



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

**MANITOBA SHARPS COLLECTION PROGRAM PLAN**

**Submitted to**

**Manitoba Conservation and Climate**

**December 21, 2020**

## Manitoba Sharps Collection Program Plan

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### **Abbreviations**

CC	Conservation and Climate
EPR	Extended Producer Responsibility
HPSA	Health Products Stewardship Association
MSCP	Manitoba Sharps Collection Program
PRO	Producer Responsibility Organization

### **Glossary of Terms**

CSA Standard	CSA Standard Z752-03
The Regulation or MR (16/2010):	Household Hazardous Material and Prescribed Material Stewardship Regulation
WRAP Act	Waste Reduction and Prevention Act
Collection Location(s):	A location, typically a retail pharmacy, at which the collection of medical sharps is offered. Retail pharmacies must have a dispensary that is accessible to the general public during normal business hours to be eligible as a collection location.
Consumer	An individual acting for personal, family or household purposes.
Program plan	A document that provides stewards with a strategy for collectively managing the extended producer responsibility (EPR) of their products, including any safety, environmental, and regulatory requirements.
HPSA Members	Stewards of obligated materials
Over Packing	Biomedical waste packaging used for the containment of filled sharps containers from the MSCP during handling, storage or transportation. Over packing for sharps containers should, at a minimum, meet the standards stated in the "Guidelines for the Management of Biomedical Waste in Canada" published by the Canadian Council of Ministers of the Environment.

## 1. Executive Summary

The Health Products Stewardship Association (HPSA) is a non-profit producer responsibility organization founded by trade associations of consumer health products in response to provincial stewardship regulations. HPSA develops and administers Extended Producer Responsibility (EPR) programs for consumer health products in Canada on behalf of its members.

This three-year plan is being submitted by HPSA on behalf of stewards of medical sharps sold in Manitoba, to Manitoba Conservation and Climate in accordance with *Manitoba Household Hazardous Material and Prescribed Material Stewardship Regulation (16/2010R)* (“Regulation”) issued under *The Waste Reduction and Prevention (Wrap) Act* (C.C.S.M. c. W40), for the period covering October 1, 2020 to June 30, 2023.

The Manitoba Sharps Collection Program Plan provides a collective strategy for the medical sharp industry stewards to comply with the Regulation by ensuring that collection sites are available to all regions of the province, and that medical sharps returned are handled, transported, and disposed of in a safe, compliant, and environmentally responsible manner. Used Medical Sharps will be collected through the existing HPSA network of registered pharmacies who are currently participating in the Manitoba Medications Return Program managed by HPSA. The MSCP Plan shall be fully funded by HPSA members distributing medical sharps devices in the province of Manitoba. There are no visible fees charged on the sales of Medical Sharps in Manitoba.

Program performance measures (section 6.) shall be included in the Annual Report submitted every year to Manitoba Conservation and Climate.

## 2. 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 health product collection, end of life management, and the regulatory framework for take-back programs across Canada. HPSA represents more than 160 health products brand owners in Canada. As the first program of this kind in North America, HPSA has collected and safely disposed over 1,500,000 kgs of medical sharps since 2013, helping to protect Canadians and the surrounding environment.

HPSA is submitting the MSCP Plan on behalf of 37 of its members who are obligated under the Regulation as stewards in Manitoba. The list of medical sharp producers who have joined HPSA to fulfill their regulatory obligations are identified in [Appendix A](#).

According to the Regulation, a "steward of designated material" defined in section 1(1) is:

- (a) "The first person who, in the course of business in Manitoba, supplies a designated material to another person; or
- (b) A person who, in the course of business in Manitoba, uses a designated material obtained in a supply transaction outside of Manitoba."

For the purposes of this Program Plan, stewards of designated materials are referred to as HPSA members.

