



**CANADIAN FEDERATION  
OF INDEPENDENT BUSINESS.**

Terrace on the Square, 8-10 Rowan Street  
St. John's, NL; A1B 2X1

Delivered by email

January 25, 2017

Board of Directors - Central Regional Service Board  
P. O. Box 254  
Norris Arm, NL  
A0G 3M0

Dear Board of Directors:

The Canadian Federation of Independent Business (CFIB) is a non-partisan and not-for-profit organization that represents over 600 independently-owned small- and medium-sized enterprises in the Central Newfoundland region.

I write in response to your letter of December 14, 2016, wherein you attempt to explain why the tipping fee increase was ultimately approved for 2017.

Having spoken to members in the central Newfoundland region, it is unacceptable to them the Sort It Central waste regulations have been so poorly implemented. Those already separating cardboard for recycling will not see savings, unless they reduce the amount of cardboard they send to the waste facility. Rather, on the same amount of cardboard in 2016, their costs will increase by 20 per cent in 2017.


Further, the non-compliance fee is unenforceable and will not have the effect of protecting the environment the Central Regional Service Board (Board) expects. For instance, without appropriate loss prevention controls in place, there is significant opportunity for clients of the waste facility to choose the lower rate of \$30 per tonne because even if found non-compliant and the \$70 fee applied, they are still saving at least 25 per cent on the higher fee.

We appreciate the Board's willingness to work with businesses rather than over-penalize them. Yet, business owners are concerned that the source separation process for recyclables chosen by the Board is not as beneficial for the environment as it could be. The Board should not be congratulating itself that the percentage of recyclables being removed from the waste stream is 20 per cent because, as a mandatory program, one would expect the percentage to be higher.

Let me be clear, on behalf of members, the rise in tipping fees is not the only expense about which they are concerned. The requirement for source separation has increased costs as well. For example, to ensure compliance with the regulations, one business had to procure a new \$80,000 truck to transport waste to the facility, which was the least cost option when compared to the alternatives. Many businesses, particularly those in the most rural areas of the region, have made significant investments to be compliant and they would like to see the Board undertake every effort to ensure full compliance with the regulations and tipping fees do not increase in the future.

The main task of the Board has been to ensure the effective implementation of a regional waste management service in central Newfoundland and it has failed. The Sort It Central waste regulations have been ill-conceived and poorly implemented, thereby creating an unfair, competitive environment at significant cost to many businesses in the region. CFIB has sought answers and presented solutions to the Board and others for many months without result. Seemingly, there is no interest to adequately address this issue in the best interest of all residents and business owners in the central Newfoundland region. **Therefore, we respectfully ask for the resignation of all members of the Board, effective immediately.**

Sincerely,



Vaughn Hammond  
Director of Provincial Affairs, Newfoundland and Labrador

Copy: Honourable Dwight Ball, Premier  
Honourable Eddie Joyce, Minister of Municipal Affairs  
Honourable Perry Trimper, Minister of Environment and Conservation  
Honourable Al Hawkins, Minister of Transportation and Works and MHA for Grand Falls-Windsor-Buchans  
Honourable John Haggie, Minister of Health and Community Services and MHA for Gander  
Mr. Jerry Dean, MHA for Exploits  
Mr. Derrick Bragg, MHA for Fogo Island-Cape Freels  
Mr. Derek Bennett, MHA for Lewisporte-Twillingate  
Mr. Colin Holloway, MHA for Terra Nova  
Mayor Barry Manuel and Grand Falls-Windsor Town Council  
Mayor Claude Elliott and Gander Town Council  
Mayor Brian Sceviour and Lewisporte Town Council  
Mayor Scott Sceviour and Botwood Town Council  
Mayor Robert Hobbs and Bishop's Falls Town Council  
Mayor Peter Lush (c/o Jean Blackwood), Town of Gambo  
Mayor Doug Churchill, Town of Glovertown  
Mayor Churence Rogers, Town of Centreville-Trinity-Wareham  
Mayor Derm Flynn, Town of Appleton  
Mayor Tony Keats, Mayor of Dover