



**HEALTH PRODUCTS**  
**STEWARDSHIP ASSOCIATION**

**PROGRAM PLAN FOR THE MANITOBA MEDICATIONS  
RETURN PROGRAM**

**Submitted to**

**Manitoba Sustainable Development  
*An Agency of the Manitoba Government***

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## Pharmaceutical and Health Products Plan Renewal

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# Medications Program Plan

## 1. Executive Summary

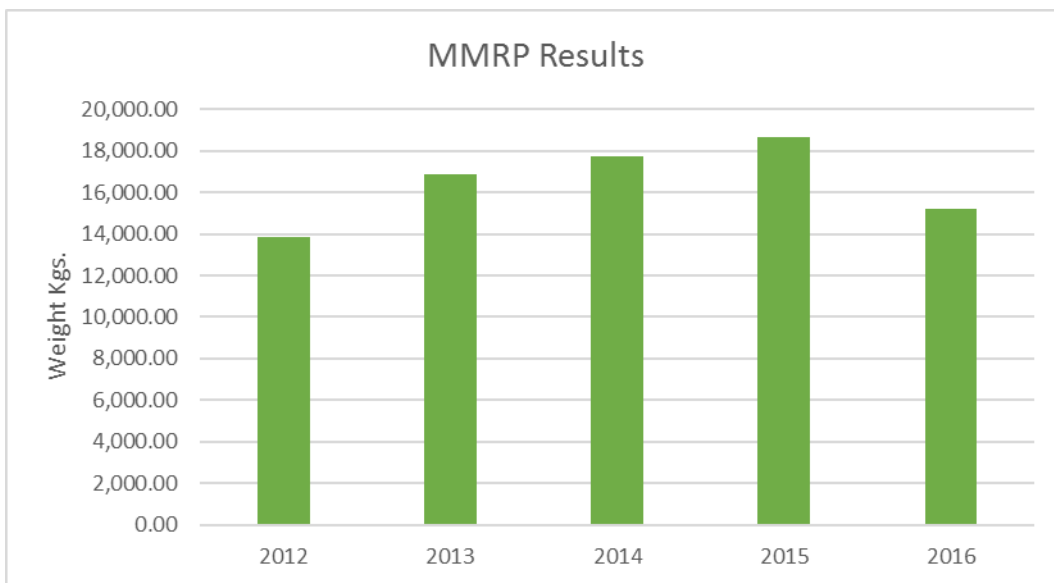
The *Household Hazardous Material and Prescribed Material Stewardship Regulation* (MR 16/2010) under the *Waste Reduction and Prevention Act* (WRAP Act) creates a set of requirements and criteria for two categories: pharmaceutical and natural health products. Both categories are represented under the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

Since April 2011, the *Health Products Stewardship Association* (HPSA) has administered the MMRP for prescriptions drugs, over-the-counter medications and natural health products that are sold for use in the province of Manitoba, but limited to the “consumer/residential” waste stream.

This program provides a collective strategy for the health industries stewards to comply with the Manitoba Regulation 16/2010. The MMRP plan will cover a five-year period from January 1, 2017 to December 31, 2021, at which time the plan will need to undergo a review.

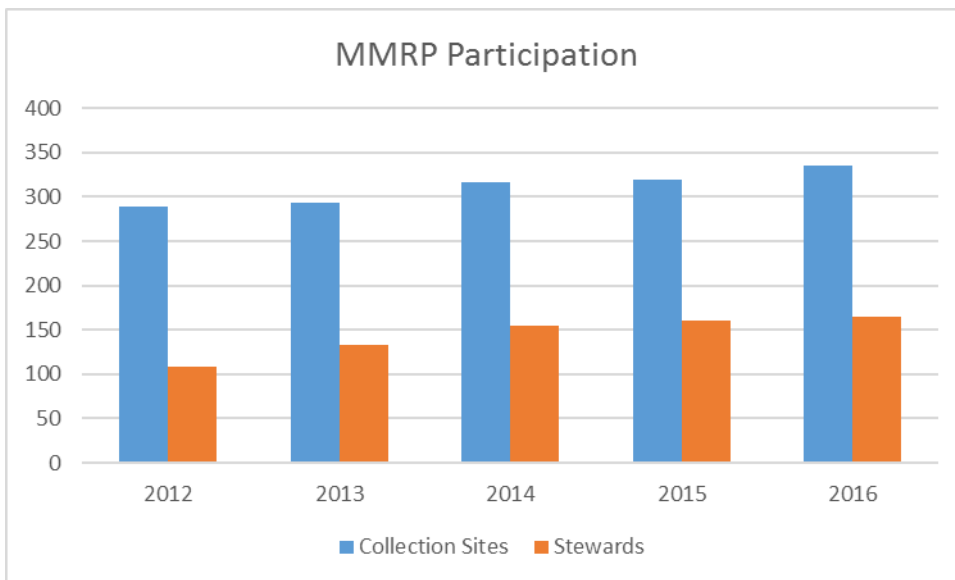
A summary of program performance for the past five years is presented below.

Figure 1 Program performance 2012-2016 MMRP results.



The Manitoba Medications Return Program was designed to ensure that collection sites are available to all regions of the province, and that products returned are packaged, handled, transported, and disposed of in a safe, compliant, and environmentally responsible manner. Figure 2 illustrates that, since the program’s inception, provincial coverage, as well as the number of stewards supporting the program, have increased slightly. Currently, the participation rate of eligible community pharmacy licensed by the Manitoba College of Pharmacists is 87 per cent across the province of Manitoba.

Figure 2 Accessibility and stewards’ participation



While awareness was low when measured in 2010 (prior to the launching of the Manitoba Medications Return Program), conditions in Manitoba were conducive to a successful social marketing campaign, which was aimed at promoting safe disposal of unwanted medications through pharmacies. Figure 3 and 4 provide the reader with historical data on both awareness and usage under section 6.

## 2. Glossary of Acronyms and Definitions

CAP:	Canada-Wide Action Plan for Extended Producer Responsibility (EPR)
CCME:	Canadian Council for Ministers of the Environment
MSD	Minister of Sustainable Development
EPR:	Extended Producer Responsibility
FDA	Food and Drugs Acts & Regulations (Canada)
HHM	Household Hazardous Materials
HPSA:	Health Products Stewardship Association
ISO:	Industry Stewardship Organization
MCP:	Manitoba College of Pharmacists
MSDES:	Manitoba Sustainable Development Eco Solutions
MMRP:	Manitoba Medications Return Program
NHP	Natural Health Products Regulations
MR (16/2010):	Household Hazardous Material and Prescribed Material Stewardship Regulation
NPAC:	Neighbourhood Pharmacies Association of Canada
PM:	Pharmacists Manitoba Inc.
RCC:	Retail Council of Canada
WRAP Act:	Waste Reduction and Prevention Act

## Terms and Definitions

- a) Collection Location(s): a location, typically a retail pharmacy, at which the collection of pharmaceutical and natural health products is provided. Retail pharmacies must have a dispensary that is accessible to the general public during normal business hours to be eligible as a collection location.
- b) Consumer: an individual who purchases goods or services for personal, family, or household use.
- c) Dosage forms: also known as unit doses, are pharmaceutical drug products in the form in which they are marketed for use. Examples include, but are not limited to:
  - i. tablets: a small disks or cylinders of compressed solid substance, containing unit dosage of one or more medicament,
  - ii. capsules: medication inside a gelatin container,
  - iii. lozenges: solid medicinal tablets consisting of sugar and gum, that facilitates a slower release of the medication to relieve sore throats,
  - iv. pastilles: Solid medication designed to dissolves slowly in the mouth
  - v. pills: small, round masses of medicine to be swallowed whole – a tablet, capsule, cap, caplet, gel cap, for example
  - vi. granules: solid, dry aggregate powder particles that are often supplied in single-dose sachets
  - vii. powder: an intimate mixture of dry, finely divided substances, intended for internal use,
  - viii. liquid preparation: an oral solution (emulsion, suspension, syrup), containing one or more active ingredient to ensure appropriate dissolution; and,
  - ix. topical dosage form: ointments, creams, gels, poultices, pastes, or semi-solid preparations to be applied to a specific part of the body.
- d) Medications: For the purposes of the MMRP, the pharmaceuticals product and natural health products categories are defined in three sub-categories:
  - All prescriptions drugs
  - Over-the-counter medications
  - Natural health products
- e) Natural health products (designated material): under the *WRAP Act*, a natural health product, as defined in The Natural Health Products Regulation under The Food and Drugs Act (Canada).
- f) Pharmaceutical products under the *WRAP Act*, a pharmaceutical product is a substance or mixture of substances manufactured, sold or represented for use in:
  - i. the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state, or its symptoms; or,
  - ii. restoring, correcting or modifying organic functions; including, but not limited to, medications available with or without a prescription, but not including contact lens disinfectants, antidandruff products and shampoos, cosmetics, antiperspirants, antiseptic or medicated skin-care products,

sunburn protectants, mouthwashes, fluoridated toothpastes, and veterinary medications and products

- g) Program plan: a document that provides producers with a strategy for individually or collectively managing the extended producer responsibility (EPR) of their products, including any safety, environmental, and regulatory requirements.
- h) Producer: the steward of a designated material. For the purposes of the industry stewardship plan, the steward of pharmaceutical and natural health products is:
  - i. the first person who, in the course of business in Manitoba, supplies a designated material to another person; or,
  - ii. a person who, in the course of business in Manitoba, uses a designated material obtained in a supply transaction outside of Manitoba.

*For the purpose of this plan, a producer will be deemed a brand owner, or first importer, in Manitoba, when applicable.*

In compliance with the *MR 16/2010*, producers must demonstrate participation in an approved program in order to conduct business in the province of Manitoba. Producers deemed “non-compliant” with program requirements will be subject to enforcement of the regulation – this is the responsibility of the Government of Manitoba.

