



HEALTH PRODUCTS
STEWARDSHIP ASSOCIATION

ISLAND SHARPS COLLECTION PROGRAM PLAN

-ISCP-

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GLOSSARY OF TERMS AND ABBREVIATIONS

Biomedical Waste	Biomedical Waste can be defined as human anatomical waste, human blood waste, animal anatomical waste, animal blood waste, microbiology laboratory waste, sharps waste, cytotoxic waste, waste that has come into contact with human blood that is infected or suspected of being infected with any infectious substance (human), and a waste containing or derived from one of more of the above wastes.
Brand Owner	A brand owner of a medical sharp is: (i) A manufacturer of the medical sharp, (ii) A distributor of the medical sharp in or into the province, or (iii) Where the medical sharp is imported into the province, the first person to sell the medical sharp in or into the province
Collection Location Site	A location, typically a retail pharmacy, registered with the ISCP 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.
Cytotoxic Waste	Means a cytotoxic drug, a medicinal chemical or a waste containing a cytotoxic drug or medicinal chemical, including waste needles.
HPSA Member	Brand Owner of Medical Sharps and a member of HPSA
ISCP	Island Sharps Collection Program – HPSA’s medical sharp stewardship program that establishes a process for the collection, transportation and disposal of medical sharps.
Medical Sharp	For the purpose of the Island Sharps Collection Program (ISCP) Plan, a medical sharp is defined as a. Infusion sets with needles attached. b. Lancets, including safety lancets. c. Needle tips. d. Needles, including safety needles. e. Pen only with needle attached. f. Pen needles. g. Prefilled cartridges only with needles attached. h. Pre-filled syringes only with needles attached. i. Safety pens only with needles attached. j. Syringes only with needles attached.
Program plan	A document that provides Brand Owners with a strategy for collectively managing the extended producer responsibility (EPR) of their products, including any safety, environmental, and regulatory

	requirements.
Regulation	Materials Stewardship and Recycling Regulations EC349/14 (<i>Environment Protection Act R.S.P.E.I 1988</i>)
Retailer	A person who sells or offer for sale medical sharps directly to consumer
Sharp Container	A colored coded, puncture, break and leak resistant container designed to contain used medical sharps.
Over Packing	HPSA branded packaging used for the containment of filled sharps containers during handling, storage and transportation. Over packing for sharps containers should, at a minimum, meet the standards stated in the “Guidelines for the Management of Biomedical Waste in Canada” published by the Canadian Council of Ministers of the Environment.

EWCC	Department of Environment, Water and Climate Change
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 unused and/or expired Consumer Health Products and used Medical Sharps in Canada on behalf of its members.

HPSA has been operating the Island Sharps Collection Program since 2015. For the past 5 years, it has been providing a collective strategy for Brand Owners of Medical Sharps to comply with the Regulation by ensuring that Collection Locations Sites are available to all regions of the province and that used Medical Sharps 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 Brand Owners of Medical Sharps sold in Prince Edward Island, to the Department of Environment, Water and Climate Change, in accordance with *the Materials Stewardship And Recycling Regulations* (“the Regulation”) issued under PEI’s Environmental Protection Act, for the period covering June 1, 2020 to May 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 used medical sharp collection, end of life management and the regulatory framework for take-back programs across Canada. HPSA represents 147 Brand Owners of Medical Sharps and Consumer Health Products in Canada. As the second program of this kind in North America, HPSA has collected and safely disposed over 30,000 kgs of used Medical Sharps in PEI since 2015, helping to protect Canadians and the surrounding environment.

HPSA is submitting the ISCP Plan on behalf of 33 of its members who are obligated under the Regulation as Brand Owners in Prince Edward Island. The list of Brand Owners of Medical Sharps that are members of the HPSA and participating in the ISCP is attached in [Appendix A](#).

2. Island Sharps Collection Program

The Island Sharps Collection Program (ISCP) will continue to provide all residents with reasonable access to Collection Location Sites on a province-wide basis and HPSA shall continue to ensure that all accredited retail pharmacies locations in Prince Edward Island 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 medical sharp stewardship programs, HPSA always seek to harmonize the definition of designated products.

