

NOVA SCOTIA
FEDERATION OF
MUNICIPALITIES

January 17, 2023

Hon. Timothy Halman

Minister, Department of Environment and Climate Change

1894 Barrington Street, Suite 1800

Halifax, NS

B3J 2P8

(Sent Via Email)

RE: Amended Regulations for Construction and Demolition Debris

Dear Minister Halman,

Thank you for your letter circulated on July 7, 2022, outlining upcoming changes to Construction and Demolition (C&D) Debris regulations. Your effort to ensure environmentally responsible waste management in Nova Scotia is commendable.

On behalf of NSFM, I am writing you to express concern about 1) unacknowledged costs to municipalities that will arise from these changes and 2) the late arrival of the required 12-month notification by the Minister of Municipal Affairs.

A document outlining consultation that took place to inform these changes acknowledges that municipalities operating waste management facilities will incur certain costs. Beyond these acknowledged costs, additional costs of adhering with new testing and sorting requirements will also arise. The unclear definition of banned materials and the significant challenge of identifying treated wood through a visual inspection at facility gates will also add to operational costs and enforcement challenges. Due to limited sorting space at existing C&D disposal facilities and transfer stations, and the increased volumes of treated wood received by landfills, municipalities are likely to also incur considerable capital costs. Increased fees are not a feasible way to recovery these costs.

I request that your department return to consultation to better account for these costs before these regulatory changes are enacted.

Finally, as the 12-month notice required by section 519 of the Municipal Government Act was conveyed on January 4th, 2023, the enactment of these changes should be delayed until January 2024.

Kind regards,

Brenda Chisholm-B

Brenda Chisholm-Beaton

President, Nova Scotia Federation of Municipalities

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Town of Port Hawkesbury

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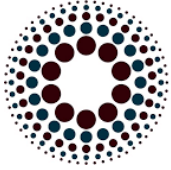
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cc.

Honourable John Lohr, Minister of Municipal Affairs and Housing

Paul LaFleche, Deputy Minister of Municipal Affairs and Housing

Lora MacEachern, Deputy Minister of Environment and Climate Change

John MacKinnon, President of the Association of Municipal Administrators