### **3. Introduction**

The purpose of this document is to submit a plan for the pharmaceuticals and natural health product material categories, under the Government of Manitoba’s *MR 16/2010*, following our initial 2012-2016 plan. The primary objective of this document is to ensure –through a detailed program plan – that HPSA members with pharmaceutical and/or natural health products are in compliance with the Manitoba *WRAP Act*.

#### 3.1 Designated material categories and sub-categories:

Pharmaceuticals and natural health products are regulated by Health Canada under the *Food and Drugs Act and Regulations* and the *Natural Health Products Regulations*.

For the purposes of the *MR 16/2010*, the pharmaceuticals product category will be limited to two sub-categories:

- All prescriptions drugs      All dosage forms
- Over-the-counter drugs      Limited to medications that are absorbed through the bloodstream, including patches, antibiotics, and anti-fungal agents.

A pharmaceutical is limited to household quantities, and does not include the following:

- A substance or mixture used as a disinfectant,



- A food within the meaning of section 2 of the *Food and Drugs Act* (Canada);
- A cosmetic within the meaning of section 2 of the *Food and Drugs Act* (Canada);
- Over-the-counter medications dispensed in a topical dosage form (such as shampoo, insect repellent, sun screen, mouthwash, et cetera); and,
- All medical devices, such as sharps and syringes.

For the purposes of the MR 16/2010, the Natural Health Products category are all natural health products (NHPs) sold in Canada subject, and approved by Health Canada under the *Natural Health Products Regulations*.

A natural health product is limited to household quantities, and does not include the following:

- food and beverage products; and,
- NHPs dispensed in topical dosage form (such as shampoo, insect repellent, sun screen, mouthwash, et cetera); or, those products that are not absorbed through the bloodstream.

#### **4. Health Products Stewardship Association**

Health Products Stewardship Association (HPSA) is a not-for-profit industry stewardship organization that has been registered with Industry Canada since 2000. In 2013, HPSA continued under the Canada Not-For-Profit Corporations Act by issuance of a Certificate of Continuance. This reflects the organization's name change, as well as new by-laws aligned with the NFP Act.

Today, HPSA draws on more than 15 years of experience as a national producer responsibility organization (PRO). The knowledge and network it has built over the years has helped in the promotion of its programs, and in educating Canadians about health product collection, end of life management, and the regulatory framework for take-back programs across Canada. HPSA represents more than [165 health products brand owners](#) in Canada. It collects and safely disposes of close to 600 tons of medications and sharps each year, helping to protect Canadians and the surrounding environment.

HPSA's board members are committed to maintaining a high standard of corporate governance. The directors are responsible for the overall stewardship of the association, as well as for establishing the association's policies and standards. The current board of directors and by-laws can be found on HPSA's website: [www.healthsteward.ca](http://www.healthsteward.ca).

HPSA's current purposes, as set out in the Articles of Continuance – under the NFP Act, are as follows:

- to be the steward for environmental waste management programs of post-consumer health products; and,
- to manage unused or expired post-consumer health products in a cost-efficient and environmentally acceptable manner, that meets government policy or legislation for its members.

The structure for the corporation, and the means by which it carries on its daily activities, were established in the General Operating By-law in 2013. A copy of the General Operation By-law was forwarded to Industry Canada at that time, for their records.

a) Membership

- HPSA, as a non-share capital corporation, is required to be structured as a membership-based organization and operated by members and directors.
- In this regard, the corporation is structured as “closed membership”, i.e. the directors and the members are one and the same person (HPSA is a member-based association representing obligated stewards of health products).
- The classes of members, and their rights, are set out in the Articles of Continuance.
- Conditions of membership are set out in Section 11 of the General Operating By-law.
- The process for termination of membership is set out in Section 18 of the General Operating By-law.
- Decisions made by the members are reflected by a resolution.
- Resolutions are recorded as part of the members' minutes. They are signed by either the chair of the board, or the secretary.

b) Directors and Meetings

- Members meetings are governed by Section 13 of the General Operating By-law.
- The governance, administration, and management of the corporation lie with the board of directors, who are accountable to its members.
- Qualification requirements for directors are set out in Section 31 of the General Operating By-law. Only those persons meeting these qualification requirements may become directors of the corporation.
- The number of directors is set out in the Articles of Continuance (minimum 4, maximum 12).
- Directors of the corporation are elected into office by resolution of the members of the corporation.
- The election, appointment, term of office, resignation, removal, and filling vacancies of directors are governed by Sections 32 to 35 of the General Operating By-law.

- It must have a minimum of three directors, at least two of whom are not officers of employees, or officers of the corporation or its affiliates.
- The association must file annual financial statements with Industry Canada.
- The association must comply with higher requirements, in terms of the appointment of public accountant, and the level of review of its financial statements.

c) Rate and Fees Setting

HPSA is responsible for ensuring that brand owners and producers who sell, offer for sale, or distribute health products in Manitoba are covering their share of the costs to the Program. Funding from the industry covers all expenses incurred in the collection, such as transportation, storage, promotion, and the disposal of products within the Manitoba program.

A public accountant (auditor) is appointed annually to conduct an audit. The association has an operating reserve of up to six months of operating funds. The association's fiscal year-end is the thirty-first day of December of each year.

➤ Prescription Drugs

The market share for brand owners of prescription drugs is based on the previous year's products that were dispensed in Manitoba. There is no minimum rate; however, there is an administrative charge that covers operations costs, which is established yearly once approved at the annual general meeting (AGM).

➤ Natural Health Products / Over-the-Counter Medications

The market share for brand owners for over-the-counter drugs and natural health products is based on sales in the previous calendar year of affected natural health products in Manitoba. There is no minimum contribution; however, there is an administrative charge, which is determined yearly, that covers operations costs. This fee is established and approved annually at the AGM.

- Budget:** The program is managed and funded by members based on fees on the sale of products in Manitoba. The fees will be set yearly using estimates for program costs and product sales units (NHP's). Fees may be adjusted to address surpluses or deficits, but all fees will be used for program purposes in Manitoba.
- Reserve Fund:** As part of its risk management system, the program does build and maintain a reserve fund. The reserve fund will stabilize program funding in the case of unexpected collection volume increases, fluctuations in operating costs or reduced revenue due to economic or other factors.
- Producer Compliance:** In order to maintain a 'level playing field' for the contributing members and to ensure compliance with the Regulation, the program will actively search for, identify and recruit producers of program products. If a potential member has not joined the program despite repeated

notifications of their obligations, the program will refer the matter to the Manitoba Sustainable Development regulatory for potential enforcement proceedings.

## 5. Manitoba Medications Return Program

In compliance with the WRAP Act, the Manitoba Medications Return Program (MMRP) will provide all Manitoba residents with reasonable access to collection sites on a province-wide basis. Health Products Stewardship Association (HPSA) will be responsible for strategic planning, as well as overseeing program and financial operations, including contracting services to manage day-to-day operations of the program. The program requirements and criteria for stewardship programs under the MR 16/2010 are outlined on the left column of Table 1. The right column identifies the program components that address each requirement:

Table 1: Program Requirements

<b>MR (16/2010) Regulation Requirement</b>	<b>HPSA Program Component</b>
1. The establishment and administration of a waste reduction and prevention program for household hazardous material or prescribed material.	The approved program plan, for the collection and safe disposal of post-consumer medications.
2. The appropriate management of waste material, in accordance with any written guidelines established by the minister.	The proper management of post-consumer pharmaceutical waste, including the consideration of risks associated with controlled substances.
3. A province-wide, convenient collection system for waste material, without user fees at the point of collection.	Reasonable and free consumer access to a province-wide retail pharmacy collection network. The network is equal to, or greater than, 80 per cent of all retail pharmacies accredited by the Manitoba College of Pharmacists. No user fee is directed to the consumer at the point of purchase, or at the point of collection.
4. A system for the payment of expenditures incurred in the collection, transportation, storage, processing, and disposal of waste material, in connection with the waste reduction and prevention program.	Funding from the health industry covers all of the expenses incurred for the collection, transportation, storage, secure disposal, promotion activities and education, in connection with the MMRP.

5. The orderly collection of revenues from subscribers to the program, in balance with expenditures for the program.	HPSA staff administers the program and its various components, including contracts with service providers.
6. The establishment and administration of education programs, for the purpose of the waste reduction and prevention program.	The development and dissemination of promotion and educational material for the program to HPSA collection sites, for the public including pharmacists, municipalities, health authorities, and other partners working in this field.
7. The establishment and administration of a point of sale information program, for the purpose of the waste reduction and prevention program.	The development and dissemination of promotion and educational material for the proper use of medications is covered Health Canada FDA, and NHP Regulation, to address Canadians' concerns about availability and safety.
8. The payment of salaries and other costs of government for the administration and enforcement of this regulation and of the Act, as it relates to household hazardous material or prescribed material.	<p>In accordance with the requirements of the <i>WRAP Act</i>, and the Regulation, remit annual payments to Manitoba Sustainable Development for the payment of salaries and other costs of government for the administration and enforcement of the <i>WRAP Act</i> and the Regulation for the duration of this Approval such as:</p> <ul style="list-style-type: none"> <li>✓ enforcement services as requested;</li> <li>✓ interpretation of regulations and guidelines – with respect to HPSA program;</li> <li>✓ administration and enforcement of the regulation and the <i>Wrap Act</i> as it relates to pharmaceuticals and NHP;</li> <li>and,</li> <li>✓ program plan renewal and amendments in accordance with the <i>Wrap Act</i>.</li> </ul>
9. Ongoing consultations about the stewardship program with persons who the operator considers the stewardship program may affect, including members of the public, in accordance with any guidelines, respecting consultation, that the minister may establish.	Commitment to the continuous improvement in program performance and targets, through the ongoing consultation with other health professionals and key stakeholders working within the pharmaceutical and natural health products industries.

