



**HEALTH PRODUCTS  
STEWARDSHIP  
ASSOCIATION**

# **Annual Report to the Director**

## **2012 Calendar Year**

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**June 30<sup>th</sup>, 2013**

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## 1. EXECUTIVE SUMMARY

Collections through community pharmacies across British Columbia (BC) has increased from 69,044 kg to 87,429 kg of returns in 2012, representing a 26% increase in medications collected. The quantity of products returns also increased from .013 kg to .0189 kg per capita.

- **Collection points:** In 2012, HPSA was able to maintain pharmacy participation rates at 95% with convenient access to over 1,098 locations.
  - **Information:** The public is informed about proper medication disposal through a number of channels, including: easy-to-find links to pharmacies on the Recyclopedia available on the Recycling Council of British Columbia's website, links to participating pharmacies on the British Columbia Pharmacy Association's website, our own directory on HPSA's website, and on the majority of Regional District or Municipalities' websites.
- Promotion:** The BC Pharmacists Association (BCPhA) campaign involved sending promotional materials and shelf signs to more than 480 pharmacies and 6 regional districts, and five news releases to promote the *BC Medications Returns Program (BCMRP)*. The Capital Regional District also ran a campaign in their region with a two hour information booth in pharmacies to provide information on the MRP to their customers.

This program continues to focus on unused and expired medications from households and continues to offer multiple solutions to reflect local/regional differences. Permanent collection programs provide ongoing, year-round drop-off services for consumers.

Once approved, this report will be available on the medications return website at [www.healthsteward.ca](http://www.healthsteward.ca).

Products within plan	Prescription drugs, over-the-counter drugs and natural health products
Program website	<a href="http://www.healthsteward.ca">www.healthsteward.ca</a>

Recycling Regulation Reference	Topic	Summary Report
<b>Part 2, section 8(2)(a)</b>	<a href="#">Public Education Materials and Strategies</a>	The public is kept informed about proper medication disposal through a number of channels, including: easy-to-find links to pharmacies on the Recyclopedia available on the Recycling Council of British Columbia's website, links to participating pharmacies on the British Columbia Pharmacy Association's website, our own directory on HPSA's website and on the majority of Regional District or Municipalities' websites.

Recycling Regulation Reference	Topic	Summary Report
<b>Part 2, section 8(2)(b)</b>	<a href="#">Collection System</a>	The medications return system continues to operate around 1,098 collection sites (95.4%).  See Section 4
<b>Part 2, section 8(2)(c)</b>	<a href="#">Product Environmental Impact Reduction, Reusability and Recyclability</a>	n/a
<b>Part 2, section 8(2)(d)</b>	<a href="#">Pollution Prevention Hierarchy and Product / Component Management</a>	All products returned are disposed of through incineration.
<b>Part 2, section 8(2)(e)</b>	<a href="#">Product Sold and Collected and Recovery Rate</a>	We increased the quantity of products returned per capita from 0.0134 to 0.0189 kg representing a significant increase of 26% in collection or 87,429 kg returned for destruction.
<b>Part 2, section 8(2)(e.1)</b>		See Section 7 for breakdown per regional district
<b>Part 2, section 8(2)(f)</b>	<a href="#">Summary of Deposits, Refunds, Revenues and Expenses</a>	n/a

Plan target	2012 Results	Remediation Strategies
1. Promote program through advertising and 2 special events.	Achieved see details under section <a href="#">2.d</a>	
2. a)Contact existing pharmacies with ownership and/or manager changes on a quarterly basis  b)Contact pharmacies with a significant change in collection pattern.  c)Contact new licensed community pharmacies from licensed sites on the College of pharmacists in B.C. on a quarterly basis.	Achieved and maintained participation rate above 95%.	
3. Continue to work with members and participating pharmacies to organize special collection events and publicize program. Promotion of program in different media.	Achieved see details under <a href="#">section 2</a>	

<p>4. a) PCPSA maintains (and will continue to maintain) a website to locate collection sites and provide additional information of the program</p> <p>b) Maintain contact with waste coordinators in regional districts/municipalities with promotional material and key messages for their websites/information booth.</p>	Achieved	Part B was partial done, some regional district were provided with promotional material however we had planned to do a more targeted campaign to get our promotional material posted on website of available in print form. Will secure resources to achieve in 2013.
5. Draft and approve the BC Stewards waste audit proposal	Achieved	
6. Quantity Collected Maintain a minimum collected quantity of 65 tons on a three-year rolling average.	Achieved 87 tons	

