

Pharmaceutical Waste: Current Laws and Options for Drug Disposal, plus Medical Waste in age of Covid-19

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Objectives

- * Define Pharmaceutical waste and Medical waste
- * Describe current options for Household Medication and Sharps Disposal
- * Describe current legal restrictions (Federal and NYS)
- * Describe specific challenges of medical waste disposal during Covid-19
- * Talk about current reuse guidelines for masks/PPE
- * QSWAB action: Help with community outreach, messaging

What is Medical Waste?

- * Presents Biohazard
 - * Infectious waste or potentially infectious waste
- * Pharmaceutical waste
- * Sharps
- * Used medical products
- * Blood or blood contaminated products
- * Chemotherapy and other hazardous pharmaceuticals



What is Pharmaceutical Waste?

How do we handle it in NY state and federally?



Expired and Unused Medications

Meds left after someone died

Post surgery

Dose changes, not needed etc

Potential for:

Overdose

Accidental poisoning

Diversion

What is Pharmaceutical Waste

- * MOST drugs are NOT classified as hazardous waste
 - * only 5-10% of pharma waste is classified as Hazardous
- * Focus on Drug Diversion vs Environment
 - * Opiates / Controlled Substances: Focus of Regulation
 - * Environmental damage: Drugs ARE found in environment, but source is hard to prove / lack of evidence

Once a drug has left a pharmacy, regulatory issues prevent it from being returned to the pharmacy.

They can **never** be resold or reused in any legal sense.

Risk of Diversion,
Contamination,
Counterfeiting,
Etc

Current options for household medication disposal

- Collection boxes at Pharmacies (**Drug Drop Boxes**)
- DEA's **Take Back Day** - April and October ONLY
 - *April event currently suspended due to Covid-19
- Purchase **mail-back** envelopes
- * Trash (mixed with undesirable product like kitty litter/coffee grounds, seal in a nondescript container)
- * FDA's flush list for highly dangerous drugs

Government Agencies: What they recommend

EPA: Encourages
use of take-back
programs, however
lists 2nd choice
household disposal

1ST CHOICE: DRUG TAKE-BACK EVENTS

To dispose of prescription and over-the-counter drugs, call your city or county government's household trash and recycling service and ask if a drug take-back program is available in your community. Some counties hold household hazardous waste collection days, where prescription and over-the-counter drugs are accepted at a central location for proper disposal.



Courtesy: Upper Merion Township
and Accolichon Valley

Drug Take-Back Event

2ND CHOICE: HOUSEHOLD DISPOSAL STEPS*



1. Take your prescription drugs out of their original containers.



2. Mix drugs with an undesirable substance, such as cat litter or used coffee grounds.



3. Put the mixture into a disposable container with a lid, such as an empty margarine tub, or into a sealable bag.



4. Conceal or remove any personal information, including Rx number, on the empty containers by covering it with permanent marker or duct tape, or by scratching it off.



5. The sealed container with the drug mixture, and the empty drug containers, can now be placed in the trash.

* Drug Disposal Guidelines, Office of National Drug Control Policy, October 2009

EPA : Health Care Facilities

EPA started enforcing a Nationwide ban on sewerage
[flushing] hazardous waste pharmaceuticals
at healthcare facilities only
effective August 2019

- * Remember, only 5-10% of pharmaceutical waste is considered hazardous - are these facilities still flushing?
- * Ban does not apply to household pharmaceutical waste
- * DEA: 'Household hazardous waste exemption' once drug is in the consumers hands

I need to get rid of this medication.

Drug Disposal Options

Do you have medicine you want to get rid of?

{FDA}

Do you have a drug take-back option readily available?

Check the [DEA website](#), as well as your local drugstore and police station for possible options.

NO

YES

Is it on the [FDA flush list](#)?

NO

YES

Follow the FDA [instructions for disposing of medicine in the household trash](#).

[Immediately flush your medicine in the toilet](#). Scratch out all personal info on the bottle and recycle/throw it away.

