



HEALTH PRODUCTS
STEWARDSHIP ASSOCIATION

ONTARIO MEDICATIONS RETURN PROGRAM PLAN

-OMRP-

May 2020

Contents

GLOSSARY OF TERMS AND ABBREVIATIONS	3
EXECUTIVE SUMMARY	5
1. Introduction	5
2. Ontario Medications Return Program	5
3. Program Products	6
3.1 Definition	6
3.2 Designated Material	6
3.3 Excluded material	6
3.4 Orphan and “Free Rider”	7
4. Program Design	7
4.1 Collection System	7
4.2 Processing requirements	9
4.3 Chain of Custody	9
5. Program Performance	9
5.1 Accessibility	9
5.2 Collection	9
6. Promotion and Education	9
6.1 Key Messages	9
6.2 Communication Methods	9
6.3 Partnerships	10
7. Funding Structure	10
8. Annual Report	11
Appendix A - HPSA Members – Consumer Health Products	12
Appendix B - OMRP - Rack Card	14
Appendix C - OMRP – Instruction Guide for Pharmacy	15

GLOSSARY OF TERMS AND ABBREVIATIONS

OMRP	Ontario Medications Return Program
Collection Location Site	A location, typically a retail pharmacy, registered with the OMRP to collect returns from the public. Retail pharmacies must have a dispensary that is accessible to the general public during normal business hours to be eligible as a collection location site.
Consumer	An individual acting for personal, family or household purposes, including acting in respect of a companion animal.
Consumer Health Products (CHP)	For the purpose of the OMRP, a pharmaceutical sold directly to consumers and include: <ul style="list-style-type: none"> ▪ Prescription drugs ▪ Non-prescription drugs ▪ Natural health products
HPSA Member	Producer of Consumer Health Products and a member of HPSA
MRP container	HPSA approved container distributed to Consumer Location Sites and used for the collection of unused and expired Consumer Health Products.
Natural Health Products (NHP)	Under the <u>Natural Health Products Regulations</u> , natural health products (NHPs) are defined as: <ul style="list-style-type: none"> ▪ Vitamins and minerals ▪ Herbal remedies ▪ Homeopathic medicines ▪ Traditional medicines such as traditional Chinese medicines ▪ Probiotics ▪ Other products like amino acids and essential fatty acids <p>NHPs must be safe to use as over-the-counter products and do not need a prescription to be sold.</p>

Non-prescription Drugs	<p>Non-prescription drugs do not require a prescription of a practitioner under Section C.01.040.03 of the Food and Drugs Regulations in order to be sold and are not listed the Prescription Drug List established under Section 29.1 of the Food and Drugs Act.</p> <p>Examples include:</p> <ul style="list-style-type: none"> a) A drug available from a pharmacist but does not require a prescription. These are the drugs located in the area of the pharmacy "behind the counter", where there is no public access and no opportunity for patient self-selection or b) A drug which does not require a prescription and is available for self-selection from the area of the pharmacy under the direct supervision of the pharmacist or c) A drug that may be purchased from any retail outlet (such as a grocery store)
Prescription Drugs	A drug requiring a prescription for sale in Canada.
Producer	<p>The producer of a pharmaceutical is</p> <ul style="list-style-type: none"> (a) the manufacturer of the pharmaceutical, if it is sold to consumers in Ontario under a brand that the manufacturer owns, licenses or otherwise has rights to; (b) if there is no person described in clause (a), the owner or licensee of the brand or the person who otherwise has rights to the brand under which the pharmaceutical is sold to consumers in Ontario; (c) if there is no person described in clause (a) or (b), the importer of the pharmaceutical into Ontario; or (d) if there is no person described in clause (a), (b) or (c), the first person who sells the pharmaceutical to another person in Ontario.
Program plan	A document that provides producers with a strategy for collectively managing the extended producer responsibility (EPR) of their products, including any safety, environmental, and regulatory requirements.
Regulation	Regulation 298/12 – “Collection of Pharmaceuticals and Sharps – Responsibilities of Producers” under Ontario’s Environment Protection Act