## 6. Program Design

### 6.1 Collection System:

The collection sites for the MMRP are community pharmacies. Registered pharmacy locations are easily identified through a web-based search engine on HPSA's website. Pharmacies are a logical and safe system for the public to return unused or expired medications. Many are open extended hours, offering a convenient place for consumer disposal year-round.

Collection locations must also meet the following requirements:

- Collection locations must provide the service to the public at no charge.
- The collection location must provide the ability to drop off products during regular business hours.
- Collection locations must display, and spread public awareness through promotional and educational HPSA program materials.
- A licensed pharmacist, or pharmacy technician, must be present when a consumer drops off products.
- Collection locations must have a valid provincial registration number issued by the provincial college of pharmacists.
- Pharmacies must sign an agreement with HPSA regarding the collection and storage of unused and expired products.
- If the location is offering safe disposal of unused and expired medications under the MMRP, and it is not a retail pharmacy, then the location has to be approved by HPSA.

Since the voluntary participation of a pharmacist is central to the success of the program, HPSA works closely with its representatives to ensure full participation, awareness and knowledgeable about the programs objectives.

All participating collection locations receive a kit containing instructions on the program, a service request form, and sample of education material developed for this program along with a minimum of two collection containers. Once the registration form is completed and faxed to HPSA's office, the pharmacist is contacted by phone to discuss the following points:

- ✓ MMRP being a medications return program offered to the public, not hospitals, institutions, doctor's offices, or a pharmacists own commercial pharmacy operations.
- ✓ All employees working at the collection site must be knowledgeable about the Medications Return Program.
- ✓ All pills need to be deposited into the collection container. All packaging should be recycled where facilities exist and are available in a particular region. The only

exceptions to this rule are liquid medications, gels, powder, and inhalers. Accepted medications are to be deposited directly into collection containers.

- ✓ There is no limitation on the quantity of medications that a consumer can drop off to a collection location.

Once two collection containers are full, the pharmacist must complete the service request form and contact the HPSA-approved service provider to schedule service.

Replacement containers will be delivered and the full containers will be picked up either on a service schedule or by request.

If the location is offering collection of medications under the MMRP – and it is not a retail pharmacy – then the location has to be approved by HPSA and meet collection location standards before collection of any unused or expired medications (controlled drugs and otherwise) can begin.



## 6.2 Performance Measures:

Medications are intended to be consumed entirely, in order to treat a specific condition or symptom. Ideally, none should be left over. Because of consumers' tendencies to hold onto medications for future use, there is typically a considerable amount of time that passes between its purchase and disposal.

- A year-to-year comparative analysis is performed to monitor the overall progress.
- The operational procedures include an audit to ensure proper tracking mechanisms and chain of custody documentation are in place from the point of collection to final destruction – including the appropriate certificates of destruction.
- The quantity of medications available for collection is difficult to estimate, since medications are taken for specific conditions and symptoms, and should be fully

consumed unless instructed by a health professional. Prescription drugs are prescribed by a physician and, in most cases, given in relatively small quantities. Patients are directed by their physician to take prescriptions until finished.

- Although data about the sales of prescription pharmaceuticals is available by dosage, products collected under the Medication Return Program are measured by weight (kilograms); therefore, there is no ability to correlate these two metrics. This makes collection targets by weight both inaccurate and unrealistic.

Table 2 Number of Collection Points

Target until 2021:	<ul style="list-style-type: none"> <li>• Increase the MMRP participation rate of provincially accredited retail pharmacies by five per cent (from 87 to 90 per cent) by 2021</li> </ul>
Performance measure:	<ul style="list-style-type: none"> <li>• Report percentage of participating pharmacies yearly by districts.</li> </ul>
Strategies:	<ul style="list-style-type: none"> <li>• Contact new pharmacies owners and promote program</li> </ul>
Year 1	<ul style="list-style-type: none"> <li>• Promotional materials and program information readily available for distribution to pharmacies upon request</li> <li>• Program materials to be developed for pharmacies to promote such events as Pharmacy Awareness Month, Earth Day, Summer Ambassador Tour (MARRC), and more</li> <li>• Promote the Manitoba Medications Return Program through members' (chains) websites, flyers, and events</li> <li>• Monthly outreach to non-participating, newly registered pharmacies</li> <li>• Educate the pharmacy staff about the Medications Return Program through HPSA's quarterly newsletter</li> <li>• Regularly monitor pharmacies, and contact those with significant changes in collection patterns on a monthly basis</li> </ul>



Year 2	<ul style="list-style-type: none"> <li>• Contact municipalities with promotional material and key messages for their websites</li> <li>• Promote the program through pharmacies, ambassador tour, Recycle Manitoba and Pharmacists Awareness Month, et cetera</li> <li>• Monitor and contact pharmacies with a significant change in collection patterns <ul style="list-style-type: none"> <li>• Continue to advertise the Manitoba Medications Return Program through websites, flyers and special events</li> </ul> </li> </ul>
Year 3-5	<ul style="list-style-type: none"> <li>• Contact municipalities with promotional material and key messages for their websites</li> <li>• Educate and promote the program to pharmacy staff with quarterly newsletter</li> <li>• Advertise the Manitoba Medications Return Program through websites, flyers and events</li> </ul>

## 7. Consumer Awareness

The association completed an initial awareness survey in 2010 to determine the level of public awareness about the disposal of unwanted medications (prior to the start of HPSA stewardship programs). These results indicated that 46 per cent of Manitobans were aware of the existence of a voluntary program. The association is committed to conducting a public awareness survey every three years (i.e. 2013, 2016, and 2019) with findings reported in the annual reports. Awareness levels began to increase as communications efforts were launched over the term of the initial program plan.

While awareness was low when measured in 2010 conditions in Manitoba were conducive to a successful social marketing campaign, which aimed to promote the safe disposal of unwanted medications through community pharmacies.

The primary challenges were to increase overall awareness and ensure that Manitoba consumers were provided with a compelling rationale that would encourage them to dispose of medications through local, registered pharmacies.

The latest survey conducted in the fall of 2016 shows some significant changes in awareness and improvements with the proper disposal of unwanted medications through HPSA collection network.

## 7.1 2016 Survey Results

This summary provides an overview of the results of a survey undertaken with 505 adult residents of Manitoba in October 2016.

In October 2016, Redfern Research executed a survey of 505 adult residents of Manitoba through Logit Group, a field house based in Toronto. These results are considered accurate to within  $\pm 4.3\%$ .

Individual households were selected randomly from the population and contacted by telephone. Only one interview was completed per household and participants were limited to those who were 18 or older. The survey data set reflects the known characteristics of the general population in terms of gender, age and geographic location.

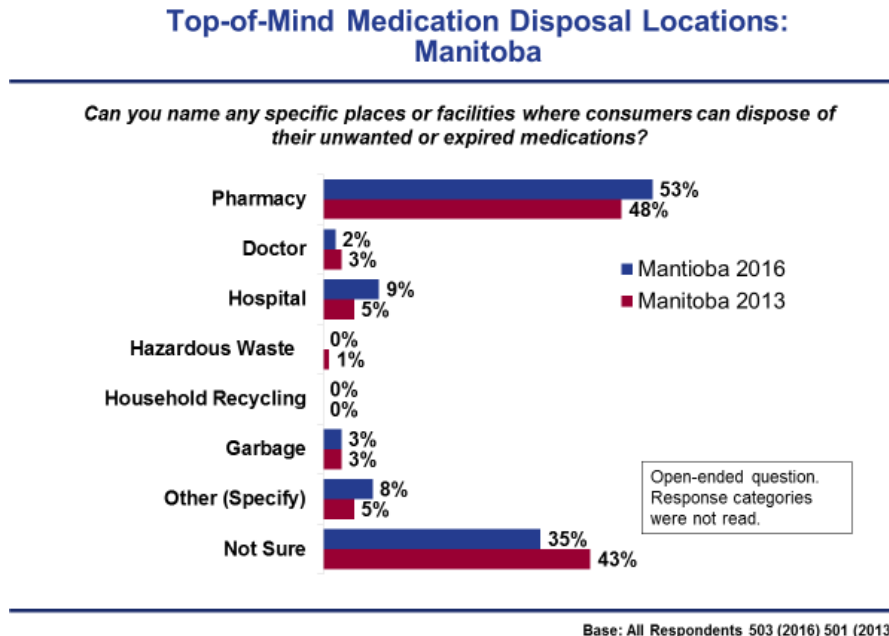
### Context

- Currently, 87% percent of Manitobans report that they have medications in their home. This figure is unchanged since 2013. Just under one-quarter of Manitobans (24%) currently have unwanted medications, as compared to 26% in 2013.

### Awareness

- When asked where unwanted medications may be disposed, 53% of individuals in Manitoba identify pharmacies. Most of the remainder (35%) say they are unaware of where unwanted medications may be disposed. Asked directly whether unwanted medications may be returned to pharmacies for disposal, 66% of Manitobans say this is true, while 12% say this not true and 22% are unsure.

