



**HEALTH PRODUCTS**  
STEWARDSHIP ASSOCIATION

**ISLAND MEDICATIONS RETURN PROGRAM PLAN**

**-IMRP-**

**June 2020**

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## GLOSSARY OF TERMS AND ABBREVIATIONS

<b>Collection Location Site</b>	A location, typically a retail pharmacy, registered with the IMRP 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.
<b>Consumer</b>	An individual acting for personal, family or household purposes.
<b>Consumer Health Products (CHP)</b>	For the purpose of the IMRP, a pharmaceutical product sold directly to consumers and include: <ul style="list-style-type: none"> <li>▪ Prescription drugs</li> <li>▪ Non-prescription drugs</li> <li>▪ Natural health products (NHP)</li> </ul>
<b>Brand Owner</b>	A brand owner of a pharmaceutical product is: <ol style="list-style-type: none"> <li>(i) A manufacturer of the pharmaceutical product,</li> <li>(ii) A distributor of the pharmaceutical product in or into the province, or</li> <li>(iii) Where the pharmaceutical product is imported into the province, the first person to sell the pharmaceutical product in or into the province</li> </ol>
<b>HPSA Member</b>	Brand Owner of pharmaceutical products and a member of HPSA
<b>IMRP</b>	Island Medications Return Program - HPSA's pharmaceutical product stewardship program that establishes a process for the collection, transportation and disposal of pharmaceutical products.
<b>MRP container</b>	HPSA approved container distributed to Consumer Location Sites and used for the collection of unused and/or expired Consumer Health Products.

<p><b>Natural Health Products (NHP)</b></p>	<p>Under the <a href="#">Natural Health Products Regulations</a>, natural health products (NHPs) are defined as:</p> <ul style="list-style-type: none"> <li>▪ Vitamins and minerals</li> <li>▪ Herbal remedies</li> <li>▪ Homeopathic medicines</li> <li>▪ Traditional medicines such as traditional Chinese medicines</li> <li>▪ Probiotics</li> <li>▪ Other products like amino acids and essential fatty acids</li> </ul> <p>NHPs must be safe to use as over-the-counter products and do not need a prescription to be sold.</p>
<p><b>Non-prescription Drugs</b></p>	<p>Non-prescription drugs do not require a prescription of a practitioner under Section C.01.040.03 of the <a href="#">Food and Drugs Regulations</a> in order to be sold and are not listed the <a href="#">Prescription Drug List</a> established under Section 29.1 of the <a href="#">Food and Drugs Act</a>.</p> <p>Examples include:</p> <ol style="list-style-type: none"> <li>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</li> <li>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</li> <li>c) A drug that may be purchased from any retail outlet (such as a grocery store)</li> </ol>
<p><b>Prescription Drugs</b></p>	<p>A drug requiring a prescription for sale in Canada.</p>
<p><b>Program plan</b></p>	<p>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.</p>
<p><b>Regulation</b></p>	<p>Materials Stewardship and Recycling Regulations EC349/14 (<i>Environment Protection Act R.S.P.E.I 1988</i>)</p>
<p><b>Retailer</b></p>	<p>A person who sells or offer for sale pharmaceutical products directly to consumer</p>

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 Medications Return Program since 2015. For the past 5 years, it has been providing a collective strategy for Brand Owners of Consumer Health Products 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 Brand Owners of Consumer Health Products 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 unused and/or expired Consumer Health Product collection, end of life management, and the regulatory framework for take-back programs across Canada. HPSA represents 147 Brand Owners of Consumer Health Products and Medical Sharps in Canada. Since inception, HPSA has collected and safely disposed over 18,000 kgs of unused and/or expired Consumer Health Products in PEI, protecting Canadians and the surrounding environment.

HPSA is submitting the IMRP Plan on behalf of 106 of its members who are obligated under the Regulation as Brand Owners in PEI. The list of Brand Owners that are members of the HPSA and are participating in the IMRP is attached in [Appendix A](#).

### 2. Island Medications Return Program

The Island Medications Return Program (IMRP) 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 Consumer Health Product stewardship programs, HPSA always seek to harmonize the definition of designated products.