## 1. PROGRAM OUTLINE

The Health Products Stewardship Association (HPSA), formally Post-Consumer Pharmaceutical Stewardship Association is a not-for-profit association formed under the British Columbia extra provincial Society Act and registered with Industry Canada since 2000. HPSA has been appointed as the agency to meet steward's obligations for pharmaceuticals and consumer health products. HPSA's role is to perform on behalf of each member certain duties required under the Regulation. As of December 2012, there were 127 active members of HPSA ([www.healthsteward.ca/sites/default/files/Member%20List%20Dec.31%2012.pdf](http://www.healthsteward.ca/sites/default/files/Member%20List%20Dec.31%2012.pdf)).

A twelve member Board of Directors manages the association, with representation from the prescriptions and non-prescription drugs, consumer health products sectors and sharps devices to oversee policies, long range plans and to govern the activities of HPSA.

This program is designed to capture unused or expired medications from the residential sector. The Program includes both products clearly attributable to an existing steward, and orphan products (those that are no longer in production, the steward is no longer in business or products purchased outside Canada).

- |                                |                                |
|--------------------------------|--------------------------------|
| ✓ All prescriptions drugs      | All dosage forms               |
| ✓ Over-the-Counter Medications | Units sold in oral dosage form |
| ✓ Natural Health Products      | Units sold in oral dosage form |

HPSA provides all collection containers and collateral materials, pays all shipping and responsible disposal costs, so there is **no cost to the public or collection sites to participate**. Collection systems is designed with user convenience and flexibility in mind.

The collection sites for the *Medications Return Program* are community pharmacies. Pharmacy managers interested in participating must complete a registration form. Details on the program (How it Works) are provided to ensure that manager and their staff are knowledgeable on the program and its operations. All participating community pharmacies receive a guide containing instructions with information on the program for the public and containers.

## 2. PUBLIC EDUCATION MATERIALS AND STRATEGIES

The program has posters, brochures, bookmarks, etc., that can quickly be supplied to participating pharmacies, special events or other partners such as Regional District, Health Authorities and municipalities. The brochures provide directions on what is accepted and not accepted; how to return the unused or expired medications and where to go in an easy fashion. HPSA partners with health awareness events, health trade shows to advertise responsible disposal of unused or expired medications.

### a. Printed Materials for the public

Information: Brochures, bookmarks and point of purchase signage are distributed to pharmacy and other locations such as clinics, doctor's offices through a reorder system by fax, email or through the website. Information on the safe use and storage of products in the form of a two panel brochure entitled "Don't Throw It Out" is available in English and French; while bookmarks provides to groups /organizations interested in promoting the program to the public is available in four languages (English, French, Punjabi and Traditional Chinese).

Due to the nature of the product, information on the safe use and storage is provided to the consumer at time of purchase.

Municipal Garbage and Recycling calendars: HPSA will continue to promote the *Medications Return Program* in the recycling calendar published by regional districts and municipalities informing residents about municipal services.

Local Newspapers: HPSA has produced articles in community newspapers promoting the *Medications Return Program*. Other initiatives are taking place during the BC Pharmacists' New Year campaign and other events such as the Capital Regional District "Fish can't say no to drugs!"

Mail Outs: HPSA will provide promotional material to Regional Districts and Municipalities or other groups/organizations interested in promoting the program.

Annual Recycle Calendars: Spaces were purchased in ten Regional Districts Recycling Calendars (Appendix 1).

### b. Printed material available to pharmacies

Brochures: A three panel easy to read brochure containing information for the pharmacy staff on each program.

Window Decal: Signage developed for participating pharmacies to indicate to the public their participation in the program.

E-Bulletin: A bi-annual e-bulletin with information for pharmacies registered in the programs. Also an e-bulletin is currently available on a quarterly basis for our members.

### c. Other resources

**Web Site:** The *Medications Return Program* website provides the public with information about the programs, upcoming community events, etc. and location of collection sites for the disposal of medications. Also within the site is a searchable database of participating pharmacies and description of products accepted by the program. As we continue to build our membership base, we encourage our members (chain drug stores) with the promotion of the *Medications Return Program* and a link to our website for all members.

