



HEALTH PRODUCTS
STEWARDSHIP ASSOCIATION

PROPOSED

Manitoba Medications Return Program Plan

Manitoba Sharps Collection Program Plan

2023–2028

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Table of Contents

Executive Summary.....	3
Terms and Definitions.....	4
I. Introduction.....	5
II. Program Products.....	5
III. Program Design.....	7
A. Collection System.....	7
B. Transportation Requirements.....	9
C. Processing Requirements.....	9
IV. Promotion and Education	9
Communication Methods.....	10
Partnerships.....	10
Northern and Remote Communities	11
V. Performance Measures	11
VI. Funding Structure	13
VII. Dispute Resolution Procedure	13
VIII. Annual Report	13
IX. Management of Environmental Impacts.....	14
A. Medications.....	14
B. Medical Sharps.....	14
X. Stakeholders Consultations	15
Appendix A - HPSA Members.....	16
Appendix B - Stewardship Plan Reference.....	18
Appendix C – Stakeholder Feedback	19



Executive Summary

Health Products Stewardship Association (HPSA) is a non-profit Producer Responsibility Organization (PRO) representing manufacturers, brand owners and first importers of medications and medical sharps in response to provincial stewardship regulations. HPSA develops and administers Extended Producer Responsibility (EPR) programs for those products in Canada on behalf of its members.

The *Household Hazardous Material and Prescribed Material Stewardship Regulation* (MR 16/2010) under the *Waste Reduction and Prevention Act* (WRAP Act) creates a set of requirements and criteria for the following categories: pharmaceutical products, natural health products and medical sharps. Those categories are represented under the *Manitoba Medications Return Program* (MMRP) and the *Manitoba Sharps Collection Program* (MSCP).

HPSA has been administering the MMRP since 2011. This program encompasses both the pharmaceutical products category (prescription drugs, over-the-counter medications) and the natural health category that are sold for use in the province of Manitoba but limited to the "consumer/residential" waste stream. The MSCP was launched in 2021 to address the safe collection and proper disposal of used medical sharps.

With a view to streamlining program management, HPSA is submitting one single renewal program plan for the *Manitoba Medications Return Program* and the *Manitoba Sharps Collection Program*.

HPSA is submitting this five-year plan on behalf of the stewards of Medications and Medical Sharps to Manitoba's Environment, Climate and Parks (ECP) in accordance with Manitoba Household Hazardous Material and Prescribed Material Stewardship Regulation (16/2010R) ("Regulation") issued under The Waste Reduction and Prevention (Wrap) Act (CCSM c. W40), for the period covering **July 1, 2023, to June 30, 2028**.

The Manitoba Medications Return Program and the Manitoba Sharps Collection Program provide a collective strategy for Medications and Medical Sharps Stewards to comply with the Regulation by ensuring that collection location sites are present in all regions of the province and that unwanted (unused and/or expired) medications and used medical sharps returned by consumer are handled, transported, and disposed of in a safe, compliant, and environmentally responsible manner.

Unwanted medications and used medical sharps will continue to be collected through the existing HPSA network of registered pharmacies that are currently participating in the MSCP and MMRP managed by HPSA. Both programs are fully funded by HPSA members distributing Medications and Medical Sharps in the province of Manitoba.



Terms and Definitions

Collection Location Site (CLS)	A location, typically a retail pharmacy, registered with HPSA to collect unwanted medications and used medical sharps returned by consumers.
Consumer	An individual who purchases goods or services for personal, family, or household use.
Medications	For the purposes of the MMRP, medications include <ul style="list-style-type: none"> • Pharmaceutical Products (Prescriptions drugs, Over-the-counter medications) • Natural Health Products
MMMRP	Manitoba Medications Return Program
MSCP	Manitoba Sharps Collection Program
Medical Sharps	For the purpose of the MSCP, medical sharp is define as: a needle, safety-engineered needle, lancet or other similar instruments designated to puncture the skin for medical purposes and that is sold or otherwise distributed and includes anything affixed to the sharp, including a syringe.
Natural Health Products	A natural health product, as defined in <i>The Natural Health Products Regulation</i> under The Food and Drugs Act (Canada).
Pharmaceutical Products	A pharmaceutical product is a substance or mixture of substances manufactured, sold or represented for use in: <ol style="list-style-type: none"> i. the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state, or its symptoms; or, ii. restoring, correcting or modifying organic functions; including, but not limited to, medications available with or without a prescription, but not including contact lens disinfectants, anti-dandruff products and shampoos, cosmetics, antiperspirants, antiseptic or medicated skin-care products, sunburn protectants, mouthwashes, fluoridated toothpastes, and veterinary medications and products
Steward	<ol style="list-style-type: none"> i. the first person who, in the course of business in Manitoba, supplies a designated material to another person; or, ii. a person who, in the course of business in Manitoba, uses a designated material obtained in a supply transaction outside of Manitoba.