Figure 3 Awareness of collections sites



## Experience

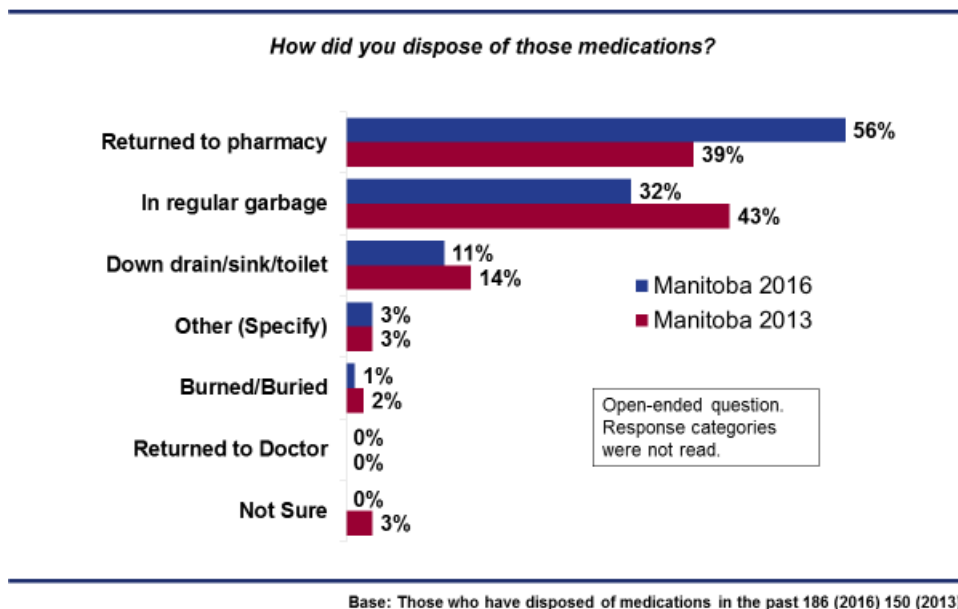
- Twenty-eight percent of Manitobans say they disposed medications in the previous six months, while 68% have not. There has been no significant change since 2013.
- Of those who disposed of medications, 56% returned them to a pharmacy. This represents a seventeen-point increase since 2013. However, 32% report that they threw medications into the garbage and 11% report that they disposed of them in a sink or toilet. Garbage disposal has dropped by 11 points since 2013.
- Manitobans who disposed of medications at a pharmacy (93%) found the process convenient. Almost all (93%) Manitobans who returned medications to a pharmacy were also satisfied with the overall experience.

## Intentions

- In the future, 48% of Manitobans say they will return medications to a pharmacy for disposal. However, 30% will dispose of medications in the regular garbage and 13% will dispose them through a sink or toilet. Overall, these results have improved since 2013.
- If they knew unwanted medications could be returned to pharmacies, 89% of Manitobans say they would be *likely* to do so. This includes 68% who say they are *very likely*.
- Two-thirds of Manitobans (67%) cannot think of any reason why they would not dispose of medications at a pharmacy. This is up significantly from 54% in 2013. The dominant reason why medications might not be returned to a pharmacy remains inconvenience.

Figure 4 Disposal of unwanted medications

### How Medications Were Disposed: Manitoba



## 7.2 Key Messages:

It is important that consumers are aware of the importance of returning unused and expired medications, where they can be returned, and the appropriate safety precautions to prevent drug abuse and misuse at home.

Some fundamental points HPSA plans to make the public more aware of are:

- Parents are the first line of defense in any drug prevention strategy
- 450,000 Canadian teens misuse prescription drugs, and 70 per cent of them claim to have stolen them from home
- One in six teenagers admit to having taken a legal prescription drug in the past year with intent to “get high”
- Canada, alongside the United States, is one of the biggest consumers of prescription drugs (painkillers, in particular)

## 7.3 Communication Methods:

HPSA will continue to provide signage to the network of community pharmacies. Promotional material (brochures and cards, for example) are available for retailers and other partners to order and display. Examples of these can be found at [www.healthsteward.ca](http://www.healthsteward.ca).

Media campaigns will be utilized to convey information about the Manitoba program, as well as a variety of methods to create consumer awareness, such campaigns will include:

- **Website:** The program website will have information on what items can be returned and how to return them. A map based collection location finder is available. It also includes a print-ready brochure, as well as a system for reordering consumer information materials produced for the program
- **Point of Return:** Any participating collection depots will be offered program signage to display, as well as counter cards to distribute to consumers
- **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:** MMRP will directly target commercial initiatives through dedicated mailings, and partnerships with relevant associations, such as Partnership for Drug Free Kids Canada, Canadian Centre for Substance Abuse; as well as other like-minded organizations

The first video is titled, “I don’t Flush”, and it illustrates and explains to viewers what should go down the toilet. This video is available to view at:

<https://www.youtube.com/watch?v=vgD7obhbbFc>

The second video is titled, “Fish Can’t Say no to Drugs”. This promotes the return of meds to pharmacies. This video was developed to help consumers learn about safe disposal, and aired during the pharmacist’s awareness month. It can be viewed at:

<https://www.bcpharmacy.ca/med-return>

The third video was designed to raise awareness on the danger of accessibility of drugs at home. It can be viewed at: <https://www.youtube.com/watch?v=alce4DCOELO>

#### 7.4 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
- **Other Stewardship Programs** – Leveraging opportunities to combine communication efforts with existing stewardship programs, such as MARRC Ambassador Tour, since 2013
- **Municipal and District Partnerships** – MMRP will seek opportunities to partner with local governments, including advertising in municipal calendars, links from local government websites to Program 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
- **Others** – Brand owners and agencies with an interest in health and safety have links to our website – [www.healthsteward.ca](http://www.healthsteward.ca) – to assist HPSA in educating the public on proper disposal

### 7.5 Performance Targets:

HPSA will continue to monitor progress in the meantime, the following targets are established for continuous improvement.

Table 3 Targets for Awareness

Target until 2021:	<ul style="list-style-type: none"> <li>Ten per cent increase in consumer awareness based on 2016 results</li> </ul>
Performance measures:	<ul style="list-style-type: none"> <li>In the fall of 2016 awareness was measured at 53%.</li> </ul>
Strategies:	<ul style="list-style-type: none"> <li>HPSA will conduct surveys to assess performance, awareness, and usage.</li> </ul>
Year 1	<ul style="list-style-type: none"> <li>Work with stewardship agencies to increase exposure through communications and shared events.</li> <li>Promote program through advertising, special events, and partnerships</li> </ul>
Year 2 - 3	<ul style="list-style-type: none"> <li>Secure publicity in annual recycling calendars, as well as continue to support special initiatives</li> </ul>
Year 4	<ul style="list-style-type: none"> <li>Measure awareness of program with public survey</li> </ul>
Year 5	<ul style="list-style-type: none"> <li>The consumer awareness strategy will be modified over time, based on the results of the methods employed, and survey results from the previous year</li> </ul>

Table 4 Targets for Quantity Collected

Target until 2021:	<ul style="list-style-type: none"> <li>Increase collection to 18,500 Kg per year or .014 kg per capita</li> </ul>
Performance measures:	<ul style="list-style-type: none"> <li>Report total quantity collected on a yearly basis with quarterly results by districts (8).</li> </ul>
Strategies:	<ul style="list-style-type: none"> <li>HPSA will conduct surveys to assess performance, awareness, and usage.</li> </ul>
Year 1-2	<ul style="list-style-type: none"> <li>Promote program through pharmacies and municipalities</li> </ul>
Year 3	<ul style="list-style-type: none"> <li>Conduct public survey and continue to work on communication and education in different media</li> </ul>
Year 4-5	<ul style="list-style-type: none"> <li>The consumer awareness strategy will be modified over time, based on survey results from the previous year.</li> </ul>

## **8. Remote Communities**

HPSA has completed an analysis of possible gaps in the access to Return Collection Facilities for both rural and remote communities in Manitoba – see Appendix H. The goal is to develop reasonable take-back options for remote communities by the end of 2018.

HPSA is also working with First Nations Communities, and the federal government (Indigenous and Northern Affairs Canada and Health Canada) to develop strategies for remote communities that have limited access to our take-back collection sites.

Since 2012, HPSA has recovered 400 kilograms. from First Nation, through contracted services to Nursing stations by Health Canada.

With ongoing discussions about program accessibility already taking place with partners in both British Columbia and Manitoba, the development of a strategy is foreseeable in the near future.

## **9. Dispute Resolution Procedure**

The Program will contract suppliers and service providers through commercial agreements.

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

e-mail: [admin@healthsteward.ca](mailto:admin@healthsteward.ca)

Fax: 613-722-1626

Phone: 613-723-7282

HPSA will seek to resolve the dispute through a co-operative approach and voluntary resolution within 15 business days. In the absence of a successful resolution, HPSA will convene a third party adjudication panel within the following 30 business days. One individual will be chosen by HPSA, one individual chosen by the pharmacy and one individual chosen by the concerned party (concerned party cannot be appointed). The panel will consider the dispute and offer a decision on all parties involved within five business days of adjournment. Should the decision not be accepted, commercial litigation may be pursued by the concerned party.

## 10. Annual Report

The reporting requirements that HPSA will provide on behalf of its members are clearly defined in the *Wrap Act* Section 16 (1). HPSA will submit an annual report on the Manitoba Medications Return Program in April of each year to the Government of Manitoba, Department of Sustainable Development.

## 11. Pollution Prevention and Best Management

Over the last five years, HPSA members have undertaken initiatives that have improved the environmental impact of health products. Some stewards have also made some changes to product monographs, which reflect the program's ability to influence change in a positive manner.

Product monographs (patient medication information sheets) are starting to indicate safe disposal options (see example in Appendix G). In addition, all MMRP containers are reusable containers.

Health Products Stewardship Association has also partnered with some chains (Shoppers Drug Mart and Rexall, for example) to distribute paper bags to customers. This assists in medicine cabinet clean-up and in reducing the environmental impact of pharmaceuticals.

### 11.1 Safety, Social and Environmental Impact

The Manitoba Medications Return Program is designed to help mitigate the following safety, societal, and environmental risks associated with unused medications in the home.

### 11.2 Safety Risk, Social and Environmental Impact

One in six teenagers have admitted to taking prescription drugs to get high. Seventy per cent of them state that the drugs were obtained at home. (Source: PDFC)). The Manitoba Medications Return Program (MMRP) promotes consumer awareness and education about the dangers of unused and expired medications in the home, and educates the public about the proper storage and handling of health products – which is essential to avoiding accidental ingestion by household members and pets. A key component of that message is promoting the use of MMRP registered community pharmacy collection locations as the proper venue for disposing of these materials.

### 11.3 Societal Risk - Abuse and Diversion



It is imperative for prescription drugs to be disposed of properly through a disposal program, such as the Manitoba Medications Return Program, and not left in the home where they can be easily abused or diverted.

