



**FREDERICTON  
CHAMBER  
OF COMMERCE**  
— The Voice of Business —

364 York Street, Suite 200  
Fredericton, NB  
E3B 3P7



26 February 2020

Hon. Jeff Carr, Minister of Environment and Local Government  
Marysville Place  
P. O. Box 6000  
Fredericton, NB E3B 5H1

VIA Email: [jeff.carr@gnb.ca](mailto:jeff.carr@gnb.ca)

**Re: Packing and Printed Paper Extended Producer Responsibility Program (“PPP-EPR”) Consultation**

Dear Minister Carr:

I am writing today to inform you and your department that we will not be able to provide feedback on the consultation documents provided to us on 12 February 2020.

As I wrote in my letter to you on 14 February 2020, there are two primary and intertwined issues with this process:

1. The subject matter is complex with many variables to be evaluated in the context of the NB economy. Exacerbating the complexity is the lack of detail and guidance in the discussion document provided.
2. The timeframe is far too short to provide meaningful feedback. For these types of consultations – even one with less complex subject matter - we would typically consult with our members and other stakeholders who may have valuable expertise and insight into this issue. It is impossible for us to provide informed feedback within the allotted timeframe.

Because we have not received a response to my 14 February 2020 letter that requested an extension of the department’s deadline, it would be irresponsible of our organization to provide feedback without adequate time to research and consult in order to make our input informed and meaningful.



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Our organization remains alarmed at the speed with which your department is attempting to introduce legislation and implement a new – and potentially very costly – regime that will negatively impact many New Brunswick businesses – particularly given the lack of detail that has been provided by the government that should be the cornerstone of any consultative process. The discussion document that was provided to us indicated on page 4, under the key objectives, that the program *ensure no additional red tape on NB businesses*. It would seem, in reviewing the document – that it will create an incredible amount of red tape and this is just the beginning of our concerns. Additionally we have seen no mention of an economic impact assessment for SME's.

In summary, we do not feel that we have enough information or time in order to reasonably participate in this consultation in a substantive manner. We implore you to slow the process down, provide more detailed background information and take the time needed to get this right.

Sincerely,

Krista Ross  
CEO, Fredericton Chamber of Commerce

CC: Mark Miller, Project Coordinator, Department of Environment and Local Government  
Hon. Mary Wilson, Minister of Economic Development and Small Business, Province of NB  
Hon. Ernie Steeves, Minister of Finance, Province of NB  
Hon. Blaine Higgs, Premier, Province of NB