I. Introduction

HPSA draws on more than 20 years of experience as a Producer Responsibility Organization (PRO). The knowledge and network it built over the years have helped in educating Canadians about Medications and Medical Sharps end of life management, proper storage at home and safe return.

HPSA is submitting the MMRP and MSCP Plan on behalf of its 154 members who are obligated under the Regulation as Stewards in Manitoba. The list of medication and medical sharps Stewards who have joined and mandated HPSA to fulfill their regulatory obligations is included in Appendix A.

In compliance with the WRAP Act and the Regulation, the MMRP and MSCP will continue to provide all Manitoba residents with reasonable access to collection sites province-wide. HPSA will be responsible for strategic planning, as well as overseeing program and financial operations, including contracting services to manage day-to-day operations of the programs. The program requirements and criteria for stewardship programs under MR 16/2010 are outlined in Appendix B.

II. Program Products

Pharmaceutical Products Category

"A substance or mixture of substances manufactured, sold or represented for use in (a) the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state, or its symptoms; or

(b) restoring, correcting or modifying organic functions; including, but not limited to, medication available with or without a prescription".

The Pharmaceuticals Products category shall be generally defined as follow:

- Any prescription drug or over-the-counter medication approved by Health Canada, with a Drug Identification Number (DIN) and sold in Manitoba.

NOT included in the MMRP are:

- Contact lens disinfectants
- Anti-dandruff products and shampoos
- Cosmetics
- Antiperspirants
- Antiseptic or medicated skin-care products
- Sunburn protectants
- Mouthwashes

- Fluoridated toothpaste
- And veterinary medications and products.

This category is limited to household quantities.

Natural Health Product Category

"A natural health product as defined in The Natural Health Products Regulation under The Food and Drugs Act (Canada)".

The Natural Health Products category shall be generally defined as follow:

- Any Natural Health Products approved by Health Canada, with a Natural product Number (NPN) or Homeopathic Medicine Number (DIN-HM) and sold in Manitoba.

This category is limited to household quantities.

Medical Sharps Category

"Devices, equipment, material, products and substances that meet the criteria for waste household hazardous materials set out in the CSA Standard Z752-03, Definition of Household Hazardous Waste, including, but not limited to, devices, equipment, material, products and substances that meet the criteria for:

- (a) flammable materials;
- (b) corrosive materials;
- (c) physically hazardous materials, including, but not limited to,
 - (i) explosives (but not including ammunition), and
 - (ii) **medical sharps carrying pathogens**;
- (d) toxic materials; or
- (e) environmentally hazardous materials, including those materials that meet the criteria of being "toxic", and either "persistent" or "bio accumulative" as those terms are described in Clauses 7.6.2.2. to 7.6.2.4. of that Standard.

Medical sharps carrying pathogens are further defined in the CSA Standard as:

All medical sharps used to inject, draw blood, or puncture tissue, including but not limited to

- (a) syringes and needles;
- (b) scalpel blades; and
- (c) lancets.

The Medical Sharps category shall be generally defined as follow:

- A needle, safety engineered needle, lancet or other similar instrument that is designated to puncture the human skin for medical purpose and that is sold or

otherwise distributed, and includes anything affixed to the sharp, including a syringe.

Products referenced in the Waste Household Hazardous Materials category description are for "household" and "domestic" use only. Accordingly, no products intended for industrial, commercial or institutional (IC&I) use shall be included in the Program. In other words, any medical sharp used in the context of an immunization campaign and/or administered by a health care practitioner (flu/influenza, COVID) must remain under the proper disposal procedures of a commercial waste agreement.

Additional products excluded from the Manitoba Sharps Collection Program:

- Scalpels*
- Sharp blades
- IV bags/tubing

*The intent of the MSCP is to provide a collection solution for patients that are using medical devices containing a sharp for self-injecting or self-testing at home. Scalpels are more commonly used by healthcare professionals thus are excluded.