Opioids, central nervous system depressants and stimulants, are the most commonly misused prescription drugs (Source: National Institute on Drug Abuse, <http://www.drugabuse.gov/publications/drugfacts/prescription-over-counter-medications>), and can presently be found in the post-consumer pharmaceutical waste stream.

Unused quantities of medications in the home creates the opportunity for abuse through unauthorized consumption, as well as the opportunity for diversion into the black market.

Educating consumers on abuse and diversion, promoting community pharmacy collection locations, and contracting a safe and secure service provider to collect and dispose of medications from pharmacies are all critical components of the Manitoba Medications Return Program that Health Products Stewardship Association has put in place, in effort to increase the accessibility to programs, which – by contrast – should decrease product abuse and diversion.

#### 11.4 Environment

There is no reuse or recycling application for post-consumer unused or expired medications. Medications must be completely destroyed through incineration. By collecting medications, the HPSA's Manitoba Medications Return Program has helped keep medications out of both waterways and landfills.

Due to the nature of environmental producer responsibility programs for pharmaceuticals and natural health products, an environmental performance measurement is problematic. The amount of eligible pharmaceutical, over-the-counter, and natural health products introduced into Manitoba can be calculated based on prescriptions or units sold; but, according to the U.S. Environmental Protection Agency (USEPA), “quantities of production or consumptions do not correspond with the quantities of pharmaceuticals and personal care products (PPCPs) introduced into the environment.” (Source: USEPA web site <http://epa.gov/ppcp/faq.html#quantities>).

The U.S. Environmental Protection Agency also notes that, “to date, scientists have found no evidence of adverse human health effects from PPCPs in the environment.” (Source: USEPA web site <http://epa.gov/ppcp/faq.html#quantities>).

Similarly, pharmaceutical, personal care and veterinary products, which have been found in wastewater and surface water, are likely to contaminate the aquatic environment. Recent studies with mussels and plants show that antibiotics in tissues, and laboratory

studies evidence that several aquatic species have common drugs in their systems. These toxicity tests generally indicate that acute lethal effects are not likely to occur in the environment, but that chronic or long-term effects are possible (Source: Pharmaceuticals and Personal Care Products in the Canadian Environment: Research and Policy Directions. Dr. Francois Gagne, p.10-11.).

Medications cannot be reused or recycled, unlike other designated products covered under this regulation.

Processing Requirements:

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

## **12. Conclusion**

Since 1997, Health Products Stewardship Association has operated the *Medications Return Programs* to provide consumers with the opportunity to return their unused and expired medications to participating retail pharmacies, at no charge.

This past year (2016), HPSA diverted approximately 750,000 kilograms of unused and expired medications from landfills, or waterways. Approximately 15,220 kilograms of these medications were collected in Manitoba.

The Manitoba Medications Return Program is well-received by the public, and used – as required – for the removal and disposal of medications at a residential level.

## 13. Appendices

### Appendix A: HPSA Membership in 2016

AA Pharma Inc.  
Abbott Diabetes Care  
Abbott EPD  
AbbVie Corporation  
Actavis Pharmaceuticals Company  
Actelion Pharmaceuticals Canada Inc.  
Advanced Orthomolecular Research (AOR)  
Advanced Sales and Marketing Canada Inc  
Alcon Canada Inc.  
Allergan Inc.  
Amgen Canada Inc.  
Amway Canada  
Apotex Inc.  
Aptalis Pharma Canada Inc.  
Aspri Pharma Canada Inc  
Astellas Pharma Canada Inc.  
AstraZeneca Canada Inc.  
Auro Pharma Inc  
Auto Control Medical  
Aventix Animal Health  
Baxter Canada  
Bayer Inc.  
BD Medical  
Bimeda-MTC Animal Health Inc.  
Bioforce Canada Inc.  
Biogen Idec Canada Inc  
Blistex  
Body Plus Nutritional Products Inc.  
Boehringer Ingelheim Canada Ltd.  
Boiron Canada Inc.  
Bristol-Myers Squibb Pharmaceutical Group  
Canada Safeway Ltd.  
Canadian Custom Packaging Company  
Celex Laboratories Inc.  
Champion Alstoe Animal Health Inc.  
Church & Dwight Canada  
Cipher Pharmaceuticals  
Combe Incorporated  
Costco Wholesale Canada Ltd.  
Covidien  
Cubist Pharmaceuticals Canada Inc  
Cytex Pharmaceutical Inc.  
D Drops Company  
Diversified Nutrition Lifestyle Canada Ltd.  
Domrex Pharma Inc.  
Duchesnay  
Elanco  
Eli Lilly Canada Inc.  
EMD-Serono Canada Inc.  
Enzymatic Therapy  
Euro-Pharm International Canada Inc.  
Ferring Inc.  
Fresenius Kabi Canada Ltd.  
Galderma Canada  
General Nutrition Centres Canada  
Generic Medical Partners Inc.  
Genuine Health Inc  
Gilead Sciences Canada, Inc.  
GlaxoSmithKline Consumer Healthcare Inc.  
GlaxoSmithKline Inc.  
Groupe Jean Coutu (PJC) inc  
Health First Network Association Inc  
Herbal Magic Inc.  
Herbalife of Canada  
Hospira Healthcare Corporation  
HPI Health Products/Lakota  
Indivior  
Intervet Canada Corp (dba Merck Animal Health)  
Jamieson Laboratories  
Janssen Inc.  
Katz Group Canada Ltd.  
Laboratoires Atlas Inc.  
Leo Pharma Inc.  
Les Laboratoires Nicar Inc  
LifeScan Canada Ltd.  
Loblaw Companies Ltd  
London Drugs Limited  
Lundbeck Canada Inc.  
Mannatech Incorporated  
Marcan Pharmaceuticals Inc.  
McKesson Canada  
McNeil Consumer Healthcare a division of Johnson & Johnson  
Mead Johnson Nutrition (Canada) Co.  
Medexus Inc  
Medical Futures Inc  
Medtronic

Merck Canada Inc.  
Merial Canada Inc.  
Methapharm Inc.  
Mint Pharmaceuticals Inc  
Mylan Pharmaceuticals ULC  
Natural Factors Nutritional Products Ltd.  
Nature's Sunshine Products of Canada Ltd.  
Nature's Way Canada Ltd  
Nestlé Canada Inc.  
Norbrook Laboratories Inc.  
Novartis Consumer Health Canada Inc.  
Novartis Pharmaceutical Inc.  
Novo Nordisk  
Omega Alpha Pharmaceuticals  
Organika Health Products Inc.  
Otsuka Canada Pharmaceuticals Inc.  
Overwaitea Food Group Ltd Partnership  
Paladin Labs Inc.  
Pascoe Canada  
Pfizer Canada Inc  
Pfizer Consumer Healthcare, Division  
of Pfizer Canada Inc.  
PharmaChoice  
Pharmasave National (Drugs) Ltd.  
Pharmascience Inc.  
Platinum Naturals  
Preferred Nutrition  
Procter & Gamble Inc.  
Purdue Pharma  
Puresource Inc  
Purity Life Health Products  
Rafter 8 Products  
Ranbaxy Pharmaceuticals Canada Inc.  
RBP Canada Ltd.  
Renew Life Canada Inc.  
Roche Canada Limited  
Roche Diagnostics  
Sandoz Canada  
Sanis Health Inc.

Sanofi Consumers Health  
Sanofi-Aventis Canada Inc.  
Schering Plough Canada Inc.  
Servier Canada Inc.  
Shaklee Canada Inc.  
Shire Canada Inc.  
Shoppers Drug Mart Central  
Sigma Tau Pharmaceuticals, Inc.  
SISU Inc.  
Sobi Inc  
Stericycle Inc.  
Sterimax Inc  
Sunovion Pharmaceuticals Inc.  
Takeda Canada Inc.  
Tanta Pharmaceuticals Inc.  
Taro Pharmaceuticals Inc.  
Teva Canada / Novopharm  
TOP Nutritionals (Natural Calm Canada)  
Tremblay Harrison Inc  
Tribute Pharmaceuticals Canada Inc  
Trillium Health Care Products  
UCB Canada Inc.  
UniPHARM Wholesale Drugs  
Univet Pharmaceuticals Ltd.  
USANA Health Sciences  
Valeant Canada LP  
Valeo Pharma Inc.  
Vertex Pharmaceuticals Incorporated  
Vetoquinol Canada Incorporate  
Virbac Animal Health Canada  
Vita Health Products Inc.  
Walmart Canada Corp.  
Webber Naturals Ltd.  
WellSpring Pharmaceutical Canada Corp.  
Westcoast Naturals  
WN Pharmaceuticals Ltd.  
Zoetis Canada

