

Comparison of Convenience Standards
United States Extended Producer Responsibility Laws for Pharmaceuticals
 Current as of June 1, 2017

State	County (click for ordinance)	Date Passed	Convenience Language	Standard (drop-off location per X people)	Notes
County Laws					
CA	Alameda County	July 2012	<p>Product Stewardship Plan...must contain...a description of the methods by which Unwanted Products from Residential Generators will be collected in Alameda County and an explanation of how the collection system will be convenient and adequate to serve the needs of Alameda County residents.</p> <p>A Product Stewardship Program shall provide a kiosk at any location in which a Person requests or volunteers to have a kiosk if the following conditions are met: The approved Product Stewardship Plan includes having physical collection sites, such as kiosks (even if the approved number of sites were accomplished by the Plan.</p>	16,000	No numerical convenience standard in the ordinance. The plan accepted by the department proposed 100 sites throughout the county.
WA	King County	July 2013	The system of drop-off sites shall provide in every city, town, or unincorporated community service area with a pharmacy or law enforcement facility, one drop-off site and a minimum of at least one additional drop-off site for every thirty thousand residents, geographically distributed to provide reasonably convenient and equitable access.	15,720	If the service convenience goal in 3. of this subsection cannot be achieved by the standard stewardship plan or any independent stewardship plan due to a lack of drop-off sites at pharmacies, law enforcement agencies or other qualified collectors in specific areas of the county, then those areas shall be served through periodic collection events or mail-back services, or a combination of these collection methods.

CA	San Francisco	April 2015	Provide reasonably convenient and equitable access for all City residents in all 5 Supervisorial Districts. The system of drop-off sites shall provide at least five drop-off sites in every Supervisorial District, geographically distributed to provide reasonably convenient and equitable access.	15,275	In lieu of drop-off sites, the department approved of MED-Project establishing mail-back mailer distribution sites plus a take-back event each quarter for any supervisorial district where they can't get enough drop-off locations.
CA	San Mateo County	May 2015	The system of drop-off sites shall provide at least one drop-off site for every 20,000 County residents, geographically distributed to provide reasonably convenient and equitable access throughout the County, and at no time shall there be less than 10 drop-off sites per County of Santa Clara Supervisorial District.	20,140	If the service convenience goal cannot be achieved due to a lack of drop-off sites at pharmacies, law enforcement agencies, or other qualified Collectors in each Supervisorial District, those areas shall be served through collection events and/or mail-back services.
CA	Santa Clara County	June 2015	The system of drop-off sites shall provide at least one drop-off site for every 20,000 County residents, geographically distributed to provide reasonably convenient and equitable access throughout the County, and at no time shall there be less than 10 drop-off sites per County of Santa Clara Supervisorial District.	20,000	When the number of drop-off sites falls below the convenience standard, they must conduct take-back events.
CA	Marin County	August 2015	Provide reasonably convenient and equitable access for all County Residents through drop-off sites. The system of drop-off sites shall be geographically distributed to provide reasonably convenient access throughout the County, and at no time shall there be less than 25 drop-off sites throughout the County.	10,450	If the convenience goal cannot be achieved due to a lack of drop-off sites at pharmacies, law enforcement agencies, or other qualified Collectors, those areas shall be served by collection events and/or mail-back services.
CA	Santa Cruz County	January 2016	Every retailer and every provider of covered drugs and sharps in the unincorporated area of the County shall establish a system consistent with the requirements of this chapter for the collection of consumer-generated covered drugs and sharps waste for proper disposal during the retailer's or provider's normal hours of operation, except that... (1) A retailer or provider who does not sell or provide sharps to consumers is not required to establish a collection system for sharps waste; and (2) A retailer or provider who does not sell or provide covered drugs to consumers is not required to establish a collection system for covered drugs waste.	6,850	No convenience standard. Instead, uses mandatory participation for all retail pharmacies in county.