## 3. Manitoba Sharps Collection Program

In compliance with the WRAP Act, the Manitoba Sharps Collection Program (MSCP) will provide all Manitoba residents with reasonable access to collection sites on a province-wide basis. 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 in [Appendix B - Stewardship Plan Reference](#).

## 4. Program Products

HPSA currently manages two medical sharps stewardship programs in Canada (Ontario and Prince Edward Island). For sake of consistency and effectiveness, HPSA always seek to harmonize the definition of designated products.

### 4.1 Designated Materials

The Regulation defines “designated material” in section 2, to include:

#### Waste household hazardous materials category

**Waste Household Hazardous Materials** are further defined as:

“Devices, equipment, material, products and substances that meet the criteria for waste household hazardous materials set out in the CSA Standard Z752-03, *Definition of Household Hazardous Waste*, including, but not limited to, devices, equipment, material, products and substances that meet the criteria for”.

- (a) flammable materials;
- (b) corrosive materials;
- (c) physically hazardous materials, including, but not limited to,
  - (i) explosives (but not including ammunition), and
  - (ii) **medical sharps carrying pathogens**;
- (d) toxic materials; or
- (e) environmentally hazardous materials, including those materials that meet the criteria of being "toxic", and either "persistent" or "bio accumulative" as those terms are described in Clauses 7.6.2.2. to 7.6.2.4. of that Standard.

**Medical sharps carrying pathogens** are further defined in the CSA Standard as:

All medical sharps used to inject, draw blood, or puncture tissue, including but not limited to

- (a) syringes and needles;
- (b) scalpel blades; and
- (c) lancets.

## 4.2 Products

For the purpose of the Manitoba Sharps Collection Program (MSCP) Plan, a medical sharp shall be generally defined as a needle, safety engineered needle, lancet or other similar instrument that is designated to puncture the human skin for medical purpose and that is sold or otherwise distributed, and includes anything affixed to the sharp, including a syringe.

Both “Orphan” and “Free Rider” medical sharps are accepted by the MSCP. “Orphan” medical sharps refer to products produced by a manufacturer that either no longer exists or no longer produces medical sharps. “Free Rider” refers to medical sharps produced, imported or distributed by a manufacturer or a retailer that is not a registered member of HPSA.

Products referenced in the Waste Household Hazardous Materials category description are for “household” and “domestic” use only. Accordingly, no products intended for industrial, commercial or institutional (IC&I) use shall be included in the Program.

**NOT** included in the Manitoba Sharps Collection Program Plan:

- Scalpels
- Sharp blades
- IV bags/tubing
- Glucose meters

## 5. Program Design

### 5.1 Collection System

Under the MSCP, post-consumer medical sharps are brought to collection locations in approved sharps containers by members of the public. Collection Locations shall consist of retail pharmacies with a public facing dispensary. In 2019, there were 344 pharmacies registered with HPSA.

Since the voluntary participation of a pharmacist or pharmacy technician is central to the success of the program, HPSA will work closely with these stakeholders to ensure full participation and awareness of the MSCP. Pharmacy managers interested in offering the program in their store must complete a registration form. Specific information is provided to ensure that pharmacy managers and staff are knowledgeable on the program objective and the way the program operates. All participating collection locations receive a kit containing instructions on the program, a service and supply request form, and sample of education material developed for this program along with approved sharps containers for the public

and over packing supplies for sharps containers returned by the public. Once the registration form is completed and submitted to HPSA, the pharmacist is contacted directly by HPSA to review the following information:

- Medical sharps from hospitals, institutions, doctor's offices or pharmacy operations are not acceptable.
- Key employees working at the collection location must be knowledgeable about the program offered to consumers.
- The pharmacy shall only receive medical sharps in a hard-shell container (approved sharps container) labelled with the universal biohazard symbol.
- Medical sharps containers must be segregated from waste pharmaceuticals.
- Approved medical sharps containers returned by consumers are placed in over packing.
- Medical sharps used to administer cytotoxic drugs shall be deposited into a sharps container and labelled with a cytotoxic label if applicable.
- The pharmacist or pharmacy technician will inform medical sharp users on the proper disposal of needles.
- Upon receiving medical sharps containers, pharmacists should ensure that the tops of the containers are locked and placed inside the over packing.
- Once the over packing is full, the pharmacist must complete the service and supply request form and contact the waste management service provider contracted by HPSA to schedule service.

