail-Back Envelope Distribution Sites Available*

The Ordinance requires approved Program Operators to supplement collection kiosk service with one-day collection events and/or mail-back services in any District where the Stewardship Program does not meet the Convenience Standard requirement of five collection kiosks. Because neither Inmar nor MED-Project currently meet the Convenience Standard in all Districts, both Program Operators supplement their collection kiosks with mail-back envelope distribution sites. Mail-back envelope distribution sites are locations where residents can obtain free postage-paid medicine "mail-back" envelopes to return unwanted medicines for proper disposal. In their efforts to establish mail-back envelope distribution sites, Inmar and MED-Project have targeted businesses that have a connection to medical, dental or veterinary services but cannot host a collection kiosk under DEA requirements. Examples include urgent care, medical and dental offices, and veterinary clinics.

During the review and approval process for Inmar's first proposed Stewardship Plan in 2020, the Department recognized that Inmar would be unable to meet the Convenience Standard in certain Districts due to the limited number of locations that can lawfully host collection kiosks under DEA requirements. The Department developed a formula that specifies the number of mail-back envelope distribution sites Inmar must provide if they have fewer than five collection kiosks in a given District. Under its current collection kiosk deployment, Inmar is required to provide at least nine mail-back envelope distribution sites in each District to meet the formula requirement. As of November 2023, Inmar meets the formula requirement of nine or more mail-back envelope distribution sites in every District and operates 152 sites total within San Francisco.

MED-Project is also required to provide mail-back envelope distribution sites in Districts where it has fewer than five collection kiosks. MED-Project voluntarily adopted the same formula requirement for its mail-back envelope distribution site deployment. As of November 2023, MED-Project operates a total of 12 mail-back distribution sites within San Francisco.

#### *Mail-Back Packages Available to Residents by Telephone and Online Request*

The Ordinance requires Program Operators to provide medicine collection services to residents who are homebound or have difficulty visiting a collection kiosk by mailing standard mail-back envelopes directly to a resident's home free of charge when requested through a Program

Operator’s website or call center. Inmar and MED-Project have both expanded on this requirement by allowing any San Francisco resident to order envelopes through the website and call center. Inmar and MED-Project also provide residents two additional product-specific mail-back packages: an injector mail-back package for unused pre-filled injector products such as EpiPens, and an inhaler mail-back package for medicines dispensed in an inhaler.

### Medicine Collection Results

When the previous Biennial Report was submitted in October 2021, medicine collection results were available only for MED-Project’s Stewardship Program because Inmar – whose written Stewardship Plan was first approved in November 2020 – had not completed a full year of program operation. We now have six years of medicine collection data available for MED-Project’s Stewardship Program and two years of medicine collection data available for Inmar’s Stewardship Program.

In 2021, MED-Project’s Stewardship Program collected 24,010 lb. of medicine through its collection kiosks and mail-back services, a 9% increase compared to MED-Project’s 2020 collection results. In 2022, MED-Project collected 26,412 lb., representing a 10% increase compared to 2021. As noted in the 2021 Biennial Report, MED-Project’s collection results dropped 25% in 2020 compared to 2019 due to the COVID-19 pandemic. The Department anticipated a gradual rebound in the weight of medicine collected in 2021 and 2022, so it was encouraging to see collection weight increase in both years.

Inmar’s Stewardship Program collected 380 lb. of medicine through its collection kiosks and mail-back services in 2021. In 2022 – Inmar’s second year of program operation – the total weight of medicines Inmar collected increased to 791 lb., a 108% increase compared to 2021. See Table 3 for a summary of each Stewardship Program’s annual medicine collection results and the combined total from both Stewardship Programs.

**Table 2: Medicine Collection Results by Stewardship Programs**

Calendar Year	MED-Project Total Collected (lb.)	Inmar Total Collected (lb.)	Inmar and MED-Project & Total Collected (lb.)	Percent Change
2017	14,787	---	14,787	---
2018	23,474	---	23,474	59%
2019	29,156	---	29,156	24%
2020	21,953	---	21,953	-25%
2021	24,010	380	24,390	11%
2022	26,412	791	27,203	12%
<b>Total</b>	<b>139,792</b>	<b>1,171</b>	<b>140,964</b>	

In the Department’s view, the significant disparity between the two Stewardship Programs’ medicine collection results demonstrates residents’ strong preference for in-person drop-off

services versus mail-back services. Residents' preference for in-person drop-off services is also shown in the collection results for MED-Project's Program, with collection kiosks accounting for 96% of the medicine collected in 2021 and 2022 and mail-back services accounted for the remaining 4%.

