

Wind-Down and Closure Plan

The Drug Takeback Solutions Foundation Oregon State Consumer Drug Takeback Program

Wind-Down Period: December 31, 2025 – June 30, 2026

Final Program Day: June 30, 2026

1. Purpose of This Wind-Down Plan

This Wind-Down and Closure Plan (“Wind-Down Plan”) is submitted in accordance with ORS 459A.209 and The Drug Takeback Solutions Foundation’s (“The Foundation”) DEQ-approved Program Plan dated June 4, 2021 (“Program Plan”).

The purpose of this Wind-Down Plan is to:

1. Define The Foundation’s orderly and compliant wind-down and closure of its Oregon Drug Take-Back Program, operated under the requirements of ORS 459A.200 to 459A.266 (the Drug Take-Back Law), from December 31, 2025 to June 30, 2026 (Wind-Down Period”).
2. Ensure no lapse in safe drug disposal services for Oregon residents.
3. Provide a clear transition path for voluntary Mail-Back Distribution Sites and Covered Manufacturers.
4. Establish timelines and responsibilities between The Foundation and MED-Project regarding the joint website and the joint toll-free number.
5. Clarify The Foundation’s continued commitment to Oregon through privately operated kiosks and mail-back services after the Wind-Down Period.

Except as specified in this Wind-Down Plan, The Foundation will operate in accordance with the Program Plan until June 30, 2026. To the extent there is a conflict between the Program Plan and the Wind-Down Plan, the Wind-Down Plan shall govern during the Wind-Down Period. Where the Wind-Down Plan is described below as superseding the Program Plan, the Wind-Down Plan only supersedes the Program Plan during the Wind-Down Period, except that Section 7 of this Wind Down Plan continues to supersede the Program Plan after the Wind-Down Period ends.

As used in this Wind-Down Plan, “Foundation Program” means the drug take-back program that The Foundation operates under the Program Plan and that The Foundation will cease operating on June 30, 2026.

The Foundation will implement this Wind-Down Plan in accordance with all applicable laws.

The Foundation and DEQ have agreed that the Foundation shall apportion costs associated with

operating the Program as outlined in the Mutual Agreement and Final Order entered *In the Matter of Drug Takeback Solutions Foundation*, Case No. LQ-MM-HQ-2024-129.

2. Wind-Down Timeline

2.1 Wind-Down Period

The Foundation will begin conducting wind-down activities during the Program Year 2025–2026 (July 1, 2025 – June 30, 2026), which will be completed on June 30, 2026, ceasing at 5:00 PM PDT (the “Last Day of Program Operation”). The Foundation provided written notice to DEQ on December 31, 2025, 6 months before June 30 2026, consistent with ORS 459A.212(3) and its Program Plan.

3. Kiosk Services

3.1 Notification to Authorized Collectors

By January 16, 2026, The Foundation will provide written notification to its Authorized Collectors, which will include the following:

- The Foundation’s planned closure;
- The Last Day of Program Operation;
- Their options for participation in a CDTB program: move to Inmar’s private program, move to MED-Project, or stop participating in a CDTB program.
- Instructions on continued Kiosk operations in Inmar’s private kiosk program.

To facilitate an efficient and timely wind-down, the Foundation will not identify, solicit, or respond to potential Authorized Collectors, and no Authorized Collectors will be allowed to join the Foundation’s Program. This Section supersedes the following sections and subsections of the Approved Plan:

- Section IV.A;
- Section V.B., except for “Safe and Secure Repository System,” “Self-Service Returns,” “Service Standards,” and “Unplanned Disaster Events,” and “Drop-off site Reporting.” and
- The implementation requirements for “Drop-off Sites” listed on page 46 of Section X of the Approved Plan.