Both "Orphan" and "Free Rider" products are accepted in the MMRP and MSCP. "Orphan" products are products produced by a manufacturer that either no longer exists or no longer produces such products. "Free Rider" products are products imported or distributed by a manufacturer or a retailer that is not a registered member of HPSA.

III. Program Design

A. Collection System

Collection Location Sites for the MMRP and MSCP are retail community pharmacies with a public-facing dispensary. Pharmacies are a logical and safe system for the public to return unwanted medications and used medical sharps. Many have extended hours, offering a convenient place for consumer disposal year-round. Every Collection Location Site (CLS) has an agreement with HPSA regarding the collection, storage and proper disposal of unwanted medications and used medical sharps.

Below are some of general terms and conditions applicable for a retail pharmacy to be registered as an HPSA collection site:

- CLS must have a valid provincial pharmacy license issued by the College of Pharmacists of Manitoba.
- A valid commercial waste agreement (CWA) proof must be submitted to HPSA.
- A CLS must provide the ability to drop off products during regular business hours and at no cost.

- A CLS must display and spread public awareness through promotional and educational HPSA program materials.
- A licensed pharmacist or pharmacy technician must be present when a consumer drops off unwanted products.
- Unwanted medications or used medical sharps from hospitals, institutions, doctor's offices or pharmacy operations are not acceptable.
- Key employees working at the collection location must be knowledgeable about the program offered to consumers.
- Medical sharps containers must be segregated from waste pharmaceuticals.

Specific instructions under the MSCP:

Post-consumer medical sharps are brought to collection location sites in approved sharps containers by members of the public

- CLS are being supplied HPSA-labelled medical sharps containers at no cost.
- Pharmacists or pharmacy technicians distribute HPSA-labelled medical sharps containers at no cost to any member of the public requesting one.
- CLS should only accept medical sharps contained in a hard-shell container labelled with the universal biohazard symbol, whether it is an HPSA-labelled medical sharps container or not.
- Medical Sharps Containers containing medical sharps used to administer cytotoxic drugs shall be labelled with a cytotoxic label. CLS are being supplied cytotoxic labels at no cost on demand.
- Upon receiving medical sharps containers, pharmacists should ensure that the tops of the containers are locked and placed inside an HPSA-labelled return overpacking.
- Once the HPSA-labelled return overpacking is full, the pharmacist contacts the waste management service provider contracted by HPSA to schedule service.

Specific Instructions under the MMRP:

- CLS are being supplied an HPSA-labelled medication container (2023: 60L green olive container) at no cost.
- The HPSA-labelled medication container is to be placed behind the counter of a dispensary.
- There is no limitation on the quantity of medications that a consumer can drop off.
- Any unwanted medication returns must be placed into the HPSA-labelled medication container.
- All packaging should be recycled where facilities exist and are available in a particular region.
- The only exceptions to this rule are liquid medications, gels, and powder that can be placed in their original vials directly in the medication container.

Since the voluntary participation of retail pharmacies and pharmacists is essential to the success of the program, HPSA will commit to working closely with Pharmacists Manitoba to ensure continued participation and awareness of both programs.

If a location would like to offer collection of medications under the MMRP or medical sharps return under the MSCP – and it is not a retail pharmacy – then the location has to be approved by HPSA and meet collection location standards before collection of any unwanted medications or used medical sharps can begin.

B. Transportation Requirements

As per the HPSA contractor agreement, all conditions of federal, provincial and/or local rules and regulations such as the Canadian Environmental Protection Act (1999) and Manitoba's *Dangerous Goods Handling and Transportation Act* (CCSM c.D12) and associated regulations must be adhered to by the waste management service provider(s) when transporting medications and medical sharps waste collected under the HPSA programs.

C. Processing Requirements

HPSA only partners with service providers with proven records of using established, approved, and verifiable procedures for the final treatment and processing of medication and sharp waste in compliance with all applicable environmental regulations.

- Biomedical sharps must be treated using a high-pressure steam sterilization process (typically a commercial autoclave) or high-temperature incineration.
- Medications and Cytotoxic medical sharps must be treated by high-temperature incineration.
- A waste-to-energy facility permitted to handle municipal solid waste shall be the preferred post-processing treatment method for medical sharps waste that has been rendered non-infectious through steam sterilization (classified as treated medical waste).

