

Halifax Chamber of Commerce, Halifax, NS

Input to the Federal Red Tape Reduction Commission

March 1, 2011

The Halifax Chamber represents approximately 1500 member companies employing more than 90,000 people in Halifax- over half of the city's workforce.

In general, regarding red tape, we hear concerns on cross jurisdictional issues within governments, the need to interface with multiple departments, duplicate regulations, approval turnaround times and what seem to be arbitrary changes to policy without accountability.

Specifically, we would offer the following for consideration:

- Think small first (small in NS and in many provinces equates to less than 20 employees, often less than 10) – it is the owner/operator who is responsible for compliance along with all other aspects of the business.
- Refrain from asking small business for information which is already available within the administration, unless it needs to be updated.
- Set up single points of contact, through which businesses can obtain all relevant information and complete all necessary procedures by electronic means.
- Show that the commitment to red tape reduction is top of mind at the top.

Before a potential regulation is drafted - have a check list upstream and communicate this process well.

For example:

- Define the objective of the regulation, the cost of compliance not only to business but to the taxpayer. Consider a sunset clause. Define clearly who is accountable and where will this feedback be housed.
- Consult and listen to those (business/sectors) impacted and refrain from making changes without appropriate notice especially changes with cost considerations.
- Determine if it replaces an old regulation, or is it an add-on? If so, ask why?
- Will the new regulation align with a regulation already in place in a province or municipality – if so, do you still need it?
- Test to see if compliance is reasonable. Define what happens if it is not.

Other suggestions:

- Education of relevant government staff on what a regulation means to business and who it will serve, encourage a client-service focus with the taxpayer/business as the client. Many staff may have no experience in a small private sector business and it would be helpful to provide this education.
- As well, define the difference between private sector and public sector role in regulation – they should be mutually supportive not adversarial.

- Are you working with other provinces – Nova Scotia has done considerable work on red tape reduction – will the federal red tape reduction initiative support this work and be aligned?

Thank you for the opportunity to provide this input.

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