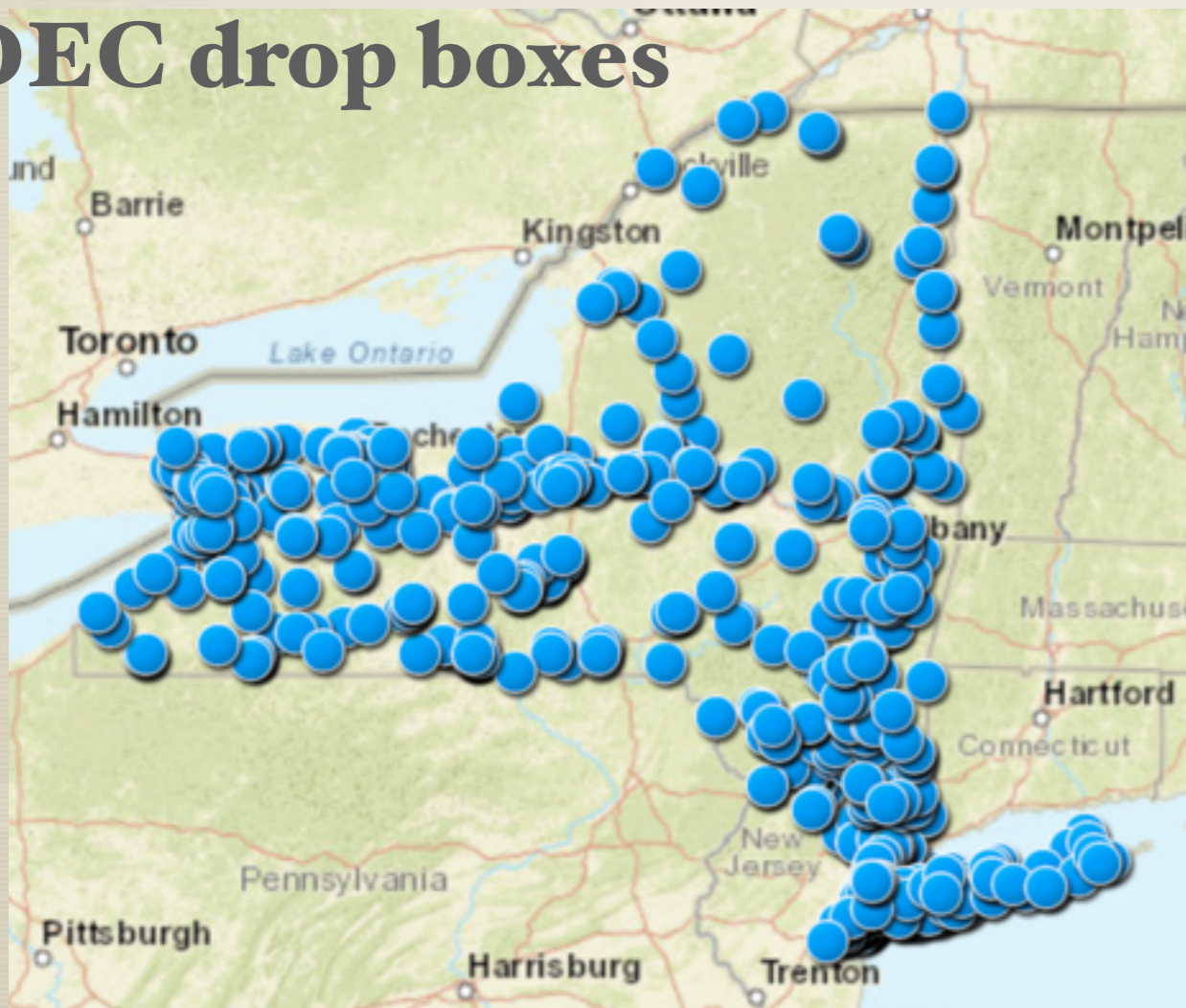
Take your medicine to a drug take-back location.

