



EFFICIENT TREATMENT OF PHARMACEUTICAL RESIDUE AT SOURCE - EPIC

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EPIC Value Network and Contribution of Work Packages

WP 5: Coordination and Communication

WP4 (SYKE,UH) : Policy Recommendations for sustainable management of pharmaceuticals

WP3 (LUT, SYKE): Cost- effectiveness of wastewater treatment solutions for bioaccumulative and persistent pharmaceutical residues

WP2 (SYKE, LUT): Pilot testing of waste water technologies in real conditions

WP1 (SYKE, UH): Identification of pharmaceutical residue emission loads and risk

Enabling conditions for residue minimisation



wwtp



Tekn

Cost efficient solutions known



wwtp



Tekn

Technology functioning known



wwtp



Tekn

Loads of APIs known



wwtp



Tekn

Beneficiaries:

- Hospitals and Health Care actors
- Scientific community
- Households
- MWWTs
- Technology developers
- Technology providers
- Planning consultants
- Food and drinking water production
- Pharmaceutical industry in Finland and globally

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- Hospitals and health care actors
- Municipal waste water treatment plants (MWTP)
- Technology developers
- Scientific community



PRODUCTION

- Raw materials
- APIs
- Final products

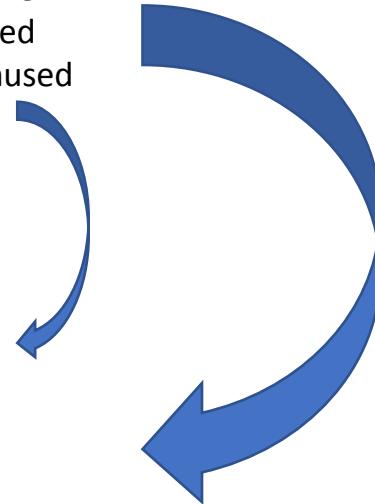


DISTRIBUTION



USAGE

- used
- unused



WASTE
to water, soil, air

Need

There are several questions which need to be answered before actions can be taken

- What is the regulatory framework and where are the possible gaps?
- In different steps of the production chain – what are the possibilities to diminish the emissions and waste using regulatory tools?
- What kind of actions could be needed and in which level – internationally, EU-level, nationally?

Approach/Activities

- Examination of the problems
- Regulatory framework and identification of the gaps
- Influencing EU-work
- Identifying actions already taken by Sipilä government
- Seminar 12.12.-18 presentation about the identified problems
- Article about regulatory possibilities, under work
- Policy paper by SYKE
- Information to the ministry of Health – environmental issues to be included in their report : Näkökulmia lääkehoitoon ja lääkkeiden jakeluun liittyvistä muutostarpeista.

Virkamiesmuistio STM 2019:5

	EU-taso KV-taso	Kansallinen taso
Raaka-aineiden valmistus – APIt Kommentit: Global business, need for global actions and collaboration	<p>WTO:n päätöksiä (DOHA-declaration 2001)</p> <p>EU:n kemikaaliasetus (1907/2006 REACH); ei koske lääkeaineita (APIt) mutta koskee muita valmistuksessa käytettäviä aineita</p> <p>SEVESO-III</p> <p>Teollisuuspäästödirektiivi (IED, 2010/75/EU), OCF BAT / BREF</p> <p>Water framework directive (2000/60/EC)</p> <p>Vuorumerkkijärjestelmä ja Eero –respa</p> <p>Priority substances directive (2008/105/EC) with amendments</p> <p>GMP (2003/94/EY) sekä komission ohjeet</p>	<p>Ympäristöluvat teollisuudelle:</p> <ul style="list-style-type: none"> • Ympäristönsuojelulaki (527/2014) • Ympäristönsuojeluasetus (713/2014) • Jätelaki (646/2011) <p>Laki vaarallisten kemikaalien ja räjäheteiden turvallisesta käsittelystä (390/2005)</p> <p>VN asetus Kemikaalien käsittelyn ja varastoinnin valvonnasta (685/2015)</p> <p>VN asetus Vaarallisten kemikaalien teollisen käsittelyn ja varastoinnin turvallisuuksista (856/2012)</p> <p>Lääkelaki (395/1987) – 2 luku</p> <p>GMP-Fimean määräys 5/2015</p>
Lääkevalmisteen valmistus ja myyntilupa / edellisten lisäksi Jo markkinoilla olevat APIt Arvointimenetelmien kehitystyö ja laboratoriot	<p>Official Medicines Control Laboratory OMCL 1994</p> <p>Euroopan farmakopea / laatustandardit lääkkeille</p> <p>Laatustandardi ISO/IEC 17025</p> <p>EU:n humaanilääkedirektiivi (2001/83/EC)</p> <p>EMA-CHMP 1.6.2006 ohjeistus ympäristöriskien arvioinnista</p>	<p>Hintamekanismi – HILA</p> <p>STMn asetus 201/2019 (hintaa koskevat ilmoitukset ja hakemukset) – ei ympäristökriteereitä</p>

Tukkukauppa Procurement processes, policies	Komission GDP-ohjeet	Fimean määräys 5/2013
Avoihuollon lääkehуolto Koraukset, hinnat, rationaalinen lääkehоito, luokittelun soveltaminen	Kansallisen säätelyn piirissä	Lääkelaki (395/1987) Hintamekanismi – STMn asetus 201/2019
Sairaaloiden lääkehуolto Julkisten hankintojen kriteerit Spot-keräily	Julkiset hankinnat, EUn hankintadirektiivi (2014/24/EU) – elinkaarikustannukset (95§)	
Eläinlääkkeet	EUn direktiivi (2001/82/EY) korvattu eläinlääkeasetuksella (EU) 2019/6 ja asetus (EU) 762/2004 korvattu EMAn lupamenettelyasetuksella (EU) 2019/5. Soveltaminen vasta 2022. EMA-CVMP	MMM (mm. MMMa 17/2014 ja MMMa 22/2014) Evira, Fimea
Lääkejätteet Tietoisuuden lisäminen, hintaojaus	EUn jätedirektiivi (2008/98/EY) artikla 127b lääkejätteen keräysjärjestelmät	Jätelaki(646/2011):vaarallinen jätte, kunnan tehtävät Fimean määräys 2/2016 Eläinlääkejätteiden osalta MMMa 17/2014, 22/2014

Problems identified

- GMP doesn't cover environmental issues and waste management
- There are no standardised risk evaluation or classification system for APIs included in Pharmacopeias
- REACH doesn't cover medicines
- Risk evaluation is made only for new medicines
- There are no price incentives in the pricing system
- Veterinary medicines – AMR
- Public procurement –processes: price only criteria in tenders
- Prescribing and dispensing: no recommendations except for small packages and expensive medicines
- Medicine wastage: good collection system but not enough efforts for preventing -> rational pharmacotherapy.

EU Strategic Approach to Pharmaceuticals in the environment 11.3.2019

5. ACTIONS

1. Increase awareness and promote prudent use of pharmaceuticals
2. Support the development of pharmaceuticals intrinsically less harmful for the environment and promote greener manufacturing (extended producer responsibility)
3. Improve environmental risk assessment and it's review
4. Reduce wasteage and improve the management of waste
5. Expand environmental monitoring
6. Fill other knowledge gaps (risk assessment)

Benefits

- Platform for collaboration and further discussions – regulatory framework understood
- Tools for advancing regulation, tools for raising awareness
- Information to administrators in different ministries – avoiding silos

Collaboration

All stakeholders needed:

Sustainability aspects should be integrated to all discussions.

To combat the problem the solutions should be integrated to all activities