



By Benjamin H. Grumbles

'Pharm Talk & Water Work'

Emphasizing pollution prevention to protect the environment and aid water agencies

The concern is well placed. We should all find troubling the widespread presence and unknown impacts of trace pharmaceuticals and chemicals from personal care products. The “canary in the coal mine” is sick in some watersheds (exhibit A: intersex fish and deformed frogs). The risk is real, but so are the gaps in our knowledge and the difficult policy choices ahead. We do not have answers to key questions about synergistic effects on ecosystems or indirect impacts to human health, but we also know we cannot wait for a “final verdict” from the scientific jury.

I testified a lot about EPA’s concerns and actions regarding pharmaceuticals and chemicals in water, but I always included the following caveat: Water managers and policy makers should not shift critical resources and attention away from higher, known

risks, such as raw sewage overflows and nutrient loadings. The dilution of risk-based priorities is a real risk of its own. The challenge is to find the right balance—to put priority on the biggest threats while not neglecting the emerging ones.

Four Prongs for Pharmaceuticals

I am proud of the work EPA did in response to such concerns, both before and after the media blitz. The agency set a firm foundation for increased, responsible action by focusing on:

- **Strengthening science and knowledge.** New investments were made in field surveys and testing, detection and treatment technologies and improving the knowledge of aquatic resource impacts and potential risks to humans.
- **Increasing public understanding.** Risk communication is key so that people and their governments do not overreact or underestimate. Honest information with useful advice through websites, public service announcements and consistent messaging leads to better decisions.
- **Building partnerships for stewardship.** Manufacturers, retailers, utilities, agricultural growers and health care professionals at all levels convened to instill an ethic of pollution prevention and product stewardship through rebates, public recognition and other nonregulatory incentives.
- **Using regulatory tools.** Authorities were reviewed under the Safe Drinking Water Act (SDWA), the Clean Water Act (CWA), the Resource Conservation and Recovery Act and other environmental laws to meet various pollution prevention, product recovery and waste management goals.

Progress

These areas led to some real progress, including:

- The beginnings of a new national policy from federal agencies to dispose of unused pharmaceuticals properly and not to treat the toilet as a trash can;
- Local efforts across the nation to collect unused pills;

- Expanded testing at treatment plants and in watersheds for pharmaceuticals and greater analysis of ecological impacts;
- A comprehensive review by EPA to determine whether to add certain pharmaceuticals and endocrine-disrupting chemicals to the list of regulated substances under the SDWA; and
- Whether to add new regulations and best management practices for hospitals and other health care facilities.

Fortunately, the work is continuing on many fronts with many new partners. The National Academy of Sciences and other research institutions are providing insights on the complex scientific issues. State and local health agencies are stepping up with “no drugs down the drain” campaigns. Some pharmaceutical manufacturers and pharmacies also are taking meaningful steps. Utilities are testing more and sharing more results to inform their customers, and they are doing it not just to maintain the confidence in local drinking water but also to reduce potential barriers to beneficial reuse and recycling of wastewater and sewage sludge.

More Work Ahead

More needs to be done in a responsible manner so that we do not shift resources and manpower away from higher risks. I hope the new administration continues to build on EPA’s four-part foundation and use SDWA and CWA regulatory tools in a careful, science-driven manner. I also hope Congress, federal and public health agencies and institutions, science agencies and institutions and the private sector increase investments in the science of emerging contaminants and their complex synergistic effects. Congress should look to reduce current or potential barriers to voluntary take-back programs, working closely with the Drug Enforcement Agency. EPA and Health and Human Services need to continue improving their public advice on how best to dispose of unused pharmaceuticals. Agricultural producers and owners of concentrated animal feeding operations need to participate as well.

Pharm talk, whether focusing on farms, cities or suburbs, must emphasize pollution prevention and the wise use of environmentally safe chemicals and hormones. That is good environmental policy—reducing the load and, we hope, the work for already hard-working water agencies. [www](#)

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