3.2 Kiosk Operation and Servicing During the Wind-Down Period

- The Foundation is responsible for ensuring that, by July 1, 2026, each drop-off site in the Foundation Program (1) has either begun operating under Inmar’s private program or (2) the Foundation’s Kiosk at the drop-off site has been decommissioned. Until The Foundation has confirmed decommissioning of the Authorized Collector’s Kiosk pursuant to Section 3.3 below or if the Authorized Collector chooses to transition their Kiosk to the private program operated by Inmar, The Foundation will:
 - Continue to service the Kiosk according to DEA and Oregon state requirements including, but not limited to, maintenance of liners, collections, transportation,

- and disposal; and
- Ensure continued public access to the Kiosk.
- Stickers on the Kiosks remaining in Inmar's private program will change to the following by June 30, 2026:
 - removal of the common mark logo sticker and any other signage indicating that the Foundation Program is part of the state program required by the Drug Take-Back Law ("State Program")
 - replacing the sticker providing state program contact information with a sticker providing Inmar's contact information for issues related to the Kiosk
 - The auto-injector order information sticker, which directs the public to the State Program to order auto-injector packages, will remain given Inmar will not be providing and they want to ensure all citizens know how to obtain a proper disposal system for auto-injectors.
- On July 1, 2026, Kiosks choosing to join Inmar's private program will not be part of the state's Oregon Drug Take-Back Program.

This Section supersedes Sections IV.B and X of the Approved Plan.

3.3 Kiosk Decommissioning

- If an Authorized Collector informs The Foundation it will not join Inmar's private program, The Foundation will send a second email to the Authorized Collector outlining the decommissioning process. A Kiosk is "decommissioned" when the following has been performed in accordance with all applicable laws:
 - The Kiosk is cleaned;
 - All signage is removed from the Kiosk;
 - Any contents in the Kiosk are disposed of in a safe and secure manner;
 - The Kiosk is rendered so that it is permanently unavailable for use as part of the State Program;
 - Any signage or other material communicating to the public that the drop-off site is part of the State Program has been removed from the drop-off site; and
 - The Authorized Collector receives information on any ongoing obligations with DEA or Board of Pharmacy requirements, such as requirements for registration and records retention, or other applicable law for the drop-off site's prior operation as part of the Foundation Program.
- The Foundation will provide a template, attached to the above-mentioned email sent to Authorized Collectors not participating with Inmar's private program, for the Authorized Collector to sign stating the date/time of the Kiosk decommissioning and removal from the registered location.
- Any Kiosk liners returned to The Foundation after June 30, 2026 will be destroyed per DEA requirements.
- To ensure proper and timely closure, no new Kiosks will be placed by The Foundation during the Wind-Down Period.

The Foundation will submit to DEQ, concurrent with the Wind-Down Report referenced in Section 7, any signed statements from Authorized Collectors confirming that the Kiosk has been decommissioned and the date when the Kiosk was decommissioned that the Foundation received and a list Authorized Collectors who decommissioned their Kiosk but did not provide signed statements.

To the extent the Program Plan addresses kiosk decommissioning, this Section supersedes the Program Plan.

4. Mail-Back Services

4.1 Notification to Mail-Back Distribution Sites

The Foundation delivered written notification (Mail-Back Distribution Sites Notification) to its Mail-Back Distribution Sites (except Costco Mail-Back Distribution Sites), on January 29, 2026, which was provided to Oregon DEQ. The notification included the following information:

- The Foundation's planned closure;
- The Last Day of Program Operation;
- Instructions on how to continue as a voluntary participant by enrolling directly with MED-Project;
- Contact information for MED-Project per their website;
- Instruct Mail-Back Distribution Sites to remove signage, educational and instructional materials, and other materials that reference The Foundation and discard them in the trash, on or before June 30, 2026;
- Any remaining envelopes may continue to be handed out to Oregon citizens as they will be directly mailed to the same destruction facility and destroyed per DEA requirements; and
 - The last day that The Foundation will fulfill mail-back envelope orders from Mail-Back Distribution Sites is May 31, 2026, and the last day for individuals to order mail-backs through the Program Website or Toll-free Phone Number from The Foundation is June 15, 2026. The Foundation has directed the joint website vendor and the toll-free number vendor to cease sending orders from the website and phone number to The Foundation starting on June 16, 2026.

The Foundation will deliver separate verbal and written notices to Costco Corporation for dissemination to Costco Mail-Back Distribution Sites, as outlined in Section 4.4 below.

