



The Union  
of Nova Scotia  
Municipalities

*PRESIDENT:*

**Mayor David Corkum**  
Town of Kentville

*VICE-PRESIDENT/*

*SECRETARY-TREASURER:*

**Warden Keith Hunter**  
County of Cumberland

*IMMEDIATE PAST-PRESIDENT:*

**Councillor Russell Walker**  
Halifax Regional Municipality

*REGIONAL CAUCUS CHAIR:*

**Councillor Claire Detheridge**  
Cape Breton Regional Municipality

*RURAL CAUCUS CHAIR:*

**Mayor Bob Taylor**  
County of Colchester

*TOWN CAUCUS CHAIR:*

**Mayor Carl Chisholm**  
Town of Antigonish

Suite 1106, 1809 Barrington Street  
Halifax, NS  
B3J 3K8

Tel: (902) 423-8331  
Fax: (902) 425-5592  
E-mail: [info@unsm.ca](mailto:info@unsm.ca)  
Web Site: [www.unsm.ca](http://www.unsm.ca)

July 16, 2014

The Honourable Randy Delorey  
Minister  
Department of the Environment  
P. O. Box 442  
Halifax, NS B3J 2P8

Dear Minister Delorey:

**RE: PROPOSED SOLID WASTE REGULATIONS**

I am writing on behalf of the Union of Nova Scotia Municipalities (UNSM) in response to your Department's recent document titled "Revising Our Path Forward: A public discussion paper about solid waste regulation in Nova Scotia".

As you are aware, the Department has held a number of municipal workshops to explore the framework and receive feedback. I am also aware you have received correspondence from the NS Solid Waste-Resource Management Regional Chairs Committee and the NS Solid Waste Managers and Directors Committee.

The UNSM Board, upon discussing the proposed framework, has concerns. The objectives of the proposed regulations are to keep programs efficient and sustainable, to provide a high level of environmental protection and to create economic opportunities. It is unclear from the discussion paper how these objectives will be achieved.

We understand the proposed solid waste regulations may at some point shift some funding to the private sector, but there has been no analysis provided as to the net cost to municipalities, timing or the impact on the private sector at a time when our economy is struggling.

Our organization has been working closely with the Province and the Association of Municipal Administrators over the last two years on issues facing municipalities. The Fiscal Review report released last November identifies a number of pressures facing municipalities.

One of the most significant pressures on municipalities is increased regulatory standards issued by both the Province and the Federal Government. Your department has indicated increased requirements pending with respect to drinking water, wastewater, activities designations (watercourse alterations and on-site septic systems), climate change as well as solid waste. Other departments are also considering legislative changes with municipal impacts. Municipalities want to do their part to ensure protection of the environment and human health. However, these regulatory changes are often aimed at the worst case scenario lacking proper risk assessment and quantifiable objectives. In the absence of this information, it is difficult to evaluate the proposed regulations in terms of effectiveness and efficiency.

..../cont'd



The Honourable Randy Delorey  
Page 2  
July 16, 2014

The Board is concerned that the cumulative effect of these regulatory changes on municipalities and taxpayers has not been considered. The impact on municipal budgets has not been clearly identified; information on the costs and benefits have not been quantified. It is paramount that municipal costs be quantified to assist municipalities in allocating necessary funds during their budgeting process. Given the costs of these regulations, we ask that your department rank these regulation changes in order of importance so municipalities will be aware of which ones to budget for first. It is clear that some municipalities will not be able to meet existing regulations let alone new ones.

Many achievements within your department has been the result of direct involvement and support of municipalities. We wish to continue this process; however, it is important that we pause and reflect on all that is being proposed. We need to be cognizant of what municipalities are able to afford, and look at reasonable implementation timeframes. We need to know your departmental priorities and how both orders of government can work together to ensure we successfully meet public expectations.

All of the issues raised in my letter have been discussed at length by the Fiscal Review Committee. The Working Group of this committee has recommended that any new provincial regulations negatively impacting municipalities stop being introduced until a clear process is developed between both parties on a clear path forward. The UNSM Board strongly supports this recommendation.

I look forward to your response on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Corkum', is positioned below the word 'Sincerely,'.

Mayor David Corkum  
President, UNSM

DC/tv

cc: The Honourable Mark Furey, Minister, Department of Municipal Affairs