

March 1, 2023

The Honourable Tim Halman
Minister of Environment and Climate Change
PO Box 442
Halifax, NS
B3J 2P8

Email: Minister.Environment@novascotia.ca

Re: Amendments to the Activities Designation Regulations and the Solid Waste Resource Management Regulations

Dear Minister:

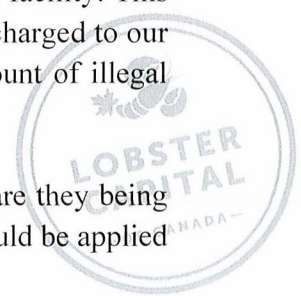
On behalf of the Municipality of the District of Barrington, I am writing to you to share our concerns relating to the new regulations on how construction and demolition (C&D) debris is managed in Nova Scotia.

As you know, amendments to the Activities Designation Regulations and the Solid Waste Resource Management Regulations mean that, starting on July 5, 2023, chemically treated timbers will no longer be accepted for disposal at C&D debris facilities.

While the Municipality appreciates the concern of fires and groundwater impacts that occurred at existing C&D debris disposal facilities, we believe these regulations will have significant implications that should be seriously considered.

First, these regulations will force units like ours to transport the chemically treated timbers to second generation landfills and pay additional tipping fees. We will also likely have to hire additional staff or alter our current operating processes to manage the waste at our facility. This will considerably increase our operating costs which will increase the tipping fees charged to our users. We believe that this increase in tipping fees will, in turn, increase the amount of illegal dumping.

Second, if chemically treated timbers have negative environmental impacts, why are they being allowed to be sold? We believe that an extended producer responsibility concept could be applied to these products which would help offset the cost of their disposal.

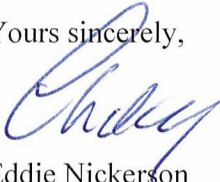


Third, the amendments to these regulations were developed by your department and we are being expected to adhere by them and our residents are being expected to pay for it. This is yet another example of provincial downloading which adds another financial and operational burden on municipalities. We believe there should be some provincial funding available to units to help correct the issue instead of it falling entirely on municipalities.

We hope you will take the time to read this letter to ensure that our concerns, questions, and suggestions are taken into consideration and that we are provided with a proper response.

Should you have any questions, please do not hesitate to contact us at your convenience.

Yours sincerely,



Eddie Nickerson
Warden

cc: Warden Alex Morrison, Municipality of the County of Annapolis
Warden Owen McCarron, Municipality of the County of Antigonish
Mayor Amanda McDougall, Cape Breton Regional Municipality
Mayor Christine Blair, Municipality of the County of Colchester
Mayor Murray Scott, Municipality of the County of Cumberland
Warden Linda Gregory, Municipality of the District of Digby
Warden Vernon Pitts, Municipality of the District of Guysborough
Warden Eleanor Roulston, Municipality of the District of East Hants
Mayor Mike Savage, Halifax Regional Municipality
Warden Bonny MacIsaac, Municipality of the County of Inverness
Mayor Carolyn Bolivar-Getson, Municipality of the County of Lunenburg
Warden Robert Parker, Municipality of Pictou County
Mayor Darlene Norman, Region of Queens Municipality
Warden Amanda Mombourquette, Municipality of the County of Richmond
Warden Bruce J. Morrison, Municipality of the County of Victoria
Warden John Cunningham, Municipality of the District of Yarmouth

