

CSL Behring L.L.C.

Plan for Compliance with California Public Resources Code Sections 47115-47116 and Minnesota Statutes 2008, Section 116.835 (Safe Sharps Management)

In October 2009, the State of California enacted legislation requiring any “pharmaceutical manufacturer that sells or distributes a medication in California that is usually intended to be self-injected at home through the use of a hypodermic needle, pen needle, intravenous needle, or any other similar device . . . [to] on or before July 1, 2010, and annually thereafter, submit to the board, or its successor agency, a plan that describes how the manufacturer supports the safe collection and proper disposal of the waste devices.” In January 2011, the State of Minnesota enacted similar legislation that was signed by the governor on April 30, 2011.

The plan must include a description of the actions, if any, taken by the manufacturer to do the following:

- (i) Provide for the safe collection and proper disposal of the waste devices.
 - (ii) Educate consumers about safe management and collection opportunities.
 - (iii) Support efforts by retailers, pharmaceutical distributors, manufacturers of injection devices, and other partners, including local governments, health care organizations, public health officers, organizations representing patients who use sharps, solid waste service providers, and other groups with interest in protecting public health and safety through the safe collection and proper disposal of waste devices.
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- A. CSL Behring does not provide its medications directly to patients, and cannot directly provide for the safe collection and proper disposal of used sharps and related materials. However, CSL Behring has sent written communications to key customers who provide CSL Behring’s medications to patients, reminding those customers of government interest in (and of the importance to patients, the general public, and the environment of) the safe collection, treatment, and proper disposal of sharps waste generated by households. CSL Behring also participates in the Pharmaceutical Product Stewardship Work Group, an association that coordinates industry efforts to raise awareness about appropriate disposal methods and to respond to disposal laws.
 - B. CSL Behring currently produces instructional videos for patients and caregivers that demonstrate proper methods for reconstitution and administration of certain CSL Behring medications. As part of those videos and (as appropriate) in accompanying written materials, CSL Behring includes, and will continue to include, demonstration of proper disposal of sharps and other medical waste incident to administration of CSL Behring products.
 - C. CSL Behring accepts grant funding requests from qualifying charitable and non-profit organizations, and will ensure consideration of proposals from such organizations requesting support, in whole or in part, for public educational programs focusing on or including the topic of safe collection, management, and proper disposal of sharps waste generated by households of patients such as those who use CSL Behring products.