#### 3.1 Definition

The Regulation defines “pharmaceutical product” 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 Island Medications Return Program (IMRP) 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 IMRP includes products that are attributable to Brand Owners 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 Brand Owner that is not a registered member of HPSA. Both “Orphan” and “Free Rider” unused and/or expired Consumer Health Products are accepted by the IMRP.

## 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 pharmaceutical products will be collected (*Section 4.1*);
3. The plans for the receipt of discarded pharmaceutical products at the pharmaceutical products return facilities that participate in the program and the policies and procedures to be followed by the pharmaceutical products 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 pharmaceutical products (*Section 6*) that includes information about
  - i. The IMRP, specifying products accepted by the program,
  - ii. How and when Consumers can access pharmaceutical products return facilities, and
  - iii. The environmental benefits of participating in the IMRP.

In addition, the IMRP will:

- Ensure that the Brand Owners who sell, offer for sale or distribute Consumer Health Products in Prince Edward Island are members of HPSA and fund a pharmaceutical products Stewardship Program;
- Ensure environmentally responsible disposal of unused and/or expired Consumer Health Products;
- Ensure that the public is able to return unused and/or expired Consumer Health Products for disposal throughout the province.

## 4.1 Collection System

Under the IMRP, unused and/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. 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 IMRP. 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 and/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.
- 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 Transportation Requirements

Approved service providers under the HPSA's IMRP signed a Contractor Agreement specific to the ongoing collection and transportation of unused and/or expired Consumer Health Products 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 Consumer Health Products waste.

## 4.3 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.

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

## 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 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 IMRP.

## 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](#).

Of note, the current blue/white pail will be replaced in 2021 by a green olive 60L container.

Media campaigns are regularly utilized to convey information about the Island 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:** IMRP 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](http://www.healthsteward.ca) – to assist HPSA in educating the public on unused and/or expired Consumer Health Products returns.

## 7. Funding Structure

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

The IMRP 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 unused or expired Consumer Health Products to pharmacies. Pharmacy participation in the HPSA network is not compensated.

The list of Consumer Health Product 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 Consumer Health Products in PEI.

## **8. Annual Report**

The reporting requirements that HPSA will provides on behalf of its Consumer Health Products Brand Owners are clearly defined in the *Environmental Protection Act* Materials Stewardship and Recycling Regulations. HPSA will submit an annual report on the IMRP or Pharmaceutical Product Stewardship Program on or before June 30<sup>th</sup> 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 Consumer Health Products Brand Owners on whose behalf the HPSA prepared the report must be listed;
- The total weight of all unused and/or expired Consumer Health Products received at collection locations for the previous year;
- A description of how unused and/or expired Consumer Health Products 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 unused and/or expired Consumer Health Products returned by Consumers to collection locations.

