

Subject: By-law 607 to amend Solid Waste By-law S-600

Dear Mayor Kelly and City Council:

We are writing to you regarding By-law S-607 to amend Solid Waste By-Law S-600. Chamber members have expressed concerns about the cost impact to business of the proposed amendments.

Chamber members cite cost competitiveness as a top priority. Businesses in Halifax are already experiencing additional new costs with increases to bridge tolls, water and power rates. As you know, businesses in HRM pay almost 4 times the residential tax rate and in addition pay for the cost of garbage/waste removal. While for the residential sector, the change may be deemed manageable, for the business sector it is significantly different.

It is critically important for you to determine if a full analysis, review and consultation for this change has been done to determine the true cost impact of compliance (both in time and dollars) to our small businesses within Halifax. I would suggest you be shown a cross section of businesses in HRM that have been consulted, those with less than 10 employees in particular, as they will be highly impacted. While public hearings are part of the process, not all small businesses can take the time to attend and often do not feel the full impact of such changes until they actually have to comply.

It is our recommendation that rather than introduce a new system for business at this time that will increase costs to the business sector, consider first working with small business, in particular, to educate them to better understand the current system and how compliance can reduce their costs. If you can show the savings to be had (which is a premise in the material provided to you on the amended by-law), I feel confident business will adapt quickly to the changes based on voluntary compliance rather than a regulatory approach.

This would be a more responsive approach and show Council's understanding of the impact to the business sector of regulatory/red tape/by-law changes.

Sincerely,  
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