Appendix B: Registered Pharmacies in 2015

Aberdeen Pharmacy	Elie Pharmacy	Loblaw Pharmacy #1506
Apothecary of Morden Inc	Ellis Pharmacy & Thrifty Meds	Loblaw Pharmacy #1509
Arborg Pharmacy	Emad pharmacy	Loblaw Pharmacy #1510
Archibald pharmacy	Emerson Pharmacy	Loblaw Pharmacy #1511
Ashern Pharmacy	Empire Drugs	Loblaw Pharmacy #1512
Assiniboine Pharmacy	Eriksdale pharmacy	Loblaw Pharmacy #1514
Autumnwood Medical Pharmacy	Exchange District Pharmacy	Loblaw Pharmacy #1515
Baldur Pharmacy	Express Scripts Canada Pharmacy	Loblaw Pharmacy #1516
BenefitsRx	Falk Pharmacy	Loblaw Pharmacy #9080
BioScript Pharmacy Ltd.	Flatland Drugs	London Drugs #66
Birtle Pharmacy	Fort Alexander Pharmacy	Lorette Pharmacy Dufresne
Bon Pharmacy	Fort Rouge Pharmacy	Lundar Pharmacy Ltd
Boyd Medical Pharmacy	Friend's Pharmacy	Macgregor Pharmacy
Brandon Clinic Pharmasave	Gilbert Plains Pharmacy Ltd	Machray Pharmacy
Brathwaite's Pharmacy	Gladstone Pharmacy	Main & Luxton Co-op Pharmacy
Broadway Pharmacy	Glenboro Pharmacy	Main St. Pharmacy
Brothers Pharmacy Ltd	Good Shepherd Pharmacy	Mandalay Pharmacy
Brown's Drug Store	Grace Badejo Pharmacy Ltd.	Maples Pharmacy
Canadadrugs.com LP	Grand Med Hth Science Pharm	Marion Pharmacy
Care At Home Pharmacy	Grand Medicine Health Services	Martin's Pharmacy Ltd
CarePlus Transcona Pharmacy	Grand Medicine Pharmacy	Meadowood Pharmacy
Carman CO-OP Pharmacy	Green Crest Pharmacy	Medic X Pharmacy
Carman Pharmacy Ltd	Grunthal Pharmacy	Medical Centre Pharmacy
CD Whyte Ridge Pharmacy	Guardian Pharmacy	Medi-Care Pharmacy
Cin Den Pharmacy	Harbourview Pharmacy	Medicine Shoppe #331
CinDen Pharmacy #2	Hartford Drugs	Medicine Shoppe Pharmacy #278
Clayman Pharmacy	Hazelwood Drugs	Medicine Shoppe Pharmacy #290
Concordia Community Pharmacy	Health Central Pharmacy	Medicine Shoppe Pharmacy #305
Co-op Pharmacy Grant Park	Health Wellness Pharmacy	Medicine Shoppe Pharmacy #313
Corydon Village Pharmacy	Healthway Pharmacy	Medicine Shoppe Pharmacy #329
Costco Pharmacy #153	Heritage Co-op Ltd	Medocare Pharmacy
Costco Pharmacy #549	Higgins Pharmacy	Medsafe Pharmacy
Costco Pharmacy #57	Hill's Clinic Pharmacy	Melita Super Thrifty Pharmacy
Crestview Pharmacy	Hill's Drug Store	Meyers Drug Store
Dakota Pharmacy	Home Health Care Pharmacy	Millennium Pharmacy
Danial Pharmacy	Ingham Pharmacy	Miller's Pharmacy
Drugstore Pharmacy #1508	Invivo Health Pharmacy	Mount Carmel Clinic Pharmacy
Drugstore Pharmacy #9002	Isabel Pharmacy	Mountain Park Pharmacy Ltd.
Drugstore Pharmacy #9079	Island Lakes Pharmacy	Munroe Pharmacy
Drugstore Pharmacy #9081	Killarney Pharmacy Ltd.	My Care Pharmacy
Drugstore Pharmacy #9082	Leclerc Pharmacy	Nations First Pharmacy
Dueck Drug Store	Leila Pharmacy	Niverville Pharmacy Ltd.
East St. Paul Pharmacy	Loblaw Pharmacy #1503	North Mart Pharmacy
Ebbling Pharmacy	Loblaw Pharmacy #1505	North Mart Pharmacy #176

Norway House Pharmacy	Rexall #7401	Shoppers Drug Mart #0533
Oakbank Pharmasave	Rexall #7402	Shoppers Drug Mart #0534
Oakfield Pharmacy	Rexall #7404	Shoppers Drug Mart #0535
Osborne Village Pharmacy Ltd.	Rexall #7405	Shoppers Drug Mart #0537
Patient Advocate Pharmacy	Rexall #7406	Shoppers Drug Mart #0538
Peoples Pharmacy	Rexall #7409 Interlake	Shoppers Drug Mart #0539
Pharma Plus #4812	Rexall Pharma Plus #4817	Shoppers Drug Mart #0540
Pharma Plus #4814	Rexall Pharma Plus #4994	Shoppers Drug Mart #0542
Pharma Plus #4815	River East Pharmacy	Shoppers Drug Mart #0544
Pharma Plus #4823	Riverton Pharmacy	Shoppers Drug Mart #0545
Pharma Plus #4846	Riverview Health Centre	Shoppers Drug Mart #0546
Pharma Plus #4854	Ronald Pharmacy	Shoppers Drug Mart #0547
Pharma Plus #4895	Rossgburn Pharmacy	Shoppers Drug Mart #0548
Pharma Plus #4903	Rossmere Pharmacy	Shoppers Drug Mart #0549
Pharma Plus #4950	Safety Drugs	Shoppers Drug Mart #0551
Pharma Plus #4960	Safeway Food And Drug Pharm #334	Shoppers Drug Mart #0552
Pharmacie Labroquerie Pharmacy	Safeway Food And Drug Pharm#588	Shoppers Drug Mart #0553
Pharmacie Seine Ltee	Safeway Food And Drug Pharm#591	Shoppers Drug Mart #0554
Pharmamir Pharmacy	Safeway Food And Drug Pharm #603	Shoppers Drug Mart #0555
Pharmasave #0451	Safeway Food And Drug Pharm#623	Shoppers Drug Mart #0556
Pharmasave #0455	Safeway Food And Drug Pharm #701	Shoppers Drug Mart #0557
Pharmasave #0469	Safeway Food And Drug Pharm #708	Shoppers Drug Mart #0559
Pharmasave #0471	Safeway Food And Drug Pharm #717	Shoppers Drug Mart #0561
Pharmasave Health Centre #0470	Safeway Food And Drug Pharm#718	Shoppers Drug Mart #2404
Pilot Mound Pharmacy	Safeway Food And Drug Pharm#725	Shoppers Drug Mart #2406
Pinawa Pharmacy	Safeway Food And Drug Pharm #726	Shoppers Drug Mart #2414
Pine Pharmacy	Safeway Food And Drug Pharm #727	Shoppers Drug Mart #2419
Plessis Pharmacy	Safeway Food And Drug Pharm#729	Shoppers Drug Mart #2421
Point Douglas Rexall #7403	Safeway Food And Drug Pharm #731	Shoppers Drug Mart #2422
Police Depot	Safeway Food And Drug Pharm#791	Shoppers Drug Mart #2428
Positive Health Pharmacy	Safeway Pharmacy #0359	Shoppers Drug Mart #2444
Prairie Trail Pharmacy	Safeway Pharmacy #0714	Shoppers Drug Mart #2460
Prana Pharmacy	Safeway Pharmacy #0720	Shoppers Drug Mart #2501
Providen Pharmacy Logistics &	Safeway Pharmacy #0728	Shoppers Drug Mart #2502
Quarry Ridge Pharmacy	Safeway Pharmacy #4823	Shoppers Drug Mart #2505
Rasha Pharmacy	Safeway Pharmacy #4829	Shoppers Drug Mart #2511
Reavie's Pharmacy	Save-On-Foods Pharmacy #4405	Shoppers Drug Mart #2514
Red River Co-op Pharmacy - St. Vital	Save-On-Foods Pharmacy #4410	Shoppers Drug Mart #2516
Red River CO-OP Southdale Pharm	Save-On-Foods Pharmacy #4415	Shoppers Drug Mart #2517
Regent Park Pharmacy	Scale Drug Store	Silver Heights Pharmacy
Reston Drug Ltd	Serenity Pharmacy	Sobey's Grant Park Pharmacy #5150
Rexall #4813	Shoal Lake Pharmacy	Sobey's Kenaston Pharmacy #5166
Rexall #4816	Shoppers Drug Mart #0530	Sobey's Northdale Pharmacy #5167
Rexall #4887	Shoppers Drug Mart #0532	Sobey's Pharmacy #5155

Sobey's Pharmacy #5180	Super Thrifty Drugs Virden	Wal-Mart Pharmacy #1141
Sobeys Pharmacy #5307	Super Thrifty Pharmacy #20	Wal-Mart Pharmacy #1186
Sobey's Pharmacy Brandon South	Super Thrifty Pharmacy Brandon	Wal-Mart Pharmacy #1204
Sobey's Pharmacy St Annes #5152	Super Thrifty Pharmacy Dauphin	Wal-Mart Pharmacy #3004
Sobey's Plessis Pharmacy #5161	Super Thrifty Pharmacy Hamiota	Wal-Mart Pharmacy #3022
Sobey's River Grove Pharmacy #5377	Super Thrifty Pharmacy Rivers	Wal-Mart Pharmacy #3069
Sobey's St Vital Pharmacy #5157	Swan Health Care Plus Pharmacy	Wal-Mart Pharmacy #3102
Sobey's Steinbach Pharmacy #5164	Swan Valley Pharmacy	Wal-Mart Pharmacy #3107
Sobey's Unicity Pharmacy #5104	Tache Pharmacy at Seven Oaks Hospital	Wal-Mart Pharmacy #3116
South Point Pharmacy	Taylor Pharmacy Ltd.	Wal-Mart Pharmacy #3117
South Sherbrook Pharmacy	The Compounding Pharmacy of Manitoba	Wal-Mart Pharmacy #3118
Southeast Wellness Pharmacy	The Medicine Shoppe #133	Wal-Mart Pharmacy #3119
St. Boniface Pharmacy	The Medicine Shoppe #319	Wal-Mart Pharmacy #3177
St. Claude Clinic Pharmacy	The Prescription Shop #1	Wal-Mart Pharmacy #3660
St. Laurent Pharmacy	The Prescription Shop #2	Well-Being Pharmacy
St. Malo Pharmacy Ltd.	The Prescription Shop #3	West Kildonan Pharmacy Ltd.
St. Pierre Pharmacy	The Prescription Shop #4	Westview Pharmacy
Stafford Pharmacy	TheCanadianPharmacy.com & Accuscreen	White Cross Drugs Manitoba
Steinbach Primary Care Pharmacy	Treherne Pharmacy	Whitemouth Pharmacy
Stevenson's Pharmacy	Valley Super Thrifty Pharmacy	White's Drug Store Ltd
Stonewall Pharmacy Ltd	Videl Pharmacy	Whitfield Drugs
Stony Mountain Pharmacy	Wal-Mart Pharmacy #1022	Winkler Pharmacy
Super Thrifty Drug Mart The Pas	Wal-Mart Pharmacy #1027	Winnipeg Beach Pharmacy

## Appendix C: Notice of Consultation

This proposed plan was posted on the HPSA website — [www.healthsteward.ca](http://www.healthsteward.ca) – for the general public, as well as other interested stakeholders to review during the 45-day consultation period in the fall of 2015. The comments received are recorded in Appendix E.

