



HEALTH PRODUCTS
STEWARDSHIP ASSOCIATION

New Brunswick Pharmaceuticals and Sharps Stewardship Plan

Submitted to:

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Terms and Definitions

Brand holder	A person who owns or licences a brand or who otherwise has rights to market a product under that brand.
Collection Location	A location, typically a retail pharmacy, registered with HPSA to collect the pharmaceutical product and medical sharp waste returned by consumers. Referred to as "return facility" in the Regulation.
Commercial waste agreement	An agreement with a waste management service provider to manage Industrial, Commercial, or Institutional (IC&I) waste (e.g., a commercial waste agreement to manage medical sharp wastes from immunization/flu shots, COVID-19 vaccines)
Consumer	A person who uses a pharmaceutical product or medical sharp for their own purpose or that of their companion animal, and not for the purpose of resale.
Cytotoxic waste	Waste containing substances with genotoxic properties (e.g., waste containing cytostatic drugs – often used in cancer therapy; genotoxic chemicals)
Material type	For this Stewardship Plan, two types of materials are defined: <ul style="list-style-type: none"> - Material type 1: Pharmaceutical waste (which include prescription drugs, over-the-counter drugs and natural health products waste) - Material type 2: Sharp waste.
Medical Sharp	A needle, safety-engineered needle, lancet or other similar instrument designed for medical purposes to puncture the skin of a consumer or their companion animal and includes anything affixed to the medical sharp, including a syringe. Also referred to as "sharp" in this document.
Permanent establishment	A permanent establishment as defined in the following provisions of the Income Tax Regulations (Canada): (a) in the case of a corporation, subsection 400(2); and (b) in the case of an individual, subsection 2600(2).
Pharmaceutical Product	A drug as defined in section 2 of the Food and Drugs Act (Canada) and a natural health product as defined in subsection 1(1) of the Natural Health Products Regulations made under that Act, but does not include: (a) a food as defined in section 2 of the Food and Drugs Act (Canada), (b) a cosmetic as defined in section 2 of the Food and Drugs Act (Canada), (c) a drug that is a radiopharmaceutical as defined in Part C of the Food and Drug Regulations made under the Food and Drugs Act (Canada) (d) a drug for veterinary use except for a drug for veterinary use in a consumer's companion animal, (e) a topical substance that does not contain an antibiotic, antifungal or analgesic, or (f) a drug that is represented as being solely for use as a disinfectant on hard non-porous surfaces. Also referred to as 'pharmaceutical' and 'medication' in this document.
Producer	A producer of a designated material, being one of the following persons: (a) the brand holder of the designated material if the brand holder has a permanent establishment in Canada;

	<p>(b) in the absence of a person referred to in paragraph (a), the importer of the designated material into New Brunswick if the importer has a permanent establishment in New Brunswick; or</p> <p>(c) in the absence of a person referred to in paragraph (a) or (b), the retailer of the designated material that supplies the designated material to the consumer.</p> <p>When a retailer sells pharmaceutical products or medical sharps by means of a physical or electronic marketplace that is owned, controlled or operated by a marketplace facilitator, the marketplace facilitator shall be deemed to be the retailer.</p>
Retailer	A person who sells or offers for sale, to a consumer in the province, pharmaceutical products or medical sharps.

Acronyms

- CL: Collection Location
- DIN: Drug Identification Number
- DIN-HM: Homeopathic Medicine Number
- EPR: Extended Producer Responsibility
- HPSA: Health Products Stewardship Association
- IC&I: Industrial, Commercial, and Institutional
- NB: New Brunswick
- NBPA: New Brunswick Pharmacists' Association
- NBPSP: New Brunswick Pharmaceuticals and Sharps Program
- NHP: Natural Health Product
- NPN: Natural Product Number
- OTC: Over The Counter drug
- PRO: Producer Responsibility Organization
- RFP: Request For Proposal
- RNB: Recycle New Brunswick
- RX: Prescription drug

Introduction

Health Products Stewardship Association (**HPSA**) is a federally incorporated, not-for-profit Producer Responsibility Organization (PRO) formed over twenty-five (25) years ago in response to Extended Producer Responsibility (EPR) regulations pertaining to pharmaceutical products (**pharmaceuticals**) and medical sharps (**sharps**).

HPSA currently operates eleven (11) programs in six (6) provinces where EPR regulations exist. The knowledge and network built over the years have helped educate Canadians about pharmaceutical product and medical sharp waste, proper storage at home, safe return and end-of-life management.

HPSA operates under the general principles of:

- **Harmonization:** harmonization with other jurisdictions where programs already exist to create efficiencies in program management and deliveries.
- **No-cross subsidization:** costs of a program shall only be charged to the Brand holders selling the specific product in the specific province.
- **Level-playing field:** costs associated with the program shall be charged based on the Brand holder's market share in the program.

HPSA's recruiting strategy is to approach Brand Holders first (i.e., companies that are registered as holder of DIN/NHP on Health Canada database). A subsequent analysis is undertaken in order to ensure that the appropriate obligated party has been identified in order to avoid double reporting (e.g., private label brand/products).

HPSA was designated as an agent per section 50.74 of New Brunswick (NB) Regulation 2022-73, amending NB Regulation 2008-54, by its members who were obligated as brand owners (under Reg 2008-54) in New Brunswick.

HPSA submitted an initial Stewardship Plan on behalf of its members that was approved on July 13, 2023 by the Recycle NB Board.

Following Regulation 2024-37 (referred to as '**the Regulation**' in the rest of the document), HPSA is submitting the New Brunswick Pharmaceuticals and Sharps Stewardship Plan on behalf of its members. The Plan details the New Brunswick Pharmaceuticals and Sharps Program (**NBPSP**) (**Program**) that manages two material categories:

- Material category 1: Pharmaceutical waste, which includes prescription drugs (**RX**), over-the-counter drugs (**OTC**) and natural health products (**NHP**) waste.
- Material category 2: Medical Sharp waste.

The list of HPSA members on whose behalf the plan is submitted is included in [Appendix A](#).

In compliance with the Regulation, the NBPSP shall provide all New Brunswick residents with province-wide access to collection locations (CLs).

The Plan criteria and requirements for the proposed Program under Regulation 2024-37 are outlined in [Appendix B](#).

Efforts shall be made by HPSA to educate obligated parties of their responsibility and to pursue compliance by its members (see page 8).



I. Program Management

The HPSA bilingual Programs Director, East, is responsible for all aspects of the Program, including:

- Relationship with Recycle New Brunswick (RNB).
- Relationship with stakeholders such as NBPA, municipalities, patient specific associations, other Collection Locations associations and other relevant stakeholders in the province.
- Establishment and maintenance of a Collection Location network for the Program in New Brunswick.
- Establishment and maintenance of an infrastructure for the delivery of clean supplies to the Collection Location network and transportation of waste collected from the Collection Location network to the final disposal facility.
- Bilingual promotion, education, and awareness campaigns for New Brunswick residents.

The HPSA Programs Director, East is supported by a Collection Location Engagement, Associate, who is a New Brunswick bilingual resident. HPSA shall be responsible for the strategic planning of the activities in New Brunswick, general financial operations, as well as overseeing the operational aspect of the Program delivery when harmonization with other provinces leads to cost efficiencies. The bilingual Programs Director is a member of the executive management team of HPSA.

Recycle New Brunswick (RNB) Advisory Committee

HPSA is working cooperatively with RNB in maintaining a relevant list of stakeholders for the RNB-led Industry Advisory Committee meetings.

As of 2025, the current stakeholders of the Advisory Committee are:

- HPSA: Alain Renard
- Stericycle: Yannick Lauzon
- Pharmacists (NBPA): Anne Marie Picone
- Regional Service Commissions: Sebastian Hultberg
- Brand owner (under Reg 2008-54) (IVC Vita Health Products): George Alevizo
- FHCP: Michelle Saunders
- Retailers (RCC): Jim Cormier
- Department of Health: Erica Craig
- Department of Environment and Local Government: Mark Miller.

II. Program Funding and audits

NBPSP shall be fully funded by HPSA members selling RX, OTC and NHP and medical sharps in New Brunswick based on the obligated parties' program share of sales into the province.

The fees charged to HPSA members shall reflect the true cost of managing each material type designated by the Regulation. The fees provide sustainable funding for collection, transportation, storage, and processing/disposal (including recovery of energy, where possible, and disposal), communications and public awareness campaign, compliance/administration, and relevant audits.

To ensure long-term sustainability, HPSA has established a contingency reserve policy for all of its Programs. The contingency reserve shall not equal more than twelve (12) months of operating costs.

As per the regulation, the effectiveness of HPSA's stewardship plan shall be assessed against the performance measures and the targets that were approved or imposed by the stewardship board.

In line with HPSA general principles, there is no cross-subsidization between material types operational and financial distinct management features.

HPSA operates a "return to retail" approach whereby the public returns unwanted pharmaceutical products and used medical sharp to pharmacies ("Collection Locations"). Collection Locations' participation in the HPSA network is voluntary. While HPSA considered the possibility of alternate Collection Locations in its previous plan, Health Canada requirements with regards to the management of post-consumer medications returns (as per Guidance Document: Handling and destruction of post-consumer returns containing controlled substances (CS-GD-021)¹) which may contain controlled substances limits options for alternative collection locations.

The Regulation requires that Producers register directly with Recycle New Brunswick. As the designated agent for Producers, HPSA shall continue to communicate with obligated parties not yet HPSA members and its members to educate them of their responsibility. In the event of noncompliance by obligated parties who are not members of HPSA, files will be referred to Recycle NB only after efforts have been made by HPSA to bring them into compliance and a detailed summary will detail those efforts made by HPSA.

¹ <https://www.canada.ca/en/health-canada/services/health-concerns/controlled-substances-precursor-chemicals/controlled-substances/compliance-monitoring/compliance-monitoring-controlled-substances/post-consumer-returns.html>

III. Program Products

A. Definitions

The products covered by the Program are defined in the Regulation and are referenced below:

Pharmaceuticals (RX, OTC and NHP) Category

"A drug as defined in section 2 of the Food and Drugs Act (Canada) and a natural health product as defined in subsection 1(1) of the Natural Health Products Regulations made under that Act,".

The pharmaceuticals category shall generally include:

- Any pharmaceutical product approved by Health Canada, with a Drug Identification Number (DIN) and sold in New Brunswick (RX or OTC).
- Any natural health product (NHP) approved by Health Canada, with a Natural Product Number (NPN) or Homeopathic Medicine Number (DIN-HM) and sold in New Brunswick.

NOT included in the pharmaceuticals category are:

- a food as defined in section 2 of the *Food and Drugs Act* (Canada).
- a cosmetic as defined in section 2 of the *Food and Drugs Act* (Canada).
- a drug that is a radiopharmaceutical as defined in Part C of the *Food and Drug Regulations* made under the *Food and Drugs Act* (Canada).
- a drug for veterinary use except for a drug for veterinary use in a consumer's companion animal.
- a topical substance that does not contain an antibiotic, antifungal or analgesic; or
- a drug that is represented as being solely for use as a disinfectant on hard non-porous surfaces.

No pharmaceutical product intended for industrial, commercial, or institutional (IC&I) use, and its waste, shall be included in the Program. In other words, any pharmaceutical product used/administered by a health care practitioner or that is expired in a pharmacy (unserviceable stock) shall remain under the proper collection and disposal procedures of a commercial waste agreement.

Sharps Category

"A needle, safety engineered needle, lancet or other similar instrument that is designed, for medical purposes, to puncture the skin of a consumer or their companion animal and includes anything affixed to the medical sharp, including a syringe."

