



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Washington, D.C. 20240



DEC 28 2011

In Reply Refer To  
FWS/AFHC/-DEQ/050265

Margaret Shield  
Local Hazardous Waste Management Program  
King County  
130 Nickerson Street, Suite 100  
Seattle, Washington 98109-1658

Dear Ms. Shield:

Thank you for your November 3<sup>rd</sup> letter that voices your concerns regarding the SMAR<sub>X</sub>T Disposal partnership campaign between the Fish and Wildlife Service, the Pharmaceutical Research Manufacturers of America (PhRMA) and the American Pharmacists Association (APhA). The Director has asked me to respond to your letter on his behalf. As you have stated, confusion about medication disposal advice for citizens does exist among the different federal agencies that have responsibility for addressing the issue. We have already taken steps to address these discrepancies and we are working with the other agencies to harmonize our efforts. To that end, we are having discussions with those agencies. We have also met with PhRMA and APhA to address the campaign's advice to consumers and update it accordingly.

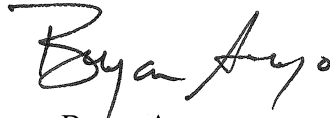
SMAR<sub>X</sub>T Disposal's original intent has always been to get consumers to move away from the longstanding advice of flushing unwanted medications and toward a more environmentally-friendly disposal behavior. In 2006, when we launched the SMAR<sub>X</sub>T Disposal campaign, the concept of take-back events was in its formative stages. At that time, the Drug Enforcement Agency (DEA) raised concerns that they would have to change their regulations, which, they are currently in the process of reviewing and updating.

In anticipation of these changes, we have always maintained that the campaign's existing guidance should be considered as interim due to new potential advances in science and new policy developments. As you have accurately described, our sister agencies are now promoting the use of medicine take-back programs as the safest method for disposal of leftover medications, and they recommend trash disposal only if a take-back program is not available.

Given these developments and the fact the Administration has elevated the medication disposal issue as a public health concern, we are bringing the SMAR<sub>X</sub>T Disposal campaign up-to-date with the current guidance and encourage the use of medicine take-back programs where available, while clarifying that disposal of unwanted medicines in the household trash is a transitional measure until drug take-back systems are available to all communities.

We hope this letter addresses your concerns and look forward to your continued engagement to help us address one of the more complex conservation issues. Please feel free to contact my deputy, Jeff Underwood at (703) 358-1829 in the future for further assistance.

Sincerely,

A handwritten signature in black ink that reads "Bryan Arroyo". The signature is written in a cursive style with a large initial "B" and a distinct "o" at the end.

Bryan Arroyo  
Assistant Director for Fisheries  
and Habitat Conservation  
U.S. Fish & Wildlife Service  
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