



HEALTH PRODUCTS
STEWARDSHIP ASSOCIATION

ONTARIO SHARPS COLLECTION PROGRAM PLAN

-OSCP-

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Contents

GLOSSARY OF TERMS AND ABBREVIATIONS	3
EXECUTIVE SUMMARY	5
1. Introduction	5
2. Ontario Sharps Collection Program	5
3. Program Products	6
3.1 Definition	6
3.2 Designated Material	6
3.3 Excluded Material	7
3.4 Orphan and “Free Rider”	7
4. Program Design	7
4.1 Collection System	8
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	10
6.1 Key Messages	10
6.2 Communication Methods	10
6.3 Partnerships	10
7. Funding Structure	11
8. Annual Report	11
Appendix A - HPSA Members – Medical Sharps	13
Appendix B - OSCP - Rack Card	14
Appendix C - OSCP – Instruction Guide for Pharmacy	15

GLOSSARY OF TERMS AND ABBREVIATIONS

OSCP	Ontario Sharps Collection Program
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.
Collection Location Site	A location, typically a retail pharmacy, registered with the OSCP 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.
Cytotoxic Waste	Means a cytotoxic drug, a medicinal chemical or a waste containing a cytotoxic drug or medicinal chemical, including waste needles.
HPSA Member	Producer of Medical Sharps and a member of HPSA
Medical Sharp	For the purpose of the Ontario Sharps Collection Program (OSCP) Plan, a medical sharp is defined as <ol style="list-style-type: none"> 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.
Producer	The producer of a sharp is <ol style="list-style-type: none"> (a) the manufacturer of the sharp, 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 sharp is sold to consumers in Ontario; (c) if there is no person described in clause (a) or (b), the importer of the sharp into Ontario; or

	(d) if there is no person described in clause (a), (b) or (c), the first person who sells the sharp 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
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 or 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.

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 Sharps Collection Program since 2013. For the past 7 years, it has been providing a collective strategy for the Medical Sharps stewards to comply with the Regulation by ensuring that Collection Locations Sites are available to all regions of the province and that 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 producers of Medical Sharps 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 medical sharp collection, end of life management, and the regulatory framework for take-back programs across Canada. HPSA represents 37 Medical Sharps Producers in Canada. As the first program of this kind in North America, HPSA has collected and safely disposed over 1,900,000 kgs of Medical Sharps in Ontario since 2013, helping to protect Canadians and the surrounding environment.

HPSA is submitting the OSCP Plan on behalf of 37 of its members who are obligated under the Regulation as Producers in Ontario. The list of medical sharps producers that are members of the HPSA and are participating in the OSCP is attached in [Appendix A](#).

2. Ontario Sharps Collection Program

In compliance with Regulation 298/12, the Ontario Sharps Collection Program (OSCP) 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 Medical Sharps stewardship programs, HPSA always seek to harmonize the definition of designated products.

3.1 Definition

The Regulation defines “sharp” as

“a needle, safety engineered needle, lancet or other similar instrument that is designed to puncture the skin of individual or companion animals for medical purposes and that is sold to consumer in Ontario, whether it is sold by the producer of the sharp or by any other person, and includes anything affixed to the sharp, including a syringe”.

3.2 Designated Material

For the purpose of the Ontario Sharps Collection Program (OSCP) 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 OSCP 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 locations.

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 locations.

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 OSCP 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 Producer that is not a registered member of HPSA. Both orphaned and “Free Rider” Medical Sharps are accepted by the OSCP.

4. Program Design

The OSCP provides all Ontario residents with reasonable access to Collection Location Sites 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 OSCP are to:

- Maintain a province-wide industry run program for the collection of used Medical Sharps in compliance with Regulation 298/12.
- Ensure an environmentally responsible disposal of used Medical Sharps.
- Ensure that the public can return, for free, used Medical Sharps for disposal throughout the province.

- Provide the public with information about Collection Location Sites.

4.1 Collection System

Under the OSCP, 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. 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 OSCP. 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. 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.
- Use 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 disposal 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 locations 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.
- A copy of the agreement and any related records must always be kept on site while the Collection Location Site is participating in the OSCP and for five years afterward.
- At each participating Collection Location Sites there must be a list of all Collection Location Sites in Ontario where used Medical Sharps can be returned for safe disposal as well as information on how consumers should safely store and disposed of Medical Sharps.
- 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 Processing requirements

HPSA only partners waste management service provider that have a valid ECA (Environmental Compliance Approval) issued by the Ontario MOECP that allows for the processing of 312P biomedical waste by steam sterilization or by incineration.

- 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).
- The bottom ash from the incineration of cytotoxic sharps must be disposed in a landfill approved to receive this waste stream.

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 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 OSCP.

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 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:** OSCP 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 OSCP is fully funded by HPSA members selling Medical Sharps in the province of Ontario 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 will be invoiced by HPSA according to the weight associated with volume of sales (units) during the previous calendar year (January-December).

The OSCP 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 used Medical Sharps in approved containers to Collection Location Sites. Pharmacy participation in the OSCP is not compensated.

The list of Medical Sharp 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 Medical Sharps in Ontario.

8. Annual Report

As per Article 9 of the Regulation, an annual report on the OSCP 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. Sharps.
 - 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 – Medical Sharps

Abbott Diabetes Care	Intervet Canada Corp Merck Animal Health
AbbVie Corporation	Janssen Inc.
Allergan Inc.	Leo Pharma Inc.
Amgen Canada Inc.	LifeScan Canada ULC
Apotex Inc.	Medexus Inc.
Ascensia Diabetes Care Canada Inc.	Merck Canada Inc.
AstraZeneca 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
Domrex Pharma Inc.	Sanofi-Aventis Canada Inc.
Elanco	SOBI Canada (Swedish Orphan Biovitrum)
Eli Lilly Canada Inc.	Stericycle Inc.
EMD-Serono Canada Inc.	Teva Canada / Novopharm
Ferring Inc.	Tremblay Harrison Inc.
GlaxoSmithKline Inc.	UCB
Hospira Healthcare Corporation	

Appendix B - OSCP - 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



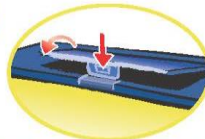
Recap needle and place into approved sharp container offered free of charge at any participating pharmacy.

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 - OSCP – Instruction Guide for Pharmacy



SHARPS COLLECTION PROGRAM : INSTRUCTION SHEET

<p>1</p>	<p>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</p>	<p>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</p>	<p>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</p>	<p>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</p>	<p>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</p>	<p>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</p>	<p>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.