Examples of products that are included in the sharps category are (list not exhaustive):

- Infusion sets and infusion pods.
- Lancets.
- Pen tips/needles.
- Needles.
- Syringes.
- Prefilled cartridges.
- Pen injectors and autoinjectors.

- Continuous Glucose Monitoring (CGM) devices
- Other medical sharps not included in the previous subcategories.

No medical sharp product intended for industrial, commercial, or institutional (IC&I) use, and its waste, shall be included in the Program. In other words, any sharp used in the context of an immunization campaign and/or administered by a health care practitioner (e.g., flu/influenza, COVID) shall remain under the proper collection and disposal procedures of a commercial waste agreement.

B. Description of Material Categories

Regulatory requirement:

39(b) a description of categories of material to be used for the purposes of annual reports and performance measures and targets;

As detailed in the section below, the collection of pharmaceutical and sharp waste shall be done using separate containers for each type of waste (RX, OTC and NHP waste – material category 1, and medical sharp waste – material category 2). Several federal and provincial acts, regulations and guidelines dictate the storage, transport, consolidation and disposal of these wastes.

Material category 1: RX, OTC and NHP waste

Health Canada Guidance Document: Handling and destruction of post-consumer returns containing controlled substances (CS-GD-021)² states that “*Effective April 1, 2018, Health Canada no longer requires that pharmacists record the name of the drug product, strength and quantity for post-consumer returns. Consequently, there is no requirement to separate post-consumer returned controlled drugs and substances from other post-consumer returned prescription or non-prescription medications.*”

As a consequence, the material category 1 consists of the bulk of prescription drugs, other-the-counter drugs and natural health products brought back comingled by the consumers, which may contain opioids and controlled drugs and substances.

Material category 2: sharp waste

Unused or used sharps that may have been in contact with blood or with a biological liquid or tissue. Due to the possibility of the use of the sharps to administer cytotoxic drugs, the sharp waste may be labelled as cytotoxic.

Disposal of the above-mentioned waste is as follows:

- Pharmaceutical waste and cytotoxic sharp waste are being incinerated at high temperature.
- Non-cytotoxic sharp waste is being sterilized (e.g. autoclaved) and landfilled.

For performance measures and targets and annual reporting purposes, there shall be two material types as described above:

- Material category 1: RX, OTC and NHP waste.
- Material category 2: (cytotoxic and non-cytotoxic) medical sharp waste.

² <https://www.canada.ca/en/health-canada/services/health-concerns/controlled-substances-precursor-chemicals/controlled-substances/compliance-monitoring/compliance-monitoring-controlled-substances/post-consumer-returns.html>

IV. Plan Details

A. Collection and processing systems prior to program launch

Regulatory Requirement:

39(g) a description of the manner in which existing collection and processing systems have been taken into account to maximize waste diversion in the Province;

Prior to HPSA starting the program in New Brunswick, pharmacies, on a voluntary basis, were collecting post-consumer returns and mixing this waste with their commercial waste for elimination through an agreement with a service provider. This situation was considered in the development of the program through an in-depth and ongoing collaboration with the New Brunswick Pharmacists' Association (NBPA) to ensure the training of pharmacists to the new program and their participation in it.

Regional Service Commissions (RSCs) were also contacted to raise awareness of the program, and any information relevant to waste management in their RSC has been analysed by HPSA. HPSA provided to RSCs recommendations on unwanted medications and used medical sharps proper handling by consumers to be displayed on RSCs' webpages.

Southeast Eco360 is a centre that receives recyclable waste from several RSCs for sorting. Unused medications and used medical sharps are found as contaminants in their sorting operations. Prior to the implementation of the HPSA program, Eco360 also used to accept unwanted medications and used medical sharps. Eco360 used to contract a service provider for the disposal of these wastes.

Since the program inception, HPSA has engaged with Eco360 as follows:

- HPSA provided the direction that no unused medications and used medical sharps shall be received at the Eco360 site. Eco360 should direct the consumers to a registered HPSA Collection Location. On a temporary basis, Eco360 would distribute sharps containers provided by HPSA to consumers.
- HPSA provided supplies so contamination sorted at Eco360 would be put in HPSA containers.
- HPSA compensated Eco360 costs for 2024 and is working towards collecting directly under its program this waste ('contamination').
- HPSA is developing an R&D program to identify the geographical source of the contamination to target communication efforts. HPSA also aims at monitoring the desired reduction of the contamination rate, as communication efforts are done in the province on the proper management of unused medications and used medical sharps.

As of the day of the writing of the Plan, no other RSC wished to receive the support of HPSA to manage unused medications and used medical sharps beyond adding information guidance on their webpage.

B. Introducing considerations, performance & targets and commitments

Regulatory requirement:

39(a) information on the storage, collection, transportation, recycling, processing, disposal and other handling of designated material waste, including the designated material waste of other producers;

The information required in section 39(a) of the Regulations are presented throughout sections C. Collection System to F. Processing/Disposal.

Any “Orphan” and “Free Rider” products are accepted. “Orphan” products are products produced by a Producer that either no longer exists or no longer produces such products. “Free Rider” products are products imported or distributed by an obligated Producer that is not a registered member of HPSA. “Unregistered Producers” will be identified via the monitoring of products sold in the province and will be approached for getting into compliance.

Table 1: List of Performance Measures and Targets

Title	Description	Baseline	Target	Target due date	Timeline for reporting	Notes
Collected weights (temporary)	Quantities of unused pharmaceuticals (cat. 1 material) and used medical sharps (cat. 2 material) collected in HPSA collection network	2025 quantities	1% annual increase	End of each year	Progress to be reported in annual reports	This temporary performance measure is proposed as an interim measure before the recovery rate (sharps) – end 2027 - and capture rate (pharmaceuticals and sharps) – end 2029 – performance measures (mentioned in Section VI.) are implemented.
Reduction in curbside recycling	Pharmaceuticals and Sharps quantities (in kg) retrieved at sorting centres and depot centres. Pilot ECO360, to be extended to other centres.	1,040 kg in 2024 at ECO360 915 kg cat. 1 material 125 kg cat. 2 material	7% annual reduction for each materials category	31-Dec-26	To be reported in annual reports	Yearly quantities in other centres to be retrieved and presented by end 2026, and same annual reduction rates from 2027 onwards. For clarity, for ECO360, the target, by December 31, 2026 are: - for category 1 material: 791 kg - for category 2 material: 108 kg
Collection Location Participation Rate	Ratio of number of pharmacies registered in HPSA Program / Total number of licensed community pharmacies in NB (College data of end of previous year)	91%	92%	End 2026, End of each year	Progress to be reported in annual reports	For clarity: 92% end 2026 and then maintain 92%. To be reported on a yearly basis.
Collection Location Accessibility	Percentage of population within a certain (to be determined) driving time from an HPSA collection location. Examples of time (from other province, to be	To be determined.	Provide baseline in 2025 annual report. Target: accessibility within set driving time:	31-Dec-26	To be reported in 2026 annual report	To be reported on a yearly basis.

	adapted to NB specific context): 30 mins in urban area / 45 mins (60km) in rural area.		- 90% in urban area - 85% in rural area.			
Consumer awareness of Collection Location network	Response rate of the HPSA-funded survey on knowledge of collection location, for sharps and medications users respectively. Every other year (odd years): survey limited to two questions only for consumer awareness performance reporting purpose.	2024 survey results: Pharmaceuticals: 53% Sharps: 71%	2% annual growth (not consolidated) by 2030: Pharmaceuticals: 63% Sharps: 81%	Yearly and by 31-Dec-2029	To be reported in annual reports	For those that usually have pharmaceuticals and medical sharps, respectively, positive response rate to HPSA every other year survey question "Do you know where to take the following to be safely collected? That is, are you aware of places that will take them and safely dispose of them if they are expired or unwanted and you want to get rid of them?".

Table 1: List of regulatory commitments

Theme	Description	Timeline
Promotion and Education	<ul style="list-style-type: none"> o Submit an annual communications plan for each calendar year of the plan no later than November 30 of the preceding year. o Have on staff a bilingual person with residence in New Brunswick. o Submit educational and consumer materials to Recycle NB for review and written approval a minimum of 15 business days before their intended use. 	Now and ongoing
Waste processing	<ul style="list-style-type: none"> o Ensure that HPSA operational procedures 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. o Develop operating rules for the service provider(s) it contracts, that will list applicable critical Canadian and New Brunswick legislation, as well as standards which must be complied with. HPSA will audit the service provider(s) against these operating rules once every three year, with the first audit to be completed by end 2027. 	<ul style="list-style-type: none"> o Now and ongoing o Operating Rules available by end 2026, first audit complete by end 2027 (reported in 2027 annual report)
Redesign	Research the concept of ‘redesign’ for pharmaceuticals and medical sharps and provide the results in the 2025 annual report, and then on a yearly basis	First report in 2025 Annual report.
Emergency Reporting	Follow the Recycle NB Emergency Reporting Clause.	Now and ongoing

C. Collection System

Regulatory requirement:

39(c) information on the province-wide collection system to be used by the consumer, including return facilities, by category of material;

Performance measure and target:

HPSA commits to:

- having 87 % (by end 2025) of the licensed community pharmacies in New Brunswick, enrolled in the Program (participation rate).
- Perform a yearly province-wide accessibility study (accessibility). The first accessibility study will be reported in 2025 annual report and related targets submitted by end Q1 2026.

The list of participating pharmacies as collection locations, as of the date of the submission of this plan, is provided as Appendix C. This list is subject to change due to, among other reasons, possible changes as:

- change in ownership,
- closure or opening of a pharmacy,
- breach of collection agreement requirements.

1. Retail Pharmacies as main Collection Locations and alternate Collection Locations

Considering the specific nature of the pharmaceutical and sharp waste, the expertise gained from managing similar programs in other Canadian provinces, the use of community pharmacies as the most relevant Collection Locations was considered as the best way to maximize waste diversion (from disposal in households) in the province.

Pharmacies are a logical and safe system for the public to return pharmaceutical and sharp waste. Many have extended hours, offering a convenient place for consumer take-back year-round.

Before the collection of any pharmaceutical or sharp waste can begin, every Collection Location shall have an agreement (Collection Location Agreement) in place with HPSA regarding the collection and storage of pharmaceutical and sharp waste, meet Collection Location standards and have access to HPSA's Collection Location portal.

Below are some of the general terms and conditions applicable for a retail pharmacy to be registered as an HPSA Collection Location:

- In the case of retail pharmacies, Collection Locations shall have a valid provincial pharmacy license issued by the College of Pharmacists of New Brunswick.
- Proof of a valid commercial waste agreement (CWA) shall be submitted to HPSA, and commercial waste (e.g. unserviceable stock, flu shots campaigns sharp waste) shall be managed separately from HPSA program waste (including with regards to record keeping).
- A Collection Location shall provide the ability to drop off products during regular business hours and at no cost to consumers.
- A Collection Location shall display and promote public awareness through educational HPSA Program materials.

- A licensed pharmacist or pharmacy technician (key employees in community pharmacies) shall be present when a consumer drops off pharmaceutical and/or sharp waste.
- Pharmaceutical or sharp waste managed under an IC&I contract, from hospitals, institutions, doctor's offices, or pharmacy operations are not acceptable.
- Key employees working at the Collection Location shall be knowledgeable about the Program offered to consumers.
- Sharps Waste shall be segregated from pharmaceutical waste (no mixing of waste categories).
- Temporary storage duration of pharmaceutical waste and sharp waste respective containers at the Collection Location will depend on the mode of pick-up by the waste management service provider (scheduled vs. ad-hoc phone call).

