

STATEMENT



Comments on SB 378

February 28, 2014

PhRMA supports efforts to help consumers safely and effectively dispose of unused pharmaceutical products. At the outset, PhRMA encourages patients to follow their health care provider's instructions regarding completion of the full course of treatment with their prescription medicines. Patient compliance with these instructions will minimize the presence of unused prescription medicines in the home.

In situations where consumers do have unused medicines in the home, PhRMA believes that it is important to provide the information necessary to allow them to dispose of unused pharmaceutical products promptly and easily. For many years, PhRMA and its members have sponsored a number consumer awareness and information programs, such as SMARxT Disposal and the American Medicine Chest Challenge, to help provide patients with the information they need to dispose of unwanted medicines safely and effectively.

PhRMA does not oppose voluntary "take-back" or community collection programs. While "in-home" disposal is the optimal option to facilitate removal of unused prescription medicines from the home, PhRMA does not oppose voluntary "take-back" programs sponsored by governments or other organizations, subject to some important caveats. Ideally, drug take back programs should involve law enforcement to ensure that the medicines discarded through the program are collected and disposed of in a secure manner. This will ensure the medicines are not diverted for abuse. Any "take back" program should be structured to prevent theft or diversion of the unused medicines and to protect patient privacy.

Governments should design, manage, and operate all aspects of the take-back programs, including conducting cost-benefit analyses and an impact evaluation to fully assess the degree to which the program meets its stated objectives. These programs necessarily require the meaningful involvement of a wide range of stakeholders, including law enforcement in order to achieve necessary efficiencies and make elected officials accountable for the operation and cost of their programs. Programs should be regularly evaluated to see if they are meeting their defined goals.

PhRMA would also observe that take-back programs have not been demonstrated to address the public health problem of reducing the misuse and abuse of prescription drugs. Other options, such as improving Prescription Drug Monitoring Programs (PDMPs), have been found to be effective in detecting inappropriate prescribing and abuse of prescription medicines.