



SF Environment

Our home. Our city. Our planet.

A Department of the City and County of San Francisco

London N. Breed
Mayor

Deborah O. Raphael
Director

Notice of Determination - Product Stewardship Plan Review

San Francisco Safe Drug Disposal Stewardship Ordinance

(Ordinance No. 31-15, San Francisco Environment Code, Chapter 22, Section 2200 through 2219)

PLAN NAME: Inmar Intelligence City and County of San Francisco Department of the Environment Safe Drug Disposal Stewardship Plan, dated August 27, 2020 as revised October 13, 2020

PLAN OPERATOR: Inmar Intelligence
Nick Massaro, Manager, Consumer Drug Take Back Solutions
635 Vine Street
Winston Salem, NC 27101
336-770-1992
Nicholas.Massaro@inmar.com

DETERMINATION:

The Inmar Intelligence Safe Drug Disposal Stewardship Plan for San Francisco dated August 27, 2020, as revised October 13, 2020, is **APPROVED** subject to the following conditions:

1. Within 45 days of this determination, the Producers represented by Inmar Intelligence shall provide, through their Plan Operator, an updated Appendix C "Standard Mail-Back Envelope Distribution Sites" listing final sites selected in order to demonstrate compliance with the alternate convenience standard established on page 8 of the October 13, 2020 Plan.
2. Within 90 days of this determination, the Producers represented by Inmar Intelligence shall operate, through their Plan Operator, each Standard Mail-Back Envelope Distribution Site listed in the updated Appendix C required in Condition 1 and in accordance with the October 13, 2020 Plan.
3. In the event that any Standard Mail-Back Envelope Distribution Site participating in the Inmar Intelligence Stewardship Plan ceases distribution as a result of addition of Kiosk Drop-Off Sites, the Producers represented by Inmar Intelligence shall ensure, through their Plan Operator, that written information on all San Francisco Kiosk Drop-Off Sites and Standard Mail-Back Envelope Distribution Sites is available at the former Distribution Site for a minimum of one year to maintain service continuity and convenience for San Francisco residents.
4. Mail-Back Service and Standard Mail-back Envelope Distribution Sites shall be featured in all Inmar Intelligence outreach in San Francisco as long as Standard Mail-Back Envelope Distribution Sites are used to meet the service convenience goal specified in Environment Code Section 2205(b)(1).

5. Kiosks at Authorized Collection Sites participating in the Inmar Intelligence Stewardship Plan shall be installed and in operation by 90 days after signed agreements are obtained with kiosk drop-off sites.
6. The Producers represented by Inmar Intelligence shall, through their Plan Operator, minimize disruption to established kiosk drop-off sites operating under another approved Plan.
7. For kiosks hosted by a pharmacy, the Producers represented by Inmar Intelligence shall ensure, through their Plan Operator, that two employees of the pharmacy shall witness and document all pick-up and disposal coordination activities and that Packaged Containers will be stored in a secure locked location in the pharmacy to await FedEx pick-up.
8. The Producers represented by Inmar Intelligence shall ensure that signage excluding sharps or auto injectors from kiosk disposal and providing direction to the public on how to obtain an Auto-Injector Mail-Back Package is available at or near each kiosk.
9. The Producers represented by Inmar Intelligence shall ensure that information about how to obtain Mail-Back Service for auto injectors and inhalers is readily available at all Standard Mail-Back Envelope Distribution Sites.
10. The Producers represented by Inmar Intelligence shall provide to the Department a complete list of all Producers participating in the Inmar Intelligence Safe Drug Disposal Stewardship Plan for San Francisco containing all information, including contact name and email, required in Section 2204(a) of the Ordinance upon request within 10 business days.
11. Notification of non-substantive changes in Program Operation described in Section 2212(c) which are made at the discretion of Inmar Intelligence on behalf of the Producers they represent, including the closure of any of the Standard Mail-Back Envelope Distribution Sites listed in the updated Appendix C required in Condition 1, shall be made in writing to the Department 15 days in advance of the change. Changes which occur due to site closure or withdrawal from the program shall be made in writing within 15 days of Inmar Intelligence's knowledge.
12. Within 10 business days of the end of each calendar quarter, the Producers represented by Inmar Intelligence shall report, through their Plan Operator and in writing, to the Department a summary of Help Desk requests by type made by Kiosk Drop-Off Sites in the previous quarter, including the number of each type, average days to close the request and the range (min/max days) in length of time to close the requests.
13. The Producers represented by Inmar Intelligence shall report, through their Plan Operator, the numerical results of the Plan's goals as described in Section XI (pages 26-27) of the October 13, 2020 Plan version in each year's Annual Report.
14. Before the start of Kiosk Drop-off Service or within 90 days of this determination, the Producers represented by Inmar Intelligence, through their Plan Operator, shall submit to the Department an outline of the training to be provided to kiosk hosts using the Self-Service Returns model described on page 10 of the October 13, 2020 Plan. The training shall include inspection of the kiosk for maintenance and cleanliness, procedures for requesting maintenance, and procedures

to ensure that a Packaged Container is removed from the Authorized Collection Site within established timeframes.

15. Within 10 business days of the end of each calendar quarter, the Producers represented by Inmar Intelligence shall report through their Plan Operator and in writing to the Department the number of kiosk hosts who utilized each of the three Pick-Up and Disposal Coordination Options offered under the October 13, 2020 Plan version in the preceding quarter.
16. The Producers represented by Inmar Intelligence shall submit through their Plan Operator an updated Stewardship Plan by November 25, 2022 and every four years thereafter.
17. The Producers represented by Inmar Intelligence shall, through their Plan Operator, participate in all meetings convened as described in Section 4.1 of Regulation SFE-16-01-SDDSO) and comply with all Guidance on a Single System of Promotion for San Francisco established by the Director of the Department of the Environment under Ordinance Section 2206(c) and, if applicable, Regulation Section 4.2.
18. The Producers represented by Inmar Intelligence shall provide, through their Plan Operator, a minimum of 50 copies in English of trifold brochures promoting safe storage and return of medicines, as referenced in the Director's Guidance on a Single System of Promotion, and 25 copies in each other language specified in the Ordinance on an annual basis by October 1 of each year and upon request to each of the San Francisco pharmacies, health-care facilities, veterinarians, and veterinary clinics on a list of these entities provided annually by the Department.
19. Within 30 days of posting of the results of a residential biennial survey, the Producers represented by Inmar Intelligence shall submit a proposal to the Department to undertake additional outreach activities to raise public awareness of the Inmar Intelligence program if that residential biennial survey reports less than 50% public awareness based on the established survey compliance question.
20. The Producers represented by Inmar Intelligence shall, through their Plan Operator, operate a collection kiosk at the City-operated pharmacy to be determined by the Director or her designee.

The above conditions of approval shall be incorporated in the Stewardship Plan approved by this Notice of Determination. In the event that any of the above conditions of this Notice of Determination are not met, the Producers represented by Inmar Intelligence are in violation of Environment Code Chapter 22 and subject to the provisions of Environment Code Section 2213, unless otherwise determined by the Director in her sole discretion.

Signed:  Plan Approval Date: 11/25/20

Jen Jackson
Program Manager, Toxics Reduction & Healthy Ecosystems

FOR
Deborah O. Raphael
Director, San Francisco Department of the Environment