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 November 1, 2018

PLAN OPERATOR: San Francisco MED-Project, LLC
Victoria Travis, National Program Director
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Washington, DC 20036
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DETERMINATION:

The San Francisco MED-Project Stewardship Plan dated November 1, 2018, is APPROVED subject to the following conditions:

Proposed Conditions of Approval for the MED-Project Product Stewardship Plan for Unwanted Medicine for the City and County of San Francisco, November 1, 2018 Revision

1. The Producers represented by the MED-Project shall provide a complete list of all Producers participating in the MED-Project Stewardship Plan for San Francisco containing all information, including contact name and email, required in Section 2204(a) of the Ordinance upon request within 10 business days.

2. The Producers represented by the MED-Project shall submit a revised Appendix M - Call Center Scripts and a revised Appendix N - Website Webpages to clarify that injectors cannot be disposed in kiosks and that separate mail-back services must be used for inhalers and for injectors by June 30, 2019.

3. The Producers represented by the MED-Project shall submit an example of the Stericycle small inhaler mail-back package referenced in Appendix L by June 30, 2019.
4. Within 10 business days of each calendar quarter, the Producers represented by the MED-Project as their Plan Operator shall report in writing to the Department whether any 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.

5. Notification of non-substantive changes in Program Operation described in Section 2212(c) which are made at the discretion of MED-Project on behalf of the Producers they represent, including the closure of any of the standard mail-back envelope distribution points listed in Appendix C of the 11-1-2018 Revised Plan, shall be made in writing to the Director 15 days in advance of the change.

6. For each type and size of mail-back packages, the Producers represented by the MED-Project shall report the total of actual, not average, weights of mail-back packages received by the disposal vendor, starting with the 2019 Annual Report due April 25, 2020.

7. Within 10 business days of the end of each calendar quarter, the Producers represented by MED-Project shall report, through their Plan Operator, in writing to the Director a summary of Help Desk requests by type made in the previous quarter, including the number of each type, average days to close and the range (min/max days) in length of time to close.

8. The Producers represented by the MED-Project shall provide signage similar to the injector mail-back signage shown in Appendix E (page 94) on each kiosk operating in San Francisco. Proposed kiosk signage or an alternative on-site method of informing residents of the need to use mail-back services for injector disposal shall be submitted to the Director by June 30, 2019 and implemented within 60 days of the Director’s approval.

9. The Producers represented by the MED-Project shall provide a minimum of 50 copies of the tri-fold flyer in Appendix O in English and 25 copies in each other language specified in the Ordinance on an annual basis and upon request to each of the San Francisco pharmacies, health-care facilities, veterinarians, and veterinary clinics within 60 days of provision of a list of these entities by the Director.

10. The Producers represented by MED-Project shall update MED-Project’s San Francisco webpages for mail-back service order form and for the kiosk & standard mail-back envelope distribution point locator so that the webpages shall be available and fully functional in Spanish, Chinese, Filipino, and Russian, as well as English by June 30, 2019.

11. The Producers represented by the MED-Project shall by September 30, 2019 provide supplemental information on the Plan’s policies and procedures to ensure that all waste disposal facilities used in the Plan comply with applicable federal and state laws, rules, and guidelines, specifically including an explanation of Heritage Thermal Services’ compliance status in light of the U.S. Environmental Protection Agency’s designation of Heritage Thermal Services on its High Priority Violations list.
12. The Producers represented by the MED-Project shall report the numerical results of the Plan's Education & Public Outreach short term goals as described in Section VI (pg 18) for CY 2018 by June 30, 2019 and update these results for future reporting periods in the applicable Annual Report.

13. During calendar year 2019, the Producers represented by the MED-Project shall undertake the following outreach activities proposed in a March 8, 2019 email by MED-Project to raise public awareness of the MED-Project program to 50% in the next biennial resident survey:

- Campaign 1 - 75% reach @ 6+ frequency for 1-month period
- Campaign 2 - 75% reach @ 3+ frequency for 5-week period
- Campaign 3 - 75% reach @ 3+ frequency for a 5-week period
- Increase Social Media activity (Facebook/Twitter) to biweekly posts in English - start by July 1, 2019
- Add Social Media and Digital activity in other languages (Chinese, Spanish, Filipino and Russian) – Start by July 1, 2019
- Print ad in Chinese and Spanish – by October 1, 2019
- Quarterly email blast to community contact list in Appendix B

14. The Producers represented by the MED-Project shall submit an updated Stewardship Plan by October 25, 2022 and every four years thereafter.

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: Deborah O. Raphael
Plan Approval Date: 6/5/19

Deborah O. Raphael
Director
San Francisco Department of the Environment