The name of location of the final disposal facility/facilities shall be submitted in the Annual Report.

IV. Promotion and Education

HPSA's communication campaign objectives will continue to educate Manitobans on the safe disposal of unwanted medications and used medical sharps and ensure environmental and health protection for everyone.

To measure the progress and ensure consumers are aware of the programs and safe disposal techniques, HPSA will conduct a biennial consumer awareness and behavior survey. Based on the learnings from the survey, HPSA will build a tailored promotion and education plan to guarantee successful awareness increase and behavior change.

The promotion and education campaigns will be evaluated against key metrics, measured and reported to ensure the progress of consumer awareness. The results will be reported in Annual Reports and key learnings published on HPSA's webpage.

Communication Methods

HPSA will use various communication tools and approaches to raise awareness of proper disposal techniques of unwanted medications and used medical sharps.

Consumer Education:

- HPSA will continue to develop ongoing social media content to educate Manitoba residents on how to dispose of their unwanted medications and used medical sharps safely. Social media content shall include reminders of safe storage and disposal, mini campaigns to promote safe medications and medical sharps return as well as reminders of drop-off location map.
- HPSA will continue to develop a bank of educational content in various formats (step-by-step *how to dispose of* infographics, video instructions) that will be shared with pharmacy banners, pharmacies, and Manitoba Pharmacists to support consumer awareness and education building. Resources will continue to be available on HPSA's website.
- HPSA will continue to plan campaigns, such as data-based content to get organic media coverage (earned media).

Program Accessibility: HPSA will continue to offer a drop-off location map on its website – a geo-localized map to find the closest collection site by submitting a postal code.

Partnerships

The programs will continue to partner with organizations interested in collaborating to promote health and safety.

Prospective partners:

- **Retailers** – pharmacy banners and community pharmacies.
- **Stewardship Programs** – Leveraging opportunities to combine communication efforts with existing stewardship programs, such as MARRC Ambassador Tour or the Winter Road Initiative (see below).
- **Municipal and District Partnerships** – HPSA will seek opportunities to partner with local governments, including links from local government websites to the HPSA website, and inclusion of program information on recycling and disposal-specific web pages, as well as the availability of program materials at the local government level.
- **Industry-Related Organizations** – HPSA will continue/plans to partner with Manitoba Pharmacists, Drug Free Kids Canada, and patient-specific associations (diabetes,

arthritis) to increase the knowledge of medications and medical sharps disposal. HPSA will continue to participate in conferences to raise awareness of programs.

Northern and Remote Communities

Since 2019, HPSA has been working with a group of stewardship organizations operating in Manitoba to develop a pilot project to provide services to Northern and Remote First Nation communities. The pilot first ran in 2019, and this initiative continued to operate in 2020, 2021 and 2022.

Although the Winter Road Initiative (as it is known) does not produce any quantity as of today, the aim is to ensure that awareness of the HPSA programs is developed. The program also recognizes that long-term, consistent engagement with First Nation communities is required to build effective working relationships and deliver long-term results.

HPSA re-commits to continuing with this initiative and its long-term support for Northern and Remote communities. The Initiative aims to provide the necessary support to the communities to collect and remove Program Products from these communities, in conjunction with other stewardship programs, where feasible and where there is demand for service.

HPSA will continue to work with First Nations Communities and the federal government (Indigenous Services Canada and Health Canada) to identify strategies for the removal of unwanted medications and used medical sharps.

V. Performance Measures

The following targets are established for the continuous improvement of the programs.

Pharmacy Participation Target	<ul style="list-style-type: none"> Maintain participation rate of provincially accredited retail pharmacies to 90%
Denominator	<ul style="list-style-type: none"> Number of registered retail pharmacies in the Manitoba College of Pharmacists as of January 1st of the reporting year.
Example of proposed tactics	<ul style="list-style-type: none"> Participate in pharmacists' conferences to promote the programs Monthly outreach to non-participating, newly registered pharmacies Regular communication with pharmacies on the program update Survey pharmacies on how easy they find the programs and services to use

Accessibility Target	<ul style="list-style-type: none"> • Increase accessibility to under-serviced areas of Manitoba
Baseline	<ul style="list-style-type: none"> • In 2023, HPSA will conduct a GIS survey to identify gaps in the province and create a baseline
Example of proposed tactics	<ul style="list-style-type: none"> • Continue participation in the Winter Road Initiative • Develop communication assets specific to First Nations • Outreach to Nursing Stations and Health Centres • Collaborate with ISC and Health Canada • Work with stewardship agencies to increase exposure through communications and shared events • Promote the programs through partnership with MARR