### **Collection Program Promotion**

The Ordinance requires all approved Stewardship Programs to coordinate with each other to develop a single system of promotion, with the goal of minimizing resident confusion, conflicting messaging, and other potential barriers. MED-Project, as the only approved Program Operator from October 2016 to November 2020, developed and operated a promotion system of its own design in the years prior to Inmar's entry. As part of this effort, MED-Project created a standardized kiosk design, established a resident-facing website and call center, and developed designs for brochures, posters, and a variety of other outreach activities. In Fall 2020, MED-Project and Inmar began discussions on how to integrate Inmar into MED-Project's existing promotion system and ultimately developed an agreement outlining their "agreed upon principles for the single system of promotion." The Department approved the proposed single system of promotion in mid-2021 and MED-Project and Inmar jointly implemented the single system of promotion in the latter half of 2021. The following sections describe the single system of promotion that MED-Project and Inmar jointly operate.

#### *Licensing Agreement for Coordinated Outreach Materials*

MED-Project and Inmar agreed to retain many elements of MED-Project's existing promotion system, with the understanding that many residents were familiar with the MED-Project Program's design and branding that had been in use since 2016. To facilitate this, MED-Project provided Inmar with a royalty-free licensing agreement that allowed Inmar to use MED-Project's collection kiosk signage and instructions, printed trifold brochure, and informational inserts for mail-back services. Inmar also agreed to use a royal blue paint on its medicine collection kiosks to match the color MED-Project uses. As a result, Inmar's collection kiosks closely resemble the collection kiosks used by MED-Project.

#### *Single Resident-Facing Website and Call Center*

The Ordinance requires all approved Stewardship Programs to create and jointly operate a single website and telephone call center for residents to find medicine collection kiosk sites and other services. Inmar and MED-Project developed a new jointly-operated website – [www.MED-ProjectSF.org](http://www.MED-ProjectSF.org) – to satisfy this requirement. The MED-Project SF website features an interactive map and list of both Program Operators' medicine collection kiosk and mail-back envelope distribution sites. The website also provides a hyperlink to each Program Operator's online form for residents to order mail-back services. For the call center, MED-Project and Inmar decided to operate their own call centers separately but created a technological solution to link their call centers so that they simulate a single call center. There is one established phone number for the call center. When a resident calls and enters a San Francisco ZIP code, they are routed to either Inmar's or MED-Project's call center on an alternating basis. This arrangement allows Inmar and MED-Project to allocate incoming calls and service requests equitably between the two Program

Operators while minimizing confusion that would result from the availability of two separate phone numbers.

### *Biennial Surveys*

The Ordinance requires all approved Stewardship Programs to jointly conduct a Biennial Survey of residents and a Biennial Survey of pharmacists, veterinarians, and health professionals. The Biennial Surveys are designed to assess respondents' awareness of medicine collection services, the convenience and usage of collection services, and respondents' knowledge of safe medicine storage and disposal practices. MED-Project conducted the first and second Biennial Surveys in 2018 and 2020, respectively, on its own because it was the only approved Program Operator at the time. As part of the approved single system of promotion, Inmar and MED-Project agreed to conduct the Biennial Surveys jointly. The first joint Biennial Surveys were conducted in 2022. Inmar and MED-Project are planning the next joint Biennial Surveys, which are tentatively scheduled for February 2024.

### *Biennial Survey Results*

The 2016 Outreach Regulations establish outreach performance and resident awareness requirements that each Stewardship Program must meet to ensure residents and the medical and veterinary communities are aware of the medicine disposal options. A key requirement is that at least 50% of residents are aware of the medicine collection kiosks, as measured by the results of the most recent Biennial Survey of residents. To assess whether Program Operators meet this requirement, the Department designated a single "compliance question" to measure residents' awareness. If the compliance question results show less than 50% resident awareness, Program Operators are required to conduct additional outreach to increase awareness.