MOECP	Minister of the Environment, Conservation and Parks
EPA	Environmental Protection Act (Ontario)
EPR	Extended Producer Responsibility
HPSA	Health Products Stewardship Association
PRO	Producer Responsibility Organization

EXECUTIVE SUMMARY

The Health Products Stewardship Association (HPSA) is a non-profit producer responsibility organization founded by trade associations of Consumer Health Product manufacturers in response to provincial stewardship regulations. HPSA develops and administers Extended Producer Responsibility (EPR) programs for Consumer Health Products and Medical Sharps in Canada on behalf of its members.

HPSA has been operating the Ontario Medications Return Program since 2013. For the past 7 years, it has been providing a collective strategy for the Consumer Health Product stewards to comply with the Regulation by ensuring that Collection Location Sites are available to all regions of the province and that unused and/or expired Consumer Health Products returned are handled, transported, and disposed of in a safe, compliant, and environmentally responsible manner.

This five year plan is being submitted by HPSA on behalf of producers of Consumer Health Products sold in Ontario, to the Ontario Ministry of the Environment, Conservation and Parks in accordance with *Regulation 298/12* (“the Regulation”) issued under *Ontario’s Environmental Protection Act*, for the period covering May 1, 2020 to December 31, 2025.

1. Introduction

HPSA draws on more than 20 years of experience as a national producer responsibility organization (PRO). The knowledge and network it built over the years has helped in the promotion of its programs, and in educating Canadians about unused and/or expired Consumer Health Products collection, end of life management, and the regulatory framework for take-back programs across Canada. HPSA represents 148 Consumer Health Product Producers in Canada. Since inception, HPSA has collected and safely disposed over 2,150,000 kgs of unused or expired Consumer Health Products to protect Canadians and the surrounding environment.

HPSA is submitting the OMRP Plan on behalf of 148 of its members who are obligated under the Regulation as Producers in Ontario. The list of producers that are members of the HPSA and are participating in the OMRP is attached in [Appendix A](#).

2. Ontario Medications Return Program

In compliance with Regulation 298/12, the Ontario Medications Return Program (OMRP) will continue to provide all Ontario residents with reasonable access to Collection Location Sites on a province-wide basis and HPSA shall continue to ensure that 90% of accredited retail pharmacies locations are participating Collection Location Sites.

HPSA will continue to be responsible for strategic planning, as well as overseeing program and financial operations, including contracting services to manage day-to-day operations of the program.

3. Program Products

For sake of consistency and effectiveness with other Consumer Health Products stewardship program, HPSA always seek to harmonize the definition of designated products.

3.1 Definition

The Regulation defines “pharmaceutical” as

“a drug within the meaning of section 2 of the Food and Drugs Act (Canada) and includes a natural health product within the meaning of the Natural Health Products Regulations made under that Act.”

3.2 Designated Material

For the purpose of the Ontario Medications Return Program (OMRP) Plan, the term “Consumer Health Product” will be used and shall be defined as including:

- Prescription drugs
- Non-prescription drugs
- Natural health products

3.3 Excluded material

- drugs that are radiopharmaceuticals within the meaning of Part C of the Food and Drug Regulations made under the Food and Drugs Act (Canada)
- drugs that are represented as being solely for the use as a disinfectant on hard non-porous surfaces
- drugs for veterinary use with the exception of drugs for companion animals.
- topical drugs and natural health products not containing antibiotics or antifungal agents with the exception of topical analgesics.

In addition, no product intended for industrial, commercial or institutional (IC&I) use shall be included in the Program such as:

- Medical/Pharmaceutical waste produced by hospitals, clinics and any other businesses (i.e. pharmaceutical is used on site and does not originate from the residential sector)
- Pharmacy waste produced by the pharmacy (unserviceable stock)

- Veterinary (agricultural) pharmaceutical waste
- Anatomical or biomedical waste

3.4 Orphan and “Free Rider”

It should be noted that the OMRP includes products that are attributable to Producers as well as orphan and “Free Rider” products. “Orphan” consumer health products refer to products produced by a manufacturer that either no longer exists or no longer produces consumer health products. “Free rider” refers to consumer health products produced, imported or distributed by a Producer that is not a registered member of HPSA. Both orphaned and “Free Rider” unused and/or expired Consumer Health Products are accepted by the OMRP.

