



Connecticut Department of  
**ENERGY &  
ENVIRONMENTAL  
PROTECTION**

**STATE OF CONNECTICUT  
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION**

Public Hearing – February 25, 2013  
Environment Committee

Testimony Submitted by Commissioner Dan Esty  
Presented By Deputy Commissioner Macky McCleary

**Raised House Bill No. 6439 – AN ACT CONCERNING THE DISPOSAL AND COLLECTION OF  
UNUSED MEDICATION**

Thank you for the opportunity to present testimony regarding Raised House Bill No. 6439 - An Act Concerning the Disposal and Collection of Unused Medication. The Department of Energy and Environmental Protection (DEEP) welcomes the opportunity to offer the following testimony.

DEEP supports the concept of reducing the negative impact of pharmaceutical waste disposal. However, a program to establish a mechanism for the collection and disposal of unused pharmaceuticals would not be effective without a continuing funding source. It is important to note that for institutions such as health care facilities and pharmacies, such a take-back program must be consistent with the hazardous waste laws including the federal Resources Recovery and Conservation Act (RCRA), as well as laws regulating the management and disposal of controlled substances. While pharmaceutical wastes generated by households are not subject to RCRA, pharmaceutical wastes from businesses and other institutional organizations are.

A primary consideration in establishing a pharmaceutical take-back program is to prevent unused or unwanted pharmaceuticals from being introduced into the environment through flushing, disposal in a landfill or other improper management. Many municipalities in Connecticut have implemented collection programs, for unwanted or unused pharmaceuticals found in homes, but these programs are not consistent or accessible to all residents. The U.S. Drug Enforcement Administration (DEA) promotes “National Prescription Drug Take-Back Days” to provide an opportunity for the public to safely remove and dispose of expired, unwanted or unused pharmaceuticals from their homes, and deliver these pharmaceuticals to participating collection points, typically a police station. The DEA collection events are semi-annual and participation to host a drop off location is voluntary.

The inclusion of a public awareness campaign is an important aspect of this bill. The DEEP website has information on the proper management and disposal of household pharmaceutical wastes <http://www.ct.gov/deep/medsdisposal>, but this is not enough to address the need for public education.

The United States Environmental Protection Agency also has a Frequently Asked Question page that specifically addresses pharmaceutical collection programs and applicability to the distinctions between business and household pharmaceutical wastes. (Frequent Questions for Pharmaceutical Collection Events - <http://www.epa.gov/wastes/hazard/generation/pharmaceuticals/collection.htm> .)

In addition, Connecticut's Department of Consumer Protection offers valuable information on the proper methods of disposal at the following website. (Proper Disposal of Prescription Drugs <http://www.ct.gov/dcp/cwp/view.asp?a=3501&q=444606&PM=1> .)

DEEP supports the concept of Raised House Bill No. 6439 and recommends it be considered for restructuring as a product stewardship proposal to limit the role of government required for implementation and to avoid costs to municipalities and the state. A pharmaceutical take-back program under a product stewardship model similar to Connecticut's e-waste or paint stewardship laws could provide a consistent, equitable and sustainable collection system.

Thank you for the opportunity to present testimony on this proposal. If you should require any additional information, please contact DEEP's legislative liaison, Robert LaFrance at 424-3401 or [Robert.LaFrance@ct.gov](mailto:Robert.LaFrance@ct.gov)