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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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April 9, 2018

The Honorable Bob Wieckowski, Chair  
Senate Committee on Environmental Quality  
State Capitol, Room 2205  
Sacramento, CA 95814

Dear Senator Wieckowski:

**OPPOSE UNLESS AMENDED ASSEMBLY BILL 514 (SALAS) MEDICAL WASTE:  
PHARMACEUTICALS – AMENDED APRIL 17, 2017**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) respectfully **opposes** Assembly Bill 514 (AB 514), as amended April 17, 2017, **unless amended to address the concerns expressed in this letter.**

AB 514 would amend the definition of “pharmaceutical” to exempt from the Medical Waste Management Act (MWMA) cosmetics and other consumer products such as homeopathic drugs and remedies, soap, shampoo, sunscreen, toothpaste, lip balm, antiperspirant, and saline products. The measure would also exempt from the definition of “waste,” pharmaceuticals being sent out of state to a licensed reverse distributor, and pharmaceuticals being sent by a reverse distributor for treatment and disposal. AB 514 seeks to clarify waste management requirements for many unsold/unwanted consumer products and avoid situations where retailers dispose of surplus products instead of finding alternatives, such as donating, liquidating or recycling unsold products.

The Task Force recognizes that the various statutory and regulatory requirements governing when a product becomes a waste and how it must be handled make it difficult for retailers and their employees to determine the appropriate handling. However, it is unclear what the potential impact of this exemption would be because it is not fully understood what is being exempted and at what quantity.

The Task Force recommends amending the bill as suggested by the Senate Committee on Environmental Quality to add safeguards like those required for other waste streams

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in which exemptions have been provided. The proposed amendment would temporarily authorize this exemption as a pilot program, for 2 years, requiring that the waste be manifested and tracked, reported to the Department of Toxic Substances Control (DTSC) and requiring a report to the Legislature. This will allow DTSC and the Legislature time to analyze the true extent of the problem and determine whether this is an appropriate exemption, and suggest/implement policy changes that make this alternative management scheme work as intended.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

Based on the foregoing, the Task Force respectfully **opposes** AB 514 **unless it is amended to address the concerns expressed in this letter**. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Council Member, City of Rosemead

BC:

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cc: Assembly Member Rudy Salas  
Each Member of the Senate Committee on Environmental Quality  
Committee on Environmental Quality Chief Consultant, Rachel Machi Wagoner  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each member of the Los Angeles County Board of Supervisors

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Sachi A. Hamai, Los Angeles County Chief Executive Officer  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Integrated Waste Management Task Force