Specific Instructions for the material category 1:

- Collection Locations shall be supplied with:
 - One one-way entry 'collection lid' that stays at the pharmacy to comply with Health Canada one-way entry container requirements.
 - one or more HPSA-labelled pharmaceuticals containers (60 L black container with a black transportation lid) at no cost.
- The HPSA-labelled pharmaceuticals container is to be placed behind the counter of a dispensary.
- There is no limitation on the quantity of pharmaceuticals that a consumer can drop off.
- Any consumer pharmaceutical waste returns shall be placed into the HPSA-labelled pharmaceuticals container.
- All secondary packaging (carton, paper and plastic bags without medications residue) should be preferably sorted at home by the consumer and recycled where facilities exist and are available in a particular region. Consumers will not be turned away if they have not sorted program materials from packaging correctly.
- HPSA will develop and implement a procedure for consumers bringing secondary packaging at the pharmacy. A pilot will be organized in 2026 to evaluate the feasibility of sorting at the pharmacy (with the provision by HPSA to pharmacists with HPSA bags so consumers can sort their materials at the time of drop off) and clear guidelines to consumers will be communicated by end 2026.
- For liquid, gel, and powder form pharmaceutical products that have residues in their original vials (primary packaging), they can be placed directly into the HPSA pharmaceuticals waste container.

Specific instructions for the material category 2:

- Collection Locations shall be supplied with HPSA-labelled sharps containers at no cost.
- Pharmacists or pharmacy technicians distribute HPSA-labelled sharps containers at no cost to any member of the public requesting one.
- Collection Locations should only accept sharp waste contained in a hard-shell container labelled with the biohazardous infectious materials pictogram, whether it is an HPSA-labelled sharps container or not.
- Sharps containers containing sharp waste from the administration of cytotoxic drugs shall be labelled with a cytotoxic label. Collection Location is being supplied cytotoxic labels at no cost on demand.
- Upon receiving sharps containers, pharmacists should ensure that the tops of the containers are locked and placed inside an HPSA-labelled return overpacking.

The voluntary participation of retail pharmacies and pharmacists is essential to the success of the Program. HPSA commits to working closely with New Brunswick Pharmacists' Association to support its pharmacists and staff to ensure continued participation and awareness of the Program.

2. Collection in Remote and Rural areas

Regulatory Requirement

39(e) information on service delivery to remote or rural areas;

HPSA shall pay particular attention to ensure remote and rural communities are adequately serviced by its Program. HPSA is aware of the key features of New Brunswick territory and population specificities, with, for example, islands with accessibility challenges.

As mentioned in introduction of this section, HPSA shall assess its Collection Locations network reach and accessibility to ensure that it meets the needs of all residents of New Brunswick. Similar to its approach developed in other provinces, HPSA shall map out its Collection Locations network and of that of the population density. Targets with regards to the reach of Collection Locations for urban areas and rural areas will be provided after the initial accessibility study is completed. HPSA shall undertake a yearly mapping exercise to map out accessibility in the province and identify service gaps. HPSA shall report on a yearly basis the accessibility improvements of remote and rural communities, together with action plans to improve the performance of the Program.

Depending on the results of the accessibility study, HPSA shall consider the opportunity to onboard alternate Collection Location in remote and indigenous communities (e.g. Community/Public Health Clinics), with a partnership approach to respond to communities' needs. HPSA considers organizing take-back day in rural areas with the presence of the police, a pharmacist or other health practitioner duly authorized to receive post-consumer returns that may contain controlled substances, with the transport organized by a licensed dealer.

3. Geographical Area for Collection

Regulatory Requirement

39(f) the geographic areas to be used for the purposes of the annual report;

For annual reporting purposes, HPSA shall be using the twelve (12) Regional Service Commission Regions:

#	Regional Service Commissions
1	Northwest Regional Service Commission
2	Restigouche Regional Service Commission
3	Chaleur Regional Service Commission
4	Peninsule Acadienne Regional Service Commission
5	Greater Miramichi Regional Service Commission
6	Kent Regional Service Commission
7	Southeast Regional Service Commission
8	Regional Service Commission 8
9	Fundy Regional Service Commission
10	Southwest New Brunswick Service Commission
11	Regional Service Commission 11
12	Western Valley Regional Service Commission

D. Transportation

As per HPSA's general service provider agreement, all requirements of federal, provincial and/or local rules and regulations such as the Canadian *Transportation of Dangerous Goods Act*, 1992 (S.C. 1992, c. 34) and New Brunswick's *Transportation of Dangerous Goods Act* (RSNB 2011, c 232)(CCSM c.D12) and associated regulations shall be adhered to by the waste management service provider(s) for the pick-up, transportation and storage of pharmaceutical and sharp waste collected under the HPSA Program.

Furthermore, for the pick-up and transportation of the pharmaceuticals waste, the company must be a licensed dealer (dealer's licence under Part G of the Food and Drug Regulations or under the Narcotic Control Regulations, obtained from Health Canada).

Any supporting documentation relating to the above is required during HPSA's Request for Proposal.

The current company hired by HPSA for transporting waste under the NBPSP is Stericycle Canada, 125 English Dr, Moncton, NB E1E 3X3.

E. Storage

Regulatory Requirement

39(d) the location of storage, recycling, processing, disposal and other handling facilities for designated materials;

There may be two “storage” steps considered in this Program:

- “Storage” at the Collection Location (i.e., at the retail pharmacy). The “storage” of wastes at Collection Locations shall be done using HPSA-labelled pharmaceuticals containers and medical sharps containers for material categories 1 and 2 waste respectively, under the responsibility of a health practitioner. Security is being required as per Health Canada Directive on Physical Security Requirements for opioids and controlled substances and described in the Collection Location Agreement. Storage duration at Collection Locations may vary depending on how quickly the pharmaceutical containers and medical sharps containers are filled up.
- “Storage” may be performed by the waste management service provider at a consolidation site, with relevant permits, where returns from several Collection Locations may be grouped. From experience, storage duration is low as the pharmaceuticals containers are emptied, washed and reintroduced into the market, and as medical sharps waste containers are transported for incineration (cytotoxic) or sterilization (non-cytotoxic) and landfill.

Storage permit requirements shall be always complied with.

Current consolidation site details: Stericycle Canada, 125 English Dr, Moncton, NB E1E 3X3.

F. Processing/Disposal

Regulatory Requirement

39(d) the location of storage, recycling, processing, disposal and other handling facilities for designated materials;

[...]

39(l) a management plan for designated material waste, by category of material, which shall provide for the implementation of environmental and human health and safety standards, which shall meet or exceed those provided by applicable law;

No existing processing facility in New Brunswick was identified for the two material categories at the start of the program. HPSA will endeavour to monitor changes in the offering of services to manage those wastes in New Brunswick. The waste is currently exported outside of the province for incineration or sterilization and landfill.

Pharmaceuticals are transported for incineration with waste-to-energy at Greenflow, 4151 Morris Dr, Burlington, ON L7L 5L5.

Cytotoxic sharps are transported for incineration at Stericycle , Inc., 95 Deerhurst Dr, Brampton, ON L6T 5R7. Ashes from incineration are landfilled at the same site, respectively.

Non-cytotoxic sharps are transported for sterilization (autoclave) at Stericycle Canada, 45 Wright Ave, Dartmouth, NS B3B 1G9. The sterilised material is then landfilled at GFL Landfill 1569 Walton Woods Rd Centre Burlington, NS B0N 1E0.

HPSA only partners with waste management service providers with proven track records of using established, approved, and verifiable procedures for the final treatment and processing of pharmaceutical and sharp waste in compliance with all applicable environmental regulations. Existing waste management service providers and their current processing systems for currently processed similar wastes shall be contacted to respond to the request for proposal.

The below descriptions of how material categories 1 and 2 shall be managed, for reference purpose, are excerpts from the World Health Organization Safe management of wastes from health-care activities, second edition handbook ('WHO handbook')³:

- Non-cytotoxic sharp waste shall be treated using a high-pressure steam sterilization process (typically a commercial autoclave), other sterilization process or high temperature incineration (preferably with waste-to-energy if such waste is permitted).

"A typical operation for an autoclave involves the following:

- **Waste collection:** *Infectious waste bags are placed in a metal cart or bin. The cart or bin should be lined with a plastic liner to prevent waste from sticking to the sides of the container.*
- **Pre-heating** *(for autoclaves with steam jackets): Steam is introduced into the outside jacket of the autoclave.*

³ World Health Organization. (2014). Safe management of wastes from health-care activities. 2nd edition. <https://apps.who.int/iris/rest/bitstreams/304722/retrieve>

- **Waste loading:** The metal cart or bin is loaded into the autoclave chamber. With every load, a colour-changing indicator is attached to the outer surface of the waste bag in the middle of the waste load to monitor treatment. The entry (or charging) door is closed, sealing the chamber.
- **Air evacuation:** Air is removed through gravity displacement, pre-vacuuming or pulse vacuuming.
- **Steam treatment:** Steam is introduced into the chamber until the required pressure or temperature is reached. Additional steam is automatically fed into the chamber to maintain the temperature and pressure for a set time. Pressure pulsing autoclaves vary the pressure according to a set process cycle.
- **Steam discharge:** Steam is vented from the chamber, usually through a condenser, to reduce the pressure and temperature. In some systems, a post-vacuum cycle is used to remove residual steam and to dry the waste.
- **Unloading:** Usually, additional time is provided to allow the waste to cool down further, after which the treated waste is removed and the indicator strip is checked. The process is repeated if the color change on the indicator shows that the treatment cycle was insufficient.
- **Documentation:** A written log is maintained to record the date, time and operator name; type and approximate amount of waste treated; and post-treatment confirmation results from any automated equipment recording or temperature–pressure monitoring indicator, such as the indicator strip.
- **Mechanical treatment:** If desired, the treated waste may be fed into a shredder or compactor before disposal in a landfill.”⁴