Consumer Awareness Target	<ul style="list-style-type: none"> • Two (2) percent increase in consumer awareness based on 2021 consumer survey results
Baseline:	<ul style="list-style-type: none"> • In 2021, knowledge of proper disposal practices for unwanted medications was 52%, and for used medical sharps, 62%.
Strategies:	<ul style="list-style-type: none"> • HPSA will continue to conduct biennial surveys to assess consumer awareness (in 2023, 2025 and 2027).
Example of proposed tactics	<ul style="list-style-type: none"> • Work with stewardship agencies to increase exposure through communications and shared events • Promote the programs through earned media, advertising, special events, and partnerships • Secure publicity in annual recycling calendars, as well as continue to support special initiatives

Consumer Usage Target	<ul style="list-style-type: none"> • Two (2) percent increase in consumer usage based on 2021 consumer survey results
Baseline	<ul style="list-style-type: none"> • In 2021, 58% of consumers with unwanted medications at home disposed of them at a pharmacy; 74% of consumers with used medical sharps disposed of them at a pharmacy.
Strategies:	<ul style="list-style-type: none"> • HPSA will continue to conduct biennial surveys to assess consumer usage (in 2023, 2025 and 2027).
Example of proposed tactics	<ul style="list-style-type: none"> • Partner with patient-specific organizations to promote the programs • Participate in pharmacists' educational events to promote the program benefits and encourage pharmacists to talk with members of the public



VI. Funding Structure

Both MSCP and MMRP are fully funded by HPSA members selling medications and medical sharps in Manitoba, using a funding formula based on market share approved by the HPSA board of directors.

There is no subsidization of programs costs from other provincial programs.

HPSA operates a "return to retail" approach whereby the public returns unwanted medications and used medical sharps to pharmacies. Pharmacy's participation in the HPSA network is not compensated.

There is no visible fee charged on medications or medical sharps in Manitoba.

VII. Dispute Resolution Procedure

HPSA contracts suppliers and service providers through commercial agreements.

Any person, or organization, that believes the responsibilities of any party participating in the MMRP or MSCP are not meeting the program plan requirements needs to provide HPSA with a detailed description of their concern immediately by:

Email: tdrover@healthsteward.ca

Phone: 647-577-5154

HPSA will seek to resolve the dispute through a cooperative approach and voluntary resolution within fifteen business days. In the absence of a successful resolution, HPSA will convene a third-party adjudication panel within the following thirty business days. One individual will be chosen by HPSA, one individual chosen by the pharmacy and one individual chosen by the concerned party (the concerned party cannot be appointed). The panel will consider the dispute and offer a decision on all parties involved within five business days of adjournment. Should the decision not be accepted, commercial litigation may be pursued by the concerned party.

VIII. Annual Report

The reporting requirements that HPSA will provide on behalf of its members are clearly defined in the *Wrap Act* Section 16 (1). HPSA will submit an annual report on the Manitoba Medications Return Program and the Manitoba Sharps Collection Program in April of each year to the Environment, Climate and Parks.

IX. Management of Environmental Impacts

The province of Manitoba abides by the pollution prevention hierarchy – reduce, reuse and recycle – however, this hierarchy is impossible to apply when managing end-of-life medications and medical sharps.

A. Medications

There is no reuse or recycling application for post-consumer unwanted medications. Unused and/or expired medications must be completely destroyed through incineration.

Processing Requirements:

- Post-consumer pharmaceutical waste collected in the Manitoba Medications Return Program must be treated by high-temperature incineration.
- To ensure safety, mitigate the risk of diversion and maximize the efficiency of the thermal treatment process, pharmaceutical waste will be contained in leak-resistant and diversion-resistant secondary packaging (i.e., plastic pharmaceutical waste liners).
- Waste-to-energy is the preferred treatment method for post-consumer pharmaceuticals.
- Processors must be licensed by the appropriate provincial government authority and have a provincial registration number, where required.

HPSA is re-committing to ensure that its operational procedures include internal audits to ensure proper tracking mechanisms and chain of custody documentation are in place from the point of collection to final destruction – including the appropriate certificates of destruction.

