



Submission

to the

Honourable Tom Osborne

Minister of Environment and Conservation

on

**Private-Public Partnering of
Waste Management Services
for the Greater Avalon**

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1 Executive Summary

The Newfoundland and Labrador Environment Industry Association (NEIA) is the environment industry's voice in Newfoundland and Labrador. NEIA's mission is the growth and development of environment businesses across the province. NEIA believes that Private-Public Partnerships (P3s) will bring value to public services and assets, and investment to the province. P3s will also result in economic growth and increased local business capacity. P3s are well suited to advance the province's waste management strategy with the provision of waste management infrastructure and services matching several of the key criteria for successful P3s.

NEIA has an extensive history in advocating modern waste management and promoting Private-Public Partnering in Newfoundland and Labrador. Over the past three years NEIA has been a leader in advancing waste management in the province and has hosted several public and private sessions on modern waste management and Private-Public Partnering.

P3s bridge the gap between the need for public infrastructure and government's fiscal capacity by having private money build infrastructure such as roads, bridges, airports, wastewater treatment systems, and waste management facilities. P3s provide high quality public infrastructure and services while relieving pressure on the public treasury.

P3s are being used very successfully in other countries and across Canada, and typically involve a design-build-finance-operate arrangement. P3s are not privatization and do require an ongoing role by government. In a P3, government identifies the need, specifies outcomes, selects the partner and designs the contract. Government also monitors the contract and enforces regulations. The private partner brings efficiencies, innovation, and private investment. Past studies have demonstrated that P3s provide faster, better and cheaper services than traditional government delivery or procurement.

P3s also allow government to focus on their regulatory role and avoid any potential conflict of both funding and regulating infrastructure and services. Whether they are provided in a P3, or directly by government, public goods and services are only as good as the standards and regulations that govern them. When the private sector provides the goods and services, government's role is more clearly defined. Value is also enhanced when regulatory controls are output rather than input based.

NEIA is proposing that government proceed with the development of the proposed waste system and site at Dog Hill, recommended for the Avalon Peninsula, via a P3. The environmental assessment work already underway by the Greater Avalon Regional Waste Management Committee should be encouraged and supported. Once complete, a request for proposals for a P3 should be developed and issued by a newly created regional authority.

In a waste management P3 the province does not need to front a large capital expenditure to establish new infrastructure. However, capital funds that can be brought to the project via federal contributions or technology programs will serve to reduce tipping fees. Tipping fees can be further reduced by the province paying a shadow fee that would cover the portion of the tipping fee needed for amortization of private capital funds. Provincial contribution in such a mechanism would be \$1.5 - \$2 million annually for a period of 15 years.

Public control and ownership of the infrastructure created in a P3 can remain in public hands while offering the private partner access rights and control during the term of the agreement. This satisfies the needs of private lenders and maintains the asset in public control. At the end of the P3 contract term the asset reverts to full public ownership and a new P3 arrangement or self operation can be executed.

A waste management P3 on the Avalon will generate a significant number of new jobs and has potential to create hundreds or possibly thousands of indirect jobs. The implementation

of a new waste system will generate several new businesses and result in the expansion of many existing firms. Many of these new businesses will be created by the economic incentive on waste generators to better manage their waste, and from the new and enhanced environmental management services that will be required at the new facilities. Our neighbours in Atlantic Canada have seen significant economic development as a result of their waste management initiatives and Nova Scotia has identified 3000 jobs that were created following implementation of their waste management strategy.

Successful application of P3s in Newfoundland and Labrador for waste management infrastructure will require policy review and development of a specific request for proposals and contract documents. To move forward on waste management and P3s, government commitment and leadership is needed. NEIA is recommending that a P3 secretariat be established in Executive Council to create a public P3 project management resource, research policy necessary for successful P3s, establish benchmarks to identify value, and develop a P3 request for proposals and contract documents. The new secretariat should also develop a Newfoundland and Labrador infrastructure investment fund which would facilitate retail investors participating in public infrastructure and create a pool of funds for P3 projects.

The environmental assessment of the proposed Avalon waste system and site at Dog Hill must be encouraged and supported, and immediately followed by formation of a regional authority and issuing of a P3 request for proposals. Once a private partner has been selected, via a full vetting process, a detailed P3 contract is established and signed by both partners.

2 Introduction

The Newfoundland and Labrador Environmental Industry Association (NEIA) is a non-profit industry group representing businesses in the environmental sector in Newfoundland and Labrador. NEIA's role is to grow and develop business in the environmental sector in Newfoundland and Labrador and to represent the industry through a unified voice.