### d. Strategies to increase awareness

- **RCBC Toll-Free and Recyclopedia** HPSA has contracted with the Recycling Council of British Columbia's "recycling hotline" service and financed the on-line recycling information database called Recyclopedia.
- Continued to support the BC Stewards Handbook. Updated online version and printed copies are available. [http://www.bcstewards.com/ips/sabc\\_ips\\_2012.zip](http://www.bcstewards.com/ips/sabc_ips_2012.zip)
- 2012 BC Medications Return campaign (January) involved more than 480 pharmacies who received promotional materials such as prescription bag stuffers and shelf signs ("shelf talkers") promoting the BC Medication Returns Program. We partnered with **six regional districts** for cross-promotion through individualized joint **news releases**, social media promotion, and features in their recycling calendars including: (Metro Vancouver, Capital RD, Peace River RD, Squamish Lillooet RD, North Okanagan RD and Comox Valley RD). The *BC Pharmacy Association* was responsible for the coordination and promotion as well as all direct advertising to their pharmacy members in *The Tablet*, which is published to more than **3,800 pharmacy members** and stakeholders across the province, as well as weekly newsletter, *Practice Update*, and website. 5 joint news releases were available as well as community articles featuring locations participating in the campaign.
- We partnered with the Capital Regional District "Fish can't say no to drugs!" March Campaign to encourage safe disposal and promote our program.



CRD's March campaign provided t-shirts to the pharmacy and a poster to highlight the initiative.

CRD's web page highlighted 30 events with a two hour information booth at participating pharmacies to provide information on the MRP to their customers.

All customers that came to the booth received a t-shirt (funded by the HPSA).

- Brochures were distributed to the following:

Canada Best-stores Fixtures, Health Wellness and Sustainability fair in October and Pharmacies (35).

- Sponsorship:

Promotion on the BC Water & Waste Associations Drinking Water Week and the Community Water Challenge at [www.drinkingwaterweek.org](http://www.drinkingwaterweek.org)

Senior Living Magazine insertion for 2012; ½ page as well as website in September with focus on - Aging in Place / Caregiving Guide [www.seniorsvictoria.com](http://www.seniorsvictoria.com)

Purchased ad space in the *Waste Wise Guide Annual Calendar* with the Powell River Regional District's Waste Management Education Program. This free calendar features information and services around waste reduction.

Landfill Blues - Voices of Nature Day concerts in Burnaby and Surrey



## MEDICATION RETURNS

“Lots of things today require a second thought”

Almost everyone has had to take medicine at some point. The doctor writes out a prescription and we get it filled at the drug store. But sometimes not all the medication gets used, and it sits in the cupboard and becomes expired. What should you do with old medicines?

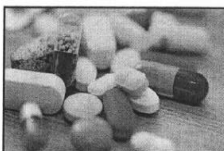
If medications get old or you don't need them, return them to your pharmacy. This is the best option. You can call your local drugstore to confirm their participation in the Medications Returns program, or use this link to find one in your area: [www.medicationsreturn.ca](http://www.medicationsreturn.ca)

Don't put old medicine in the trash, where children, pets or urban wildlife can find them. Your trash will eventually make it to a local landfill where your medications still have the potential to leach out.

Medicines should never be flushed down the toilet or poured down the sink, that will take your drugs into the local sewage system. Modern water treatment plants are not fully designed to deal with medication disposal. Drugs can leach into the water table, eventually coming out somewhere, like a lake or stream, putting pets, livestock or wildlife at risk.



Threespine Stickleback are small endangered fish that live along the coast of BC in many creeks and ponds. Keeping medicines out of the sewage system minimizes the amount of pollution in the water where these little fish live.



### Children be safe!

If you see pills anywhere, in your house, on the ground or in the garbage, do not touch them. Tell an adult so the medications can be properly stored or disposed of.

SECTION 3 - WE ARE PART OF THE CYCLE

LANDFILL 33 BLUES

1/3 page space in the printed souvenir concert program for all concerts.

1 page in the Landfill Blues online educators' handbook to communicate messages about safe disposal of medications. We are currently in the process of doing the layout. The online handbook and music-science video will be available province- and Canada-wide, and be used for years to come.