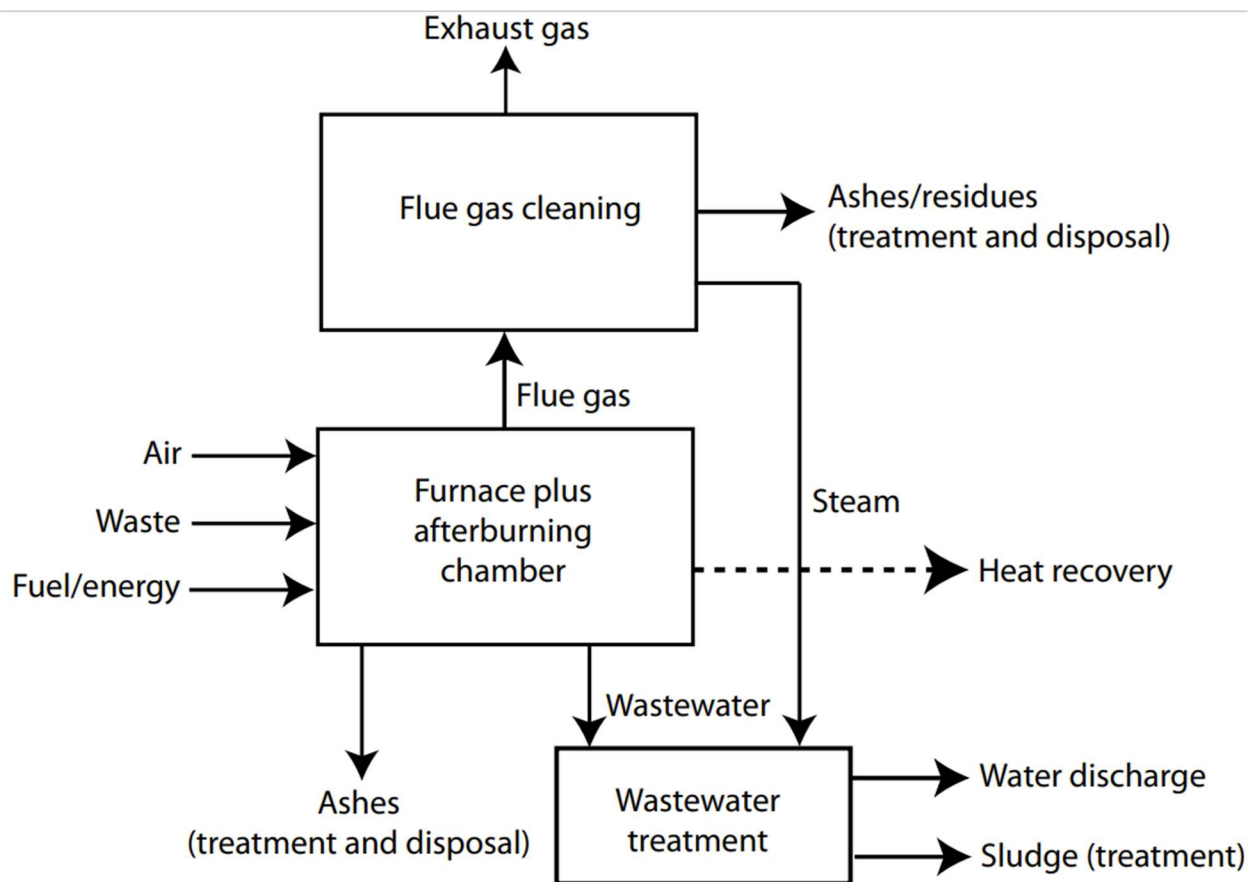
For non-cytotoxic sharp waste that has been rendered non-infectious through sterilization (classified as treated medical waste): if energy recovery is available and, compared to landfill, does not increase environmental impacts (supported by a full greenhouse gas assessment including the long term emissions from landfilling the waste and offsets from using energy recovery), it shall be the preferred management method over disposal in a landfill.

- RX, OTC and NHP waste and cytotoxic sharp waste shall be treated by high temperature incineration.

“Incinerators range from extremely sophisticated, high-temperature operating plants to very basic combustion units. All types of incinerators, if operated properly, should eliminate pathogens from waste and reduce waste to a small volume of ash. Incineration equipment should be chosen on the basis of the available resources and the local situation, balancing the public health benefits of pathogen elimination against the technical requirements needed to avoid the health impacts of air or groundwater pollution from the by-products of waste combustion.”⁵

⁴ Ibid, p.110

⁵ Ibid, p.119



Source: Adapted by Jorge Emmanuel from UNEP (2006)

Figure 8.3 Simplified flow scheme of the incineration process

Figure from the WHO handbook⁶.

- Pharmaceuticals (RX, OTC and NHP) are processed via a waste-to-energy facility.
- A waste-to-energy facility permitted (including security aspects of storage) to handle cytotoxic sharp waste, if available and not leading to an increase of the environmental impacts from a life-cycle perspective (supported by a full greenhouse gas assessment, including any offset from converting the waste-to-energy and what material or energy source the waste is displacing when used in waste-to-energy), shall be the preferred processing treatment method over standard incineration. HPSA will map in 2026 the waste-to-energy facilities permitted to receive HPSA wastes in all Canadian provinces. A full greenhouse gas life-cycle analysis (including any offset from converting the waste-to-energy and what material or energy source the waste is displacing when used in waste-to-energy) between the current treatment and the alternative treatment will be performed to confirm the best option, from an environmental perspective.

All effluents from any process (e.g. exhaust gas, ashes/residues, water discharge) shall meet regulatory requirements or thresholds prescribed in environmental permits of the facilities.

⁶ Ibid, p.117

Other treatment processes might be possible or under development (e.g., microwave treatment technologies). HPSA shall engage with stakeholders with regard to the opportunities to use such technologies in the future.



HPSA does not expect any long-term storage or containment for pharmaceutical and sharp waste. The final treatment and processing facility/facilities locations shall be established via contract with the waste management service provider(s) and shall be communicated in HPSA's annual report. HPSA intends to use existing facilities whenever this constitutes the best option based on the analysis of the responses to the RFP. Of note, the waste management service provider(s) may propose alternative disposal site(s) located outside of NB, as long as they meet all relevant regulatory requirements.



V. Promotion and Education

Regulatory requirement:

39(k) a communications plan to inform consumers about the stewardship plan, including
(i) information concerning reasonable and free access to a method of collection, and
(ii) a plan for education and awareness;

Regulatory requirements

HPSA commits:

- To submit an annual communications plan for each calendar year of the plan no later than November 30th of the preceding year.
- To have on staff a bilingual person with residence in New Brunswick.
- To submit educational and consumer materials to Recycle NB for review and written approval a minimum of 15 business days before their intended use.
- To conduct a biennial consumer awareness and behaviour survey (the consumer awareness percentage of the collection location network, in the baseline 2025 survey, were respectively 53% for pharmaceuticals and 71% for medical sharps).

HPSA's communication campaign objectives shall be to educate New Brunswick residents on the safe handling and return of the pharmaceutical and sharp waste and ensure environmental and health protection for everyone.

To measure the progress and ensure consumers are aware of the Program and safe disposal techniques, it is HPSA's intent to conduct a biennial consumer awareness and behaviour survey, with the next iteration in 2027. Based on the learnings from the survey, HPSA shall develop a tailored promotion and education plan to guarantee awareness increase and behaviour change.

A. Communication Methods

HPSA shall use various communication tools and approaches to raise awareness of proper disposal techniques of pharmaceutical and sharp waste.

An annual communications plan shall be submitted to RNB on or before November 30th of the preceding year.

Consumer Education

- HPSA shall develop social media content to educate New Brunswick residents on how and when to safely return their pharmaceutical and sharp waste. Social media content could include:
 - reminders of safe storage at home and return to Collection Locations;
 - mini campaigns to promote safe pharmaceutical and sharp waste return; as well as
 - reminders of the Collection Location map.
- HPSA shall develop a bank of educational content in various formats (step-by-step *how to dispose* of infographics, video instructions) that shall be shared with pharmacy banners, pharmacies, New

Brunswick Pharmacists' Association, and alternate Collection Locations to support consumer awareness and education building. Resources shall be available on HPSA's website.

- HPSA shall plan campaigns, such as data-based content, to get organic media coverage (earned media).
- HPSA shall use paid advertisements as a method of communication (e.g. billboards).

Program Accessibility

HPSA shall offer a Collection Location map on its website – a geo-localized map to find the closest Collection Location by submitting a postal code. HPSA shall collaborate with RNB to transmit relevant data so the Collection Location map can also be displayed on the RNB website.

Pharmacy and alternate Collection Location Education/Support

HPSA shall outfit community pharmacies and alternate Collection Locations with Program guides and consumer educational materials to increase the Program and consumer awareness and ensure consumers are well-informed on how to properly return their pharmaceutical and sharp waste.

B. Partnerships

HPSA shall partner with organizations interested in collaborating to promote health and safety of consumers holding pharmaceutical and sharp waste.

HPSA collaborates with:

- **New Brunswick Pharmacists' Association** – planning webinars and/or educational events for pharmacists with the purpose of familiarizing them with the Program guidelines.
- **Retailers** – pharmacy banners and community pharmacies.
- **Producer Responsibility Organizations managing other programs** – Leveraging opportunities to combine communication efforts with existing programs. A practical example has been the communication by Circular Materials in Saint John of the importance not to put used medical sharps in their containers, with a link to HPSA geolocator.
- **Municipalities' and RSCs' Partnerships** – HPSA worked with RSCs so the links from their webpage direct to the HPSA website. HPSA intends to engage municipalities to continuously improve communications towards the inhabitants of these municipalities.
- **Indigenous organizations** – Engagement with indigenous communities of New Brunswick to understand specific needs and provide relevant services.
- **Industry-Related Organizations** – HPSA shall partner with patient-specific associations (diabetes, arthritis) to increase the knowledge of pharmaceutical and sharp waste disposal.

VI. Environmental Impacts

A. Research & Development (R&D)

Regulatory requirement:

39(j) information on current and future research and development activities in the Province related to the management of the designated material;

No current research and development activities in New Brunswick were identified during the process of the NBPSP development.

HPSA shall discuss with the relevant stakeholders (including waste management service providers, universities) on possible future R&D activities in the province, aiming to reduce environmental impacts of the management of pharmaceutical and sharp waste. HPSA started R&D projects as following:

- Analysis of the market and existing processes for inhalers recycling.
- Monitoring Eco360 contamination rate and targeted communications measures, in partnership with Circular Materials (2025 as baseline year).
- Development of the methodologies to:
 - o calculate a collection rate for used medical sharps (methodology to be developed by end 2026; calculation of the collection rate, for sharps collected in 2026, by end 2027)
 - o determine the amount of material that is available to collect in households (methodology to be developed by end 2028; amount data to be provided by end 2029).

HPSA commits to analyse sharps waste post sterilization material recycling and inhalers recycling feasibility.

Upon provision of waste audits details (financials) by Recycle NB and corresponding budgeting by HPSA, HPSA commits to participate in a waste audit.

The medical sharp collection rate and the available to collect data will be used to calculate:

- a recovery rate (quantity collected / quantity placed on the market) performance measure for medical sharps
- a capture rate (quantity collected / quantity available in households) performance measure for pharmaceutical products and medical sharps.

B. Hierarchy

Regulatory Requirement:

39(h) a management plan for designated material waste, by category of material, according to the following order of preference:

- (i) reuse of the designated material;**
- (ii) recycling or composting of the designated material;**
- (iii) recovery of energy produced by the designated material; and**
- (iv) disposal of the designated material in accordance with the Act;**

Whenever possible, minimizing the generation of unwanted pharmaceutical and used medical sharp waste is the best practice to prevent the occurrence of risks from the waste. Pharmaceutical products shall thus be consumed adequately to avoid leftovers or expired drugs.

The Regulation prescribes the order of preference for the management of the designated materials as explicated by Section 39 (h). HPSA, with its members and partners (e.g. DASTRI in France) intends to explore better processing methods, while complying with regulatory requirements on managing pharmaceutical and sharp waste. HPSA intends to use recovery of energy when the incinerator allows it, otherwise it intends to use the disposal in compliance with the Act.

The description of activities, per order of preference of processing method, followed by the current methods per material categories, is as below:

(i) Reuse of the designated material

Due to the nature of the pharmaceuticals (consumables) and medical sharps (health and safety issue), reuse is not a possibility.

(ii) Recycling or composting of the designated material

No composting is planned as a management method, due to the nature of the materials.

Recycling:

R&D activities have started for the recycling of inhalers. Post-sterilisation medical sharp waste material will also be investigated as part of HPSA R&D projects for the recycling of plastics and metals.

(iii) Recovery of energy produced by the designated material

Accessibility of sites with recovery of energy is a challenge as they must be permitted to accept such waste and shall have the capacity for them. Where available and is preferable from an environmental perspective (justified by a full greenhouse gas assessment, including any offset from converting the waste-to-energy and what material or energy source the waste is displacing when used in waste-to-energy), it is a preferred management method compared to incineration. HPSA shall assess the feasibility of such management method by mapping the sites and performing an environmental impact comparison analysis (full greenhouse gas assessment).

(iv) Disposal of the designated material in compliance with the Act

Material Category 1: RX, OTC and NHP Waste

There is currently no reuse or recycling application for post-consumer pharmaceutical waste.