Collection locations must also meet the following requirements:

- Collection locations must provide the service of collecting medical sharps from Consumers at no charge.
- The collection location must provide the Consumer the ability to drop off medical sharps in approved containers during regular business hours.
- There must be an agreement in place between the collection location and HPSA that addresses the types of containers that are to be used for the collection, handling, storage and labeling of medical sharps. The agreement must also stipulate how medical sharps containers are to be collected, handled and stored at the collection location.

Note: If a location wishes to offer the collection of medical sharps under the MSCP but it is not a retail pharmacy (i.e. health center or nursing station), HPSA will ensure that it meets all safety procedures before approving it.



## 5.2 Transportation Requirements

As per HPSA contractor agreement, all conditions of federal, provincial and/or local rules and regulations such as Canadian Environmental Protection Act (1999) and Manitoba's *Dangerous Goods Handling and Transportation Act* (C.C.S.M c.D12) and associated regulations must be adhered to by the waste management service provider(s) when transporting medical sharps waste collected under HPSA programs.

## 5.3 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 residuals, in compliance with all applicable environmental regulations.

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

The name of location of the final disposal facility/facilities shall be submitted in the Annual Report.

## 6. Performance Measures and Targets

HPSA is proposing four (4) sets of measures the organization will follow throughout the first three years of the program to assess its performance. No target shall be presented until the MSCP become more mature.

### 6.1 Accessibility

Target	<ul style="list-style-type: none"><li>• Develop the MSCP participation rate of provincially accredited retail pharmacies</li></ul>
Strategy	<ul style="list-style-type: none"><li>• Targeted outreach</li></ul>
Tactics	<ul style="list-style-type: none"><li>• Reach out to the existing participating collection locations in the Manitoba Medications Return Program to promote the new MSCP</li><li>• Promote the Manitoba Sharps Collection Program through members' (chains) websites, flyers, and events</li><li>• Regular outreach to non-participating and/or newly registered pharmacies</li><li>• Educate the pharmacy staff about the Manitoba Sharps Collection Program through HPSA's newsletters</li></ul>

	<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> </ul>
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## 6.2 Consumer Awareness

Target	<ul style="list-style-type: none"> <li>• Develop consumer awareness of the MSCP</li> </ul>
Strategies	<ul style="list-style-type: none"> <li>• Targeted advertising and partnerships</li> </ul>
Tactics	<ul style="list-style-type: none"> <li>• Develop survey to assess consumer awareness (note: the consumer awareness strategy will be modified over time, based on the results of the methods employed, and previous survey results).</li> <li>• Promote program through advertising, special events such as the MARRC Ambassador program</li> <li>• Develop targeted partnerships in the healthcare sector</li> <li>• Participate in SWAT/ISC task force to reach out to the Indigenous communities</li> <li>• Contact municipalities with promotional material and key messages for their websites</li> </ul>

## 6.3 Consumer Usage

Target	<ul style="list-style-type: none"> <li>• Develop consumer usage of the MSCP</li> </ul>
Strategies	<ul style="list-style-type: none"> <li>• Targeted advertising and partnerships</li> </ul>
Tactics	<ul style="list-style-type: none"> <li>• Develop survey to assess consumer usage (note: the consumer usage strategy will be modified over time, based on the results of the methods employed, and previous survey results)</li> <li>• Promote program through advertising, special events such as the MARRC Ambassador program</li> <li>• Develop targeted partnerships in the healthcare sector</li> <li>• Participate in SWAT/ISC task force to reach out to the Indigenous communities</li> <li>• Contact municipalities with promotional material and key messages for their websites</li> </ul>

## 6.4 Collection

Until annualized data have been accumulated and a benchmark calculated, HPSA shall report on absolute collection of medical sharps.