**Table 3: Biennial Survey Results – Resident Awareness of Collection Kiosk Sites**

<b>Survey Year</b>	<b>Survey Conducted By</b>	<b>Percent of Residents Aware of Kiosks</b>	<b>Percent of Residents Using Collection Services</b>
2018	MED-Project	37%	21%
2020	MED-Project	44%	37%
2022	Inmar and MED-Project	23%	30%

In the 2020 Biennial Survey of residents, 44% of residents indicated that they were aware of the medicine collection kiosk sites. Accordingly, the Department required MED-Project to develop and implement an outreach plan with the goal of increasing resident awareness. Due to the COVID-19 pandemic, MED-Project decided to execute a digital outreach campaign emphasizing the availability of medicine mail-back services. In 2022, the first jointly conducted Biennial Survey showed that only 23% of residents indicated they were aware of the medicine collection kiosk sites compared to 44% in the 2020 survey. The Department attributes this decrease in resident awareness to lingering impacts from the COVID-19 pandemic. As a result, Inmar and

MED-Project were both required to conduct additional outreach in calendar year 2022 and 2023 to increase residents' awareness.

## **Department Implementation Activities**

### *Updates to the Ordinance and Implementing Regulations*

In Fall 2022, the Department worked with the City Attorney's Office to draft language to update certain sections of the Ordinance, which is codified as Environment Code Chapter 22, Division I. The updated language primarily pertained to Section 2207 Stewardship Plans – Disposal of Covered Drugs. The proposed language was introduced in February 2023 and passed by the Board in April 2023. Prior to the update, Program Operators were required to either dispose of collected medicines at a permitted hazardous waste facility or submit a petition to the Department to use other types of disposal facilities if certain conditions were met. Under the updated Section 2207 language, Program Operators can use any permitted facility that operates in compliance with all local, state, and federal requirements applicable to that facility.

The Department is also preparing significant updates to the Ordinance's Outreach Regulations. Currently, the Outreach Regulations pertain only to outreach and the single system of promotion required in the Ordinance. The proposed updates are intended to incorporate the Department's lessons learned and other experiences gained over the past seven years. The proposed updates would add new requirements for operation of the collection system, content to formalize the single system of promotion that Inmar and MED-Project jointly implemented, and updates to the outreach performance and resident awareness requirements. The Department conducted two public comment periods on the proposed regulations in 2023 and is preparing to adopt the final updated regulations in early 2024. Once the proposed updates regulations are adopted, Inmar and MED-Project will have 90 days to update their Stewardship Programs to comply with the new requirements.

### *One-Day Medicine Collection Events*

Once adopted, the updated Ordinance regulations will require Program Operators to provide one-day medicine collection events in Supervisorial Districts where the operator provides fewer than three drop-off kiosk sites. This requirement is intended to address medicine collection service disparities in Districts that have fewer DEA-eligible collector locations, because the DEA does not limit which locations can host collection events. The DEA does require a law enforcement presence at events to prevent diversion of collected medicines for illicit purposes. The Department anticipates that Inmar – which currently provides only one collection kiosk site – will be required to provide most of the collection events under the updated Ordinance regulations. The Department intends to support execution of the events by: (1) facilitating the participation of the San Francisco Police Department and/or Sheriff's Office; and (2) identifying local events and event organizers that the Program Operators can collaborate with to host take-back events.

