Thank you for the opportunity to comment on the proposed Safe Drug Disposal Stewardship Plan, dated May 22, 2020, from Inmar Intelligence. The Department may wish to consider requesting revisions to Inmar’s statement regarding coordination of kiosk locations and services. On page 5 of the plan, Inmar states, “It is not our intention to duplicate kiosks that already exist in the City currently operated by other Plan Operators. Should volume demands indicate a need for additional kiosk capacity at location covered by Inmar or another Plan Operator, Inmar is willing to place additional kiosks adjacent to existing operating kiosks or supplement kiosk servicing frequency should the Department deem necessary. Inmar will work with other Plan Operators to coordinate kiosk locations and servicing needs to ensure safe and compliant kiosk operation. Where necessary, Inmar may engage long-term care facilities as potential authorized Collectors to ensure reasonably convenient and equitable access for all City residents.”

Inmar’s stated intention to avoid duplicating kiosks is commendable, as multiple kiosks in one location may confuse users. But the Department may consider requiring that the condition “should the Department deem necessary” be removed, as it suggests such coordination must occur at the Department’s direction. Oregon’s E-Cycles Program, a product stewardship program for electronics waste, includes multiple programs, but coordination of services is not at DEQ’s direction. Rather, programs may propose coordination of collection services, provided that they include information for shared collection sites and services and clarify how pounds collected will be allocated between the programs for reporting purposes. (Each program must be able to meet the required statewide convenience standard on its own.) DEQ has a section on “Coordination” in its plan guide for E-cycles program operators: see pages 4-5 at https://www.oregon.gov/deq/FilterDocs/ecyclesGuideManProg.pdf.

For E-Cycles, such coordination between program operators on collection services has allowed program operators to meet their convenience standard requirement while ensuring that collection sites are productive and responsive to the public and avoid unnecessary duplication or confusion.

Thanks again,

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