4.2 Mail-back Distribution Site Operation and Servicing During the Wind-Down Period

To ensure proper and timely closure:

- The Foundation will not place any new Mail-Back Distribution Sites during the Wind-Down Period.
- Mail-Back Distribution Sites may begin to transition to MED-Project if they wish at any time after the January 29, 2026, notification.
- The Foundation will fulfill any pending Mail-Back Distribution Site orders received prior to or on May 31, 2026.
- Between December 31, 2025 – May 31, 2026, The Foundation will only fulfill any Mail-Back Distribution Site orders requested in quantities of more than 50 Standard Mail-back Envelopes, 5 Inhaler Mail-Back Envelopes, or 6 Auto-injector Mail-back Packages at one time, and will not fulfill more than one order every 30 days.
- After May 31, 2026, The Foundation will not accept or fulfill any Mail-Back Distribution Site Mailer orders.
- Any Mailers returned to The Foundation after June 30, 2026 will be destroyed per DEA regulations.

4.3 Consumer Direct Mail-Back Requests

To maintain convenience for the public while simultaneously ensuring proper and timely closure:

- The Foundation will fulfill Covered Entities requests for Standard Mail-back Envelopes, Inhaler Mail-Back Envelopes, or Auto-injector Mail-back Packages via the joint website or toll-free number through June 15, 2026. After June 15, 2026, the website will no longer continue the 50/50 split of orders between The Foundation and MED-Project. This ensures The Foundation has time to send out the mailers ordered and resolve any outstanding issues regarding those orders by June 30, 2026. Consumers may only order one of each type of mail-back at a time between December 31, 2025, and June 15, 2026, but they may place multiple orders to ensure they have enough disposal solutions to meet their needs.
- After June 15, 2026, The Foundation will not accept or fulfill any orders from consumers.
- Any Mailers returned to The Foundation after June 30, 2026, will be destroyed per DEA requirements.

4.4 Costco Mail-Back Distribution Sites

By March 1, 2026, The Foundation will deliver verbal and written notification to Costco Corporation which will include the following information for distribution to stores participating as Mail-Back Distribution Sites:

- The Foundation's planned closure,
- The Last Day of Program Operation, and
- Notice that service will continue but will be transitioned to Inmar's privately-operated mail-back program beginning July 1, 2026.

Costco Mail-Back Distribution Sites will continue to be serviced in the same manner as they currently are through the Wind-Down Period.

As of July 1, 2026, Inmar will retain all Costco Mail-Back Distribution Sites and transition them into its privately-operated mail-back program. This Program will not be part of the state Oregon Drug Take-Back Program.

This Section supersedes Section IV.C of the Approved Plan solely to the extent it modifies mail-back distribution quantities, fulfillment timelines, ordering frequency, and participation of Mail-Back Distribution Sites during the Wind-Down Period. All other provisions of Section IV.C, including the types of mail-back materials offered, methods for consumer access, and compliance with applicable handling, transportation, and disposal requirements, remain in effect through June 30, 2026. This Section supersedes the implementation timeline for "Mail-back Distribution Sites in Population Centers where the Minimum Number of Drop-off Sites are Met" in Section X.

5. Take-Back Events

The Foundation does not have any events currently scheduled and, to ensure proper and timely closure, will not schedule any events during the Wind-Down Period.

This Section supersedes Section IV.D of the Approved Plan. No take-back events shall be conducted during the Wind-Down Period, and the Foundation shall have no obligation to schedule or promote additional events prior to June 30, 2026.

6. Manufacturer Notification and Transition

By February 1, 2026, The Foundation will deliver written notification to all participating manufacturers, which shall include:

1. The last day of the Foundation Program will be June 30, 2026 at 5PM PDT.
2. The need for manufacturers to enroll with MED-Project for the next Program Year 6, July 1, 2026 – June 30, 2027.

