

New Brunswick Pharmaceuticals and Sharps Stewardship Plan

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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): <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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: <ul style="list-style-type: none"> (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
- FHC: 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

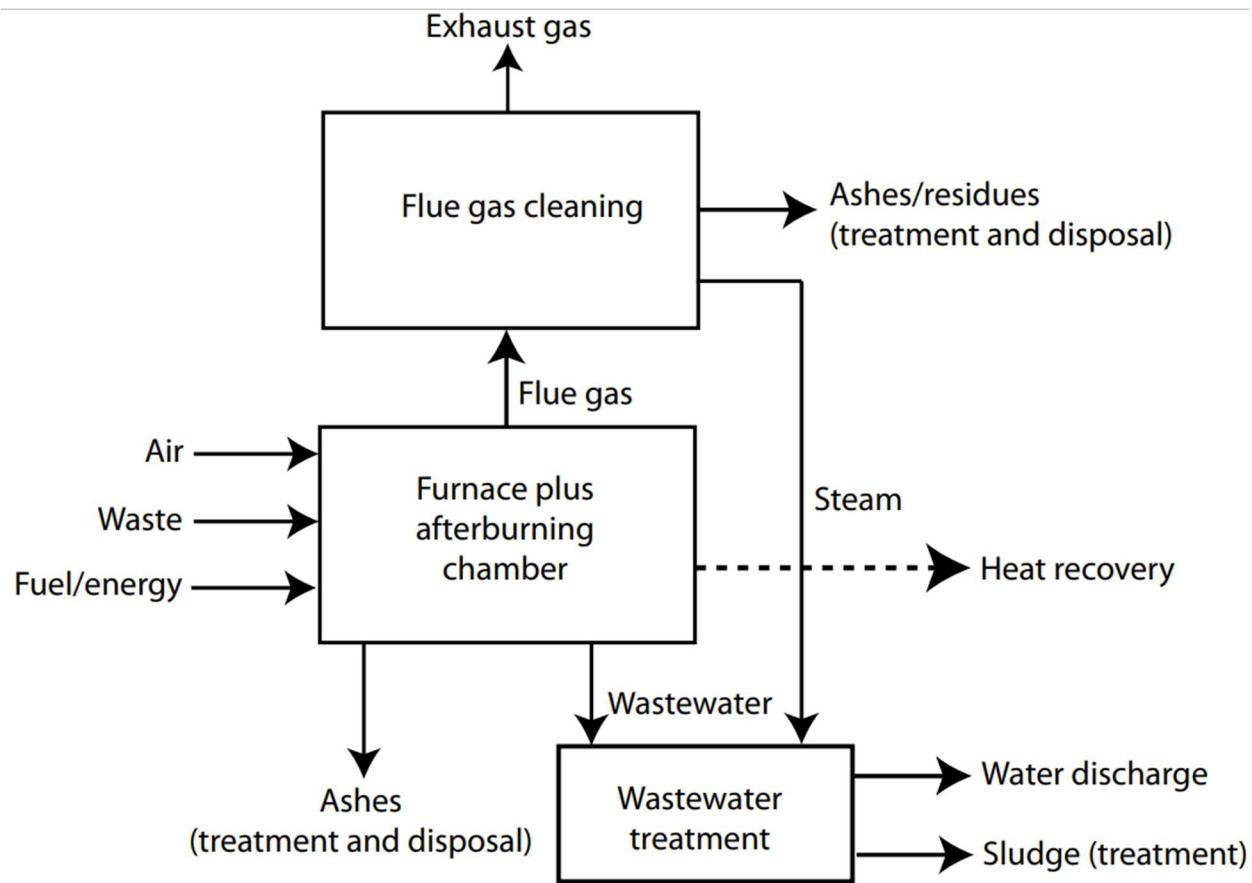
For non-cytotoxic sharp waste that has been rendered non-infectious through sterilization (classified as treated medical waste): if energy recovery is available and, compared to landfill, does not increase environmental impacts (supported by a full greenhouse gas assessment including the long term emissions 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 years, 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 unproperly 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 |

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|---------------------------------------|--------------------------------------|
| 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 |

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| 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 |

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| 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 |

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| 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> |

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|-----|---|-----------------------|
| (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 |

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|--|----------------------------|---------------------|---------|------|-------------------|
| 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 Shediac 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 |

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|--------------------------------------|---------------------------------|---------------|---------|------|-------------|
| 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 | Rothesay | 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 |

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|--|------------------------|-----------------------|---------|------|-------------------|
| 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 |

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|--------------------------------|----------------------|--------------------------|---------|------|-------------------|
| 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 Vallee | 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 |
| Rothesay PharmaChoice | 122 Hampton Rd | Rothesay | 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 |

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|--------------------------|--------------------------|-------------|---------|------|-------------------|
| 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 |

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|-------------------------|-----------------------------|------------------------|---------|------|-------------------|
| 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 | Rothesay | 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 |

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|------------------------------------|-----------------------------------|-----------------|---------|------|-------------------|
| 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 | Rothesay | 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 Shédiac Road | Moncton | E1A 2R9 | P244 | Southeast |
| The Medicine Shoppe Pharmacy #261 | 335 Main Street | Shédiac | E4P 2B1 | P252 | Southeast |

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| 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 |