- Ambassador Program - BC

The seventh edition of the annual Summer Ambassador Program started on May 1<sup>st</sup> 2012. The Ambassador Team, canvassed the province of British Columbia to help spread the message on programs, relevant take-back programs at community events and gathered stewardship-specific feedback from government representatives. Ambassadors visited **55** HPSA facilities.

Many of the pharmacies stated that community awareness about the Medications Return program was high, even though the HPSA had the least amount of point-of-sale signage. Despite positive feedback from pharmacists, government representatives felt consumer awareness was still too low.



### 3. COLLECTION SYSTEM AND FACILITIES

There is no charge for a consumer to return products. Community pharmacies currently participating in the program can be easily located by the public on the association's website at [www.healthsteward.ca](http://www.healthsteward.ca) or by accessing Recycle Council of British Columbia Encyclopedia at <http://rcbc.bc.ca/>. The medications return system continues to operate around 1,098 collection sites equivalent to 95.4% of licensed community pharmacies. The fluctuation in number of collection facilities for 2012 is due to addition of 164 collection facilities and 61 sites ceasing to operate for the year ending December 31, 2012. New registration were submitted from the majority of our collection facilities since we started to use a new company, Stericycle LLP, in 2012. We will continue to seek registration in 2013 and beyond.

- Pharmacies are a natural, logical and safe site for the public to return medications.
- They also offer easy access to those with special needs and varying degrees of personal mobility.
- Pharmacists are the most knowledgeable of all health care professionals when it comes to medications.
- Many of those pharmacies are open extended hours, offering a convenient place for consumer disposal year-round.

The following lists provide an example of materials that would be acceptable. Note that this list is not exhaustive.

#### Accepted

- ✓ All prescription drugs
- ✓ Nonprescription medications
- ✓ Natural health products
- ✓ Vitamin and mineral supplements

#### Not accepted

- ✓ Sharps, needles or syringes
- ✓ Cosmetics
- ✓ Antiperspirants, antiseptic
- ✓ Skin cleansers
- ✓ Mouthwashes
- ✓ Hard surface and disinfectant cleaners
- ✓ Expired samples physicians' offices
- ✓ Unused or expired drugs from a hospital and institutions
- ✓ Pharmaceuticals from farms and veterinary products

#### 4. PRODUCT ENVIRONMENTAL IMPACT REDUCTION, REUSABILITY AND RECYCLABILITY

The Canadian Council of Ministers of the Environment in their Extended Producer Responsibility Product Evaluation Tool proposed several criteria to measure the impact of pharmaceutical waste on human and environment health.

The bulk of human pharmaceuticals found in waterways most likely got there by way of sewage. It is questioned whether take-backs have any real environmental and safety benefit. Taking unused pharmaceuticals out of landfills might have only a small difference in the concentrations found in water. But take-back programs may help prevent leftover pharmaceuticals from being misused, diverted or illicitly used.

#### 5. POLLUTION PREVENTION HIERARCHY AND PRODUCT / COMPONENT MANAGEMENT

The pollution prevention hierarchy requirements outlined in the *Recycling Regulation* to reduce the environmental impact are not feasible for pharmaceutical products; consequently, HPSA disposes of the waste at government-approved facilities through incineration.

#### 6. PRODUCT SOLD AND COLLECTED AND RECOVERY RATE

Medications may have a long delay between purchase and return and prescriptions drugs should be fully consumed unless otherwise directed by a health professional. The *Medications Return Program* collects medications; not the bottle or vial used to market the product or used to dispense the prescription. We recommend that containers be recycled by the pharmacists or the consumer.

We increased the quantity of products returned per capita from 0.0134 to 0.0189 kg representing an increase (26%) in collection or 87,358 kg\* returned for disposal (Appendix 3). The highest rate of return is Powell River at .0321 kg followed by Nanaimo at .0291kg; the lowest rate is Kitimat-Stikine at .0076 kg.

[Appendix 2](#) shows the absolute collection of medication in kilogram (mass recovered) on a quarterly basis.