4. Program Design

The OMRP provides all Ontario residents with reasonable access to collection locations on a province-wide basis. HPSA is responsible for strategic planning, overseeing the program and financial operations. This includes:

- The appropriate management of waste material according to the guideline established by the Minister;
- A province-wide, convenient collection system for waste material without user fees at the point of collection;
- A collection system equal to 90% of retail locations in Ontario;
- The establishment and administration of promotion and educational material for the program;
- Annual reports.

The goals of the OMRP are to:

- Maintain a province-wide industry run program for the collection of unused or expired Consumer Health Products in compliance with Regulation 298/12.
- Ensure an environmentally responsible disposal of unused or expired Consumer Health Products.
- Ensure that the public can return, for free, unused or expired Consumer Health Products for disposal throughout the province.
- Provide the public with information about Collection Location Sites.

4.1 Collection System

Under the OMRP, unused or expired Consumer Health Products are brought to Collection Location Sites by members of the public. Collection location sites consist of retail pharmacies with a public facing dispensary. At its own discretion, HPSA might approve certain non-retail facing pharmacies as collection sites (e.g. remote locations, nursing stations, health centers).

Since the voluntary participation of pharmacists is central to the success of the program, HPSA will continue to work closely with these stakeholders to ensure awareness and participation in the OMRP. Pharmacy managers interested in offering the program in their store must complete a Collection Location Agreement. Specific information is provided to ensure that pharmacy managers and staff are knowledgeable on the program objectives and the way the program operates. All participating Collection Location Sites receive a kit containing instructions on the program, a service and supply request form as well as samples of education material developed for this program. MRP Containers are also provided free of charge. Once the Collection Location Agreement is completed and submitted to HPSA, the pharmacist is contacted directly by HPSA to review the following information:

- Unused or expired Consumer Health Products from hospitals, institutions, doctor's offices or pharmacy operations are not accepted.
- All pills should be placed into the MRP Container except for liquid medications, gels, powder, etc. whereas original vials can be placed directly into the MRP Container.
- Collection Location Sites should recycle any outer container/ extra packaging where facilities exist and available in their region.
- Once MRP Containers are full, the pharmacist must complete the service and supply request form and contact the service provider to schedule service.
- Replacement MRP Containers will be delivered, and the full MRP Container will be picked up either on service schedule or by request.

Collection location sites must also meet the following requirements:

- Collection Location Sites must offer unused and/or expired Consumer Health Product take back at no charge to the public.
- The Collection Location Site must provide the consumer or a member of the public the ability to drop off unused and/or expired Consumer Health Products during regular business hours.
- There must be an agreement in place between the Collection Location Site and HPSA that addresses the types of containers that are to be used for the collection, handling, storage of unused and/or expired Consumer Health Products. The agreement must also stipulate how unused and/or expired Consumer Health Products are to be collected, handled and stored at the collection location.
- A copy of the agreement and any related records must be kept on site at all times while the Collection Location Site is participating in the OMRP and for five years afterward.
- At each participating Collection Location Site there must be a complete list of all Collection Location Sites in Ontario where unused and/or expired Consumer Health Products can be returned for safe disposal as well as information on how consumers should safely store and handle unused and/or expired Consumer Health Products before bringing them to a Collection Location Site.
- There is no limitation on the quantity of unused and/or expired Consumer Health Products that a consumer or a member of the public can drop off at a Collection Location Site.

4.2 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 unused and/or expired Consumer Health Products, in compliance with all applicable environmental regulations.

The waste management service provider must have an ECA (a Provisional Certificate of Approval for a Waste Disposal Site) issued by the Ontario MOECP that allows for the processing of 312P biomedical waste by incineration.