## 7. Promotion and Education

### 7.1 Key Messages

It is important that consumers are aware of the importance of returning used medical sharps, where they can be returned, and the appropriate safety precautions to prevent needlestick injuries.

[Appendices C](#) provide an example of a rack card available for the MSCP.

### 7.2 Communication Methods

HPSA shall provide signage to the network of community pharmacies. Promotional material (bookmarks and rack cards) shall be available for retailers and other partners to order and display. A guide and pamphlet is specifically developed for pharmacists and their staff. Examples of these can be found in [Appendix D – Instruction Guide for Pharmacy](#).

Media campaigns will be utilized to convey information about the Manitoba Sharps Collection program, as well as a variety of methods to create consumer awareness. Such campaigns shall 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 shall be available. The HPSA website also includes 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:** MSCP shall directly target commercial initiatives through dedicated mailings, and partnerships with relevant associations as well as other like-minded organizations.

### 7.3 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

- **Other Stewardship Programs** – Leveraging opportunities to combine communication efforts with existing stewardship programs, such as MARRC Ambassador Tour.
- **Municipal and District Partnerships** – HPSA will seek opportunities to partner 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 local government level.
- **Patient Associations** – in collaboration with health professionals, HPSA will reach out to association of patients whose pathology require the use of medical sharps (e.g. Canada Home Care Association).
- **Others** –Brand owners and agencies with an interest in health and safety have links to HPSA website – [www.healthsteward.ca](http://www.healthsteward.ca) – to assist HPSA in educating the public on proper medical sharps collections.

#### 7.4 Northern and Remote Communities

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

With ongoing discussions about program accessibility already taking place with partners, HPSA will ensure to develop a strategy for reasonable take-back options for remote communities by the end of 2020.

### 8. Funding Structure

The MSCP shall be fully funded by HPSA members distributing medical sharps devices using a funding formula reviewed annually by the board of directors with any changes vetted by the membership annually.

HPSA operates a “return to retail” approach whereby the public returns used medical sharps to pharmacies. Pharmacy’s participation in the HPSA network is not compensated.

The MSCP 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 costs from other provincial programs.

There is no visible fee charged on medical sharps in Manitoba.

## 9. Dispute Resolution Procedure

HPSA will contract suppliers and service providers through commercial agreements.

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

E-mail: [tdrover@healthsteward.ca](mailto:tdrover@healthsteward.ca)

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 Sharp Collection Program in April of each year to Manitoba Conservation and Climate.

## 11. Management of Environmental Impacts

The Province abides by the pollution prevention hierarchy – reduce, reuse and recycle – however, this hierarchy is impossible to apply to medical sharps as it poses an unacceptable risk to consumers.

As a designated material, medical sharps have unique characteristics that other designated materials do not. For example:

- Sharps are used as a delivery device in a healthcare related application;
- They are used only once and then discarded: because of contact with human or animal tissue, medical sharps are potentially infectious and are considered a biomedical waste;
- Some medical sharps are used to inject drugs with chemotherapeutic properties and are therefore considered more hazardous than biomedical sharps. These sharps are classified as a cytotoxic waste. It has been observed that cytotoxic medical sharps make up approximately 4% of the medical sharps waste stream.

There are no readily available options to reduce the waste generated when using a sharp related product. Due to the unique health hazards associated with sharps waste, reuse or recycling are therefore not an option.

Some efforts have been made to recycle the sharps waste stream once it has been treated and rendered non-infectious. But currently none of those programs are available in Canada nor are they designated for EPR (post-consumer) medical sharp related waste streams.

HPSA is committed to ensure that its operational procedures will include internal audits 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. An example of a Bill of Lading is included in [Appendix E](#).

