



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

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



14 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

Re: Request for Extension of GNB's Packing and Printed Paper Extended Producer Responsibility Program ("PPP-EPR") Consultation

Dear Minister Carr:

I am writing today in response to the consultation documents and proposed regulatory framework that our organization received on 12 February 2020 regarding the Province's plans to implement a PPP-EPR. The corresponding email requested feedback on the documents by 28 February 2020.

I attended the consultation session held in December and the information provided during the consultation lacked adequate detail to allow stakeholders to conceptualize cost and competitive impacts of including the costs of a PPP EPR on their operations. The department produced a discussion document a full two months after that session and is now asking for meaningful input within 12 business days.

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.

Therefore, it is imperative that your department slow this process down significantly so that time for comprehensive and meaningful consultation with impacted businesses be allowed for during the



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process. At a minimum, we are requesting that the deadline be extended to March 31st for response to consultation documents on PPP Extended Producer Responsibility.

Given the very short response time provided in the email from the Manager of the Waste Diversion Unit, and the fact that at issue is creating a multi-million dollar regime that will increase costs and red tape to business, a speedy response to our request will be greatly appreciated.

Sincerely,

Krista Ross
CEO, Fredericton Chamber of Commerce