Consumer Health Product waste must be treated by high temperature incineration.

4.3 Chain of Custody

HPSA's internal operational procedures includes internal audits to ensure proper tracking mechanisms. A chain of custody documentation is in place from the point of collection to final destruction – including the appropriate certificates of destruction.

5. Program Performance

5.1 Accessibility

One of HPSA key program performance indicator related metric is to have 90% of retail pharmacies in Ontario registered as Collection Location Sites and at least one (1) Collection Location Site in each local municipality in Ontario.

5.2 Collection

HPSA shall continue to report on volume of unused and/or expired Consumer Health Products collected and disposed in kilograms annually.

6. Promotion and Education

6.1 Key Messages

It is important that consumers are aware of the importance of returning unused and/or expired Consumer Health Products and where they can be returned.

[Appendix B](#) provide an example of a rack card available for the OMRP.

6.2 Communication Methods

HPSA provides signage to the network of community pharmacies. Promotional material (brochures and rack cards) are available for retailers and other partners to order and display. A

guide and pamphlet have also been developed specifically for pharmacists and their staff. Examples of these can be found in [Appendix C – Instruction Guide for Pharmacy](#).

Media campaigns are regularly utilized to convey information about the Ontario Medications Return Program, as well as a variety of methods to create consumer awareness. Such campaigns include:

- **Website:** The program website has information on what items can be returned and how to return them. A map-based collection location finder is available. The HPSA website also includes a system for reordering consumer information materials produced for the program.
- **Point of Return:** Any participating Collection Location Site offers program signage to display, as well as rack cards to distribute to Consumers and the public at large.
- **Earned media and advertising:** The program targets the use of earned media (press releases, op-eds, etc.), as well as paid advertising
- **Direct advertising and communications:** OMRP directly target commercial initiatives through dedicated mailings.

6.3 Partnerships

The program works towards partnering with organizations interested in collaborating to promote health and safety. Collaboration strategies have been developed through discussions with potential partners and HPSA members. Some avenues currently used by HPSA are:

- **Retailers** – Point of sale materials including shelf-talkers, counter cards, consumer brochures, and program posters are provided at no cost to retailers
- **Municipal and District Partnerships** – HPSA partners with local governments, including advertising in municipal calendars, links from local government websites to HPSA website, and inclusion of program information on recycling and disposal-specific web pages, as well as the availability of program materials at a local government level.
- **Health Providers Associations** – in collaboration with health professionals such as the Institute for Safe Medication Practices Canada (ISMP), HPSA reaches out to the public and patients in ambulatory care regarding best practices on returning unused and/or expired Consumer Health Products.
- **Others** – Brand owners and agencies with an interest in health and safety have links to HPSA website – www.healthsteward.ca – to assist HPSA in educating the public on unused and/or expired Consumer Health Products returns.

7. Funding Structure

The OMRP is fully funded by HPSA members through an annual fee invoiced at the beginning of the year. The annual fee calculation is based on a Board-approved methodology which takes into account the sales figures of consumer health products sold in Ontario and the proportion

of each of the three sub-categories' returns (prescription drugs, non-prescription drugs and natural products).

The OMRP revenue are applied towards the costs for the collection, transportation and proper disposal while the base rate (set yearly) covers the administration, public education and communication costs. There is no subsidization of programs cost for other provincial programs.

HPSA operates a "return to retail" approach whereby the public returns unused or expired CHPs to pharmacies. Pharmacy participation in the HPSA network is not compensated.

The list of Consumer Health Product producers who have joined HPSA to fulfill their regulatory obligations are identified in [Appendix A](#).

There is no visible fee charged on the sale of Consumer Health Products in Ontario.

