



**HEALTH PRODUCTS**  
STEWARDSHIP ASSOCIATION  
ASSOCIATION POUR  
LA RÉCUPÉRATION DE  
**PRODUITS SANTÉ**

330 – 2255 St. Laurent Blvd.  
Ottawa, Ontario | K1G 4K3

September 25, 2019

Ministry of Environment and Climate Change Strategy  
Recycling Regulation Amendments  
PO Box 9341 Stn Pro Govt  
Victoria, BC V8W 9M1

### **Re: Plastic Action Plan Consultation Paper**

Health Products Stewardship Association (HPSA) is the Producer Responsibility Organization (PRO) that administers programs for the collection at retail pharmacies, transportation and secure destruction of unused and expired post-consumer pharmaceuticals. HPSA is a federal not-for-profit corporation with an industry board consisting of producers of health products including prescriptions and non-prescription drugs, natural health products and medical devices such as syringes and needles. HPSA administers the following regulated extended producer responsibility (EPR) programs in Canada:

- British Columbia Medication Return Program
- Manitoba Medications Return Program
- Ontario Medication Return Program
- Ontario Sharps Collection Program
- Island Medications Return Program
- Island Sharps Collection Program

In British Columbia the British Columbia Medications Program (BCMRP) was established in 1997. HPSA administers the BCMRP to ensure compliance for Producer members (160) with BC Regulation 449/2004 “Recycling Regulation”.

HPSA appreciate the opportunity to provide feedback on new policy opportunities and proposed amendments to the Recycling Regulation of the Environmental Management Act to address plastic waste.

HPSA supports the approach in principle and provides the following comments to assist in the drafting of the above-mentioned initiatives.



[www.healthsteward.ca](http://www.healthsteward.ca)

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## **Ban on Single-Use Packaging**

*If a ban was applied, how should exemptions be considered?*

HPSA fully supports the BC Government's position that "exemption to the ban are often required where no viable alternative is found, or to ensure that the essential safety, health and wellness of all individual is maintained (emphasis added)" (pg. 6 of the Consultation Paper).

HPSA is of the view that any single-used items or packaging-like products used in the medical and healthcare industry be exempted from any plastic ban considered by the BC government. The rigorous compliance requirements such as the maintenance of the product's protection or sterile integrity surrounding those items have been deemed crucial in the protection of the health and safety of patients and health-care workers and any plastic ban on those items would undermine the overall safety of the public.

*Are there bans best suited for implementation at the federal, provincial or local government level?*

As packaging requirements for prescription drugs, non-prescription drugs and natural health products are already regulated at the federal level by Health Canada. HPSA recommends seeking endorsement by Health Canada regarding any proposed changes on plastic packaging, bans for single-used plastics for products used in the medical and/or healthcare industry. At a minimum, any changes would have to be discussed and deemed acceptable at the federal level before proceeding with any changes affecting health products covered under HPSA stewardship programs.

HPSA is thanking the BC Government for the opportunity to participate in the consultation process and is looking forward to continuing discussions.

Sincerely,

A handwritten signature in blue ink that reads "Ginette Vanasse". The signature is written in a cursive style and is positioned above a faint, light-colored rectangular stamp or watermark.

Ginette Vanasse  
Director General