# Notice of Consultation: Revised HPSA Stewardship Plan for Medication Returns in Manitoba

The Health Products Stewardship Association (HPSA), on behalf of Canada’s health products industries, manages the national Medications Return Program (MRP) within the province of Manitoba. Health Products Stewardship Association’s plan was approved and recognized as the official industry stewardship program for pharmaceuticals and natural health products by the Manitoba Conservation and Water Stewardship in 2011.

Health Products Stewardship Association invites stakeholder to comment on the revised industry stewardship plan, which intends to highlight program success and detail how HPSA intends to meet program requirements as described in the *Household Hazardous Material and Prescribed Material Stewardship Regulation*.

The 2017-2021 program plan is available at: <http://www.healthsteward.ca/sites/default/files/MBProgramPlan20162021.pdf>. You may direct your questions and comments to Meaghen Mahood-Clarke by e-mailing [mmclarke@healthsteward.ca](mailto:mmclarke@healthsteward.ca) or phoning 1-844-535-8889 by January 31, 2017.

HPSA looks forward to continuing its commitment to providing accessible programs for the responsible disposal of health products to all Manitobans.

The Manitoba Medications Return Program plan was sent to the pharmacy managers of HPSA participating pharmacy collection locations (see Appendix B), as well as the Association of Manitoba Municipalities members, HPSA member companies (see Appendix A), and other key stakeholders interested, as well as the listed associations below:

- Environment Resource Counselling
- Manitoba Association for Resource Recovery
- Manitoba Association of Regional Recyclers
- Manitoba College of Pharmacists
- Neighborhood Pharmacy Association of Canada
- Pharmacists Manitoba Inc



- Pharmacists Manitoba Inc Board of Directors
- Pharmasave – Central Office
- Product Care Manitoba
- Rexall – Central Office
- Shoppers Drug Mart – Pharmacy Operations
- Stericycle
- Walmart – Pharmacy Operations



## HEALTH PRODUCTS STEWARDSHIP ASSOCIATION

MANITOBA MEDICATIONS RETURN PROGRAM  
(MMRP)

## HPSA Overview

- National Industry Stewardship Organization representing companies that introduce health products (medications and sharps) into the marketplace as a result of EPR regulations
- Operates collection programs that focus on drugs, natural health products and sharps waste from the public
- Rely on an extensive network of community pharmacies to voluntarily collect materials
- Act as a compliance agent for producers of health products

## HPSA Stewardship Programs

- British Columbia Medications Return Program (BCMRP): 1996
  - Recycling Regulation 2004/16
- Manitoba Medications Return Program (MMRP): 2011
  - Household Hazardous Material and Prescribed Material Stewardship Regulation
- Ontario Medications Return Program (OMRP) and Ontario Sharps Collection Program (OSCP): 2012
  - EPA 298/12
- Island Medications Return Program (IMRP) and Island Sharps Collection Program (ISCP): June, 2015
  - PEI Environmental Protection Act Materials Stewardship and Recycling Regulations



## HPSA Standards

- Guiding Principles:
  - Safety
  - Diversion
  - Environment
  - Compliance
- Offer a "one-stop" for product stewards
  - Central administration
  - Harmonized product definitions
  - Single board of directors representing industries
    - Rx, OTC, NHP and sharps
  - Coordination of events and promotion
- Pharmacy collection locations

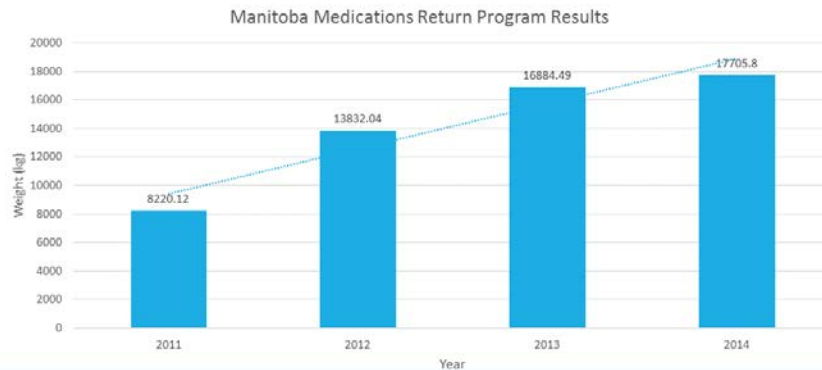


# Manitoba Medication Returns Program

- MMRP was launched 2011
- Allows the public to safely dispose of unused or expired medications
  - Free, no eco-fee
- Total number of collection sites: 317
  - Voluntary participation from 87% of Manitoba's community pharmacies
  - No fee to participate
  - Containers are behind pharmacy counters
- Helps prevent diversion by getting rid of unused prescription drugs

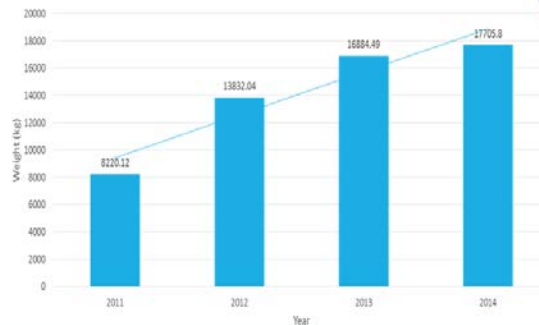


## Collection Results



## MMRP Promotion

•text



## Public Consultation in Person – 2015 MARR Forum Attendance List

<b>First Name</b>	<b>Last Name</b>	<b>Organization</b>
Alan	Abraham	LGD of Pinawa
Sandra	Abuwalla	Call2Recycle
Mac	Balacano	MTS
Lisa	Baldwin	RM of Hanover
Glen	Basarowich	RM of St. Clements
Kathy	Bennett	Eastman Recycling Services
Ron	Benson	MARRC
Angela	Bidinosti	Aboriginal Affairs & Northern Development
Bob	Bodnaruk	RM of Springfield
James	Bolton	Portage & District Recycling Inc.
Sam	Brask	City of Winnipeg
Bill	Brenner	City of Dauphin
Don	Budinsky	Communities in Bloom
Peter	Campbell	RM of West St. Paul
Jennifer	Carlson	MARRC
Kathy	Cass	Miller Environmental
Lorne	Charney	Whitemouth-Reynolds Waste Management
Darcy	Culbertson	Miller Environmental
Greg	Currie	Louise Integrated Waste
Rosemary	Deans	MEIA
jaclyn	Diduck	CBCRA
Murray	Donald	Prairie View Municipality
Melissa	Dorota	CBCRA/Recycle Everywhere
Jerry	Drobot	RM of St. Clements
Gerry	Dube	Overton Environmental Enterprises
Brett	Eckstein	Tire Stewardship Manitoba
Pam	Elias	RM of West St. Paul
Greg	Elson	RM of Springfield
Heather	Erickson	RM of Springfield
Ken	Fargher	City of Winnipeg
Jim	Ferguson	Manitoba Sustainable Development
Mike	Fernandes	StrategyMakers Consulting
Debbie	Fiebelkorm	RM of St. Clements
Heather	Francis	SWAMP Waste Authority
Ray	Frey	RM of St. Clements
Barry	Friesen	CleanFarms
Dan	Gagne	Town of Altona
Ron	Gerbrandt	Gateway Resources Inc.
Marj	Greenwood	The Pas & Area Recycling Centre
Scott	Haddow	City of Brandon
Sylvie	Hebert	Green Action Centre
Hank	Hildegbrand	SWAMP Waste Authority
Laura	Hnatiuk	MTS
Kristin	Houle	Emterra
Floyd	Houston	Town of Virden
Debbi	Hruda	RM of Springfield
Tracy	Hucul	Green Action Centre
Laurie	Hunt	RM of St. Andrews

**Brent Booker – Pharmacy Manager CO-OP Grant Park**

These comments should not be misconstrued as unsupportive, but it should be noted that a significant amount of time is needed by pharmacy staff to deal with the volume of product returned. It is not uncommon for people to come to the pharmacy with grocery bags of unused medications. The sorting and removal of product from original packaging diverts pharmacy assistant labor on average of 1-2 hours per week, and, over the course of a year, this should not be taken lightly. I may be incorrect, but I am not aware of any visible or backstage remuneration for this.

- A. HPSA data shows increase foot traffic to locations offering additional services such as safe disposal of medications. We do acknowledge time and efforts required to remove extra packaging and promote the recycling of extra paper and packaging. Update promotional information (appendix E) and website information is encouraging patient to remove personal information and consolidate all dry products in a single container when feasible. This will reduce time and effort require at the collection site.

**Jim Harlow – Empire Drugs**

It would be advantageous to have a sharps recovery program added. This would prevent a huge number of sharps from entering landfills.

- A. Please note that HPSA is not the administrator for the sharps collection program in Manitoba we operate a sharps program in Ontario and PEI with compelling medical sharps regulations

**Marlene Hutchinson – Cycle Environment**

After reading the proposed plan for the Manitoba Medications Stewardship Plan (2017-2021) we agree with the program as managed for the past five years by HPSA.