3.1 Definition

The Regulation defines “medical sharp” as

“a needle, safety engineered needle, lancet or other similar instrument that is designed to puncture the skin for medical purposes and that is sold or otherwise distributed and includes anything affixed to the medical sharp, including a syringe”.

3.2 Designated Material

For the purpose of the Island Sharps Collection Program (ISCP) Plan, a Medical Sharp is generally defined as

- k. Infusion sets with needles attached.
- l. Lancets, including safety lancets.
- m. Needle tips.
- n. Needles, including safety needles.
- o. Pen only with needle attached.
- p. Pen needles.
- q. Prefilled cartridges only with needles attached.
- r. Pre-filled syringes only with needles attached.
- s. Safety pens only with needles attached.
- t. Syringes only with needles attached.

Post-consumer Medical Sharps collected in the ISCP fall into two categories; biomedical sharps and cytotoxic sharps.

Biomedical sharps are sharps products used by consumers that are designed to puncture the skin for medical purposes. Used biomedical sharps must be properly placed in an approved sharps container, colour coded yellow with a universal biohazard symbol on the outside, for primary containment purposes in order to be accepted at collection location sites.

Cytotoxic sharps are sharps products used by consumers for a chemotherapeutic application. Used cytotoxic sharps must be placed in an approved sharps container, colour coded or labeled

red and must have a cytotoxic symbol on the outside, for primary containment purposes in order to be accepted at collection location sites.

3.3 Excluded Material

- Biomedical waste other than sharps.
- Expired samples.
- Prefilled pen/cartridges without the needle.
- Vial/ ampoules.

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

3.4 Orphan and “Free Rider”

It should be noted that the ISCP includes products that are attributable to HPSA Members as well as “Orphan” and “free rider” products. “Orphan” Medical Sharps refer to products produced by a manufacturer that either no longer exists or no longer produces Medical Sharps. “Free rider” refers to Medical Sharps produced, imported or distributed by a Brand Owner that is not a registered member of HPSA. Both “Orphan” and “Free Rider” Medical Sharps are accepted by the ISCP.

4. Program Design

As per the *Environmental Protection Act* Materials Stewardship and Recycling Regulations the program plan will continue to provide the following:

1. The management structure of the program (intro);
2. How discarded medical sharps will be collected (*Section 4.1*);
3. The plans for the receipt of discarded medical sharps at the medical sharp return facilities that participate in the program and the policies and procedures to be followed by the medical sharp return facilities (*Section 4.1*);
4. The quality control and assurance aspects of the program, including tracking and auditing mechanisms (*Section 4.3 and 4.4*); and
5. An education and awareness program for Consumers of medical sharps (*Section 6*) that includes information about
 - i. The ISCP, specifying products accepted by the program,
 - ii. How and when Consumers can access medical sharps return facilities, and
 - iii. The environmental benefits of participating in the ISCP.

In addition, the ISCP will:

- Ensure that the Brand Owners who sell, offer for sale or distribute medical sharps in Prince Edward Island are members of HPSA and fund a Medical Sharp Stewardship Program;
- Ensure environmentally responsible disposal of used medical sharps;
- Ensure that the public is able to return used medical sharps for disposal throughout the province.

4.1 Collection System

Under the ISCP, post-consumer medical sharps are brought to Collection Location Sites in approved sharps containers 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. 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 ISCP. 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 promotion and education material developed for this program. HPSA approved sharps containers and over packing supplies for sharps 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:

- Used Medical Sharps from hospitals, institutions, doctor's offices or pharmacy operations are not accepted.
- The pharmacy shall only receive used Medical Sharps in a hard-shell container (approved sharps container) labelled with the universal biohazard symbol.
- Medical sharps containers must be segregated from waste pharmaceuticals.
- Used Medical sharps used to administer cytotoxic drugs shall be placed into a sharps container and labelled with a cytotoxic label.
- The pharmacist or pharmacy technician will inform patients on the proper storage of used Medical Sharps.
- Upon receiving medical sharps containers, pharmacists should ensure that the top of the container is locked.
- All Medical Sharp containers must then be placed into approved secondary containment packaging with the universal biohazard symbol on the outside and a cytotoxic label prominently displayed on the outside of the Over-Packing when applicable.