Processing Requirements:

- Post-consumer pharmaceutical waste collected shall be treated by high temperature incineration (regulatory requirement). Ashes from incineration shall be landfilled.

- To ensure safety, mitigate the risk of diversion and to maximize the efficiency of the thermal treatment process, pharmaceutical waste shall be contained in leak-resistant and diversion-resistant secondary packaging (i.e., plastic pharmaceutical waste liners).
- Waste-to-energy is the preferred treatment method for post-consumer pharmaceutical waste, as it enables the use of the calorific potential of the waste to generate power or heat (via steam).
- Processors shall be licensed by the appropriate provincial government authority and have a provincial registration number, where required. Processors that currently service pharmacies for the elimination of pharmaceutical and sharp waste in the New Brunswick market shall be contacted to respond to the RFP.

HPSA is committing to ensure that its operational procedures 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.



Material Category 2: Sharp Waste

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 tissue, sharps are potentially infectious and are considered biomedical waste.
- Some sharps are used to inject drugs with chemotherapeutic properties and are therefore considered more hazardous than biomedical sharps. These sharps are classified as cytotoxic (genotoxic) waste.

HPSA is committing to ensure that its operational procedures 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.

State-of-the-art practices, from environmental, human health and safety standpoints, are required from all actors dealing with sharp waste through requirements described in the Collection Location agreements and agreements with waste management services provider(s). Non-cytotoxic sharp waste must be sterilized (e.g. autoclaved) to treat their potential for infection, becoming non-hazardous waste. The latter are currently landfilled. R&D efforts to analyse feasibility of recycling is planned. Cytotoxic sharps must be incinerated. Ashes from incineration must be landfilled.

By end 2026, HPSA commits to develop operating rules for the service provider(s) it contracts, that will list applicable critical Canadian and New Brunswick legislation, as well as standards which must be complied with. HPSA plans to audit the service provider(s) against these operating rules once every three year, with the first audit to be completed by end 2027.

C. Redesign

Regulatory Requirement:

39(i) a description of the efforts being made by the producer to redesign designated materials to improve opportunities for reuse and recycling;

These efforts may be performed by R&D departments of HPSA members anywhere in the world. There are also other regulatory dimensions (e.g. drug or medical device performance) that limit the opportunity to redesign materials (without considering that medications shall be consumed in the first place).

HPSA is planning to research the concept of ‘redesign’ for pharmaceuticals and medical sharps and will provide the results in the 2025 annual report, and then on a yearly basis.

D. Environmental Impacts Reduction and Emergency Reporting

Regulatory Requirement:

39(m) a plan for the elimination or reduction of the environmental impacts of designated material waste, by category of material;

Commitment

HPSA commits to follow the Recycle NB Emergency Reporting Clause.

Environmental impacts from improperly managed consumer pharmaceutical (material category 1) and sharp waste (material category 2), if not collected and processed adequately, are pollutions of waterways and soils via inadequate disposal by households (sinks, toilets, regular household waste stream).

For waste sharps (material category 2), injury and infection of humans and wildlife that encounter the waste, and the transmission of infectious diseases may be observed, together with metal and plastics pollution from the medical device.

This can disrupt ecosystems and pose a broader threat to public and animal health and the sustainability of the environment.

The OECD Report on Management of Pharmaceutical Household Waste⁷, provides further information on:

- The ways the pharmaceuticals may enter the environment (e.g., when conventional wastewater treatment plant are not designed to remove them, when sludges from these wastewater plants are applied on land for agricultural use, or from leachate – if not well managed, from landfills).
- Their impacts: *“certain pharmaceuticals have been proven to cause adverse effects to ecosystems when entering environmental systems, including increased mortality in aquatic species and changes to physiology, behaviour or reproduction. The discharge of antibiotics can also lead to mutations in animals and the development of antimicrobial resistant bacteria.”*

This OECD report provides examples of measured effects of certain pharmaceutical residues on aquatic organisms in laboratory studies, such as reduced growth or behaviour changes.

HPSA, via its communication campaign to households on proper return at pharmacies and alternate Collection Locations, via the adequate processing of these wastes, shall help reduce the above-cited environmental impacts from pharmaceutical and sharp waste improperly disposed of by consumers.

The R&D initiatives described in the plan and the aim for continuous program performance improvement (including towards applying the waste management hierarchy) constitute the plan for the reduction of the environmental impacts of designated material waste, by category of material.

As per the PRO Emergency Reporting Clause, should HPSA discover an environmental emergency, HPSA shall immediately notify, whether during normal hours or after hours, Recycle NB and the New Brunswick Department of Environment.

⁷ https://www.oecd-ilibrary.org/environment/management-of-pharmaceutical-household-waste_3854026c-en

E. Greenhouse Gas Impacts

Regulatory Requirement:

39(n) a description of greenhouse gas emissions resulting from the implementation of the stewardship plan and opportunities to reduce environmental impact;

Implementing the proposed NBPSP may lead to an increase in the volume of collected materials, in turn leading to an increase in the transportation and processing of waste.

Although certain environmental impacts might be reduced (see above section D.), this increase in transportation and waste processing may lead to increased greenhouse gas (GHG) emissions from these activities.

Opportunities for reducing those impacts may be found in transportation management (e.g., optimization of an itinerary to reduce mileage between Collection Locations and to the consolidation/elimination site, electric fleet) and finding, where possible, local processing facilities (with the aim to reduce transport emissions) or processing methods that may reduce GHG emissions.

HPSA confirms it will provide, by end of 2025, calculation methods for:

- The estimate of the carbon footprint of the materials life cycle with boundaries being from the collection location until the final waste disposal step, per material category. As of the date of this program plan, a draft report has been prepared by the consultancy which needs to be revised.
- The estimate of the total GHG yearly emission of the NBPSP.

Further analysis and improvement opportunities with emissions reductions quantifications and costs/revenues shall be developed by end 2026.

The standards to be considered for use might include:

- United States Environmental Protection Agency (EPA) Waste Reduction Model (WARM)⁸.
- World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) Product Life Cycle Accounting and Reporting Standard, part of the Greenhouse Gas Protocol⁹.
- International Standard Organization (ISO) Standard 14067:2018(en) Greenhouse gases — Carbon footprint of products — Requirements and guidelines for quantification¹⁰.

⁸ <https://www.epa.gov/warm>

⁹ <https://ghgprotocol.org/product-standard>

¹⁰ <https://www.iso.org/obp/ui/#iso:std:iso:14067:ed-1:v1:en>

VII. Dispute Resolution Procedure

Regulatory requirement:

(o) a dispute resolution process to deal with disputes between a producer and a service provider;

The Dispute Resolution Procedure between HPSA and its service provider is part of the service agreement and as following:

Informal Discussion

Within thirty (30) days of receipt of a Notice of Concern, the Parties will meet to:

- clarify the nature of the Dispute;
- request any further documentation in relation to the Dispute; and
- arrange for and facilitate a meeting to attempt in good faith to resolve the Dispute with representatives of the Contractor and HPSA.

Management Discussion

- If the Dispute remains unresolved following informal discussion, one of the Parties may, within thirty (30) days of the completion of the informal discussion, notify the other Party in writing summarizing the aspects of the Dispute which remain outstanding.
- Within thirty (30) days of a Party receiving a Dispute Notice, the Parties will arrange for and facilitate a meeting between their senior representatives to attempt in good faith to resolve the Dispute.

Arbitration

All Disputes that cannot be resolved through the above mentioned procedures will be determined by a sole arbitrator (the “Arbitrator”) under the Arbitration Act (New Brunswick) (the “Arbitration Act”) at the request of either Party. In addition:

- the arbitration will take place in the City of Fredericton, New Brunswick;
- the Parties shall jointly agree upon an Arbitrator within thirty (30) days of a Party’s request for arbitration. If the Parties cannot agree on an Arbitrator, each Party shall submit the name of two potential arbitrators, and the identity of the Arbitrator will be chosen from the possible names by a random draw observed by both Parties;
- the arbitration will be scheduled for a date to be determined by the Arbitrator, in consultation with the Parties, acting reasonably, who shall divide the arbitration time equally to present their positions to the Arbitrator;
- the Arbitrator’s decision will be final and binding;
- each Party will bear its own costs of the arbitration and the Parties will share equally the fees and disbursements of the Arbitrator and any other related costs of the arbitration, regardless of the outcome;
- the Arbitrator will have no jurisdiction to award costs in favour of either Party; and
- the Parties desire that any arbitration should be conducted in strict confidence and that there will be no disclosure to any Person of the existence or any aspect of a Dispute except as is necessary for the resolution of the Dispute. Any proceedings before the Arbitrator will be

attended only by those Persons whose presence, in the opinion of any Party or the Arbitrator, is reasonably necessary for the resolution of the Dispute. All matters relating to, all evidence presented to, all submissions made in the course of, and all documents produced in accordance with, an arbitration under this Article, will be kept confidential and will not be disclosed to any Person without the prior written consent of all the Parties except as required by Applicable Law, or by an order of an Arbitrator.



VIII. Other matters

Regulatory requirement:

(p) information or documents respecting any other matter provided for under Divisions 2 to 9.



Appendix A - Membership

3M Healthcare Canada Company Limited	RNBPPMS198
A&D Instruments Canada Inc.	RNBPPMS85
AA Pharma Inc.	RNBPPMS149
Abbott Diabetes Care	RNBPPMS129
AbbVie Corporation	RNBPPMS73
Accel Pharma Inc	RNBPPMS178
Accord Healthcare	RNBPPMS120
Advanced Orthomolecular Research (AOR)	RNBPPMS37
Advantage Solutions	RNBPPMS153
Alcon Canada Inc.	RNBPPMS103
Amgen Canada Inc.	RNBPPMS87
Amway Canada Corporation	RNBPPMS52
Analog Pharma Canada Inc.	Not registered with RNB (email sent)
Apotex Inc.	RNBPPMS14
Aralez Pharmaceuticals Canada Inc.	RNBPPMS31
Arcutis Biotherapeutics Inc.	RNBPPMS171
Ascensia Diabetes Care Canada Inc.	RNBPPMS43
Aspen Pharmacare Canada Inc	RNBPPMS197
Assured Natural Distribution	Not registered with RNB (email sent)
Astellas Pharma Canada Inc.	RNBPPMS91
AstraZeneca Canada Inc.	RNBPPMS55
Auro Pharma Inc	RNBPPMS155
Aventix Animal Health	RNBPPMS176
Avir Pharma	RNBPPMS209
Bausch + Lomb Corporation	RNBPPMS152
Bausch Health, Canada Inc.	RNBPPMS123
Baxter Canada	RNBPPMS170
Bayer Inc.	RNBPPMS121
BGP Pharma (Mylan)	RNBPPMS48
Bimeda-MTC Animal Health Inc.	RNBPPMS167
Biocon Biologics Canada, Inc.	RNBPPMS196
Bioforce Canada Inc.	RNBPPMS10
BioGaia Probiotics Canada Inc.	RNBPPMS185
Biogen Canada Inc	RNBPPMS125
Biomed Pharma	RNBPPMS203
BioSyent Pharma Inc.	RNBPPMS39
Blistex Corporation	RNBPPMS82
Boehringer Ingelheim Canada - Animal Health Canada Inc.	RNBPPMS97
Boehringer Ingelheim Canada Ltd.	RNBPPMS96
Boiron Canada	RNBPPMS32

