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Canadian
Home Builders'
Association



Association canadienne
des constructeurs
d'habitations

March 16, 2010

The Honourable Charlene Johnson
President
Canadian Council of Ministers of the Environment
123 Main Street, Suite 360
Winnipeg, Manitoba
R3C 1A3

Re: Construction and Demolition Waste Management and Extended Producer Responsibility

Dear Minister:

It is the policy of the Canadian Home Builders' Association (CHBA) to support the development of effective methods for reducing the volume of construction and demolition wastes (C&D) entering Canada's sanitary landfill system. In this regard, I am pleased to provide you with the attached document, ***CHBA Policy Position on Construction and Demolition Waste Management and Extended Producer Responsibility***, which sets out the Association's views in this area.

The CHBA was pleased to provide initial comments on the Canadian Council of Ministers of the Environment (CCME) discussion paper on a Canada-Wide Framework for Extended Producer Responsibility (EPR) last summer. We look forward to continued collaboration with the CCME in this important area.

We would point out that, across Canada, many new home builders are already involved in waste reduction and diversion activities, through involvement in voluntary, market-driven "green" housing initiatives such as R-2000™, GreenHouse™ and Built Green™.

The construction and renovation of homes is a complex process that aggregates a wide range of materials and products. As outlined in the attached paper, the CHBA supports development of outcome-based waste diversion mechanisms with clear responsibilities and accountabilities, based on EPR principles. Further, we believe that these efforts must focus on approaches that are both effective and cost-efficient. To this end, and working with suppliers, new home builders, renovators and developers have a key role to play in the design and implementation of EPR-type programs in the residential construction sector.

The CHBA urges the CCME to move forward expeditiously, in consultation with affected parties, with the development of a Canada-wide EPR framework for C&D wastes. A number of jurisdictions across Canada are in the process of developing C&D waste policies, regulations and programs. Given that many building and material producers treat Canada as a single market, the timely availability of a national EPR framework can inform decision-makers at the provincial and municipal levels, leading to greater effectiveness and cost-efficiencies.

To this end, the CHBA remains ready and willing to work with the CCME, and views this matter as having urgency.

I look forward to hearing from you.

Yours truly,

A handwritten signature in black ink that reads "Victor Fiume". The signature is written in a cursive style with a large, looping initial "V".

Victor Fiume
President

c.c:

- Honourable Jim Prentice
Minister of the Environment,
Environment Canada
- Honourable Rob Renner
Minister of Environment,
Alberta
- Honourable Barry Penner
Minister of Environment and
Minister responsible for Climate Action
Secretariat,
British Columbia
- Honourable Bill Blaikie
Minister of Conservation,
Manitoba
- Honourable Rick Miles
Minister of Environment,
New Brunswick
- Honourable J. Michael Miltenberger
Minister of Environment and Natural
Resources,
Northwest Territories
- Honourable Sterling Belliveau
Minister of Environment,
Nova Scotia
- Honourable Daniel Shewchuk
Minister of Environment,
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- Honourable John Gerretsen
Minister of the Environment,
Ontario
- Honourable Richard E. Brown
Minister of Environment, Energy and
Forestry,
Prince Edward Island

- Honourable Line Beauchamp
Minister of Sustainable Development,
Environment and Parks,
Québec
- Honourable Nancy Heppner
Minister of Environment,
Saskatchewan
- Honourable John Edzerza
Minister of Environment
Yukon
- Joanne Thibault, Secretariat, Canadian Council of Ministers of the Environment
- CHBA Executive Board