WA	Snohomish County	June 2016	The system of drop-off sites shall provide in every city and town with a potential authorized collector, one drop off site and a minimum of at least one additional drop-off site for every thirty thousand residents at the locations of potential authorized collectors, geographically distributed to provide reasonably convenient and equitable access.	32,190	If the minimum number of drop-off sites cannot be achieved by the standard stewardship plan or any independent stewardship plan due to a lack of potential drop-off sites in specific county areas, then service to those areas shall be supplemented by collection events and/or mail-back services.
CA	Santa Barbara County	June 2016	At no time shall there be less than 5 Drop-off Sites per County of Santa Barbara Supervisorial District.	17,790	If the service convenience goal cannot be achieved due to a lack of drop-off sites at retail pharmacies, law enforcement agencies, or other qualified Collectors throughout the County, then those areas deficient of Drop-off Sites shall be served through periodic collection events or Mail-back Services.
IL	Cook County	October 2016	The system of drop-off sites shall provide at least one drop-off site for every 150,000 County residents in each District, distributed to provide reasonably convenient and equitable access, but at no time shall there be less than five drop-off sites per District.	61,630	If the service convenience goal in this subsection (b)(1) cannot be achieved due to a lack of drop-off sites at pharmacies, law enforcement agencies, or other qualified Collectors in each District, then those areas shall be served through periodic collection events and/or or mail-back services.
WA	Kitsap County	December 2016	There must be at least one drop-off site within the geographical boundaries of every city in Kitsap County. In addition, for any city with a population over thirty thousand residents, there must be at least one additional drop-off site for every additional 30,000 in population.	52,030	If there is no potential authorized collector within the geographic boundaries of a city, service to those geographic areas shall be supplemented with periodic collection events, mail-back services or a combination of periodic collection events and mail-back services.
WA	Tacoma-Pierce County	December 2016	In every city and town with a potential authorized collector and in the unincorporated county, the system of drop-off sites shall provide one drop-off site and a minimum of at least one additional drop-off site for every thirty thousand residents at the locations of pharmacies, hospitals/clinics with an on-site pharmacy, or law enforcement agencies, geographically distributed to provide reasonably convenient and equitable access.	19,180	If the minimum number of drop-off sites in 2. of this subsection cannot be achieved by the standard stewardship plan or any independent stewardship plan due to a lack of potential drop-off sites in specific areas of the county, then service to those areas shall be supplemented by periodic collection events and mail-back services.

CA	Contra Costa County	December 2016	Provide for the operation of at least three drop-off sites in each supervisorial district for the collection of unwanted covered drugs, in locations that allow for convenient and equitable access by residents of the unincorporated areas of those districts, to the greatest extent feasible.	11,330	If providing for the operation of at least three drop-off sites is not feasible in a supervisorial district, a stewardship program's collection system must provide for the operation of as many drop-off sites in the district as is feasible, in addition to both of the following methods of collection of unwanted covered drugs: (A) A free mail-back service that allows for convenient and equitable access by all county residents in the district. (B) Periodic take-back events that are at least six hours in length and held once per quarter of each calendar year in at least three locations in the district.
NY	Rockland County	February 2017	Retailer means any person or entity that sells drugs directly to consumers at a business located in the County. To be subject to this law, a retailer must belong to a chain of three or more retail establishments, whether operation inside or outside of Rockland County, that are engaged in the same general field of business and: 1) conduct business under the same business name; or 2) operate under common ownership or management or pursuant to a franchise agreement with the same franchisor.		No convenience standard. Instead, uses mandatory participation for all retail pharmacy chains doing business in the county (that have 3 or more locations anywhere in the US).
City Laws					
CA	City of Santa Cruz	August 2016	Every Retailer and every Provider of Covered Drugs and Sharps in the City shall establish a system consistent with the requirements of this chapter for the collection of consumer generated Covered Drugs and Sharps waste for proper disposal during the Retailer's or Provider's normal hours of operation, except that: (a) A Retailer or Provider who does not sell or provide Sharps to consumers is not required to establish a collection system for Sharps waste; and(b) A Retailer or Provider who does not sell or provide Covered Drugs to consumers is not required to establish a collection system for Covered Drugs waste.		

CA	City of Capitola	September 2016	A. Every retailer and every provider of covered drugs and sharps in the city shall establish a system consistent with the requirements of this chapter for the collection of consumer-generated covered drugs and sharps waste for proper disposal during the retailer's or provider's normal hours of operation, except that: 1. A retailer or provider who does not sell or provide sharps to consumers is not required to establish a collection system for sharps waste; and 2. A retailer or provider who does not sell or provide covered drugs to consumers is not required to establish a collection system for covered drugs waste.		
State Laws					
MA	Ordinance	March 2016	No convenience standard. To be developed by MA Department of Public Health in promulgation of regulations.		Manufacturer-funded safe disposal program is provision in larger drug abuse prevention law.
VT	Ordinance	June 2016	No convenience standard. Program details to be developed by VT Department of Health.		Manufacturer-funded safe disposal program is provision in larger drug abuse prevention law.