Bristol-Myers Squibb	RNBPPMS140
Canadian Custom Packaging Company	RNBPPMS119
Can-Vet Animal Health Supplies Ltd.	RNBPPMS202
Cardinal Health Canada	RNBPPMS63
Celex Laboratories Inc.	RNBPPMS79
Ceva Animal Health Inc.	RNBPPMS86
Champion Alstoe Animal Health Inc.	RNBPPMS36
Church & Dwight Canada	RNBPPMS21
Cipher Pharmaceuticals Inc.	RNBPPMS57
Costco Wholesale Canada	RNBPPMS53
D Drops Company	RNBPPMS40
Dechra Veterinary Products Inc.	RNBPPMS101
Dexcom Canada	RNBPPMS175
Domrex Pharma Inc.	RNBPPMS154
Dr. Reddy's Laboratories	RNBPPMS157
Duchesnay	RNBPPMS139
Eisai	RNBPPMS33
Elanco Canada Limited	RNBPPMS64
Eli Lilly Canada Inc.	RNBPPMS13
Elimedical	RNBPPMS216
Embecta Canada Co.	RNBPPMS50
EMD-Serono Canada Inc.	RNBPPMS124
EXZELL PHARMA IN	RNBPPMS147
Familiprix Inc.	RNBPPMS199
Ferring Inc.	RNBPPMS6
Fresenius Kabi Canada Ltd.	RNBPPMS89
Galderma Canada Inc.	RNBPPMS118
Generic Medical Partners Inc.	RNBPPMS19
Giant Tiger	RNBPPMS226
Gilead Sciences Canada Inc.	RNBPPMS134
GlaxoSmithKline Inc.	RNBPPMS138
Glenmark Pharmaceuticals Canada Inc.	RNBPPMS201
GNC Canada Holdings, LLC	RNBPPMS166
Grey Wolf Animal Health Inc.	RNBPPMS191
Groupe Jean Coutu (PJC) Inc.	RNBPPMS22
Haleon	RNBPPMS122
Health First Network Association Inc.	Not registered with RNB (email sent)
Herbalife of Canada	RNBPPMS51
Hill Dermaceuticals	RNBPPMS225
HLS Therapeutics	RNBPPMS164
HPI Health Products/Lakota	RNBPPMS156
HTL-Strefa Inc.	RNBPPMS217
Imperial Tobacco Canada Limited	RNBPPMS173
Incyte Biosciences Canada	RNBPPMS218

Indivior Canada	RNBPPMS11
Intervet Canada Corp Merck Animal Health	RNBPPMS54
Ipsen Biopharmaceuticals Canada Inc	RNBPPMS204
Jamieson Laboratories	RNBPPMS151
Jamp Pharma Corporation	RNBPPMS160
Janssen Inc.	RNBPPMS105
Juno Pharma Canada Inc	RNBPPMS68
Kenvue Canada Inc.	RNBPPMS110
Knight Therapeutics Inc.	RNBPPMS83
Laboratoire Riva	RNBPPMS194
Laboratoire Trianon	RNBPPMS210
Laboratoires Atlas Inc.	RNBPPMS70
Laboratoires Confab Inc.	RNBPPMS207
Leadiant Biosciences Inc.	RNBPPMS165
Leo Pharma Inc.	RNBPPMS71
Les Laboratoires Nicar Inc.	RNBPPMS137
Life Science Nutritionals Inc.	RNBPPMS208
LifeScan Canada ULC	RNBPPMS46
Loblaw Companies Ltd.	RNBPPMS60
Lundbeck Canada Inc.	RNBPPMS47
Lupin Pharma Canada Ltd.	RNBPPMS189
Mannatech Incorporated	RNBPPMS131
Mantra Pharma Inc.	RNBPPMS184
Marcan Pharmaceuticals Inc.	RNBPPMS59
McCaughey Consumer Products Management Inc.	Not registered with RNB (email sent)
McKesson Canada	RNBPPMS107
Mead Johnson Nutrition (Canada) Co.	RNBPPMS77
Medexus Pharmaceuticals Inc.	RNBPPMS100
Medisca Pharmaceutique Inc.	RNBPPMS190
Medtronic Canada ULC	RNBPPMS211
Medunik Canada Inc.	Not registered with RNB (email sent)
Merck Canada Inc.	RNBPPMS106
Mint Pharmaceuticals Inc	RNBPPMS5
Montmed Inc	RNBPPMS219
Mylan Pharmaceuticals ULC	RNBPPMS49
Natco Pharma Canada Inc.	RNBPPMS193
Natural Factors Nutritional Products Ltd.	RNBPPMS111
Nature's Sunshine Products of Canada Ltd.	RNBPPMS113
Nestle Canada Inc	RNBPPMS16
Nestle Purina PetCare Canada	RNBPPMS144
New Chapter Canada Inc.	RNBPPMS78
New Nordic Inc.	RNBPPMS212
Nora Pharma	RNBPPMS200
Nordic Pharma Canada Inc.	RNBPPMS223

Novartis Pharmaceutical Canada Inc.	RNBPPMS88
Novo Nordisk	RNBPPMS35
Nutratology	Not registered with RNB (email sent)
Odan Laboratories Ltd.	RNBPPMS188
Omega Alpha Pharmaceuticals Inc.	RNBPPMS68
Organika Health Products Inc.	RNBPPMS72
Organon Canada Inc	RNBPPMS104
Otsuka Canada Pharmaceuticals Inc.	RNBPPMS161
Partnar Animal Health	RNBPPMS192
Pascoe Canada Inc	RNBPPMS34
Pfizer Canada Inc.	RNBPPMS109
Pharmasave Drugs Ltd	RNBPPMS18
Pharmascience Inc.	RNBPPMS90
Platinum Naturals Ltd	RNBPPMS66
Procter & Gamble Inc.	RNBPPMS67
Purdue Pharma	RNBPPMS95
Puresource Corp	RNBPPMS9
RB Health Canada Inc.	RNBPPMS76
Rexall Pharmacy Group Ltd.	RNBPPMS92
Roche Canada Ltd. - Hoffmann	RNBPPMS136
Roche Diabetes Care - a division of Hoffmann-La Roche Ltd	RNBPPMS3
Sandoz Canada	RNBPPMS84
Sanis Health Inc.	RNBPPMS163
Sanofi Consumer Health	RNBPPMS132
Sanofi-Aventis Canada Inc.	RNBPPMS117
Seaford Pharmaceuticals	RNBPPMS116
Servier Canada Inc.	RNBPPMS172
Shaklee Canada Inc.	RNBPPMS65
Shoppers Drug Mart Inc.	RNBPPMS61
Sivem Pharmaceuticals ULC	RNBPPMS108
Smith & Nephew Inc	RNBPPMS229
Sobeys National (Mississauga)	RNBPPMS8
SOBI Canada (Swedish Orphan Biovitrum)	RNBPPMS81
St. Francis Herb Farm	RNBPPMS159
Stella Pharmaceutical Canada Inc.	RNBPPMS162
Stericycle	RNBPPMS69
Sterimax Inc.	RNBPPMS115
Sumitomo Pharma Canada Inc.	RNBPPMS41
Sun Global Industries Inc.	RNBPPMS206
Takeda Canada Inc.	RNBPPMS20
Tanta Pharmaceuticals Inc.	RNBPPMS62
Teva Canada / Novopharm	RNBPPMS7
UCB Canada Inc.	RNBPPMS128
Unilever Canada Inc.	RNBPPMS148

USANA Health Sciences	RNBPPMS74
Valeo Pharma Inc	RNBPPMS158
Vertex Pharmaceuticals Incorporated	RNBPPMS133
Vetoquinol N.-A. Inc.	RNBPPMS102
Virbac Corporation	RNBPPMS17
Vita Health Products Inc.	RNBPPMS99
Wal-Mart Canada Corp	RNBPPMS94
WellSpring Pharmaceutical Canada Corp.	RNBPPMS80
Wholesale Medical Network Inc	RNBPPMS75
WN Pharmaceuticals Ltd.	RNBPPMS112
Xediton Pharmaceuticals Inc.	RNBPPMS180
Ypsomed Canada Inc.	RNBPPMS182
Zoetis Canada	RNBPPMS38



Appendix B – Stewardship Plan Reference

Contents of pharmaceuticals and sharps stewardship plan as per Regulation Section 39.

	Required in the Plan	Location in the Plan
(a)	information on the storage, collection, transportation, recycling, processing, disposal and other handling of designated material waste, including the designated material waste of other producers;	<u>Section IV.B.</u>
(b)	a description of categories of material to be used for the purposes of annual reports and performance measures and targets;	<u>Section III. B.</u>
(c)	information on the province-wide collection system to be used by the consumer, including return facilities, by category of material;	<u>Section IV.C.</u>
(d)	the location of storage, recycling, processing, disposal and other handling facilities for designated materials;	<u>Sections IV.D / E / F</u>
(e)	information on service delivery to remote or rural areas;	<u>Section IV. C. 2.</u>
(f)	the geographic areas to be used for the purposes of the annual report;	<u>Section IV. C. 3.</u>
(g)	a description of the manner in which existing collection and processing systems have been taken into account to maximize waste diversion in the Province;	<u>Section IV.A.</u>
(h)	a management plan for designated material waste, by category of material, according to the following order of preference: (i) reuse of the designated material; (ii) recycling or composting of the designated material; (iii) recovery of energy produced by the designated material; and (iv) disposal of the designated material in accordance with the Act;	<u>Section VI. B.</u>
(i)	a description of the efforts being made by the producer to redesign designated materials to improve opportunities for reuse and recycling;	<u>Section VI.C.</u>
(j)	information on current and future research and development activities in the Province related to the management of the designated material;	<u>Section VI. A.</u>
(k)	a communications plan to inform consumers about the stewardship plan, including (i) information concerning reasonable and free access to a method of collection, and (ii) a plan for education and awareness;	<u>Section V.</u>
(l)	a management plan for designated material waste, by category of material, which shall provide for the implementation of environmental and human health and safety standards, which shall meet or exceed those provided by applicable law;	<u>Section IV. F.</u>

(m)	a plan for the elimination or reduction of the environmental impacts of designated material waste, by category of material;	<u>Section VI. D.</u>
(n)	a description of greenhouse gas emissions resulting from the implementation of the stewardship plan and opportunities to reduce environmental impact;	<u>Section VI. E.</u>
(o)	a dispute resolution process to deal with disputes between a producer and a service provider;.	<u>Section VII.</u>
(p)	information or documents respecting any other matter provided for under Divisions 2 to 9	<u>Section VIII</u>



Appendix C – List of participating pharmacies

List of participating pharmacies as collection locations, as of the date of the submission of this plan. This list is subject to change due to, among other reasons, possible changes as:

- change in ownership,
- closure or opening of a pharmacy,
- breach of collection agreement requirements.