8. Annual Report

As per Article 9 of the Regulation, an annual report on the OMRP will be prepared by HPSA on behalf of its members on or before April 1 of every year. The following information shall be included:

1. The number of collection locations and the location of each of the collection locations at which collection of the designated material of the producer was provided for during the previous calendar year and a description of any changes that occurred with respect to the number and location of collection locations from the previous calendar year.
2. The total weight of all of the following that was collected at the collection locations during the previous calendar year:
 - i. Pharmaceuticals.
 - ii. Containers
3. A description of how the designated material of the producer collected at collection locations was handled and how it was recycled or disposed of during the previous calendar year.
4. A description of actions taken by the producer during the previous calendar year, their effectiveness and outcomes achieved
5. A description of any actions taken by the producer during the previous calendar year that exceeded the actions required, in order to provide for the collection of the designated material of the producer.
6. A description of any actions taken by the producer during the previous calendar year that exceeded the actions required with respect to educational and public awareness activities in order to promote to consumers the collection locations and the availability of collection.
7. The name of each producer on whose behalf the report is prepared.
8. The report shall include an opinion from a licensed public accountant

The Annual Report will be posted on HPSA website and available publicly for at least 3 years.

Appendix A - HPSA Members – Consumer Health Products

Allergan Inc.	Mannatech Incorporated
AA Pharma Inc.	Marcan Pharmaceuticals Inc.
AbbVie Corporation	McCarthy & Sons Service (Rafter 8)
Accord Healthcare	McKesson Canada
Advanced Orthomolecular Research (AOR)	McNeil Consumer Healthcare, a Division of Johnson & Johnson
Advantage Solutions	Mead Johnson Nutrition (Canada) Co.
Alcon Canada Inc.	Medexus Inc.
Amgen Canada Inc.	Merck Canada Inc.
Amway Canada Corporation	Methapharm Inc.
Apotex Inc.	Metro Brands, G.P.
Aralez Pharmaceuticals Inc.	Mint Pharmaceuticals Inc
Astellas Pharma Canada Inc.	Natural Factors Nutritional Products Ltd.
AstraZeneca Canada Inc.	Nature's Sunshine Products of Canada Ltd.
Atrium Innovations Inc	Nestlé Canada Inc.
Aurium	New Chapter Canada Inc.
Auro Pharma Inc	Novartis Pharmaceutical Canada Inc.
Aventix Animal Health	Novo Nordisk
Bausch Health Canada Inc.	Omega Alpha Pharmaceuticals Inc.
Baxter Canada	Organika Health Products Inc.
Bayer Inc.	Otsuka Canada Pharmaceuticals Inc.
Bell Lifestyle Products	Overwaitea Food Group Ltd Partnership
BGP Pharma (Mylan)	Paladin Labs Inc.
Bimeda-MTC Animal Health Inc.	Pascoe Canada Inc
Bioforce Canada Inc.	PF Consumer Healthcare Canada ULC/PF Soins de Santé SRI
Biogen Canada Inc	Pfizer Canada Inc.
BioSyent Pharma Inc.	PharmaChoice
Blistex Corporation	Pharmasave Drugs (National) Ltd
Body Plus Nutritional Products Inc.	Pharmascience Inc.
Boehringer Ingelheim Canada - Animal Health Canada Inc.	Platinum Naturals Ltd
Boiron Canada	Procter & Gamble Inc.
Bristol-Myers Squibb	Purdue Pharma
Canadian Custom Packaging Company	Puresource Inc.
Celex Laboratories Inc.	RB Health Canada Inc.
Champion Alstoe Animal Health Inc.	Rexall Pharmacy Group Ltd
Church & Dwight Canada	Roche Canada Ltd. - Hoffmann
Cipher Pharmaceuticals Inc.	Sandoz Canada
Clorox Company of Canada Ltd.	Sanis Health Inc.