B. Medical Sharps

As a designated material, medical sharps have unique characteristics that other designated materials do not. For example:

- Sharps are used as a delivery device in a healthcare-related application.
- They are used only once and then discarded: because of contact with human tissue, medical sharps are potentially infectious and are considered biomedical waste.
- Some medical sharps are used to inject drugs with chemotherapeutic properties and are therefore considered more hazardous than biomedical sharps. These sharps are classified as cytotoxic waste. It has been observed that cytotoxic medical sharps make up approximately 4% of the medical sharps waste stream.

There are no readily available options to reduce the waste generated when using a sharp device. Due to the unique health hazards associated with sharps waste, reuse or recycling are therefore not an option.

HPSA is re-committing to ensure that its operational procedures include internal audits to ensure proper tracking mechanisms and chain of custody documentation are in place from the point of collection to final destruction – including the appropriate certificates of destruction.

X. Stakeholders Consultations

Below is a timeline of the following outreach and consultations undertaken by HPSA, ahead of submitting the renewal MMRP and MSCP plan to Environment, Climate and Parks.

When	Activities
December 19, 2022	Draft MMRP & MSCP plans posted on HPSA’s website for 30 days
December 21, 2022	Plan renewal notice sent to all HPSA collection location sites
December 21, 2022	Plan renewal notice sent to all HPSA’s members (154)
December 21, 2022	Plan Renewal notice sent to Pharmacist MB (provincial pharmacy association)
January 4, 2022	Plan renewal notice sent to AMM (Association of Municipalities in Manitoba)
January 4, 2022	Reminder of Plan renewal notice sent to HPSA’s members
January 9, 2023	Webinar #1 on MMRP & MSCP renewal
January 18, 2023	Webinar #2 on MMRP & MSCP renewal
January 20, 2023	Webinar #3 on MMRP & MSCP renewal (in collaboration with HRAI)
January 27, 2023	End of the Consultation period

Stakeholder comments, feedback, and HPSA answers shall be recorded in [Appendix C](#).



Appendix A - HPSA Members

HPSA Member List - Medications	
AA Pharma Inc.	Marcan Pharmaceuticals Inc.
AbbVie Corporation	McKesson
Accord Healthcare	McNeil Consumer Healthcare - a Division of Johnson & Johnson
Advanced Orthomolecular Research (AOR)	Mead Johnson Nutrition (Canada) Co.
Advantage Solutions	Medexus Inc.
Alcon Canada Inc.	Merck Canada Inc.
Allergan Inc.	Metro Brands G.P.
Amgen Canada Inc.	Mint Pharmaceuticals Inc
Amway Canada Corporation	Miravo
Apotex Inc.	Mylan Pharmaceuticals ULC
Astellas Pharma Canada Inc.	Natural Factors Nutritional Products Ltd.
AstraZeneca Canada Inc.	Nature's Sunshine Products of Canada Ltd.
Atrium Innovations Inc	Nestle Canada Inc
Auro Pharma Inc	New Chapter Canada Inc.
Bausch Health Canada Inc.	Novartis Pharmaceutical Canada Inc.
Baxter Canada	Novo Nordisk
Bayer Inc.	Omega Alpha Pharmaceuticals Inc.
BGP Pharma (Mylan)	Organika Health Products Inc.
Bioforce Canada Inc.	Otsuka Canada Pharmaceuticals Inc.
Biogen Canada Inc	Overwaitea Food Group Ltd Partnership
BioSyent Pharma Inc.	Paladin Labs Inc.
Blistex Corporation	Pascoe Canada Inc
Body Plus Nutritional Products Inc.	Pfizer Canada Inc.
Boehringer Ingelheim Canada Ltd.	PharmaChoice Inc.
Boiron Canada	Pharmasave Drugs Ltd
Bristol-Myers Squibb	Pharmascience Inc.
Canadian Custom Packaging Company	Platinum Naturals Ltd
Celex Laboratories Inc.	Procter & Gamble Inc.
Church & Dwight Canada	Purdue Pharma
Cipher Pharmaceuticals Inc.	Puresource Inc.
Clorox Company of Canada Ltd.	RB Health Canada Inc.
Costco Wholesale Canada	Rexall Pharmacy Group Ltd.
D Drops Company	Roche Canada Ltd. - Hoffmann
Dr. Reddy's Laboratories	Sandoz Canada
Duchesnay	Sanis Health Inc.
Eisai	Sanofi Consumers Health
Eli Lilly Canada Inc.	Sanofi-Aventis Canada Inc.
Exzell Pharma	Seaford Pharmaceuticals
Ferring Inc.	Servier Canada Inc.
Fresenius Kabi Canada Ltd.	Shaklee Canada Inc.
Galderma Canada Inc.	Shoppers Drug Mart Inc.