Waste management is one of the largest market areas in the environment industry throughout Canada and the world and NEIA's members have a keen interest and expert knowledge in waste management. Some of NEIA's companies are actively involved in a wide range of waste management activities through their parent companies and/or affiliates elsewhere in Canada. For the past several years NEIA has contributed significantly to the development of waste management policy in Newfoundland and has devoted significant resources to participating in and developing waste management initiatives. NEIA has consistently advocated that development and implementation of the Provincial Waste Management Strategy will result in significant economic development and create hundreds of jobs. Nova Scotia has seen the creation of 3000 jobs since the introduction of their waste management program.

Our current waste management practices can be considered third world and are hindering the Province's economic development. Newfoundland and Labrador is lagging behind other provinces in Canada and the time for change is long overdue. Newfoundland and Labrador has limited recycling and reuse of waste material and we are leading the country in emissions of dioxins and furans due to our use of open burning and Teepee incinerators. These factors are a deterrent to large companies considering locating here as they may not be able to operate in compliance with their own environmental policies. The majority of firms looking to come to this province to service the oil and gas sector are ISO registered, as this is an advantage in obtaining contracts from oil companies. An ISO 14000 registered company has implemented international environmental standards as company policy. However, with current

waste management practices in this province, an ISO registered company cannot meet its own environmental standards. Many waste management processes and products are not available in this province. This can result in a company locating in Halifax rather than a community in Newfoundland and Labrador. Additionally, local companies are losing ground to competitors in the rest of Atlantic Canada as our maritime neighbours advance their new waste systems.

Given the current fiscal status of the province and the need for infrastructure to support modern waste management and economic development, it appears that Private-Public Partnering would be an effective tool in providing the financing, infrastructure and expertise needed to implement the waste management strategy. The waste management strategy itself identified Private Public Partnering as a mechanism that would be needed to advance waste management in the province. The province's environment industry has the capacity, resources and expertise to provide waste management infrastructure via a Private Public Partnership. NEIA and its members are ready to work with government to establish a Private-Public Partnership for the waste system proposed for the Avalon region.

The following paper was developed out of NEIA's research and consultations with NEIA members and NEIA's Board of Directors. The paper provides an overview of NEIA's activity to date to advance waste management in our province and then presents information on the key elements and benefits of successful Private-Public Partnering. Finally the paper provides an overview of a Private-Public Partnership (P3) model to implement the proposed waste system for the Avalon and the necessary steps for implementation.

3 NEIA's History in Waste Management

For the past several years NEIA has advocated and contributed to the development of a modern waste management system in Newfoundland and Labrador. Since one of our member companies first invested in fibre collection infrastructure and began promoting a fibre collection service in the early 1990s, NEIA has been actively promoting, facilitating and contributing to the development of a new waste system in the province. In fact NEIA has been a key force in advancing waste management to its current status.

NEIA strongly believes in the economic benefits and wealth that can be brought to the province by a progressive waste management policy and has invested significantly in developing opportunities for member firms. The following is a summary of NEIA's activities over the past three years to facilitate waste management and provide reliable and accurate information to stakeholders:

1. NEIA made a formal presentation and participated in public and private discussions with the Minister's Advisory Committee on Waste Management in 2001.
2. NEIA prepared and made a formal presentation to the Minister of Environment in 2001 on the economic benefits of a waste management strategy.
3. In 2001 NEIA researched and submitted a formal position paper on waste management highlighting the economic benefits of a waste management strategy.
4. NEIA has made formal submissions to the Minister of Finance during pre-budget consultations in 2001, 2002 and 2003 highlighting waste management.
5. NEIA used its annual conference in 2002 to profile modern waste management and brought experts to the province to present waste management models and also

- brought the president of the Canadian Council for Private-Public Partnerships to St. John's to speak directly on how to structure Private-Public Partnerships.
6. NEIA was a key member on the Avalon Waste Management Community Consultative Committee, chairing a sub-committee and leading the development of the Committee's Action Plan.
 7. NEIA developed and hosted a workshop, using the Canadian Council for Private-Public Partnerships, on P3s for senior government officials in early 2003.
 8. At our 2003 annual conference NEIA brought in speakers from New Brunswick and PEI to profile their waste systems and also brought the Mayor of Moncton, New Brunswick to St. John's as the keynote speaker. Mayor Murphy provided an excellent overview of highly successful Private-Public Partnerships in the City of Moncton in wastewater and sports/recreation facilities.
 9. NEIA facilitated feedback sessions with members on proposed waste management standards and performed and submitted a thorough review of the draft standards.
 10. NEIA has promoted the benefits of a waste management P3 to municipalities and published an article on P3s in the Newfoundland and Labrador Federation of Municipalities Municipal News.
 11. NEIA has communicated with the media on a P3 waste management arrangement and has had positive radio and newspaper experiences promoting the benefits of the waste management strategy and P3s.
 12. NEIA has organized and hosted commercial composting workshops in 2003 and 2004.
 13. NEIA is a key and active member of the Greater Avalon Regional Waste Management

Committee and chairs the Environmental Assessment Sub-Committee.