Costco Wholesale Canada Ltd.	Sanofi Consumers Health
D Drops Company	Sanofi-Aventis Canada Inc.
Duchesnay	Seaford Pharmaceuticals
Eisai	Servier Canada Inc.
Elanco	Shaklee Canada Inc.
Eli Lilly Canada Inc.	Shire Pharma Canada ULC
EMD-Serono Canada Inc.	Shoppers Drug Mart Central
Exzell Pharma	Sisu Inc.
Ferring Inc.	Sobeys National (Mississauga)
Fresenius Kabi Canada Ltd.	St Francis Herb Farm Inc.
Galderma Canada Inc.	Stella Pharmaceutical Canada Inc.
General Nutrition Centres Canada	Sterimax Inc.
Generic Medical Partners Inc.	Sunovion Pharmaceuticals Inc.
Gilead Sciences Canada Inc.	Takeda Canada Inc.
GlaxoSmithKline Consumer Healthcare Inc.	Tanta Pharmaceuticals Inc.
GlaxoSmithKline Inc.	Taro Pharmaceuticals Inc.
Groupe Jean Coutu (PJC) Inc.	Teva Canada / Novopharm
Health First Network Association Inc.	Trillium Health Care Products
Herbalife of Canada	UCB Canada Inc.
HPI Health Products/Lakota	UniPHARM Wholesale Drugs
Indivior Canada PLC Inc.	USANA Health Sciences
Jamieson Laboratories	Vertex Pharmaceuticals Incorporated
Jamp Pharma Corporation	Vetoquinol Canada Incorporate
Janssen Inc.	Virbac Animal Health Canada
Laboratoires Atlas Inc.	Vita Health Products Inc.
Leadiant Biosciences, Inc.	Wal-Mart Canada Corp.
Leo Pharma Inc.	WellSpring Pharmaceutical Canada Corp.
Les Laboratoires Nicar Inc.	Westcoast Naturals
Loblaw Companies Ltd.	WN Pharmaceuticals Ltd.
London Drugs Limited	Xediton Pharmaceuticals Inc.
Lundbeck	Zoetis Canada

Appendix B - OMRP - Rack Card

HAVE YOUR OLD MEDICATIONS OVERSTAYED THEIR WELCOME?

- 

1 Safely store medications in your home.
- 

2 Check for unused and expired medications.
- 

3 Empty all pills into a bag or container, but keep liquids, creams and inhalers in their original packaging. Remove any personal identification. Recycle all other packaging.
- 

4 Take it back to a participating pharmacy.


HEALTH PRODUCTS
STEWARDSHIP ASSOCIATION

HPSA IS FUNDED BY THE HEALTH PRODUCTS INDUSTRY

For more information, visit:
healthsteward.ca or e-mail info@healthsteward.ca
Call Our Toll-Free Number: 1-844-535-8889

TAKE IT BACK!

Responsibly return unused and expired medications.



You Can Return:

- All prescription medications
- Over-the-counter drugs
- Natural health products
- Inhalers

It is important to check your home regularly for medications that are expired or no longer needed. Disposing of them properly can prevent misuse, accidental ingestion, and protect the environment in the process.

Visit www.healthsteward.ca to find your nearest participating pharmacy.



MEDICATIONS
RETURN PROGRAM

Appendix C - OMRP – Instruction Guide for Pharmacy



MEDICATIONS RETURN PROGRAM: PHARMACISTS' GUIDE

<p>1</p>	<p>Upon receipt of an empty collection bin, lid, liner and zip ties, please ensure bins are kept in an access-controlled and secure area behind the pharmacy counter.</p>	
<p>2</p>	<p>Please refer to the Accepted and Not Accepted decal to determine what is accepted through the Medications Return program and what is not. The HPSA website: www.healthsteward.ca, is also a great resource tool.</p>	
<p>3</p>	<p>Be sure to place all loose pills directly into the lined collection bin, and recycle outer packaging when possible. Liquids and creams must remain in its original bottle or tube. Do not put any free liquids or denatured drugs in the container.</p>	
<p>4</p>	<p>A full bin should not exceed 23 kilograms (50 pounds). Once the bin is full, secure the liner by tying it closed. Apply firm pressure to the lid until the seal is formed. Using the provided zip ties, weave through each hole above the bin to seal and lock the ties into place.</p>	
<p>5</p>	<p>To schedule a pickup, complete the Service and Supply Request form and send to HPSA by e-mailing info@healthsteward.ca, or by faxing 1-855-228-2099.</p>	

For immediate assistance, contact our toll-free number 1-844-535-8889.