- Once the Over Packing is full, the pharmacist must complete the service and supply request form and contact the waste management service provider contracted by HPSA to schedule the service.

Collection Location Sites must also meet the following requirements:

- Collection Location Sites must provide the distribution of sharp containers and collection of used Medical Sharps in approved containers 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 used Medical Sharps in approved containers 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 and labeling of used Medical Sharps. The agreement must also stipulate how medical sharps containers are to be collected, handled and stored at the collection location site.
- Collection Location Sites must have promotion and educational materials developed by HPSA on site.
- There is no limitation on the quantity of medical sharps containers that a consumer or member of the public can drop off at a Collection Location Site.

4.2 Transportation Requirements

Approved service providers under the HPSA's ISCP signed a Contractor Agreement specific to the ongoing collection and transportation of used Medical Sharps from Collection Location Sites registered with HPSA to the approved disposal facility.

All conditions of the Waste Resource Management Regulations (E.C. 2000-691) must be adhered to by the waste management service provider(s) when transporting sharp waste.

4.3 Processing requirements

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

4.4 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 at least 95% of retail pharmacies in Prince Edward Island registered as Collection Location Sites.

5.2 Collection

HPSA shall continue to report on volume of used Medical Sharps 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 used Medical Sharps, where they can be returned, and the appropriate safety precautions to prevent needlestick injuries.

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

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. An example can be found in [Appendix C – Instruction Guide for Pharmacy](#).

Media campaigns are regularly utilized to convey information about the Island Sharps Collection 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:** ISCP 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.
- **Patient Associations** – in collaboration with health professionals such as the Institute for Safe Medication Practices Canada (ISMP), HPSA reaches out to association of patients whose pathology require the use of medical sharps (e.g. Canada Home Care Association).
- **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 proper medical sharps collections.

7. Funding Structure

The ISCP is fully funded by HPSA members selling Medical Sharps in Prince Edward Island using a funding formula reviewed annually by the board of directors with any changes vetted by the membership annually. HPSA members with products meeting the material definition of Medical Sharps are invoiced by HPSA according to the weight associated with volume of sales (units) during the previous calendar year (January-December).

The ISCP 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 with other provincial programs.

HPSA operates a “return to retail” approach whereby the public returns used Medical Sharps in approved containers to Collection Location Sites. Pharmacy participation in the ISCP is not compensated.

The list of Medical Sharp Brand Owners who have joined HPSA to fulfill their regulatory obligations are identified in [Appendix A](#).

There is no visible fee charged on the sale of Medical Sharps in Prince Edward Island.

8. Annual Report

The reporting requirements that HPSA will provides on behalf of its medical sharps Brand Owners are clearly defined in the *Environmental Protection Act* Materials Stewardship and Recycling Regulations. HPSA will submit an annual report on the ISCP or Medical Sharp Stewardship Program on or before June 30th of every year to the Department of Environment, Water and Climate Change.

The annual report will continue to meet the following requirements:

- The name of all medical sharp Brand Owners on whose behalf the HPSA prepared the report must be listed;
- The total weight of all used medical sharps received at collection locations for the previous year;
- A description of how used medical sharps generated by collection locations were handled and disposed of during the previous calendar year;
- A description of the actions taken by HPSA to ensure compliance with the requirements for collection and disposal of used medical sharps and sharps containers returned by Consumers to collection locations.

