



October 26, 2016

Honorable Chairman Larry Suffredin
Cook County Board of Commissioners
Legislation & Intergovernmental Relations Committee
118 North Clark Street
Chicago, IL 60602

Dear Chairman Suffredin:

The Illinois Product Stewardship Council strongly supports Cook County's efforts to establish a producer financed drug collection program. Cook County has the opportunity to become a national leader in fighting prescription drug abuse, reducing drug-related death and injury, and preventing water contamination in one of the country's largest counties. However, we are concerned that the current draft ordinance (16-1983 proposed substitute as of October 5, 2016) **does not have a strong enough convenience standard, nor a high enough producer fee, to ensure a successful program.**

Currently, the convenience standard calls for "at least one drop-off site for every 150,000 County residents" in each district, which would result in five take-back collection locations per district. This number is far fewer than other counties with successful ordinances, in which a standard of at least one drop-off site per 30,000 residents is common. Considering the number of pharmacies in Cook County that are potential collection sites for unwanted/leftover medications, this enhanced convenience standard would be both necessary and feasible.

Cook County's proposed ordinance would require producers to pay a flat registration fee of \$250 each. Even if all manufacturers selling drugs in the county are compelled to contribute their share through this ordinance, the total funds raised are likely to fall far short of what is needed to support the program. In addition, there is currently no ability for the program director to acquire more funds if needed. The fee should be increased and language added to give the director the authority to recommend that the ordinance include a provision stating that fees should be no more than necessary to cover the costs of running the program.

Thank you for your strong leadership on this important issue. Please let us know if we can be helpful in any way.

Respectfully,

Marta Keane, Chair/Illinois Product Stewardship Council, (815) 774-4343

David Van Vooren, Executive Director/Solid Waste Agency of Northern Cook County, (847) 724-9205, x202

Walter Willis, Executive Director/ Solid Waste Agency of Lake County, (847) 336-9340, x1

Scott Cassel, CEO/Product Stewardship Institute, Inc., (617) 236-4822