

## Key Elements to be Addressed Based on Existing Extended Producer Responsibility (EPR) Pharmaceutical Take-Back Ordinances in California

1. Determine which products will be included in the take-back program, for example:
  - Prescription medicines
  - Over-the-counter medicines
  - Generic medicines
  - Sharps
2. Define terms that will be used throughout the ordinance such as manufacturer, producer, wholesaler, and repackager.
3. Determine funding of a stewardship take-back program, including administration and oversight.
4. Determine elements of a stewardship take-back program plan, which will include the safe and legal collection, transportation, and disposal of unwanted products and “convenience” standards or other metrics that must be met.
5. Determine the review and approval process for product stewardship plans.
6. Determine the education and outreach requirements for product stewardship plans.
7. Establish requirements for reporting to the public agency overseeing the program.
8. Determine how the ordinance will be implemented and enforced – including the establishment of regulations and fees.
9. Determine miscellaneous, additional provisions.