## Appendix A - HPSA Members – Consumer Health Products

AA Pharma Inc.	Lundbeck
AbbVie Corporation	Mannatech Incorporated
Accord Healthcare	Marcan Pharmaceuticals Inc.
Advanced Orthomolecular Research (AOR)	McKesson Canada
Alcon Canada Inc.	McNeil Consumer Healthcare, a Division of Johnson & Johnson
Allergan Inc.	Mead Johnson Nutrition (Canada) Co.
Amgen Canada Inc.	Medexus Inc.
Amway Canada Corporation	Merck Canada Inc.
Apotex Inc.	Mylan Pharmaceutical ULC
Aralez Pharmaceuticals Inc.	Mint Pharmaceuticals Inc
Astellas Pharma Canada Inc.	Naka Herbs & Vitamins
AstraZeneca Canada Inc.	Natural Factors Nutritional Products Ltd.
Atrium Innovations Inc	Nature's Sunshine Products of Canada Ltd.
Auro Pharma Inc	New Chapter Canada Inc.
Bausch Health Canada Inc.	Novartis Pharmaceutical Canada Inc.
Baxter Canada	Novo Nordisk
Bayer Inc.	Organika Health Products Inc.
Bell Lifestyle Products	Otsuka Canada Pharmaceuticals Inc.
BGP Pharma (Mylan)	Paladin Labs Inc.
Bioforce Canada Inc.	Pascoe Canada Inc
Biogen Canada Inc	PF Consumer Healthcare Canada ULC/PF Soins de Santé SRI
BioSynt Pharma Inc.	Pfizer Canada Inc.
Blistex Corporation	PharmaChoice
Body Plus Nutritional Products Inc.	Pharmasave Drugs (National) Ltd
Boehringer Ingelheim Canada	Pharmascience Inc.
Boiron Canada	Procter & Gamble Inc.
Bristol-Myers Squibb	Purdue Pharma
Celgene Inc	Puresource Inc.
Cipher Pharmaceuticals Inc.	RB Health Canada Inc.
Clorox Company of Canada Ltd.	Roche Canada Ltd. - Hoffmann
D Drops Company	Sandoz Canada
Duchesnay	Sanis Health Inc.
Eisai	Sanofi-Aventis Canada Inc.
Eli Lilly Canada Inc.	Seaford Pharmaceuticals
EMD-Serono Canada Inc.	Servier Canada Inc.
Ferring Inc.	Shaklee Canada Inc.
Fresenius Kabi Canada Ltd.	Shoppers Drug Mart Central
Galderma Canada Inc.	Sisu Inc.
General Nutrition Centres Canada	St Francis Herb Farm Inc.
Generic Medical Partners Inc.	Stella Pharmaceutical Canada Inc.
Gilead Sciences Canada Inc.	Sterimax Inc.
GlaxoSmithKline Consumer Healthcare Inc.	Sunovion Pharmaceuticals Inc.
GlaxoSmithKline Inc.	Takeda Canada Inc.
Herbalife of Canada	Taro Pharmaceuticals Inc.
HPI Health Products/Lakota	Teva Canada / Novopharm
Indivior Canada PLC Inc.	Trillium Health Care Products
Jamieson Laboratories	UCB Canada Inc.
Jamp Pharma Corporation	USANA Health Sciences
Janssen Inc.	Vertex Pharmaceuticals Incorporated
Laboratoires Atlas Inc.	Vita Health Products Inc.
Leadiant Biosciences, Inc.	Wal-Mart Canada Corp.
Leo Pharma Inc.	WellSpring Pharmaceutical Canada Corp.
Loblaws Companies Ltd.	WN Pharmaceuticals Ltd.

## Appendix B - IMRP - 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](http://healthsteward.ca) or e-mail [info@healthsteward.ca](mailto: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](http://www.healthsteward.ca) to find your nearest participating pharmacy.

  
**MEDICATIONS**  
RETURN PROGRAM

## Appendix C - IMRP – Instruction Guide for Pharmacy



### ISLAND MEDICATIONS RETURN PROGRAM: INSTRUCTION SHEET

<p><b>1</b></p>	<p>You will receive the lid and empty collection pail together. Please ensure the pail is kept in an access-controlled and secure area behind the pharmacy counter. When not in use you may cover the pail with the lid loosely, but do not seal until the pail is full.</p>	
<p><b>2</b></p>	<p>Refer to the Accepted/Not Accepted decal to determine what is accepted through the Medications Return Program.</p>	
<p><b>3</b></p>	<p>Place loose pills directly into the collection pail and recycle outer packaging when possible. Liquids and creams must remain in their primary packaging. Do not add any free liquids to the collection pail.</p>	
<p><b>4</b></p>	<p>A full pail should not exceed 20 kilograms. Once full, close the liner by making a knot and twist on the lid. Clearly label the outside of the full collection pail with your pharmacy name and address. Do not use permanent marker.</p>	
<p><b>5</b></p>	<p>To schedule a pickup, complete the <i>Service and Supply Request Form</i> and send it to HPSA by e-mail: <a href="mailto:info@healthsteward.ca">info@healthsteward.ca</a> or Fax: 1-855-228-2099</p> <p><b>NOTE:</b> a minimum of two items is required to schedule a pickup.</p>	

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