Table 2012 Collection by Regional Districts

Absolute Collection	2012 POPULATION	WEIGHT (kg)	CONTAINER	per capita/kg	Level
<b>British Columbia</b>	<b>4,622,600</b>	87358.04	6472	0.0189	<b>NORM</b>
Alberni-Clayoquot	31,548	497.39	30	0.0158	low
Bulkley-Nechako	39,319	548.47	32	0.0139	lower
Capital	376,422	8815.71	894	0.0234	highest
Cariboo	65,759	842.9	63	0.0128	lower
Central Kootenay	60,896	950.69	77	0.0156	low
Central Okanagan	188,501	3802.86	351	0.0202	high
Columbia-Shuswap	53,603	827.78	69	0.0154	low
Comox	65,052	1433.09	91	0.0220	high
Cowichan Valley	83,544	1630.6	133	0.0195	NORM
East Kootenay	60,457	769.87	55	0.0127	lower
Fraser Valley	288,819	5652.41	482	0.0196	norm
Fraser-Fort George	97,449	1031.55	76	0.0106	low
Kitimat-Stikine	40,300	305.7	31	0.0076	<b>lowest</b>
Kootenay-Boundary	31,887	395.11	33	0.0124	low
Metro Vancouver	2,443,744	45493.55	2985	0.0186	NORM
Mount Waddington	11,776	247.74	6	0.0210	high
Nanaimo	151,508	4411.13	411	0.0291	high
North Okanagan	83,319	1427.88	109	0.0171	NORM
Northern Rockies	6,388	114.9	3	0.0180	NORM
Okanagan-Similkameen	82,908	1483.28	113	0.0179	NORM
Peace River	66,167	1810.8	53	0.0274	high
Powell River	20,550	659.62	18	0.0321	<b>highest</b>
Skeena-Queen Charlotte	19,375	289.67	15	0.0150	low
Squamish-Lillooet	42,425	404.11	37	0.0095	lowest
Sunshine Coast	33,811	401.38	16	0.0119	low
Strathcona	44,589	489.62	34	0.0110	low
Thompson-Nicola	132,457	2620.23	255	0.0198	norm

## 7. SUMMARY OF DEPOSITS, REFUNDS, REVENUES AND EXPENDITURES

n/a

**Reference:** Recycling Regulation – Part 2, Section 8(2)

## 8. PLAN PERFORMANCE

In 2012, HPSA started to operate under its 2012-2017 Stewardship Plan while we are awaited approval. HPSA set several new performance measures and targets and is reporting against these new.


Plan Target	2012 Results	Remediation Strategies
7. Promote program through advertising and 2 special events.	Achieved see details under section <a href="#">2.d</a>	
8. Contact existing pharmacies with ownership and/or manager changes on a quarterly basis Contact pharmacies with a significant change in collection pattern. Contact new licensed community pharmacies from licensed sites on the College of pharmacists in B.C. on a quarterly basis.	Achieved and maintained participation rate above 95%.	
9. Continue to work with members and participating pharmacies to organize special collection events and publicize program. Promotion of program in different media.	Achieved see details under <a href="#">section 2</a>	
10. PCPSA maintains (and will continue to maintain) a website to locate collection sites and provide additional information of the program Maintain contact with waste coordinators in regional districts/municipalities with promotional material and key messages for their websites/information booth.	Achieved	Part B was partial done, some regional district were provided with promotional material however we had planned to do a more targeted campaign to get our promotional material posted on website of available in print form. Will secure resources to achieve in 2013.

Plan Target	2012 Results	Remediation Strategies
11. Draft and approve the BC Stewards waste audit proposal	Achieved	

## Appendix 1 Website links

<b>Regional Districts</b>	<b>Website</b>	<b>Annual Calendars</b>	<b>Link to HPSA</b>
Alberni - Clayoquot	yes		yes
Bulkley - Nechako	yes		yes
Capital	yes		yes
Cariboo	yes		yes
Central Kootenay	yes		yes
Central Okanagan	yes	yes	yes
Columbia Shuswap	yes		yes
Comox-Strathcona	yes		yes
Cowichan Valley	yes		
East Kootenay		Invermere	
Fraser - Fort George	yes		yes
Fraser Valley	yes	Mission, Chilliwack	yes
Metro Vancouver	yes		yes
Central Coast			
Kitimat - Stikine	yes		yes
Kootenay Boundary		yes	
Mount Waddington			yes
Nanaimo	yes		yes
North Okanagan	Partial		
Northern Rockies		yes	
Okanagan - Similkameen	yes	Penticton	yes
Peace River	yes	yes	yes
Powell River		yes	yes
Skeena-Queen Charlotte			
Squamish-Lillooet			
Strathcona			yes
Sunshine Coast	yes		yes
Thompson-Nicola		yes	