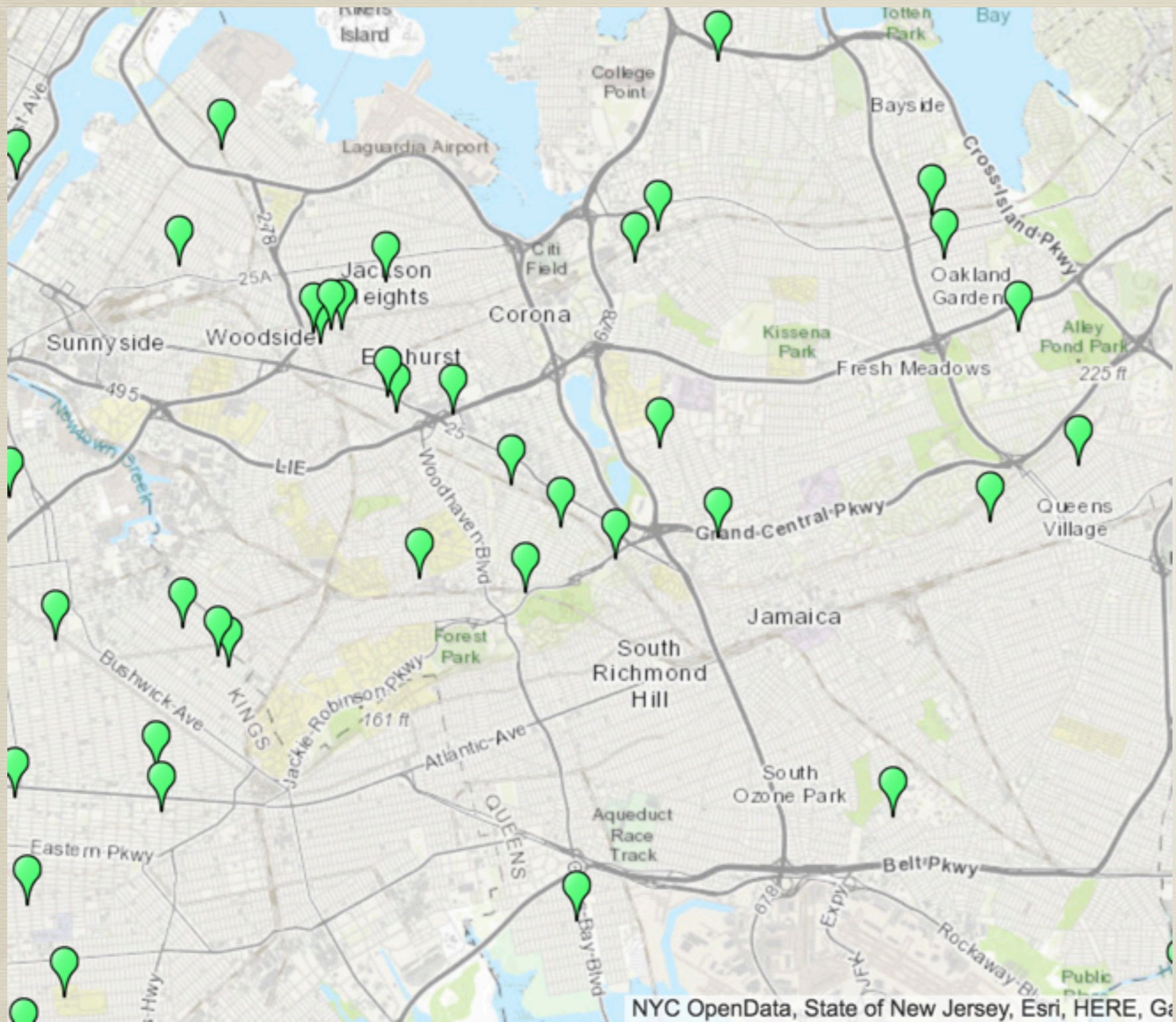
Do this promptly for [FDA flush list](#) drugs!

DEA: National Drug Take Back Day



Current NYS DEC drop boxes





Map of CURRENT Queens DEC Drug Drop Box Locations

NONE in the
Rockaways,
few in
South Queens

No specific
guidelines exist
for disposal of:

Liquids
Creams
Lotions
Inhalers
Aerosols

*Syringes that are pre-filled



Covid-19 affects on drug disposal

- **DEA Drug Take Back day CANCELLED**
- **SAFE Disposal events CANCELLED**

Covid-19 affects on drug disposal

- Pharmacies are essential businesses = OPEN!
 - Social media Pitch for spring cleaning your medicine cabinet
- * CALL pharmacies on list to make sure drug drop box still available, and verify pharmacy hours

Test: Called 5 Pharmacies in Queens 4/21/20

OPEN DROP BOXES

- * CVS - Astoria (31-01 Ditmars)
- * Harpell Chemists - Whitestone
- * Sterling Pharmacy - Bayside
- * Cross Bay Chemist - Howard Beach (Cross Bay Blvd)

CALL
FIRST!

