

July 23, 2025

Oregon Department of Environmental Quality  
700 NE Multnomah St #600  
Portland, OR 97232

**Re: Input on 2025 program plan by Drug Takeback Solutions Foundation and MED-Project USA**

Thank you for the opportunity to provide comments on the updated plans submitted by Drug Takeback Solutions Foundation and MED-Project USA. After reviewing the 2025 Program Plans from each program operator, Metro and the City of Portland have collaborated on these comments summarized into four areas below.

**Budget**

Both Producer Responsibility Organizations (PROs) have outlined their budgets in a similar level of detail, however, there are significant differences to allocations within the expenditures. We question the efficacy of a program provider whose budget is approximately 60% administratively focused with only 20% spent on collection and disposal activities. The PRO does not provide an explanation for the necessity of an administratively heavy budget. In contrast, the other PRO has allocated less than 40% of their budget for administrative costs and approximately 40% percent for collection and disposal.

**Safe and secure drop-off locations**

Through our Recycling Information Center hotline and Household Hazardous Waste services Metro has received reports of inaccessible drop off location kiosks, either because the kiosk is locked and the pharmacy staff are unable to help the patron, or because the kiosk is full and unable to accept additional medications. We would like to see additional details on drop-off locations including the number of kiosks in publicly accessible areas that are locked and the average number of days a kiosk is full before being serviced included in program plans to understand accessibility of the kiosks.

We see that both PROs have again requested variances for the convenience standard. Statute outlines the minimum effort, not the only effort required, to meet the convenience standard. Both PROs have requested variances to the convenience standard for multiple years. We would like to see PROs take more than the minimum statutorily required action and at least meet the requirements of the previously issued variances.

**Flexibility in mail-back envelope distribution**

We would like to see additional flexibility in mail-back envelope distribution sites to include events. In email and conversations, a PRO told Metro our Household Hazardous Waste Collection Events and smaller scale community collection events were not eligible to distribute mail-back envelopes because the events are not tied to a permanent geographic location. Metro hosts more than 20 large collection events throughout the greater Portland area each year serving more than 300 households per event. Metro's smaller events serve historically underserved communities. In both cases the events are intentionally marketed to specific audiences. The City of Portland's community outreach team tables at more than 30 events each year interacting with at least 1,000 people in Portland. The majority reach historically underserved communities. Through these events we see

an opportunity to publicize the Drug Take-Back program and increase participation and collection in the mail-back envelope program.

### Education and Outreach

We would like to see education and outreach expanded generally and welcome the option in MED-Project's plan to "conduct additional targeted campaigns to further enrich the outreach program based on consultation with appropriate local governments." (p. 33) Given the growing trend of online and mail-order pharmacies, one area we would like to see enhanced is promoting the program directly to customers via these channels.

ORS 459A.227 requires that at a minimum, the program operator must "...Discourage the disposal of covered drugs in the garbage or sewer system". We do not see this consistently reflected in the PRO materials and would like to see that information clearly stated on the website and brochures for both PROs.

We appreciate the language on kiosks that encourages recycling, but currently in Oregon most prescription bottles are not allowed in commingled (curbside) recycling because the minimum size is 2x2 inches for plastic bottles and jars. We suggest removing that line of text. That could have the added benefit of reducing the overall text and making it easier for customers to quickly skim and understand the drug take-back preparation instructions. We have the same request to remove instructions to recycle remaining packaging in all communication including the brochure, mail-back inserts, and FAQs.



Metro and the City of Portland appreciate the opportunity to provide feedback in this public input process.

Respectfully,

*Thomas Egleston*

Thomas Egleston  
Policy and Program Development Manager  
Metro  
[Thomas.Egleston@oregon](mailto:Thomas.Egleston@oregon)

*Pete Chism-Winfield*

Pete Chism-Winfield  
Materials and Waste Policy Manager  
City of Portland  
[pete.chism-winfield@portlandoregon.gov](mailto:pete.chism-winfield@portlandoregon.gov)