## *12. Stakeholders Consultations*

Ahead of being submitted to Conversation and Climate, the proposed MSCP plan was shared with the College of Pharmacists of Manitoba, Pharmacists Manitoba as well as HPSA member companies obligated under the Regulation. A Public Consultation took place between October 20, 2020 and December 4, 2020 on the Manitoba government’s “EngageMB” portal. The feedback and answers received are recorded in [Appendix F](#).

Appendix A - HPSA Membership in 2019 – Medical Sharps

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

## Appendix B - Stewardship Plan Reference

	Required in the Plan	Location
<b>A</b>	Stewardship Plan	
1	The establishment and administration of a waste reduction and prevention program for household hazardous material and prescribed material	Throughout Plan
2	The appropriate management of household hazardous material and prescribed material according to guidelines established by the minister	Throughout Plan
3	A province-wide, convenient collection system for waste material without user fees at the point of collection	Section 5
4	A system for the payment of expenses incurred in the collection, transportation, storage, processing and disposal of waste material in connection with the waste reduction and prevention program	Section 8
5	The orderly collection of revenue from program subscribers in balance with expenses for the program	Section 8
6	The establishment and administration of education activities for the program	Section
7	The establishment and administration of point-of-sale information for the program	Section 7
8	The payment of salaries and other costs for the administration and enforcement of the regulation and the Act as it relates to household hazardous material and prescribed material	Not applicable
9	On-going consultations with those who may be affected by the program, including members of the public, in accordance with any consultation guidelines the minister may establish	Section 12
10	The Plan may also deal with research and development, training and education activities, as well as activities related to waste reduction or pollution prevention. The minister may provide additional program guidance to program operators.	Section 11



# TAKE IT BACK!

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



**You Can Return:**

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

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

Visit [www.healthsteward.ca](http://www.healthsteward.ca) to find your nearest participating pharmacy.



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



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



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



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



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



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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



### SHARPS COLLECTION PROGRAM : INSTRUCTION SHEET

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

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

## Appendix E – Example of a Bill of Lading



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COMBINATION  
WORK-ORDER AND  
BILL OF LADING

CUSTOMER INFORMATION			
NAME		CONTACT PERSON	
BILLING ADDRESS	CITY	PROVINCE	POSTAL CODE
TELEPHONE	EMAIL	CUSTOMER ID#	
CONSIGNOR / GENERATOR INFORMATION		CONSIGNEE / RECEIVER INFORMATION	
NAME		NAME	
ADDRESS		ADDRESS	
CITY	PROVINCE	POSTAL CODE	CITY
TELEPHONE	EMAIL	TELEPHONE	EMAIL
GENERATOR NUMBER		GENERATOR NUMBER	
CARGO INFORMATION			
QTY	CONTAINER TYPE	DESCRIPTION	WEIGHT
		Medical Sharp Waste	
FREIGHT CHARGES		IN CASE OF EMERGENCY CALL	
COD			
I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labelled and are in all respects in proper condition for transport under applicable regulations.			
CARRIER INFORMATION			
NAME		VEHICLE / UNIT ID#	
BILLING ADDRESS	CITY	PROVINCE	POSTAL CODE
TELEPHONE	EMAIL	CARRIER ID#	
TESTAMENTS			
CONSIGNOR / GENERATOR	CARRIER	CONSIGNEE / RECEIVER	
CONTACT NAME	CONTACT NAME	CONTACT NAME	
SIGNATURE	SIGNATURE	SIGNATURE	
DATE	DATE	DATE	
COPY 1: CONSIGNOR		COPY 2: TRANSPORTER	
		COPY 3: RECEIVER	

