

**Statement before the General Law Committee  
Thursday, March 3, 2016**

**HB 5429 An Act Concerning Pharmacies and Collection and Disposal of Unwanted Medication**

Good Afternoon Senator Leone, Representative Baram and members of the General Law Committee. My name is Margherita Giuliano and I am both a pharmacist and the Executive Vice President of the Connecticut Pharmacists Association, a professional organization representing 1,000 pharmacists in the State. I am submitting testimony in opposition of **HB 5429 An Act Concerning Pharmacies and Collection and Disposal of Unwanted Medication**.

The issue of properly disposing of unused medications is not a new issue. With the increased public awareness of teenage abuse of prescription medications and access to parents and grandparents unused medications, as well as the contamination of our water systems, the Connecticut Pharmacists Association has been very aggressive in providing information to the public and to our pharmacies about the proper disposal of prescription medications. These efforts seem to be having an impact.

The Connecticut Pharmacists Association agrees that unwanted pharmaceuticals should have an appropriate collection site. However, pharmacies are not that appropriate location. In fact, the State of Connecticut currently prohibits drop boxes in pharmacies. Pharmacies are meant to be a clean - and in certain areas - a sterile environment. We are concerned not only that bringing unwanted pharmaceuticals to the pharmacy would compromise this clean environment, but also it provides an opportunity for diversion in the pharmacy.

We have spoken before about the small, insidious ways that Connecticut adversely affects small businesses. Pharmacies **are** small businesses, employing thousands of employees and providing direct patient care. We are strongly opposed to adding this requirement to their already strained business model which would now add registering for a biowaste certificate, creating room for a receptacle, and hiring a certified waste hauler to transport the contents to a biomedical waste treatment facility.

We are also concerned that this would be considered voluntary on the part of the pharmacies. This would be difficult to track and enforce to ensure all standards were met in protecting consumers and employees. It could also create patient confusion if only certain pharmacies elected to participate. The last thing we want is for a frustrated patient to arrive with drugs only to find their pharmacy not participating, and then dispose of their unwanted medications in an inappropriate manner. Many pharmacies provide "takeaway medication recovery system mailers" that patients can use to mail back unused or unwanted medications to a DEA registered reverse distributor and collector.

The State of Connecticut Department of Consumer Protection currently runs a voluntary drug disposal program for police departments that has approximately 60 + participants. This program is currently working well and we strongly support using this program as a model for potential expansion to other municipal departments. Pharmacists currently direct their patients to the participating police departments to be able to anonymously dispose of unwanted medications. In addition, there have been many community forums and collection drives across the state sponsored by Water Departments, Senior Centers, and other entities. This is an appropriate response partnered with education and awareness.

This language also calls for a public awareness campaign. We are interested in working with legislators and the Commissioner of Consumer Protection to create a campaign to educate the public concerning the safe disposal of pharmaceuticals. Since pharmacists are usually on the front line of answering question about, and advising their patients concerning unwanted medication disposal issues, pharmacists would be able to continue to help educate about the proper disposal methods.

In conclusion, the Connecticut Pharmacists Association is in favor of having a safe and anonymous drop off for unwanted pharmaceuticals. We believe we should build on the successes we have seen with the disposal through the police departments. We are opposed to having pharmacies be the physical collection site as it would compromise the clean environment and safety of pharmacies; and, place a financial burden on pharmacies to transport this waste to an appropriate biomedical waste treatment facility.

Thank you.