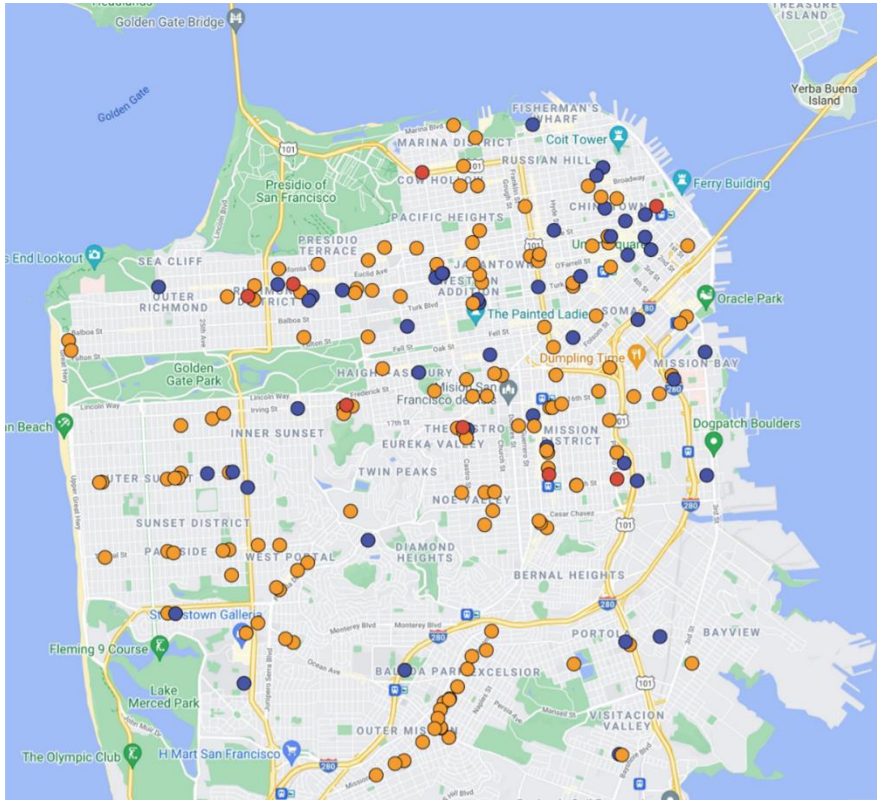
## **Conclusions**

The Ordinance envisions a Producer-operated and financed program that provides San Francisco residents services to dispose of their unwanted medicines in a safe, convenient, and environmentally-sound manner. There are currently two approved Stewardship Programs that provide residents a total of 62 collection kiosk locations, 164 mail-back envelope distribution sites, and three different types of mail-back packages by request online and by telephone.

MED-Project's Stewardship Program, now in its seventh year of operation – has a mature collection system and developed outreach program. Inmar's Stewardship Program, currently in its third year of operation, has struggled to establish collection kiosk sites and primarily provides mail-back envelope distribution sites as an alternative collection service. Under proposed updates to the Ordinance's implementing regulations, Program Operators will be required to provide one-day collection events in Supervisorial Districts that have fewer collection kiosk locations.

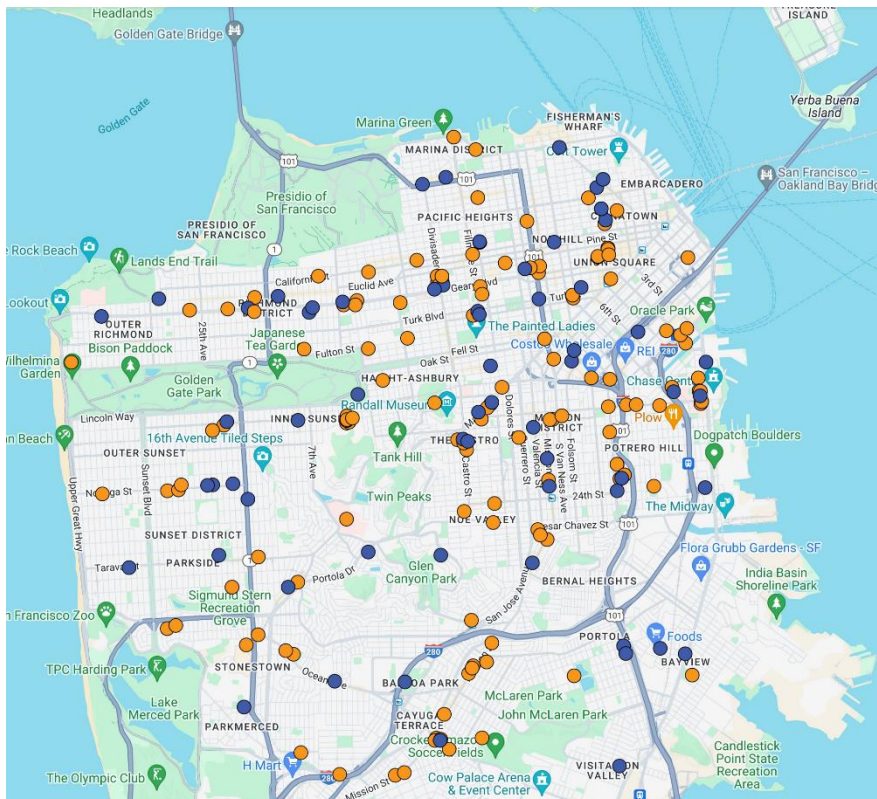
Inmar and MED-Project jointly operate a cohesive and coordinated single system of promotion as envisioned in the Ordinance. Results of the most recent Biennial Survey of residents conducted in 2022 show that awareness of safe medicine disposal services fell during the pandemic. Increasing resident awareness will be a key focus of the Department in the next two years.

## Appendix A: Visual Comparison of Medicine Collection Services, 2021 vs. 2023



August 2021

- Inmar or MED-Project Kiosk Location
- Mail-Back Envelope Distribution Location
- Walgreens Collection Kiosk Location



November 2023

- Inmar or MED-Project Kiosk Location
- Mail-Back Envelope Distribution Location