Name	Address 1: Street 1	Address 1: City	Address 1: ZIP/Postal Code	License Number	RSC
Albert County Pharmacy	5883 King Street	Riverside-Albert	E4H 4B5	P107	Southeast
Baie Pharmacy	5447 Route 117	Baie-Sainte-Anne	E9A 1E5	P157	Greater Miramichi
Bayshore Pharmacy	580 Main Street	Saint John	E2K 1J5	P295	Fundy
Bioscript Pharmacy	103-300 Price Street	Moncton	E1A 2L2	P287	Southeast
Blackville Pharmasave #554	175 Main Street	Blackville	E9B 1S3	P57	Greater Miramichi
Bouctouche Guardian 556626	200- 30 Irving Blvd	Bouctouche	E4S 3L2	P3	Kent
Bowman's Pharmasave	1111 Regent Street	Fredericton	E3B 3Z2	P309	11
Cameron Street Clinic	107 Cameron Street	Moncton	E1C 5Y7	P261	Southeast
Campus Pharmacy	29 Dineen Drive	Fredericton	E3B 5A3	P304	11
Corner Drug Store	106 Main Street	Sackville	E4L 4A7	P264	Southeast
Costco Pharmacy	140 Granite Drive	Moncton	E1H 0K6	P224	Southeast
Costco Pharmacy #1055	300 Retail Dr	Saint John	E2J 2R2	P274	Fundy
Create Compounding Pharmacy	10 Desbrisay Avenue, Unit 2	Moncton	E1E 0G8	P275	Southeast
Dickison's Pharmasave #553	135 Henry Street	Miramichi	E1V 2N5	P49	Greater Miramichi
Dieppe Guardian 556615	185 Acadie Avenue	Dieppe	E1A 1G6	P237	Southeast
Doaktown Pharmasave #559	314 Main Street	Doaktown	E9C 1E2	P55	Greater Miramichi
Drugstore Pharmacy #366	195 King St	St. Stephen	E3L 2E4	P205	Southwest NB
Eric Lee Pharmacie	809 Rue Principale	Clair	E7A 2H7	P145	Northwest
Express Scripts Canada Pharmacy Atlantic	115-1040 Champlain St.	Dieppe	E1A 8L8	P285	Southeast

Familiprix Beresford	879 Rue Principale Unite 2	Beresford	E8K 1R3	P45	Chaleur
Familiprix Dalhousie	562 Darlington Drive	Dalhousie	E8C 1N1	P104	Restigouche
Familiprix Dieppe	318 rue Amirault	Dieppe	E1A 1G3	P299	Southeast
Familiprix Paquetville	1351 Rue Des Fondateurs	Paquetville	E8R 1A3	P198	Acadian Peninsula
Ford's Family Pharmacy & Wellness Centre	544 St. George Bl	Moncton	E1E 2B5	P164	Southeast
Ford's Pharmacy Ltd.	2848 Main Street	Hillsborough	E4H 2Y7	P59	Southeast
Grand Bay Pharmacy	114 Rivervalley	Grand Bay-Westfield	E5K 1A2	P160	Fundy
Grand Isle Drug Store Ltd.	163 Route 776	Grand Manan	E5G 1A4	P62	Southwest NB
Guardian	1966 Mountain Road	Moncton	E1G 1A9	P321	Southeast
Hampton Guardian	5-361 William Bell Drive	Hampton	E5N 6B4	P276	8
Hampton Pharmasave	599 Main St	Hampton	E5N 6C2	P10	8
Harbourview Pharmacy	220-275 Main Street	Bathurst	E2A 1A9	P323	Chaleur
Harrisville Pharmacy	100- 1121 Shediack Road	Moncton	E1A 7B6	P318	Southeast
Innomar Pharmacy	100 Arden Street	Moncton	E1C 4B7	P303	Southeast
Jared MacTavish Pharmacy Ltd	35 UNIVERSITY AVE	Saint John	E2K1Z2	P254	Fundy
Jean Coutu Briggs Drugs #154	598 Union Street	Fredericton	E3A 3N2	P44	11
Jean Coutu Pharmacy #102	1116 Mountain road	Moncton	E1C 2T3	P147	Southeast
Jean Coutu Pharmacy #129	123 Champlain Street	Dieppe	E1A 1N5	P146	Southeast
Jean Coutu Pharmacy #203	97 Main Street	Sackville	E4L 4A9	P109	Southeast
Jean Coutu Pharmacy #209	404 St. George Street	Moncton	E1C 1X6	P68	Southeast
Jean Coutu Pharmacy #218	250 Pleasant Street	Miramichi	E1V 1Y5	P12	Greater Miramichi
Jean Coutu Pharmacy #219	4 Johnson Avenue	Miramichi	E1N 3B7	P136	Greater Miramichi
Jean Coutu Pharmacy #287	1789 Mountain Road North	Moncton	E1E 1E7	P227	Southeast
Jean Coutu Pharmacy #360	10525 Rue Principale	Saint-Louis de Kent	E4X 1E7	P166	Kent
Jean Coutu Pharmacy #337	600 Blvd Dieppe	Dieppe	E1A 9J8	P290	Southeast

Jean Coutu Pharmacy #379	63 Rue Rochette	Petit-Rocher	E8J 1J5	P103	Chaleur
Jean Coutu Pharmacy #398	271 Rue Centre	Beresford	E8K 1R1	P301	Chaleur
Jean Coutu Pharmacy #69	1047 St. Peter Avenue	Bathurst	E2A 2Z6	P25	Chaleur
Jean Coutu Pharmacy #95	276 Broadway Street	Grand Falls	E3Z 2K2	P149	Northwest
Jean Coutu Pharmacy/ Ford's Pharmacy	438 COVERDALE ROAD	Riverview	E1B 4R9	P60	Southeast
Johnson Guardian	16 F Tribe Road	Perth-Andover	E7H 3R6	P67	12
Johnstone's PharmaChoice	17 Centennial Street	Stanley	E6B 1A9	P82	11
Kennebecasis Drugs	1 Marr Road	Rothsay	E2E 3L4	P156	Fundy
Kent Guardian # 556604	9385 Main Street	Richibucto	E4W 4B6	P4	Kent
Keswick Pharmacy	10 Yerxa Lane	Keswick	E6L 0A1	P188	11
King Street Pharmacy	348 King Street	Fredericton	E3B 1E3	P313	11
La Pharmacie Kedgwick	116 Rue Notre-Dame	Kedgwick	E8B 1H8	P129	Restigouche
Lakewood Guardian	2075 Loch Lomond Rd	Saint John	E2N 1A1	P225	Fundy
Lawtons Drugs #137	138 Main St.	Sussex	E4E 3E1	P154	8
Lawtons Drugs #147	40 Mapleton Road	Moncton	E1C 7W8	P253	Southeast
Lawtons Drugs #2552	107 Catherwood Street Suite 212	Saint John	E2M 5J7	P270	Fundy
Lawtons Drugs #2564	107 Catherwood Street	Saint John	E2M 5J7	P39	Fundy
Lawtons Drugs #2572	565 Elmwood Drive	Moncton	E1A 2X4	P33	Southeast
Lawtons Drugs #2575	1381 Regent Street, Comp 220	Fredericton	E3C 1A2	P308	11
Lawtons Drugs #2706	39 King Street	Saint John	E2L 4W3	P37	Fundy
Lawtons Drugs #2748	519 Westmorland Road	Saint John	E2J 3W9	P35	Fundy
Lawtons Drugs Brookside Mall	435 Brookside Dr.	Fredericton	E3A 8V4	P36	11
Lewis Pharmacy	14F Tribe Rd	Perth-Andover	E7H 3R6	P76	12
Loblaw #341	471 Smythe Street	Fredericton	E3B 3E3	P174	11
Loblaw Pharmacy #262	25 Savoie Avenue	Atholville	E3N 4A8	P186	Restigouche
Loblaw Pharmacy #311	680 Somerset Street	Saint John	E2K 2Y7	P196	Fundy
Loblaw Pharmacy #315	1150 Onondaga Street	Oromocto	E2V 1B8	P214	11

Loblaw Pharmacy #316	3455 Principale Avenue	Tracadie	E1X 1C8	P229	Acadian Peninsula
Loblaw Pharmacy #326	89 Trinity Drive	Moncton	E1G 2J7	P168	Southeast
Loblaw Pharmacy #329	116 Main Street	Fredericton	E3A 1R7	P199	11
Loblaw Pharmacy #353	168 Rothesay Ave	Saint John	E2J 2B5	P162	Fundy
Loblaw Pharmacy #357	700 St. Peter Ave	Bathurst	E2A 3Y8	P169	Chaleur
Loblaw pharmacy #361	425 Coverdale Rd	Riverview	E1B 3K3	P191	Southeast
Loblaw Pharmacy #389	44 Lower Cove Road	Sussex	E4E 5L2	P172	8
Loblaw Pharmacy #4350	165 Main Street	Moncton	E1C 1B8	P163	Southeast
Loblaw Pharmacy #6800	307 Main Street	Shediac	E4P 2A8	P210	Southeast
Mapleton Pharmacy	210 Price Street	Moncton	E1A 2L2	P267	Southeast
McAdam Pharmacy Inc.	4-153 Harvey Road	McAdam	E6J 1A1	P94	Southwest NB
McKesson SPS Pharmacy (NB)	284 Frenette Ave	Moncton	E1H 0E2	P272	Southeast
Medicine Shoppe Pharmacy 347	317 River Valley Drive	Grand Bay-Westfield	E5K 1A8	P291	Fundy
Millidgeville PharmaChoice	703 Millidge Ave.	Saint John	E2K 2N7	P324	Fundy
Neighbourly Pharmacy 6007	101 King Street	St. Stephen	E3L 2C6	P79	Southwest NB
Nevers Pharmacy Ltd	370 Main Street	Hartland	E7P 3N2	P112	12
Northern Carleton Pharmacy	15 McCain Street	Florenceville-Bristol	E7L 3H5	P71	11
Northside PharmaChoice	231 Canada Street	Fredericton	E3A 4A1	P151	11
Oromocto Pharmacy	66 Broad Road	Oromocto	E2V 1C2	P150	11
Petitcodiac Drug Mart Inc.	37 Main Street	Petitcodiac	E4Z 4L9	P90	Southeast
PharmaChoice #313	292 Main Street	Saint George	E5C 3V1	P247	Southwest NB
Pharmacie Cocagne Pharmacy	4813 Route 134	Cocagne	E4R 2Y2	P273	Kent
Pharmacie de Cap-Pele Ltee	2680 Ch. Acadie	Cap-Pelé	E4N 1E5	P83	Southeast
Pharmacie Edmundston Smyth et St-Onge inc.	131 Rue De L'Eglise	Edmundston	E3V 1J9	P288	Northwest
Pharmacie Jean Coutu #0130	338 Main St	Shediac	E4P 2E5	P106	Southeast
Pharmacie Jean Coutu #109	101 Water Street	Campbellton	E3N 1B2	P6	Restigouche

Pharmacie Jean Coutu #391	396 William Street	Dalhousie	E8C 2X2	P77	Restigouche
Pharmacie Jean Coutu #408	2562 Acadie Rd.	Cap-Pelé	E4N 1E3	P310	Southeast
Pharmacie Kevin Smyth	138 Rue Principale	Sainte-Anne-De-Madawaska	E7E 1B8	P41	Northwest
Pharmacie Memramcook Inc.	150 Route La Vallée	Memramcook	E4K 2A6	P280	Southeast
Pharmacie Neguac Ltée	759 Rue Principale	Neguac	E9G 1S2	P207	Acadian Peninsula
Pharmacie Rogersville (Oulton)	11085 Rue Principale	Rogersville	E4Y 2L9	P87	Kent
Pharmacy for Life	554 Main Street	Hartland	E7P 2N5	P306	12
Pharmasave Bathurst	325 Vanier Boulevard	Bathurst	E2A 3N1	P302	Chaleur
Pharmasave Elsipogtog	35 Big Cove Road	Elsipogtog First Nations	E4W 2S1	P305	Kent
Plaster Rock Guardian	282 Main Street	Plaster Rock	E7G 2C7	P43	12
Port City Pharmacy	333 Main Street	Saint Johns	E2K 1J1	P294	Fundy
Restigouche Pharmacy	53 Mack St.	Belledune	E8G 2R3	P102	Chaleur
Rexton Pharmacy	114 Main Street	Rexton	E4W 2B3	P262	Kent
River Stone Pharmacy	70 Crown Street	Saint John	E2L 2X6	P322	Fundy
Riverside Guardian	225 Mitchell Street	Oromocto	E2V 0H3	P61	11
Riverview Guardian Pharmacy	645 Pinewood Road	Riverview	E1B 5R6	P259	Southeast
Ross Drug - Queen St	402 Queen Street	Fredericton	E3B 1B6	P24	11
Ross Drug - Smythe St.	1128 Smythe Street	Fredericton	E3B 3H5	P22	11
Ross Drug -Rookwood Ave.	206 Rookwood Avenue	Fredericton	E3B 2M2	P23	11
Rothsay PharmaChoice	122 Hampton Rd	Rothsay	E2E 2N5	P316	Fundy
Salisbury Pharmacy Ltd.	3154 Main Street	Salisbury	E4J 2L8	P84	Southeast
Scott's Pharmasave	1781 Water Street	Miramichi	E1N 1B2	P144	Greater Miramichi
Sentrex Pharmacy Moncton	240 COMMERCE ST	Moncton	E1H 2G2	P319	Southeast
Sharp's Corner Drug Store Ltd.	3 Broad Street	Sussex	E4E 2J7	P69	8
Shoppers Drug Mart #163	939 St-Peter Avenue	Bathurst	E2A 2Z3	P7	Chaleur
Shoppers Drug Mart #165	2540 King George Hwy	Miramichi	E1V 6W2	P99	Greater Miramichi

