



**MINISTER OF  
CONSERVATION AND CLIMATE**

Legislative Building  
Winnipeg, Manitoba, CANADA  
R3C 0V8

Terri Drover  
Director General  
Health Products Stewardship Association  
330 – 2255 St. Laurent Blvd  
Ottawa, ON K1G 4K3  
[tdrover@healthsteward.ca](mailto:tdrover@healthsteward.ca)

Dear Terri Drover:

I am pleased to issue an Approval to the Health Products Stewardship Association (HPSA) for the Manitoba Sharps Collection Program (the Program) effective January 15, 2021. This Approval will expire June 30, 2023, pursuant to Section 7(4) of the Household Hazardous Material and Prescribed Material Stewardship Regulation (Regulation) under the Waste Reduction and Prevention Act (WRAP Act).

This Approval is issued to HPSA under Section 7(2) of the Regulation and is subject to HPSA meeting the conditions as set forth in “Attachment A” of this letter, and which forms part of this Approval.

If I am not assured that HPSA is implementing or operating the Program substantially in accordance with its intent, or where I or my officials have concluded, based on relevant circumstances, that the Program or terms of this Approval, including “Attachment A: Conditions of Approval” should be reviewed, then pursuant to Section 8 of the Regulation new or additional conditions may be imposed as deemed appropriate so as to ensure that the environmental outcomes and regulatory requirements are fulfilled.

It is a priority of this department that the Program provide convenient, province-wide accessibility to all Manitoba communities including Manitoba’s northern, remote and Indigenous communities. I expect HPSA to work collaboratively with other Producer Responsibility Organizations to maximize synergies and deliver program outcomes in a cost effective and efficient manner.

I will take this opportunity to remind you that under Section 11(1) of the Regulation, as Minister, I have the authority to suspend or cancel the Approval of the Program at any time if there is a breach or contravention by HPSA as the operator of the Program, of either the WRAP Act or the Regulation or the conditions set forth in this Approval and, if applicable, subsequent amendments of this Approval.

Any notices to be provided to department officials pursuant to this Approval shall be submitted in writing to: Director, Environmental Programs and Remediation Branch, Manitoba Conservation and Climate, Box 38, 200 Saulteaux Crescent, Winnipeg, Manitoba, R3J 3W3.

HPSA should submit their next application for renewal of this Approval by January 31, 2023 to allow adequate time for review and public consultations.

I look forward to the operation of the Program in the Province of Manitoba.

Warm regards,

Original signed by

Sarah Guillemard  
Minister

Attachment

c. Rhian Christie

**ATTACHMENT A**  
**Conditions of Approval**

Health Products Stewardship Association (HPSA)

The conditions set forth below form part of the Ministerial Approval for the Manitoba Sharps Collection Program (the Program) pursuant to the Household Hazardous Material and Prescribed Material Stewardship Regulation (Regulation) and are as follows:

THAT HPSA:

1. Implement and operate the Program substantially in accordance with its intent, consistent with the requirements of the WRAP Act, the Regulation, the Conditions of Approval and the Guideline for Household Hazardous Material and Prescribed Material Stewardship, as approved and amended from time to time.
2. Identify a senior official with HPSA as a contact person to work with my officials at Manitoba Conservation and Climate to provide such assistance or any information (including both financial and non-financial information) that may be deemed necessary in a timely manner to enable them to provide me with information to assess whether HPSA has implemented the Program and it is operating substantially in accordance with its intent and the Conditions of Approval and, if applicable, subsequent amendments to this Approval.
3. Retained earnings shown on HPSA financial statement for the Manitoba Program (total revenues less total expenditures), as determined by an external auditor, shall not at any time during the term of this Approval, exceed an amount equal to one year's program revenue.
4. Submit an annual report to Director, Environmental Programs and Remediation Branch, Manitoba Conservation and Climate, per the applicable regulation and guidelines.
5. Achieve a 90% participation rate among eligible pharmacies in Manitoba over the term of this Approval.
6. Provide updated information on collection sites/depot locations to Manitoba Conservation and Climate when requested or when substantial changes occur.
7. Maintain its status as a body corporate and registration under The Corporations Act, C.C.S.M. c. C225 (Manitoba) while operating the Program.