General Nutrition Centres Canada	Sisu Inc.
Generic Medical Partners Inc.	Sivem Pharmaceuticals ULC
Gilead Sciences Canada Inc.	Sobeys National (Mississauga)
GlaxoSmithKline Consumer Healthcare Inc.	St Francis Herb Farm Inc.
GlaxoSmithKline Inc.	Sterimax Inc.
Groupe Jean Coutu (PJC) Inc.	Sunovion Pharmaceuticals Inc.
Herbalife of Canada	Takeda Canada Inc.
HLS Therapeutics	Tanta Pharmaceuticals Inc.
Hospira Healthcare Corporation	Taro Pharmaceuticals Inc.
HPI Health Products/Lakota	Teva Canada / Novopharm
Indivior UK Ltd.	Trillium Health Care Products
Jamieson Laboratories	UCB Canada Inc.
Jamp Pharma Corporation	UniPHARM Wholesale Drugs
Janssen Inc.	USANA Health Sciences
Laboratoires Atlas Inc.	Vertex Pharmaceuticals Incorporated
Leo Pharma Inc.	Virbac Animal Health Canada
Les Laboratoires Nicar Inc.	Vita Health Products Inc.
Loblaw Companies Ltd.	Wal-Mart Canada
London Drugs Limited	WellSpring Pharmaceutical Canada Corp.
Lundbeck	WN Pharmaceuticals Ltd.
Mannatech Incorporated	

HPSA Member List - Medical Sharps	
Abbott Diabetes Care	Janssen Inc.
AbbVie Corporation	Leo Pharma Inc.
Accord Healthcare	LifeScan Canada ULC
Amgen Canada Inc.	Medexus Inc.
Apotex Inc.	Merck Canada Inc.
Ascensia Diabetes Care Canada Inc.	Novartis Pharmaceutical Canada Inc.
AstraZeneca Canada Inc.	Novo Nordisk
Auto Control Medical	Paladin Labs Inc.
Bausch Health Canada Inc.	Pfizer Canada Inc.
BD Medical	Roche Canada Ltd. - Hoffmann
BGP Pharma (Mylan)	Roche Diabetes Care - a division of Hoffmann-La Roche Ltd
Biogen Canada Inc	Sandoz Canada
Bristol-Myers Squibb	Sanofi-Aventis Canada Inc.
Cardinal Health Canada- Medtronic	SOBI Canada (Swedish Orphan Biovitrum)
Domrex Pharma Inc.	Stericycle
Eli Lilly Canada Inc.	Sterimax Inc.
EMD-Serono Canada Inc.	Takeda Canada Inc.
Ferring Inc.	Teva Canada / Novopharm
GlaxoSmithKline Inc.	UCB Canada Inc.
Intervet Canada Corp Merck Animal Health	Wholesale Medical Network Inc

Appendix B – Stewardship Plan Reference

	Required in the Plan	Location in the Plan
1	The establishment and administration of a waste reduction and prevention program for household hazardous material and prescribed material	Throughout Plan
2	The appropriate management of household hazardous materials and prescribed materials according to guidelines established by the minister	Throughout Plan
3	A province-wide, convenient collection system for waste material without user fees at the point of collection	Section 3
4	A system for the payment of expenses incurred in the collection, transportation, storage, processing and disposal of waste material in connection with the waste reduction and prevention program	Section 6
5	The orderly collection of revenue from program subscribers in balance with expenses for the program	Section 6
6	The establishment and administration of educational activities for the program	Section 4
7	The establishment and administration of point-of-sale information for the program	Section 4
8	The payment of salaries and other costs for the administration and enforcement of the Regulation and the Act as it relates to household hazardous material and prescribed material	Not applicable
9	Ongoing consultations with those who may be affected by the program, including members of the public, in accordance with any consultation guidelines the minister may establish	Section 10
10	The plan may also deal with research and development, training and education activities, as well as activities related to waste reduction or pollution prevention. The minister may provide additional program guidance to program operators.	Section 09

Appendix C – Stakeholder Feedback