## Appendix 2 Regional District Summary Report

			HPSA		District Summary Report		2012				
											
	Q1		Q2		Q3		Q4		Total		
District	Kg	Pails	Kg	Pails	Kg	Pails	Kg	Pails	Kg	Pails	
Alberni-Clayoquot	94.82	5	149.76	8	156.1	8	96.71	9	497.39	30	
Bulkley-Nechako	134.98	8	80.98	3	141.9	8	190.61	13	548.47	32	
Capital	1204.2	207	2433.25	216	2535.95	229	2642.31	242	8815.71	894	
Cariboo	205.53	14	209.15	16	240.6	19	187.62	14	842.9	63	
Central Kootenay	190.83	17	301.52	24	175.4	15	282.94	21	950.69	77	
Central Okanagan	905.71	88	938.54	88	1052.48	93	906.13	82	3802.86	351	
Columbia-Shuswap	192.63	15	267.34	15	187.11	20	180.7	19	827.78	69	
Comox Valley	209.7	15	348.85	21	283.22	21	591.32	34	1433.09	91	
Cowichan Valley	342.9	29	407.2	31	420.55	36	459.95	37	1630.6	133	
East Kootenay	310.98	20	85.69	7	70.5	6	302.7	22	769.87	55	
Fraser Valley	1232.77	98	1380.43	116	1326.7	115	1712.51	153	5652.41	482	
Fraser-Fort George	249.68	15	299.77	21	268.8	22	213.3	17	1031.55	75	
Kitimat-Stikine	62.8	5	82.5	11	38.3	3	122.1	13	305.7	32	
Kootenay Boundary	82.24	6	116.97	10	93.4	8	102.5	9	395.11	33	
Metro Vancouver	18915.1	680	7462.29	695	9769.23	828	9346.93	782	45493.55	2985	
Mount Waddington	0	0	0	0	247.74	6	0	0	247.74	6	
Nanaimo	1083.97	114	1162.61	106	1042.02	99	1122.53	92	4411.13	411	
North Okanagan	323.44	26	351.89	30	327.6	24	424.95	29	1427.88	109	
Northern Rockies Rd	64.9	2	50	1	0	0	0	0	114.9	3	
Okanagan-Similkameen	303.82	25	348.61	26	358.13	29	472.72	33	1483.28	113	
Peace River	333.9	21	553	11	294.3	8	629.6	13	1810.8	53	
Powell River	170.5	5	209.42	6	59.6	2	220.1	5	659.62	18	
Sheena-Queen Charlotte	120.67	5	62	3	64.1	4	42.9	3	289.67	15	
Squamish-Lillooet	109.82	9	42.89	4	104	10	147.4	14	404.11	37	
Strathcona	95.25	8	184.15	13	113.3	7	96.92	6	489.62	34	
Sunshine Coast	62.68	3	78.7	3	175	7	85	3	401.38	16	
Thompson-Nicola	693.5	63	710.01	68	693.41	69	523.31	55	2620.23	255	
Totals	27697.32	1503	18317.52	1553	20239.44	1696	21103.76	1720	87358.04	6472	

## Appendix 3 Third Party Independent Report for Non-Financial Information



### INDEPENDENT AUDITOR'S REPORT TO Post-Consumer Pharmaceutical Stewardship Association

We have audited the following Sections within Post-Consumer Pharmaceutical Stewardship Association's (the "Stewardship Agency") Annual Report for the year ended December 31, 2012 (together the "Subject Matter"):

- Section #1 *collection facilities*;
- Section #2 *Product collected (products are not sold)*

The objective of this Report is to disclose how the Stewardship Agency's management has discharged its responsibility to report on the Subject Matter in accordance with Sections 8(2)(b), (d) and (e) of the Recycling Regulation.