Appendix A - HPSA Members – Medical Sharps

Abbott Diabetes Care	Leo Pharma Inc.
AbbVie Corporation	LifeScan Canada ULC
Amgen Canada Inc.	Medexus Inc.
Apotex Inc.	Merck Canada Inc.
Ascensia Diabetes Care Canada Inc.	Novartis Pharmaceutical Canada Inc.
Auto Control Medical	Novo Nordisk
Bausch Health Canada Inc.	Paladin Labs Inc.
Baxter Canada	Pfizer Canada Inc.
BD Medical	Roche Canada Ltd. - Hoffmann
Biogen Canada Inc	Roche Diabetes Care, a division of Hoffmann-La Roche Ltd
Cardinal Health Canada- Medtronic	Sandoz Canada
Eli Lilly Canada Inc.	Sanofi-Aventis Canada Inc.
EMD-Serono Canada Inc.	SOBI Canada (Swedish Orphan Biovitrum)
Ferring Inc.	Stericycle Inc.
GlaxoSmithKline Inc.	Teva Canada / Novopharm
Intervet Canada Corp Merck Animal	UCB Canada Inc.
Janssen Inc.	

Appendix B - ISCP - Rack Card

TAKE IT BACK!

Responsibly dispose of your used sharps to help prevent needlestick and sharps injuries.

You Can Return:

- Needles, needle tips and syringes
- Insulin pens
- Lancets
- Other used medical sharps

Components such as glucose meters and cotton swabs should not be disposed of in sharps containers.

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



SAFELY DISPOSE OF YOUR USED SHARPS DEVICES BY FOLLOWING THESE STEPS:

1



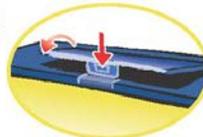
Recap needle and place into approved sharp container offered free of charge at any participating pharmacy.

2



Once the sharp waste has reached the designated fill line, snap lid closed by securing the strip.

3



To permanently close the sharps container, insert the tab into the opening to secure the lid down.

4



Always use an approved sharps container when disposing of used sharps to help reduce the risk of needlestick injuries.



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

Appendix C - ISCP – Instruction Guide for Pharmacy



SHARPS COLLECTION PROGRAM : INSTRUCTION SHEET	
<p>1 THE SHARPS COLLECTION PROGRAM KIT CONTAINS THE FOLLOWING</p> <ul style="list-style-type: none"> • Twenty-four (24) 4.25 L sharps containers and lids • Two (2) yellow plastic bags • Two (2) cardboard boxes • Four (4) cytotoxic labels 	
<p>2 ISSUING THE SHARPS CONTAINERS TO THE PUBLIC</p> <ul style="list-style-type: none"> • The sharps containers must be issued to the public for free. It may only be used for domestic purposes only. • Assemble the container before giving it out to the public. • Press firmly until the lid is clicked on securely. 	
<p>3 ASSEMBLING THE CARDBOARD BOX</p> <ul style="list-style-type: none"> • Assemble the box as pictured. • Secure the bottom with tape. • Use the yellow bag to line the box. 	
<p>4 ACCEPTING RETURNS FROM THE PUBLIC</p> <ul style="list-style-type: none"> • Ensure the tab is folded to correctly lock the container lid. • Any type of approved sharps container returned from the public is accepted. • Any member of the public may return containers to your location. • Refuse the waste if it's coming from a commercial, institutional or clinical source. 	
<p>5 PACKING THE BOX</p> <ul style="list-style-type: none"> • Place locked sharps containers received from members of the public inside the lined box as pictured. • If a container is returned and contains cytotoxic waste, make sure you apply a cytotoxic label to the box. • As this program accepts sharps containers of varying sizes and shapes, ensure the liner and the box can be safely closed. DO NOT OVERFILL. This box is designed to take twelve (12) 4.25L containers. 	
<p>6 PREPARING THE BOX FOR TRANSPORTATION</p> <ul style="list-style-type: none"> • Tie the yellow bag closed when the box is full. • Close the top flaps while ensuring the handles are correctly assembled. • Secure the top flaps with tape. • Ensure the box is clearly labelled with your pharmacy name and address 	
<p>7 ARRANGING FOR A SERVICE</p> <ul style="list-style-type: none"> • Submit your service request online by visiting www.healthsteward.ca/forms • You may also call your service provider for pick-up and re-supply 	

If you have further questions or comments about the Sharps Collection Program, please contact the Health Products Stewardship Association at info@healthsteward.ca or by phone at **1-844-535-8889**. You can also visit us online at www.healthstewardship.ca.