

**TESTIMONY OF  
CONNECTICUT HOSPITAL ASSOCIATION  
SUBMITTED TO THE  
ENVIRONMENT COMMITTEE  
Wednesday, February 22, 2012**

**SB 92, AN ACT CONCERNING THE DISPOSAL AND COLLECTION OF  
UNUSED MEDICATION**

The Connecticut Hospital Association (CHA) appreciates this opportunity to submit testimony concerning **SB 92, AN ACT CONCERNING THE DISPOSAL AND COLLECTION OF UNUSED MEDICATION**.

Protection of Connecticut's water supply is essential to ensuring the well-being of our residents. Connecticut hospitals are committed to maintaining superior health and safety standards, and as such, are in compliance with all applicable state and federal laws governing the disposal of medication.

SB 92, however, raises serious concerns. As written, it is overly broad, and in certain aspects duplicative of and potentially conflicting with existing federal, state, and local requirements concerning wastewater discharge of medications. Furthermore, the bill would sweep in under its purview discharge of certain items which are defined as medications that pose no environmental risk. SB 92 also fails to take into account the substantial activity at the federal agency level to develop new systems for the safe disposal of medications.

The disposal of drugs and other substances through discharge into public or private wastewater treatment facilities in Connecticut is already regulated by federal and state law, including the federal Clean Water Act, Connecticut's Water Pollution Control Act, and related regulations. In addition, because hospitals are largely users of local sanitary sewer systems, they are often subject to local permit requirements or local codes.

This bill would sweep all medications into its purview, without adherence to federal laws distinguishing between hazardous and non-hazardous waste. This is unwarranted, as many medications are unregulated and pose no environmental risk. For example, saline, dextrose, or electrolytes used in medical treatment and procedures would be classified as medication. But saline is simply salt water, and dextrose is simply sugar water. They have no detrimental effect on wastewater going into water treatment facilities.

Finally, an active national dialog is currently taking place on this topic at the federal level, involving pilot projects concerning new systems for the proper disposal of medications.

In fact, the EPA has developed a draft guidance document entitled, "*Best Management Practices for Unused Pharmaceuticals at Healthcare Facilities*," which is working its way through the comment and discussion process. In addition, the EPA has also proposed a new universal waste rule for pharmaceuticals, which is expected to be available for public comment in early 2013.

CHA respectfully suggests that it would be premature for the General Assembly to pass such a broad prohibition at this time. As the comprehensive federal review of this issue continues, Connecticut can benefit from the findings and ultimately enact a law consistent with federal policy.

As you consider this bill and its implications, CHA would welcome the opportunity to work with the Environment Committee to help ensure the safety of Connecticut's water supply.

Thank you for your consideration of our position.

For additional information, contact CHA Government Relations at (203) 294-7310.