

## Industry Stewards Summary

As the Medications Return Program expands into other province, different provincial regulation dictates programs and sector compliance. This information is to assist stewards/producers with their obligations under existing regulations and understand our structure and services. We trust that the following chart and FAQs will provide more details on Pharmaceuticals and Natural Health Products regulations.

	Medications		
<b>Medications Return Program Overview</b>	Agreement provides compliance for provincial mandated health products stewardship programs		
<b>Provincial Programs</b>	BC, Manitoba, Ontario and PEI		All Prescription Drugs OTC's (oral dosage) NHP's (oral dosage)
<b>Fees</b>	Prescription Drugs Rx  Based on market share, IMS Compuscript Eutrx Data from prior year.	OTC's and NHP's ( \$ sales)  Ratio of actual retail sales From previous year.	Fees mean the yearly amounts for the operation and administration charges assessed on the Members by the Association to meet the capital and operating costs of the Association.
<b>Membership Dues</b>	A onetime fee upon joining the Association; the amount is determined by the Board in accordance with Operating Policies.		
<b>Fees*</b>	Paid to HPSA on annual basis; this amount is determined by the Board in accordance with Operating Policies.		
<b>Obligated Stewards Who Pays</b>	Typically, the responsibility is placed on the " <b>Brand Owner</b> " – either the name on the product or the licensee owner. In some instances, the steward can be the " <b>First Importer</b> " or the retailer is considered the obligated steward.		
<b>Agreement</b>	Membership Agreement		

*\*please note that fees are subject to change*



## Industry Stewards/Producers FAQs

### What is HPSA?

The Health Products Stewardship is a not-for-profit organization with membership open to all brand-owners of health products in Canada (in some cases including first importers).

### Why was HPSA formed?

British Columbia passed the first regulation in 1997. This regulation required all brand-owners of medications sold in B.C. to provide a way for consumers to dispose of their unused or expired products in an environmentally responsible manner. Industries have united to ensure that unused or expired products they are introducing into the marketplace are collected and disposed through HPSA programs.

### What will HPSA do?

HPSA's mandate is to administer stewardship programs (health products) to facilitate and increase collection, management and safe disposal of medications and sharps devices in specific provinces with regulations through partnership with community pharmacies. HPSA will fulfill your stewardship obligations through a program plan. Plans are posted on our website by province at [www.healthsteward.ca](http://www.healthsteward.ca)

### What are the Benefits of being an Industry Steward?

HPSA stewardship programs provide industry stewards with compliance under provincial regulations.

- **Producer Responsibility:** demonstrates your company's commitment to responsible disposal of unused or expired medications.
- **Simplicity:** allows your company to manage regulatory complexities and cost-effectiveness by supporting one program.
- **Reporting:** on behalf of its members, HPSA submits extensive recycling reports to regulatory bodies - including British Columbia, Manitoba and Ontario which require them as part of the regulations.
- **Information:** ensures your company remains informed of pertinent updates on regulatory changes, steward responsibilities and fees and collection results.

### What regulation is currently in place?

In 2004, the *BC Recycling Regulation*, Schedule 2 defined pharmaceuticals products as all unused or expired medications, including natural health products and non-prescription drugs.

In 2011, the Manitoba *Household Hazardous Material and Prescribed Material Stewardship Regulation* was passed. Industries for pharmaceuticals and natural health products are now responsible for end-of-life management of their products through a Stewardship Program.

In 2012, the Ontario EPA Regulation 298/12 was published on the Environmental Registry for producers of pharmaceutical carrying business in Ontario.

In 2014 the PEI Regulation EC 2014-349: Environmental Protection Act - Materials and Stewardship and Recycling Regulations was passed on June 20th.

### Who is required to participate in these programs?

All brand-owners (first importers) who sell regulated products (prescription drugs, over-the-counter drugs and natural health products) are required to either have a registered plan or join an Association with an approved plan.

**How will HPSA represent me as a brand-owner under these Regulations?**

HPSA has developed stewardship program plans for medications and sharps devices. When required by regulations these plans are provided to the Ministry of Environment on behalf of industries for approval. HPSA will also submit all reporting requirements covering program performance and additional obligations outlined in each specific provincial regulation to the Ministry as required. HPSA will also provide with our reports a list of companies registered with HPSA. *When companies register with HPSA by signing a Membership Agreement and pay their sector share, they engage HPSA to meet their compliance requirements within these Regulations.*

**What will happen to medications that are returned?**

Participating pharmacies collect expired and unused medications from the public. All containers returned from a pharmacy are tracked by weight, pick-up date, location and stored in a secure location until a shipment is accumulated for safe destruction through a licensed incineration facility.

**What will happen to sharps devices that are returned?**

Participating pharmacies collect used sharps from the public. All sharps approved containers returned from a pharmacy are tracked by weight, pick-up date, location and stored in a secure location until a shipment is accumulated for safe destruction through either a licensed incineration facility or autoclaving.

**How much are the fees to become an Industry Steward?**

At the AGM, members approved the rates to support administrative functions associated with the regulatory compliance process required for each provincial program. The administrative charge for 2015 is \$700.00 per program per province. In addition producers must self report their volumes yearly by the end of March to HPSA.

**I sell Natural Health Products/Sharps devices in the required provinces; however, I am a very small company with limited sales. Do I still have to pay fees?**

You may be required to pay an administrative charge of 700\$ as an alternative solution for regulatory compliance.

**Are we required to notify the provincial governments of B.C., Manitoba, Ontario and PEI that we participate in these Stewardship Programs?**

**British Columbia:** if you sell regulated products, pharmaceuticals and natural health products, in the province and are currently a member of HPSA, no further action is required. If your company is not a member of HPSA you are required by the Ministry of Environment to submit a signed appointment letter to enable HPSA to represent your company in British Columbia; and provide HPSA with the appropriate payment in order to comply.

**Manitoba:** if you sell regulated products, pharmaceuticals and natural health products in the province and have already paid your fees to HPSA, no further action is required. Your company will automatically be regulatory compliant through its membership with HPSA. If you sell regulated products in the province and are not a current member of HPSA, you must complete the registration form and provide HPSA with the appropriate payment in order to be represented by HPSA. Click [here](#) to download membership form.

**Ontario:** any company/producer which markets pharmaceuticals/sharps in Ontario must either institute their own product stewardship program, or join an industry- managed program such as the HPSA *Medications Return Program*. If you sell regulated products in the province and are paying your fees to HPSA, no further action is required. Your company will automatically be regulatory compliant through its membership with HPSA. If you sell regulated products in the province and are not a current member of HPSA, you must complete the [registration form](#) and provide HPSA with the appropriate payments in order to be represented by HPSA.

**PEI:** In June 2014, Prince Edward Island passed the Materials Stewardship and Recycling Regulations under the Environmental Protection Act ([Link](#)). The HPSA submitted program plans on behalf of the health products industries to the Province for both a Medications Return Program and Sharps Collection Program. These programs have now been approved by the Minister of Environment, Labour and Justice and are set to start in June 2015.



**Are we still required to participate and report quantity for your company under Printer Paper and Packaging?**

This stewardship program is not covering your obligations under MMBC, Stewardship Ontario and MMMS, our stewardship program are for medications and sharps devices only.