The Subject Matter is the responsibility of the Stewardship Agency's management who has prepared the Subject Matter in accordance with the evaluation criteria which are an integral part of the Subject Matter. Our responsibility is to express an opinion on this Subject Matter based on our audit. Our audit does not constitute a legal determination on the Stewardship Agency's compliance with the Recycling Regulation.

### EVALUATION CRITERIA

The suitability of the evaluation criteria is the responsibility of management. The evaluation criteria presented in Attachment 1 are an integral part of the Subject Matter and address the relevance, completeness, reliability, neutrality and understandability of the Subject Matter.

### SCOPE OF THE AUDIT

We carried out our audit in accordance with the International Standard on Assurance Engagements 3000 (ISAE 3000) published by the International Federation of Accountants. This Standard requires, amongst others, that the assurance team possesses the specific knowledge, skills and professional competencies needed to understand and audit the information included within the Subject Matter, and that they comply with specific requirements to ensure their independence.

An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the Subject Matter. An audit also includes assessing the evaluation criteria used and significant estimates made by management, as well as evaluation overall presentation of the Subject Matter. The main elements of our work are presented in Attachment 1.

**OPINION**

In our opinion, the Subject Matter within the Stewardship Agency's Annual Report for Report for the year ended December 31, 2012 presents fairly in accordance with the evaluation criteria, in all material respects:

- the location of collection facilities, and any changes in the number and location of collection facilities from the previous report in accordance with Section 8(2)(b) of the Recycling Regulation;
- the description of how total amounts of the producer's product collected has been calculated in accordance with Section 8(2)(e).

Our report has been prepared solely for the purposes of management's stewardship under the Recycling Regulation and is not intended to be and should not be used for any other purpose. Our duties in relation to this report are owed solely to the Corporation, and accordingly, we do not accept any responsibility for loss occasioned to any other party acting or refraining from acting based on this report.

OHCD LLP

**OUSELEY HANVEY CLIPSHAM DEEP LLP**  
Licensed Public Accountants

Ottawa, Ontario  
June 27, 2013

**Attachment 1 to  
the Auditor's  
Report Evaluation  
Criteria**

The following evaluation criteria were applied to the assessment of the location of collection facilities, and any changes in the number and location of collection facilities from the previous report in accordance with Section 8(2)(b) of the Recycling Regulation

1. We obtained a list of all of the Collection Facilities from the Association as at December 31, 2012.
2. The listing stated 1098 facilities, matching the number in the 2012 annual report.
3. We randomly selected 30 Collection Facilities in accordance with the Sample Size General Guidance suggested. Registration forms were not available for most of the locations. This is because as of January 1, 2012 the Association began using a new company to manage the program. Any forms would be with the old company, and could not be retrieved. Management indicated that starting in 2012, there were registration forms filled out and retained for new registrants. They will not go back and get old registrants to sign a new form. Newer locations tested did have forms. We called each facility and verified the existence by confirming the address of the facility. We asked each facility to acknowledge the existence of the Medication Returns Program pails at the location, with no exceptions.
4. To test the completeness of the list, we randomly selected 30 registration forms in accordance with the Sample Size General Guidance suggested. We ensured that the pharmacies listed on these registration forms were on the clients listing and the information on their listing was accurate.
5. We obtained the historical data for the total number of Collection Facilities for the past 3 years as reported by the Association in the annual reports: (2012 – 1098 2011 – 1033; 2010 – 1022). The fluctuation in number of collection facilities for 2012 is due to addition of 164 collection facilities and 61 sites ceasing to operate for the year ending December 31, 2012. Comfort over the fluctuation was obtained through our testing procedures #3 and 4.

**Attachment 1 to  
the Auditor's  
Report Evaluation  
Criteria (ctd)**

The following evaluation criteria were applied to the assessment of the description of how total amounts of the producer's product sold and collected and, if applicable, the producer's recovery rate has been calculated in accordance with Section 8(2)(e); and,

1. All of the product is collected by one company, Stericycle.
2. We obtained their monthly invoices, which contain a breakdown of the total product collected by weight. The report is broken down by dates and locations
3. All of the product is sent for incineration. Nothing is recovered or sold.
4. We obtained the quarterly Certificates of Destruction provided by Stericycle. We agreed this to the monthly invoices, and investigated and variances.
5. We totaled the Certificates of Destruction for the year, and agreed this to the total in the annual report.