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Dockets Management Staff  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852  
Submitted via [www.regulations.gov](http://www.regulations.gov)

**RE: In-Home Disposal Systems for Opioid Analgesics; Request for Information  
(Docket No. FDA-2023-N-0917)**

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the Food and Drug Administration's (FDA) Request for Information on In-Home Disposal Methods for Opioid Analgesics (88 FR 19959). NACWA represents the interests of 350 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the US. NACWA member utilities are responsible for treating the millions of gallons of wastewater produced by their communities each day. Many NACWA members are actively involved in efforts to reduce the quantities of potential pollutants, such as pharmaceuticals, that are discharged into the sewer system. This is especially important for the growing number of utilities that are providing their communities with recycled water.

NACWA has communicated in the past with the FDA, the Environmental Protection Agency (EPA), and the Drug Enforcement Administration (DEA) on the need for more practical disposal options to reduce flushing or down-the-drain disposal of pharmaceuticals into the sewer system. Disposal by flushing is not environmentally protective, since wastewater treatment plants are not designed to remove pharmaceuticals. NACWA and its members have long supported pharmaceutical take-back programs for unused prescription medications. Incineration of the pharmaceuticals collected through take-back programs is effective in both keeping the pharmaceuticals out of the water environment and preventing illicit use. Mail-back envelopes are an effective part of take-back programs, allowing an easy method of returning unused prescriptions at any time.

Although FDA still recommends disposing of unused pharmaceuticals in the trash if a take-back program is not available, this method is not protective of the water environment, since pharmaceuticals are found in the landfill

leachate that may be discharged to a wastewater treatment plant. NACWA understands that some unused prescriptions should be disposed of as soon as possible to prevent diversion. However, the efficacy of at-home disposal methods in destroying pharmaceuticals compounds must be proven before their use is encouraged. Providing at-home disposal methods that may not be used properly or may not be effective in destroying opioids will potentially lead to diversion and environmental harm.

NACWA supported FDA's decision to provide free mail-back envelopes with opioid prescriptions. A consistent message from FDA that unused prescriptions should be dropped off at pharmacies or other take-back locations, or mailed in an envelope provided by the pharmacy, will help ensure that the public understands how to properly dispose of unused pharmaceuticals. The message that some drugs may be disposed of in the trash, whether mixed with unpalatable household waste or in at-home disposal methods, will likely be confusing to the public and lead to disposal of additional medications in the trash that will inevitably end up at the wastewater treatment plant.

Thank you for your consideration of these comments. Please contact me at 202-533-1836 or [cfinley@nacwa.org](mailto:cfinley@nacwa.org) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cynthia A. Finley". The signature is written in a cursive, flowing style.

Cynthia A. Finley, Ph.D.  
Director, Regulatory Affairs