

LGVSD Board Report – March 13, 2018
Judy Schriebman

Handout

Agenda Item

4B8c

Date

March 15, 2018

RXSafeMarin

On Tues. March 13, I attended the BOS meeting where a resolution was passed making March 2018 Drug Awareness Month, at the request of RXSafeMarin. This program seeks to keep addictive drugs out of the community via a multi-layered approach. Sanitary Districts, including myself as LGVSD, have long supported these efforts as in Marin they include drug take back locations and messaging that does NOT recommend flushing drugs down the toilet.

However, I learned from a physician that at the Federal Level, the “home disposal” route, including flushing, is still being taught to physicians who dispense these drugs to tell their patients. This is the REMS program, run by the FDA. This seems in direct contradiction to the CWA of the EPA.

RXSafeMarin seeks to have consistent messaging to the public from Marin Physicians and for a way to educate the public on this community and environmental health problem. They would like to work collaboratively with us (or the Marin Group of SA) for newsletter, website and other consistent communication tools.

Official FDA Guidance:

<https://www.fda.gov/drugs/resourcesforyou/consumers/buyingusingmedicinesafely/ensuringsafefuseofmedicine/safedisposalofmedicines/ucm186188.htm#1>

There are, however, a few prescription medicines that contain controlled substances and are especially harmful if taken accidentally by someone other than the patient. These medicines should not be thrown in the trash, because this method may still provide an opportunity for a child or pet to accidentally take the medicine. If a DEA-authorized collector or drug take-back program is not available, FDA recommends that these medicines be disposed of by flushing when they are no longer needed. The list of medicines recommended for disposal by flushing can be seen at [this link](#).

Why do the medicines on this list have directions for disposal by flushing and other medicines do not? What is the rationale for this policy?

The medicines recommended for disposal by flushing are safe and effective when used as prescribed, but they could be especially harmful to a child, pet, or others if taken accidentally....For these reasons, FDA recommends that when it isn't possible to return these medicines through a take-back program or to a DEA-authorized collector via a collection box or mail-back program, consumers should flush them down the sink or toilet to immediately and permanently remove this risk from their home.

Reducing the risk of harm from accidental exposure to this small, select list of medicines is of utmost concern to FDA and we believe that this risk far outweighs any potential risk to human health or the environment that may come from disposal by flushing. FDA continues to work with and encourage manufacturers of these medicines to develop alternative, safe disposal systems.

<https://www.ncbi.nlm.nih.gov/pubmed/28787777>

The goal of the current investigation was to evaluate the ecological and human-health risks associated with the environmental release of the 15 active pharmaceutical ingredients (APIs) currently on the FDA "flush list". The evaluation suggests that even when highly conservative assumptions are used-including that the entire API mass supplied for clinical use is flushed, all relevant sources in addition to clinical use of the API are considered, and no metabolic loss, environmental degradation, or dilution of wastewater effluents are used in estimating environmental

concentrations-most of these APIs present a negligible eco-toxicological risk, both as individual compounds and as a mixture. For a few of these APIs, additional eco-toxicological data will need to be developed. Using similar conservative assumptions for human-health risks, all 15 APIs present negligible risk through ingestion of water and fish.

To me, this ignores the impact of these drug chemicals on fish, BMIs, and other water creatures and only focuses on human impacts, which are very difficult, over time, to make correlations between long-term ingestion and health issues. And is a "pass" to the pharmaceutical industry.

<https://www.fda.gov/downloads/drugs/resourcesforyou/consumers/buyingusingmedicinesafely/ensuringsafeuseofmedicine/safe-disposalofmedicines/ucm337803.pdf>

FDA List of Flushable Drugs

Medicine	Active Ingredient
Abstral (PDF -1M), tablets (sublingual)	Fentanyl
Actiq (PDF -251KB), oral transmucosal lozenge *	Fentanyl Citrate
Avinza (PDF -51KB), capsules (extended release)	Morphine Sulfate
Belbuca (PDF - 44KB), soluble film (buccal)	Buprenorphine Hydrochloride
Buprenorphine Hydrochloride, tablets (sublingual) *	Buprenorphine Hydrochloride
Buprenorphine Hydrochloride; Naloxone Hydrochloride, tablets (sublingual) *	Buprenorphine Hydrochloride; Naloxone Hydrochloride
Butrans (PDF -388KB), transdermal patch system	Buprenorphine
Daytrana (PDF -281KB), transdermal patch system	Methylphenidate
Demerol, tablets *	Meperidine Hydrochloride
Demerol, oral solution *	Meperidine Hydrochloride
Diastat/Diastat AcuDial, rectal gel [for disposal instructions: click on link, then go to "Label information" and view current label]	Diazepam
Dilaudid, tablets *	HydromorphoneHydrochloride
Dilaudid, oral liquid *	HydromorphoneHydrochloride
Dolophine Hydrochloride (PDF -48KB), tablets *	Methadone Hydrochloride
Duragesic (PDF -179KB), patch (extended release) *	Fentanyl
Embeda (PDF -39KB), capsules (extended release)	Morphine Sulfate; Naltrexone Hydrochloride
Exalgo (PDF -83KB), tablets (extended release)	HydromorphoneHydrochloride
Fentora (PDF -338KB), tablets (buccal)	Fentanyl Citrate
Hysingla ER (PDF -78KB), tablets (extended release)	Hydrocodone Bitartrate
Kadian (PDF -135KB), capsules (extended release)	Morphine Sulfate
Methadone Hydrochloride, oral solution *	Methadone Hydrochloride
Methadose, tablets *	Methadone Hydrochloride
Morphabond (PDF - 162 KB), tablets (extended release)	Morphine Sulfate
Morphine Sulfate, tablets (immediate release) *	Morphine Sulfate
Morphine Sulfate (PDF -282KB), oral solution *	Morphine Sulfate
MS Contin (PDF -433KB), tablets (extended release) *	Morphine Sulfate
Nucynta ER (PDF -38KB), tablets (extended release)	Tapentadol
Onsolis (PDF -297KB), soluble film (buccal)	Fentanyl Citrate
Opana, tablets (immediate release)	Oxymorphone Hydrochloride
Opana ER (PDF -56KB), tablets (extended release)	Oxymorphone Hydrochloride
Oxecta, tablets (immediate release)	Oxycodone Hydrochloride
Oxycodone Hydrochloride, capsules	Oxycodone Hydrochloride

Oxycodone Hydrochloride (PDF -100KB), oral solution	Oxycodone Hydrochloride
Oxycontin (PDF -417KB), tablets (extended release)	Oxycodone Hydrochloride
Percocet, tablets *	Acetaminophen; Oxycodone Hydrochloride
Percodan, tablets *	Aspirin; Oxycodone Hydrochloride
Suboxone (PDF -83KB), film (sublingual)	Buprenorphine Hydrochloride; Naloxone Hydrochloride
Targiniq ER (PDF -48KB), tablets (extended release)	Oxycodone Hydrochloride; Naloxone Hydrochloride
Xartemis XR (PDF -113KB), tablets	Oxycodone Hydrochloride; Acetaminophen
Xtampza ER (PDF – 67.6KB), capsules (extended release)	Oxycodone
Xyrem (PDF -185KB), oral solution	Sodium Oxybate
Zohydro ER (PDF -90KB) capsules (extended release)	Hydrocodone Bitartrate
Zubsolv (PDF -354KB), tablets (sublingual)	Buprenorphine Hydrochloride; Naloxone Hydrochloride