



March 13, 2015

Manitoba Conservation and Water Stewardship
Environmental Programs and Strategies Branch
1007 Century Street
Winnipeg, MB R3H 0W4

To Whom It May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), I would like to provide our comments on the Province of Manitoba's newly proposed Waste Management Facilities (WMF) Regulation that addresses all solid waste management facilities, including landfills, transfer stations, and composting facilities in Manitoba.

The AMM appreciated the consultative meeting between AMM's Vice-President Ralph Groening and staff and Manitoba Conservation and Water Stewardship representatives that was held on March 2, 2015 following the release of the public consultation document.

While the AMM supports waste minimization and environmental sustainability goals, we strongly oppose any regulatory changes that negatively affect municipalities.

Firstly, the newly proposed WMF regulation will affect all waste management facilities in the province, and municipalities will be responsible for carrying astronomical costs under the new classification scheme. This is simply unacceptable, as municipalities cannot afford to pay tens of thousands of dollars, possibly hundreds of thousands, to conform to the new regulation.

Secondly, the short time period for public consultation as indicated by the April, 2, 2015 submission deadline is unreasonable as the Province of Manitoba is still seeking public input for *Recycling and Waste Reduction: A Discussion Paper*. This consultative overlap may lead to considerable resistance from stakeholders and the public, which may ultimately degrade the quality of the proposed WMF regulation and undermine its implementation.

Thirdly, the WMF public consultation document does not sufficiently explain the shortcomings associated with existing regulations, despite stating they were enacted in 1991. Moreover, a comprehensive explanation regarding why existing regulations are inadequate was also not conveyed to AMM representatives on March 2, 2015.

Fourthly, the lack of consultation with the AMM prior to the release of the WMF public consultation document is worrisome as we informed the Province of Manitoba in 2012 to consult with us on any possible changes to recycling and waste management in the province under the *TomorrowNow* framework.

Lastly, during our annual meeting with Minister Mackintosh on March 2, 2015, the AMM Executive expressed our concerns with this proposed regulation, and in result was pleased to learn regulatory changes will not be enacted without AMM's support. The AMM hopes to work collaboratively with the Province of Manitoba to find cost-effective sustainable solutions for protecting the environment.

The AMM appreciates the opportunity to provide these comments. Thank you for your consideration.

Sincerely,



Joe Masi
Executive Director

cc: Honourable Gord Mackintosh, Minister of Conservation and Water Stewardship