



December 5, 2017

Hon. Serge Rousselle, Q.C.
Minister of Environment and Local Government
Marysville Place
P.O. Box 6000
Fredericton, NB, Canada E3B 5H1

*****URGENT – Opposition to the Exportation of Waste to Other Provinces*****

Dear Minister Rousselle,

The Southeast Regional Service Commission believes the Regional Service Commissions are best suited to manage their region's waste, and for this reason, the exportation of waste to other provinces should not be allowed without approval by the Regional Service Commission where the waste originated.

For this same reason, the SERSC also opposes approval of the application by Green for Life Environmental Ltd. (GFL) to build a garbage transfer station in Saint John, NB to ship garbage to Nova Scotia. Initial approval will negatively affect the Fundy Regional Service Commission (Fundy), and will set precedent to expand to the other 11 Regional Service Commissions.

As such, it could lead to the loss of revenues from the ICI (Industrial, Commercial and Institutional) sector threatening:

- 1. Regional Service Commission (RSC) Economic Viability**
 - In most regions, ICI waste can represent upwards to 70% of the total waste stream and revenues.
 - The revenues of the solid waste department account for over 80% of the total revenues and pay 80% of the corporate expenditures.
 - The loss of this revenue will lead to a reduction of services by the RSC such as the potential closure of our recycling facility and our regional sanitary landfill.
- 2. Jobs**
 - The closure of recycling and composting facilities will lead to considerable job losses in the province.
 - Some of these jobs will likely be relocated to other provinces.
- 3. Climate Change**
 - Out-of-province shipping will significantly increase the provincial carbon footprint.
 - Diversion programs (i.e. recycling) will downsize and increase the carbon footprint.
 - There will be a significant public outcry at the loss of diversion programs.

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4. Taxes

- Loss of RSC revenue will need to be offset by constituent community tax bases.
- As per legislation, defaults, debt and closure costs will be community responsibility.
- Municipalities will have to pay more for regional governance with less service.

New Brunswick landfills and solid waste infrastructure were built by regional communities on the understanding that solid waste produced in the region would pay for the cost of construction, environmental protection and operations. Additionally, communities were asked by the Province to commit to waste diversion (recycling, compost and household hazardous waste) and legislated to pay for the RSC model, each of which are heavily subsidized by the garbage tip fee.

Application approval means GFL or other private sector entities will not have to pay for any of these services and can therefore use this unfair advantage to provide lower prices to increase profit at the expense of core provincial goals and community infrastructure.

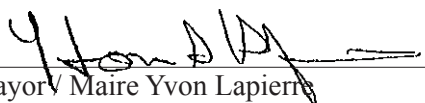
We would ask that this application be denied, or at a minimum, to delay approval and propose regulation to restrict the exportation of garbage out-of-province.

We also ask that the Province develop a Solid Waste Strategy which will provide common goals and objectives for solid waste management in the province and provide a framework for the RSC's to meet these goals and objectives.

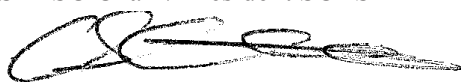
If you should have any questions, please do not hesitate to contact our Executive Director, Gérard Belliveau at (506) 382-4836.

Sincerely,


Board of Directors



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SERSC Chair / Président SCRSE



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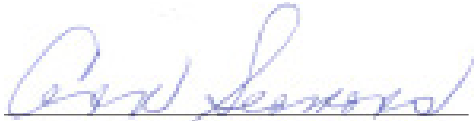


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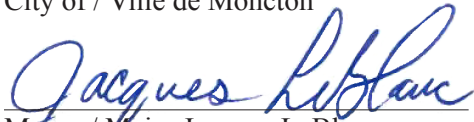
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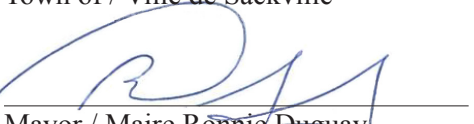
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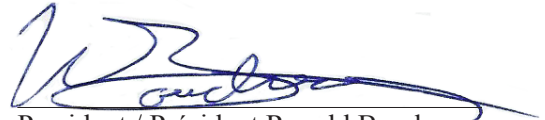
President / Présidente Heather Russell
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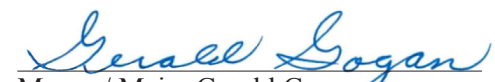
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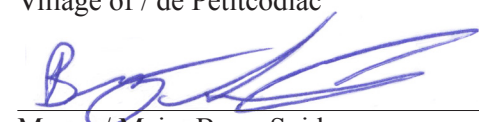
Mayor / Maire Terry Keating
Village of / de Salisbury



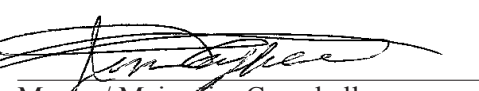
President / Président Ronald Boudreau
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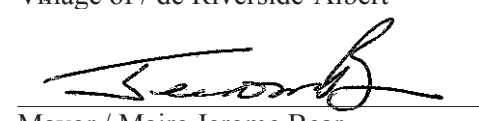
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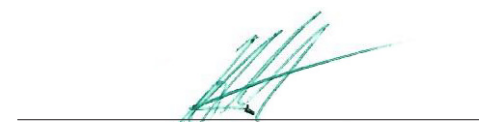
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