## Appendix F – Consultation Feedback Summary

Feedback	Response
Currently certain patients bring back needles in plastic jars. What is HPSA’s position on return in this situation?	Pharmacists should not be accepting returns that are not in an approved sharps container (bearing the universal bio-hazardous logo). In a situation where a member of the public returns loose sharps or lancets or sharps plastic cup, HPSA recommends that the pharmacist provide to the individual, an approved sharp container to transfer its returns into acceptable container.
What is the dimension of the HPSA sharp container?	The HPSA sharps container is a yellow container with a blue lid bearing the universal bio-hazardous logo and HPSA markings. It is 4.25L (27.3cmX12.06cmx 20.32cm).
Are there any plans on developing different size sharp containers?	Currently, HPSA does not have any plan to develop different size sharps containers.
Is HPSA planning on having larger container (mailbox size) in the pharmacies to take back the current “inventory” at the beginning of the program implementation?	Currently, HPSA does not have any plan to develop different size sharps containers. As returns are from the residential sector, there should not be any backlog inventory at the pharmacy.
Why are sharps generated by pharmacists/pharmacies for patient care and services, say, vaccinations, not allowed to be disposed through the HPSA program?	HPSA’s mandate is the management of post-consumer returns only. Medical sharps generated by hospitals, institutions, doctor’s offices or pharmacy operations (flu vaccinations campaign) are not considered consumer returns but rather IC&I waste (IC&I being <i>industrial, commercial or institutional</i> ) from a program perspective.
Will the program supply the public with an approved sharps container?	Yes. HPSA will provide approved sharps containers to pharmacists at no cost.
If patients bring back <i>Fragmin</i> injections (i.e. in a carton box), should a pharmacist/pharmacy accept it?	Pharmacists should not be accepting returns that are not in an approved sharps container. Please note than an approved sharps container is a container bearing the universal bio-hazardous logo. In situation where a member of the public returns loose sharps or lancets or sharps in cardboard boxes or plastic jar to the pharmacy, HPSA recommends that the pharmacist provide the member of the public an HPSA sharps container.
What about patients who bring lancets in a plastic jar?	Pharmacists should not be accepting returns that are not in an approved sharps container. Please note than an approved sharps container is a container bearing the universal bio-hazardous logo. In situation where a member of the public returns loose sharps or lancets or sharps in cardboard boxes or plastic jar to the pharmacy, HPSA recommends that the pharmacist provide the member of the public an HPSA sharps container.

Feedback	Response
Absolutely fantastic idea! This makes it easy to use and properly dispose of sharps instead of throwing them in a garbage.	HPSA is looking forward to working with Manitobans for a safer and healthier environment
A designated needle sharing station would be a good place to have this.	This comment is out of scope
This plan needs to not only include "People" sharps, but also sharps used by the Veterinary population. This includes the Agricultural sector for Large Animals (livestock). This also needs to include all livestock/competition grounds - Horse shows, Rodeos, Morris Stampeed, Brandon Winter Fair, livestock feed lots, livestock auctions, hog barns, chicken/turkey barns, horse barns, etc, etc, etc. They all have and use sharps and they need to be dealt with correctly. Not all sharps are the sole use of vets. Many, many direct animal owners use sharps in their daily work with animals.	Please note that medical sharps used on companion animals ("pets") are covered by the HPSA Sharps Collection Program Plan.
I feel that by no longer accepting plastic containers we are now making it more difficult for households to participate in the program. I understand that they will be given a free sharps container instead, but will people 'give up' when told we can't accept what they have and ask them to transport the materials into the new container?	Please note that HPSA accept any approved sharp containers brought back by consumer to a pharmacy
Incredible idea. Before I became old-age I was kind of on my own to get rid of my sharps for diabetes. Initially they went direct to trash. Then I thought to put them in an empty laundry soap container. Now I get a small sharp container from pharmacy. This would save our landfill and terrain from being more contaminated	HPSA is looking forward to working with Manitobans for a safer and healthier environment.
As long as it doesn't cost too much money, and is safe and practical for everyone	Please note that there is no visible fee charged on medical sharps in Manitoba.