



December 3, 2021

Marin County Environmental Health Services  
3501 Civic Center Drive, Ste 236  
San Rafael CA 94903

Dear Marin County Environmental Health Services,

Alcohol Justice is the alcohol industry watchdog, as well as a policy and advocacy workshop focusing on all drugs of abuse. We are located in the Canal District of San Rafael, a lower-income, heavily Latinx neighborhood. We have long been involved in promoting drug takeback infrastructure in this area, and would like to comment on the shortcomings of the Inmar Safe Drug Disposal Stewardship Plan.

Although we see some strengthening in Inmar's plan to broaden access options for communities that do not currently have a kiosk, we still believe more explicit commitment is necessary to serve the Canal. We would like the following efforts to be explicitly agreed to:

1. Inmar will engage in dedicated Spanish-language outreach, including both print and social media efforts. More broadly, Inmar should make an effort to find community partners to amplify and ensure cultural competence in their outreach to residents for whom English is not their primary language.
2. Recognition that efforts to provide a physical drug drop-off location do not stop once a mailback location has been secured, and that Inmar will repeatedly monitor and pressure agencies in the Canal (and other areas served only by mailback options) with the aim of permanently establishing a physical drop-off.
3. Commitment to in-person outreach in the Canal, similar to the "drop-off fairs" suggested as a method of last resort, even if mailbacks are already in place. In addition, Spanish-language flyers and mailers should be sent repeatedly.
4. Outreach to local prescribers and providers who serve the Canal to facilitate education about drug drop-off.

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[alcoholjustice.org](http://alcoholjustice.org)

As it stands, the Canal District is underserved by existing drug—particularly opioid—takeback infrastructure. Although efforts have been underway for years to get one located in the local pharmacy (the Marin Community Clinic), they have consistently run into barriers. We are disappointed to find that Inmar, likewise, has no plan to push for one in that site, and no alternate site that is easily accessible by Canal residents is under consideration.

This is both a social justice issue, since more affluent neighborhoods have much greater ease of access to drug takebacks, and one of urban equity, since the guidelines for placement of takeback kiosks are supposed to be dependent on population density. Yet the Canal has both the largest non-White population of any San Rafael neighborhood *and* the highest population density.

We recognize that takeback boxes are a work-in-progress. Nonetheless, as an effective method to reducing access to diverted opioids and other controlled pharmaceuticals, the barriers to accessing them should be minimized as much as possible. We hope Inmar will take on this challenge.

Respectfully,



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