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Taking healthcare personally.

March 1, 2023

The Honorable Delegate Joseline A. Pena-Melnyk
Chair, Health and Government Operations Committee
House Office Building, Room 241
Annapolis, MD 21401

The Honorable Delegate Bonnie Cullison
Vice Chair, Health and Government Operations Committee
House Office Building, Room 241
Annapolis, MD 21401

RE: Opposition H.B. 517 (Solomon) – Drug Take-Back Programs

Dear Chair Pena-Melnyk and Vice Chair Cullison:

On behalf of the Consumer Healthcare Products Association (CHPA), the Washington, D.C. based national trade association representing the leading manufacturers of over-the-counter (OTC) medicines, dietary supplements, and consumer medical devices, I'm writing to express opposition to H.B. 517. The bill requires pharmaceutical manufacturers, including nonprescription drug makers, to establish and operate a drug take-back stewardship program to collect and dispose of unused, unwanted, or expired medications. While we appreciate the importance of safe medicine disposal as part of a safe medicine use regiment, we disagree that mandating a manufacturer-funded drug take-back program in the State of Maryland is necessary to accomplish this goal.

Adequate Disposal Options Already Exist

Consumers in Maryland already have numerous options for disposing of medication. In fact, according to MyOldMeds.com – an industry-funded website providing disposal information to consumers - there are 380 existing locations in Maryland that provide medicine disposal options for residents. These locations are strategically placed near population centers and allow for 88% of Marylanders to reach a disposal location within a 10-minute drive, and 97% of residents to reach a location within a 20-minute drive.¹

Additionally, the United States Drug Enforcement Administration (DEA) – in partnership with law enforcement partners across the state – hosts National Prescription Drug Take-Back Day (NPDTB) events bi-annually. The spring NPDTB has already been scheduled for April 22, 2023 and will provide additional options for residents to safely and conveniently dispose of medication. Last year's spring NPDTB featured 33 law enforcement participants, 105 take-back sites and a total collection of 10,349 pounds of returned medication statewide.²

The combination of existing permanent drug disposal locations and the DEA NPDTB event sites provide Maryland residents with an abundance of options for safe medicine disposal without risking increased costs for affordable OTC medications families rely on.

¹ Pharmaceutical Product Stewardship Work Group

² <https://health.maryland.gov/oper/Pages/National%20Drug%20Take%20Back.aspx>

Conclusion

CHPA has long been an advocate of responsible medicine use, safe medicine storage, and proper medicine disposal. We have education programs and partnerships focused on drug safety or drug disposal including with the Centers for Disease Control and Prevention, America's Poison Centers, Safe Kids Worldwide, and the Alliance for Aging Research among others.

Our efforts, combined with the ever-expanding landscape of voluntary drug disposal collection sites, provide sufficient opportunity for the residents of Maryland to properly dispose of any unwanted, unneeded, or expired medication in their homes.

For these reasons, we oppose passage of H.B. 517, but thank Delegate Solomon for bringing attention to this important matter. Thank you for considering our concerns and please feel free to contact me directly with any questions.

Respectfully submitted,



Carlos I. Gutiérrez
Vice President, State & Local Government Affairs
Consumer Healthcare Products Association
cgutierrez@chpa.org | 202-429-3521

cc: Maryland Health and Government Operations Committee
Delegate Jared Solomon