



February 1, 2006

The Honourable Trevor Holder
Minister of Environment and Local Government
Government of New Brunswick
Marysville Place
P.O. Box 6000
Fredericton, NB E3B 5H1

RE: *An Act to Amend the Clean Environment Act (Bill 15)*

Dear Minister:

On behalf of Corporations Supporting Recycling (CSR), Retail Council of Canada (RCC), and Food and Consumer Products of Canada (FCPC), representing Canadian-based manufacturers, retailers and distributors of a wide range of food, beverage and consumer products, we are writing in response to Bill 15, *An Act to Amend the Clean Environment Act*.

Collectively our members are committed to environmentally sustainable business practices and our goal is to ensure sustainable product/packaging stewardship programs are developed in provincial jurisdictions across the country. While we fully support New Brunswick's intention to develop a multi-material recycling program, we are concerned that paragraph *r.26* of Bill 15 prohibits a transparent cost recovery process, which in turn will impair consumer awareness of the recovery/recycling costs for designated products and packaging, thereby reducing consumer compliance.

In jurisdictions such as Alberta and British Columbia where recycling and recovery fees are transparent and directly traceable to actual packaging and product recycling costs, the benefits both to consumer awareness and the program's ultimate success can be significant. Transparent and traceable fees:

- Educate consumers on what it costs to recover and recycle a particular product or package
- Communicate to consumers which products and packaging are costly to recycle and which are less costly, allowing them to make educated and environmentally-friendly choices
- Provide consumers with a convenient and accessible way of "doing their part" for the environment
- Contribute to the sustainability of a stewardship program by helping to recover the costs

In light of these considerations, we request that Bill 15 be amended to exclude paragraph *r.26*. Approving the legislation as drafted could deny industry operating in New Brunswick the opportunity to establish sustainable stewardship programs to meet recovery targets established by government.

We would appreciate the opportunity to meet with you as soon as possible to discuss our concerns and will follow up with your staff to establish a meeting date. We look forward to your reply.

Sincerely,



Damian Bassett
President & CEO
CSR
(416) 594-3456



Diane J. Brisebois
President & CEO
Retail Council of Canada
(416) 922-6678



Gemma Zecchini
Senior Vice President
Public Policy
FCPC
416-510-8024, ext. 2239

c. William Eaton, Chair, New Brunswick Multi-Material Stewardship Board