CLOSED DROP BOX


- * S + M Pharmacy - Flushing

Current options for Pharmacy level medication disposal

- Only applies to Pharmacy Inventory that is **unsold and expired**
- Collection through an approved **Reverse Distributor**
- Pharmacies **can** get money back for drugs sitting on shelf
- Possible opportunity and challenge for Independent pharmacies (NY)

Brooklyn neighborhood concerned over piles of trash outside pharmacy



 Eyewitness News

Monday, September 10, 2018

BEDFORD-STUYVESANT, Brooklyn (WABC) -- A pharmacy in Brooklyn has drawn anger from residents after mounds of garbage have been piling up on its property, with the rubbish reportedly including bags of prescription pills.

New York State Drug Take Back Act

- Extended Producer Responsibility (EPR) - Drug take back paid for by pharmaceutical companies, free to public
- Require Pharmacies with >10 stores to have a plan for CONSUMER LEVEL pharmacy waste disposal
 - Either a drop box or mail back program counts
- Was signed June 2018, supposed to take effect Jan 2019; NY DOH overseeing implementation
 - However, NO current information available on status of implementation
 - In Oct. 2019 the Citizens Campaign (CCNY) laid out what needs to be done to implement the law correctly; we are still waiting for NY DOH to respond to public comments and take steps toward implementation

Observations: Why is Pharma waste management an issue?

- Misinformation: No visual guide or crystal clear message exists
- Pharmacists, Health Officials and Law Enforcement often refer to each other OR reinforce the flush/kitty litter method
- Conflicting, outdated regulations in effect at Federal level
- Opiates and drug diversion are main cause for concern over environmental
 - Environmental damage alone may not be most compelling argument
- No clear disposal options for unused inhalers/pre-filled syringes, liquids, etc

Where most
Pharma waste
ultimately goes:
Incineration

Pharmacy level returns (Reverse
Distributors) generally are
60% destruction,
40% (EPR) returnable

Consumer level = 100% destruction



What about the pill bottles?

- * NYC - considered Recyclable (hard plastic)
- * Leave caps on to increase chance of being recycled
- * Remove label / personal information
- * Reuse your containers! Great for sharp object storage
- * Outside NYC- pharmacies can collect bottles via a paid collection service
- * Bringing meds to Drop Box? Shake pills into drop box and recycle the bottle at home!



Sharps Disposal

Hospitals required by law to accept sharps

There is a link to Sharps drop off locations
on QSWAB website

In NYC you can set out sharps with
household TRASH if use puncture proof
container labeled 'SHARPS'

- make sure sealed
- fill up to only 2/3 full



Hospital and Health System Waste





Medical Waste during Covid-19

PPE Waste Education



- * Place in BLACK trash bag, NOT clear recycling bag
- * Littering gloves, masks, wipes in the street puts the public at risk for contracting the virus
- * If we put gloves/ masks etc into recycling, it becomes a public safety hazard to those working at MRF's who are sorting the recycling

CDC (Centers for Disease Control) Recommendations

- * DO NOT advise reuse of medical grade masks
- * Save Medical grade masks (especially N-95) for those working directly with patients in medical settings
- * If someone HAS Covid-19, follow CURRENT CDC and WHO website recommendations on protective masks



Great News!
REUSABLE cloth
Masks and bandanas
are OK!

*Per current CDC
recommendations

Opportunity for
promoting
Reuse > Disposable



CDC Homemade cloth mask recommendations

CDC on Homemade Cloth Face Coverings

[CDC recommends](#) wearing cloth face coverings in public settings where other social distancing measures are difficult to maintain (e.g., grocery stores and pharmacies), **especially** in areas of significant community-based transmission.

CDC also advises the use of simple cloth face coverings to slow the spread of the virus and help people who may have the virus and do not know it from transmitting it to others. Cloth face coverings fashioned from household items or made at home from common materials at low cost can be used as an additional, voluntary public health measure.

Cloth face coverings should not be placed on young children under age 2, anyone who has trouble breathing, or is unconscious, incapacitated or otherwise unable to remove the mask without assistance.

The cloth face coverings recommended are not surgical masks or N-95 respirators. Those are critical supplies that must continue to be reserved for healthcare workers and other medical first responders, as recommended by current CDC guidance.