7. Reporting and Data Transfer

7.1 Wind-Down Report

The Foundation will:

- Submit a Wind-Down Report for the program year July 1, 2025 to June 30, 2026 (Year 5) on or before the required submission date of November 1, 2026 (“Wind-Down Report”). The Wind-Down Report will include *only* the following information:
 - Executive summary outlining wind-down process, including confirmation that (1) all of the Foundation’s Kiosks have transitioned to Inmar’s private program or have been decommissioned and (2) that the Foundation Program has been wound down in accordance with the Wind-Down Plan and all applicable law;
 - A list of covered manufacturers participating in the Foundation Program during Year 5;
 - Collection Methods and Weights in Year 5, including the collection in weight of covered drugs by each drop-off site and Mail-Back Distribution Site to allow DEQ to determine the usage rate of each drop-off site and Mail-Back Distribution Site;
 - Mail-back services will include only the table summarizing collection through mail-back services made available through the Program Website and the Program Toll-free Telephone Number through June 30, 2026 and through Mail-Back Distribution Sites;
 - Collection through any events, and the date and location of such events, if applicable, in Year 5;
 - The disposal method used pursuant to ORS 459A.224, including identification of the permitted incineration facility or facilities utilized in Year 5;
 - Whether any safety or security problems occurred during the collection, transportation or disposal of drugs, including during the decommissioning process, and, if a problem occurred, a summary of the occurrence and possible resolutions; and
 - Listing of all prior Foundation Kiosks that operated during the program year, with a status report on each drop-off site that includes:

- Each drop-off site that has transitioned to Inmar’s private program
- For all drop-off sites that decommissioned their Kiosk, the date The Foundation was notified by the Collector of the Kiosk decommission.
- Total Plan Expenditure for the program year;
- Attestation that all covered drugs collected under the drug take-back program were disposed of in compliance with applicable laws, rules and regulations; and

This Section supersedes Sections VI and VII of the Approved Plan.

7.2 Other Reporting

The Foundation will continue to notify DEQ of manufacturer information as required by ORS 459A.212(4) until June 30, 2026.

Per ORS 459A.212, The Foundation will continue to notify DEQ of drop-off site and Mail-Back Distribution Site status on a monthly basis, in a form and manner prescribed by DEQ, until June 30, 2026.

7.3 Records Retention

The Foundation will retain all records related to its drug take-back program from July 1, 2021 to June 30, 2026 (collectively, the “Records”) for at least three years from the time the Record is generated. The Foundation will retain Records and make them available to DEQ for review and inspection upon DEQ’s request, including providing such Records for DEQ to access by electronic means at DEQ headquarters in Portland, OR, upon DEQ’s request.

8. Residual Public Communications and Website Updates

During the Wind-Down Period, the Foundation will not conduct additional outreach campaigns other than the public notices described herein.

- The Foundation’s and MED-Project’s joint website and toll-free number:
 - During the Wind-Down Period, the joint website will be updated monthly to provide the public with information about sites that have notified The Foundation that they have decommissioned their Kiosks or have discontinued their service as a Mail-Back Distribution Sites.
 - By February 1, 2026, The Foundation will request to meet with the joint website vendor to discuss the program’s closure and wind-down operations, and develop a specific plan for the removal of The Foundation’s participants from the joint website to be completed by July 1, 2026.
 - By February 1, 2026, The Foundation will request to meet with the toll-free number vendor to discuss the program’s closure and wind-down operations, and develop a specific wind-down plan for the toll-free number.
 - By April 1, 2026, The Foundation will deliver written notice to MED-Project of its intent to Wind-Down the program and plan for data movement and contract termination with the joint website and the toll-free number vendor(s) for the Oregon state sponsored consumer drug takeback program.
 - As of July 1, 2026, the program will no longer have any responsibility for the

joint website or toll-free number nor the information contained on either for the Oregon state sponsored consumer drug takeback programs.

- By June 30, 2026, The Foundation and its Service Provider will update their websites to reflect The Foundation's Oregon Drug Take-Back Program closure.
- The Foundation will prepare and publish public notices clarifying that kiosks and Costco Mail-Back Distribution Sites will remain available to Oregon citizens after June 30, 2026, in Oregon newspapers during the month of May 2026, via the same news networks that were utilized by The Foundation in past program years.

This Section supersedes Sections V, IX, and X of the Approved Plan.

9. Notification of Wind-Down Plan and Termination of Agreements with Vendors and its Service Provider:

- As of December 31, 2025, The Foundation notified Inmar, its Service Provider, of its intent to Wind-Down the program and terminate its agreement. Inmar will continue to act as a Service Provider until the Annual Report discussed in Section 7 is submitted.
 - All vendors will receive notice and have their agreements terminated to the extent they are providing services for The Foundation's Oregon Drug Take-Back Program.
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