Shoppers Drug Mart #167	160 Hebert Blvd	Edmundston	E3V 2S7	P88	Northwest
Shoppers Drug Mart #169	440 Kings Place	Fredericton	E3B 5H8	P42	11
Shoppers Drug Mart # 171	312 Val D'Amour Road	Atholville	E3N 4E2	P143	Restigouche
Shoppers Drug Mart #172	1040 Prospect Street	Fredericton	E3B 3C1	P17	11
Shoppers Drug Mart #173	269 Main Street	Fredericton	E3A 1E1	P46	11
Shoppers Drug Mart #174	234 Main Street	Minto	E4B 3R3	P16	11
Shoppers Drug Mart #175	1198 Onondaga Street	Oromocto	E2V 1B8	P142	11
Shoppers Drug Mart #176	1015 Regent Street	Fredericton	E3B 3Y9	P108	11
Shoppers Drug Mart #177	180 Madawaska Road	Grand Falls	E3Y 1A7	P114	Northwest
Shoppers Drug Mart #180	387 Main Street	Shediac	E4P 2B5	P66	Southeast
Shoppers Drug Mart #182	45 Vaughan Harvey Blvd.	Moncton	E1C 0N7	P141	Southeast
Shoppers Drug Mart #187	397 King George Hwy	Miramichi	E1V 1L5	P11	Greater Miramichi
Shoppers Drug Mart #188	201 Main Street	Sussex	E4E 1R4	P100	8
Shoppers Drug Mart #191	57 Lansdowne Avenue	Saint John	E2K 2Z9	P19	Fundy
Shoppers Drug Mart #193	175 Old Hampton Road	Quispamsis	E2E 4Y7	P101	Fundy
Shoppers Drug Mart #194	407 Westmorland Road	Saint John	E2J 3S9	P54	Fundy
Shoppers Drug Mart #195	667 Fairville Blvd.	Saint John	E2M 3W2	P29	Fundy
Shoppers Drug Mart #198	370 Connell St Unit 9	Woodstock	E7M 5G9	P159	12
Shoppers Drug Mart #2005	18 Champlain St	Dieppe	E1A 1N3	P238	Southeast
Shoppers Drug Mart #2011	681 Mountain Road	Moncton	E1C 2P4	P232	Southeast
Shoppers Drug Mart #5386	570 Dieppe Blvd	Dieppe	E1A 0E7	P325	Southeast
Shoppers Drug Mart #580	110 Crown Street	Saint John	E2L 2X7	P63	Fundy
Shoppers Drug Mart #5848	200 Two Nations Crossing	Fredericton	E3A 0W8	P328	11

Shoppers Drug Mart #588	350 St. George Street	Moncton	E1C 1X1	P18	Southeast
Shoppers Drug Mart #590	320 Elmwood Drive	Moncton	E1A 6S1	P70	Southeast
Shoppers Drug Mart #591	193 Irving Blvd	Bouctouche	E4S 3K4	P65	Kent
Shoppers Drug Mart #592	25 Cartier Boul.	Richibucto	E4W 3W7	P140	Kent
Shoppers Drug Mart #593	1633 Mountain Road	Moncton	E1G 1A5	P187	Southeast
Shoppers Drug Mart #594	229 Boulevard J.D. Gauthier	Shippagan	E8S 1N2	P72	Acadian Peninsula
Shoppers Drug Mart #595	5138 Route 113	Lamèque	E8T 3L4	P110	
Shoppers Drug Mart #596	25 Blvd. St. Pierre Ouest	Caraquet	E1W 1B8	P111	Acadian Peninsula
Shoppers Drug Mart #597	344 Rue Canada, Unit B	Saint-Quentin	E8A 1H7	P139	Northwest
Shoppers Drug Mart #599	3528 Rue Principale	Tracadie-Sheila	E1X 1G5	P14	Acadian Peninsula
Smith Drugs	8818 Main St.	Florenceville-Bristol	E7L 3G2	P161	11
Sobeys Pharmacy #233	149 Lansdowne Avenue	Saint John	E2K 2Z9	P197	Fundy
Sobeys Pharmacy #2701	10 Boul. St-Pierre Est	Caraquet	E1W 1B6	P289	Acadian Peninsula
Sobeys Pharmacy #348	1380 Mountain Road	Moncton	E1C 2T6	P202	Southeast
Sobeys Pharmacy #349	463 Brookside Drive	Fredericton	E3A 8V4	P201	11
Sobeys Pharmacy #375	1180 Prospect Street	Fredericton	E3B 5C7	P315	11
Sobeys Pharmacy #495	140 Hampton Road	Rothsay	E2E 2R1	P209	Fundy
Sobeys Pharmacy #548	44 East Point Way	Saint John	E2J 0H5	P221	Fundy
Sobeys Pharmacy #602	477 Paul Street	Dieppe	E1A 4X5	P216	Southeast
Sobeys Pharmacy #680	2485 King George Highway	Miramichi	E1V 6W6	P223	Greater Miramichi
Sobeys Pharmacy #736	1160 Findlay Boulevard	Riverview	E1B 0J6	P34	Southeast
Sobeys Pharmacy #738	183 Main Street	Shediac	E4P 2A5	P266	Southeast
Sobeys Pharmacy #756	55 Vaughan Harvey Boulevard	Moncton	E1C 0N3	P250	Southeast
Sobeys Pharmacy #778	1 Plaza Avenue	Saint John	E2M 0C2	P258	Fundy
Sobeys Pharmacy #783	77 Filles De Jesus Avenue	Moncton	E1A 9G6	P282	Southeast

Sobeys Pharmacy #849	407 Regent Street	Fredericton	E3B 3X6	P226	11
Sobeys Pharmacy #860	375 Miramichi Road	Oromocto	E2V 4T4	P235	11
Sobeys Pharmacy #892	1125 St. Peters Avenue	Bathurst	E2A 3A1	P122	Chaleur
Sobeys Pharmacy By Mail	565 Elmwood Drive	Moncton	E1A 2X4	P278	Southeast
Southside PharmaChoice	640 Prospect Street	Fredericton	E3B 9M7	P179	11
SRx Pharmacy	290 Main Street	Moncton	E1C 1B9	P320	Southeast
St Andrews Pharmacy	192 Water Street	Saint Andrews	E5B 1B2	P13	Southwest NB
St. George Pharmacy Inc.	127 Brunswick Street	Saint George	E5C 1A8	P5	Southwest NB
St. Mary's Pharmacy	150 Cliffe Street	Fredericton	E3A 0A1	P277	11
St. Stephen Prescription Centre	101 King Street	St. Stephen	E3L 2C6	P79	Southwest NB
Steeves' Pharmasave #818	212 Mcallister Drive	Saint John	E2J 2S7	P183	Fundy
Superstore Pharmacy	577 rue Victoria	Edmundston	E3V 3M9	P176	Northwest
Sussex PharmaChoice	101-10 Park Street	Sussex	E4E 1T8	P248	8
The Drug Store Pharmacy #396	240 Madawaska Road	Grand Falls	E3Y 1A5	P195	Northwest
The Drugstore Pharmacy # 364	115 Campbell Drive	Rothsay	E2E 6E4	P230	Fundy
The Drugstore Pharmacy #332	408 King George Highway	Miramichi	E1V 2T3	P215	Greater Miramichi
The Medicine Shoppe Pharmacy # 282	106 Newcastle Boulevard	Miramichi	E1V 2L7	P260	Greater Miramichi
The Medicine Shoppe Pharmacy #174	90 Mapleton Road	Moncton	E1C 7W8	P212	Southeast
The Medicine Shoppe Pharmacy #176	3360 Boulevard Dr. Victor LeBlanc	Tracadie-Sheila	E1X 0E1	P213	Acadian Peninsula
The Medicine Shoppe Pharmacy #192	170 Doak Road	Fredericton	E3B 5A6	P219	11
The Medicine Shoppe Pharmacy #205	68 Rue Principale C.P. 2066	Lamèque	E8T 1M6	P228	Acadian Peninsula
The Medicine Shoppe Pharmacy #219	960 St. George Blvd	Moncton	E1E 3Y3	P241	Southeast
The Medicine Shoppe Pharmacy #252	120 Shediac Road	Moncton	E1A 2R9	P244	Southeast
The Medicine Shoppe Pharmacy #261	335 Main Street	Shediac	E4P 2B1	P252	Southeast

The Medicine Shoppe Pharmacy #273	127 Main St.	Fredericton	E3A 1C6	P256	11
The Medicine Shoppe Pharmacy #294	1685 Main Street	Moncton	E1E 1G8	P269	Southeast
The Medicine Shoppe Pharmacy #323	100 Jones Street	Woodstock	E7M 0H6	P281	12
The Medicine Shoppe Pharmacy #401	2049 Route 640 Hwy	Hanwell	E3C 1V3	P314	11
Tri-County Healthcare Inc.	157 Sunbury Drive	Fredericton Junction	E5L 1R5	P300	11
Valley Pharmacy	10 Millennium Drive	Quispamsis	E2E 4B1	P307	Fundy
Village Pharmacy	13 East Main Street	Port Elgin	E4M 2X8	P15	Southeast
Walmart Pharmacy #1013	494 Rue Madawaska Street	Grand Falls	E3Y 1A3	P233	Northwest
Walmart Pharmacy #1033	805 Victoria Street	Edmundston	E3V 3T3	P234	Northwest
Walmart Pharmacy #1043	430 Connell Street	Woodstock	E7M 5R5	P240	12
Walmart Pharmacy #1052	80 Main Street	Sussex	E4E 1Y6	P242	8
Walmart Pharmacy #1067	125 Two Nations Crossing	Fredericton	E3A 0T3	P243	11
Walmart Pharmacy #1175	651 Fairville Blvd	Saint John	E2M 3W3	P193	Fundy
Walmart Pharmacy #3003	900 St. Anne Street	Bathurst	E2A 6X2	P31	Chaleur
Walmart Pharmacy #3032	1399 Regent Street	Fredericton	E3C 1A3	P21	11
Walmart Pharmacy #3056	477 Paul Street	Dieppe	E1A 5B2	P137	Southeast
Walmart Pharmacy #3091	450 Westmorland Road	Saint John	E2J 4Z2	P20	Fundy
Walmart Pharmacy #3659	25 Plaza Boulevard	Moncton	E1C 0E8	P218	Southeast
Walmart Pharmacy #3737	4 Jagoe Street	Atholville	E3N 5C3	P220	Restigouche
Walmart Pharmacy #5833	200 Douglastown Boulevard	Miramichi	E1V 7T9	P236	Greater Miramichi