**Pharmacists of Manitoba - Board of Directors**

1. Number of inhalers is capped at 10 canisters per pail. This volume is far too low as many are returned on a daily basis. Please re-evaluate and consider removing any minimum number to be returned per pail.
  - A. This maximum is for full inhalers; empties are not subject to this minimum. We will inform our pharmacies network as this is obviously needs interpretation. This requirement was from the facility used for final disposal. Since this technology has evolved and we have not hear of boiler failure due to the explosive nature of full canister, we will seek new guidelines from our service provider and advise accordingly.
2. Advertising to the public requires strong messaging about what can and cannot be returned to the pharmacy (5.3).
  - A. We are developing a new piece of promotional material for the public and will make it available next year in Manitoba (see appendix E).
3. Information regarding sharps and the appropriate containers these can returned in to the pharmacy i.e. random jars, peanut butter jars, and coke cans are not appropriate.

- A. Please note that HPSA is not the administrator for the sharps collection program in Manitoba we operate a sharps program in Ontario and PEI with compelling medical sharps regulations.
- 4. Two collection containers to be full before pick up is a hardship for small independent pharmacies (5.1). We have a large proportion of independent pharmacies in Manitoba.
- A. Any pharmacies that are challenged with storage are able to be serviced more frequently and return only one item. This can be requested directly through our program coordinator at [programwest@healthsteward.ca](mailto:programwest@healthsteward.ca).
- 5. Consumers should be provided with a complaint line if a pharmacy refuses to take returns.
- A. If there is an issue the public can reach us at 1-844-535-8889, this information appears in the new rack card (see appendix E). NB. The public has started to use this number to call our office on all issued regarding HPSA collection program.

# TAKE IT BACK!

Responsibly return unused and expired medication.



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.



## 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

## What's in your medicine cabinet?

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HPSA partnered with Drug Free Kids Canada to create this PSA, which aims to spread awareness about the dangers of accessibility to medications at home.

### Teen Takers



WHERE FAMILIES COME FOR HELP



## I Don't Flush?

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HPSA partnered with Clean Water Foundation to create this PSA, which aims to raise awareness on flushing medications at home.

### I don't flush



## Fish can't say "no" to drugs



The Association funded a new entertaining and educational video to promote the return of medications. Its theme is *Fish Can't Say No to Drugs*. View at: [www.bcpharmacy.ca/med-return](http://www.bcpharmacy.ca/med-return).

## Appendix G: Product Monograph

### Patient Medical Information

Zellers Pharmacy #472, Hamati Pharma Inc., Ottawa ON, K1H 7X6  
Phone: (613) 526-4466 Fax: (613) 526-0853

Printed On: 01/12/2011 16:33:02

**Brand Name: NOVAMOXIN 500 MG CAPSULE DIN:00406716**

**Generic Name: Amoxicillin Trihydrate**

**AMOXICILLIN - ORAL**

(a-MOX-i-SIL-in)

#### USES

Amoxicillin is used to treat a wide variety of bacterial infections. This medication is a penicillin-type antibiotic. It works by stopping the growth of bacteria.

This antibiotic treats only bacterial infections. It will not work for viral infections (such as common cold, flu). Unnecessary use or misuse of any antibiotic can lead to its decreased effectiveness.

Amoxicillin is also used with other medications to treat stomach/intestinal ulcers caused by the bacteria *H. pylori* and to prevent the ulcers from returning.

#### OTHER USES

This section contains uses of this drug that are not listed in the approved US professional labeling for the drug but that may be prescribed by your health care professional. Use this drug for a condition that is listed in this section only if it has been so prescribed by your health care professional.

This drug may also be used by people with certain heart problems (such as heart valve disease) before medical/dental procedures (such as tooth/gum procedures) to prevent heart infection.

#### HOW TO USE

Take this medication by mouth with or without food as directed by your doctor, usually every 8 or 12 hours. The dosage is based on your medical condition and response to treatment.

Drink plenty of fluids while using this medication unless your doctor tells you otherwise.

Antibiotics work best when the amount of medicine in your body is kept at a constant level. Therefore, take this drug at evenly spaced intervals. To help you remember, take it at the same times each day.

Continue to take this medication until the full prescribed amount is finished, even if symptoms disappear after a few days. Stopping the medication too early may allow bacteria to continue to grow, which may result in a return of the infection.

Tell your doctor if your condition persists or worsens.

#### SIDE EFFECTS

Nausea, vomiting, or diarrhea may occur. If any of these effects persist or worsen, tell your doctor or pharmacist promptly.

Remember that your doctor has prescribed this medication because he or she has judged that the benefit to you is greater than the risk of side effects. Many people using this medication do not have serious side effects.

Use of this medication for prolonged or repeated periods may result in oral thrush or a new vaginal yeast infection (oral or vaginal fungal infection). Contact your doctor if you notice white patches in your mouth, a change in vaginal discharge or other new symptoms.

Tell your doctor immediately if any of these rare but serious side effects occur: dark urine, persistent nausea or vomiting, stomach/abdominal pain, yellowing eyes or skin, easy bruising or bleeding, persistent sore throat or fever.

This medication may rarely cause a severe intestinal condition (Clostridium difficile-associated diarrhea) due to a type of resistant bacteria.

This condition may occur during treatment or weeks to months after treatment has stopped. Do not use anti-diarrhea products or narcotic pain medications if you have the following symptoms because these products may make them worse. Tell your doctor immediately if you develop: persistent diarrhea, abdominal or stomach pain/cramping, blood/mucus in your stool.

A very serious allergic reaction to this drug is rare. However, get medical help right away if you notice any symptoms of a serious allergic reaction, including: rash, itching/swelling (especially of the face/tongue/throat), severe dizziness, trouble breathing.

Amoxicillin can commonly cause a mild rash that is usually not serious. However, you may not be able to tell it apart from a rare rash that could be a sign of a severe allergic reaction. Therefore, get medical help right away if you develop any rash.

This is not a complete list of possible side effects. If you notice other effects not listed above, contact your doctor or pharmacist.

In the US -

Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

In Canada - Call your doctor for medical advice about side effects. You may report side effects to Health Canada at 1-866-234-2345.

- Continued -

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Page 1

Continued Monograph For 00406716 (Novamoxin)

#### PRECAUTIONS

Before taking amoxicillin, tell your doctor or pharmacist if you are allergic to it; or to penicillin or cephalosporin antibiotics; or if you have any other allergies. This product may contain inactive ingredients, which can cause allergic reactions or other problems. Talk to your pharmacist for more details.

Before using this medication, tell your doctor or pharmacist your medical history, especially of: kidney disease, a certain type of viral infection (infectious mononucleosis).

Before having surgery, tell your doctor or dentist about all the products you use (including prescription drugs, nonprescription drugs, and herbal products).

During pregnancy, this medication should be used only when clearly needed. Discuss the risks and benefits with your doctor.

Amoxicillin passes into breast milk. Consult your doctor before breast-feeding.

#### DRUG INTERACTIONS

The effects of some drugs can change if you take other drugs or herbal products at the same time. This can increase your risk for serious side effects or may cause your medications not to work correctly. These drug interactions are possible, but do not always occur. Your doctor or pharmacist can often prevent or manage interactions by changing how you use your medications or by close monitoring.

To help your doctor and pharmacist give you the best care, be sure to tell your doctor and pharmacist about all the products you use (including prescription drugs, nonprescription drugs, and herbal products) before starting treatment with this product. While using this product, do not start, stop, or change the dosage of any other medicines you are using without your doctor's approval.

Some products that may interact with this drug include: live bacterial vaccines, methotrexate.

Before taking amoxicillin, tell your doctor or pharmacist if you are also taking probenecid. Probenecid slows down the removal of amoxicillin from your body, causing higher levels of this antibiotic in your bloodstream. For certain types of difficult-to-treat infections, your doctor may prescribe these 2 medications together in order to achieve this effect. Consult your doctor or pharmacist for more details.

Although most antibiotics probably do not affect hormonal birth control such as pills, patch, or ring, some antibiotics may decrease their effectiveness. This could cause pregnancy. Examples include rifamycins such as rifampin or rifabutin. Be sure to ask your doctor or pharmacist if you should use additional reliable birth control methods while using this antibiotic.

Amoxicillin may cause false positive results with certain diabetic urine testing products (cupric sulfate-type). This drug may also affect the results of certain lab tests. Make sure laboratory personnel and your doctors know you use this drug.

This document does not contain all possible drug interactions. Keep a list of all the products you use. Share this list with your doctor and pharmacist to lessen your risk for serious medication problems.

#### OVERDOSE

If overdose is suspected, contact a poison control center or emergency room immediately. US residents can call the US National Poison Hotline at 1-800-222-1222. Canada residents can call a provincial poison control center. Symptoms of overdose may include: severe vomiting, persistent diarrhea, a severe decrease in the amount of urine, or seizures.

#### NOTES

Do not share this medication with others.

This medication has been prescribed for your current condition only. Do not use it later for another infection unless your doctor directs you to do so. A different medication may be necessary in that case.

With prolonged treatment, laboratory and/or medical tests (such as kidney and liver function, complete blood counts) may be performed periodically to monitor your progress or check for side effects. Consult your doctor for more details.

#### MISSED DOSE

If you miss a dose, use it as soon as you remember. If it is near the time of the next dose, skip the missed dose and resume your usual dosing schedule. Do not double the dose to catch up.

#### STORAGE

Store at room temperature according to the product labeling, away from light and moisture. Different brands of this medication have different storage needs. Check the product package for instructions on how to store your brand, or ask your pharmacist. Keep all medications away from children and pets.

Do not flush medications down the toilet or pour them into a drain unless instructed to do so. Properly discard this product when it is expired or no longer needed. Consult your pharmacist or local waste disposal company for more details about how to safely discard your product.

**IMPORTANT: HOW TO USE THIS INFORMATION: This is a summary and does NOT have all possible information about this product. This information does not assure that this product is safe, effective, or appropriate for you. This information is not individual medical advice and does not substitute for the advice of your health care professional. Always ask your health care professional for complete information about this product and your specific health needs.**

Appendix H: Google Map of Collection Sites