*As of 4/22/2020, CDC DOES recommend reusable, DIY cloth masks.
Opportunity for QSWAB to promote reusables*

CDC reusable mask recommendations

Should cloth face coverings be washed or otherwise cleaned regularly? How regularly?

Yes. They should be routinely washed depending on the frequency of use.

How does one safely sterilize/clean a cloth face covering?

A washing machine should suffice in properly washing a face covering.

How does one safely remove a used cloth face covering?

Individuals should be careful not to touch their eyes, nose, and mouth when removing their face covering and wash hands immediately after removing.



[https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/
diy-cloth-face-coverings.html](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html)

Remember: New York SWAB's
are NOT medical advisory boards

Caution with recommending reusable medical grade items

Virus can live on surfaces

Potential Liability - do not make medical claims,
use disclaimer

What can WE do, as QSWAB members and guests?

- **Educate friends, family and followers on**
 - Where to bring expired and unused medications - **Link on QSWAB/MSWAB websites to map/resources**
 - **Pill bottle reuse and recycling**
- **Talk with your Pharmacist - engage them on pharma waste topic!**
 - Ask them what to do with Pharmaceutical waste.
 - See how they respond, then Educate
 - Do they know where their closest drop box is?
 - Opt in to new Law - do they have a plan? (Can still apply for DEC box)

What can WE do, as QSWAB members and guests?

- **Educate friends, family and followers on proper disposal of PPE during COVID-19**
- **Share CDC guidelines on how to make Reusable cloth masks from materials found at home**
- Refer to with CDC/WHO recommendations on Covid-19 regarding medical supply reusability

**Remember that it's ok to say “we don't know”
about the reuse potential for medically protective
items.**

We are not a medical advisory board.



Have unused or expired pharmaceuticals or “sharps”?

Please **never** dispose of pharmaceuticals by flushing them in the toilet, pouring them down the drain, and or putting them in the garbage.

Rather, dispose of unwanted pharmaceuticals at a [safe disposal event](#) or visit the NY State Department of Conservation's [website](#) or [this ArcGIS-driven page](#) to find a safe disposal pharmacy or police station near you.

You can also find safe disposal sites for used needles or other “sharps” by entering your zip code into [this map](#).

Are you a pharmacy?

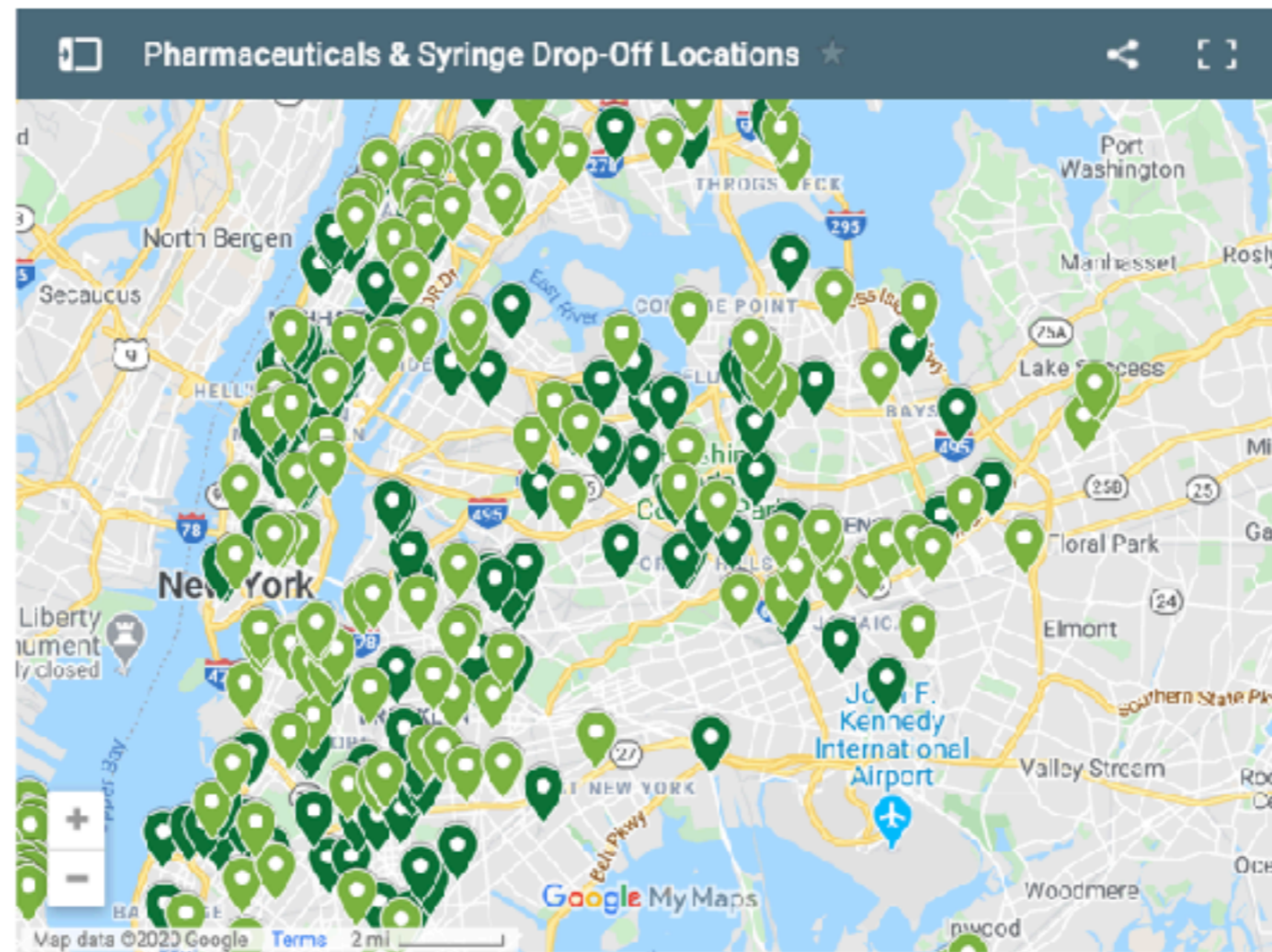
You can **save money** and **protect the environment** by joining two programs:

- [Collect unused and unwanted pharmaceuticals from the public.](#)

Manhattan SWAB links

<http://www.manhattanswab.org/pharmaceutical-waste-recycling>

- Pharmaceutical and Syringe Drop-Off Locations in New York City:



Queens SWAB link to map

<https://queensswab.nyc/explore-data-research/>

Moving forward:
Create a multi-SWAB
Pharmaceutical/
medical waste
Committee?



Photo sources

- * <http://www.securewaste.com/2015/10/the-effects-of-pharmaceutical-waste-on-the-environment/>
- * <https://www.shutterstock.com/video/clip-4557737-senior-man-looking-medicine-cabinet>
- * <https://abc7ny.com/brooklyn-residents-plagued-by-piles-of-trash-outside-pharmacy/4206771/>
- * <https://www.necn.com/news/local/photos-empty-boston-streets-filled-with-discarded-gloves-supplies-during-coronavirus-outbreak/2253064/>
- * <http://www.diabetesforecast.org/2014/07-jul/make-your-own-sharps.html>
- * <https://www.amberleyvillage.org/2020/02/19/national-drug-take-back-day-saturday-april-25/>
- * Maps: <https://www.dec.ny.gov/chemical/67720.html>

Resources

- * <https://www.fda.gov/downloads/drugs/resourcesforyou/consumers/buyingusingmedicinesafely/ensuringsafeuseofmedicine/safedisposalofmedicines/ucm337803.pdf>
- * <http://www.manhattanswab.org/pharmaceutical-waste-recycling>
- * <https://www.dec.ny.gov/chemical/102907.html>
- * <https://www.dec.ny.gov/chemical/67720.html>
- * <https://www.epa.gov/hwgenerators/collecting-and-disposing-unwanted-medicines>
- * Catellier, Jim; National Pharmaceutical Returns, January 15, 2019 email correspondence.
- * <https://www.fda.gov/downloads/Drugs/ResourcesForYou/Consumers/BuyingUsingMedicineSafely/EnsuringSafeUseofMedicine/SafeDisposalofMedicines/UCM599501.pdf>
- * <https://www.federalregister.gov/documents/2019/02/22/2019-01298/management-standards-for-hazardous-waste-pharmaceuticals-and-amendment-to-the-p075-listing-for>
- * <https://www.bdlaw.com/publications/new-york-state-adopts-drug-take-back-law-requiring-drug-manufacturers-to-develop-implement-and-pay-all-costs-of-a-statewide-drug-take-back-program/>
- * <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

Questions?