14. NEIA again put waste management on the agenda at our 2004 Conference with presentations from the Ministers of Environment and Municipal and Provincial Affairs, the Avalon Waste Management Committee and a full overview by NEIA member on their P3 experiences and how they could deliver the Avalon waste system via a P3.
15. NEIA serves on an Ad Hoc Fibre Recycling Committee and continues to contribute to the development of recycling programs in the province.
16. NEIA is an invited member of the province's advisory committee to the Interdepartmental Steering Committee on Implementation of the Waste Management Strategy, chaired by Municipal and Provincial Affairs.
17. NEIA accepts and entertains many inquiries on waste management in Newfoundland and Labrador and encourages investment by members firms and other companies.

As is indicated above, NEIA has a significant history in waste management in the province and has made a significant investment in moving forward on this issue. NEIA has worked hard to provide real, accurate and relevant information on P3s and has provided government with direction on how to develop a successful P3.

4 P3s - Overview, Opportunities and Benefits

4.1 Infrastructure Investment

The total cost to upgrade our provinces waste management and wastewater infrastructure and thereby support economic growth is no doubt a figure that far exceeds government's ability under status-quo funding mechanisms. We need to consider new approaches and be innovative to meet the challenges of providing high quality public services while relieving the pressure on the public treasury. P3s present an opportunity to bridge the gap between the need for public infrastructure and fiscal capacity. However, financial crisis should not be the only driver to enter a P3. Lack of government commitment, poorly defined outcomes, and lack of public staff understanding can cause a private partner to become frustrated. Private-Public Partnering is a policy change, and policy revisions and implementation are necessary for success. A key consideration is private partner payment which will likely mean a move towards more consumption based taxation in user fees. Administrative flexibility may also be required for governments to obtain value and access additional sources of taxation and debt financing.

The current lack of government capital, need for waste facility infrastructure and clear revenue stream (tipping fees) present an excellent opportunity for a successful waste management P3 on the Avalon Peninsula. The waste management initiative on the Avalon also meets several other key criteria for a successful P3. There is private sector capacity in place, legislative and regulatory hurdles are manageable, and, as there is no existing similar system, labour issues are easily managed. A P3 waste project for the Avalon would also provide the public with guarantees on cost overruns, time lines, operating standards, environmental protection standards, and value for money.

Another consideration is the fact that in other jurisdictions governments are moving away from directly providing waste infrastructure and are purchasing or leasing waste services from firms and organizations with expertise and/or specialization in waste management. Much of

the waste management infrastructure in the maritime provinces is now owned and operated by private companies that provide a service to municipalities and businesses. Halifax's waste facilities, and most other waste facilities in Nova Scotia, are owned and operated by private firms. Landfill operations in the rest of Canada, the United States and Europe are also privately owned and operated. In a privately operated facility, such as would be in place in a P3, the liabilities and environmental responsibility/risk are taken on solely by the private company(s).

4.2 Environmental Protection

In a P3 there is an enhanced and independent regulatory environment. By separating the development and operation of infrastructure from government's regulatory role, the enforcement of standards is not conflicted with the obligation to fund a service or equipment upgrades. It is government's role to ensure public services are adequately provided, not necessarily provide them. When the two functions are both provided from within government there is potential for conflict. When the private sector provides the infrastructure and its operation, government's regulatory role is more clearly defined and becomes more effective. The provision of public goods and services is only as good as the standards and regulations that government them. Greater value will be gained when regulatory controls are output, rather than input based. (ie. Regulations that require performance, such as meeting environmental discharge limits.)

4.3 Value and Investment

P3s have been used successfully in other jurisdictions and have resulted in lower capital costs, the creation of new jobs and economic wealth, and increased local business capacity. P3s differ from privatization in that the government retains an ongoing role. However, government's role does change to identifying the need, specifying specific outcomes, selecting the partner and designing and developing the appropriate contract. Government also continues to be responsible for monitoring the contract and enforcing regulations. The private partner brings expertise, efficiencies, innovation, economy of scale from being

involved in similar operations, and private investment. Value for money studies have shown that a P3 will provide faster better and cheaper services than traditional government delivery or procurement. P3s are also more likely to avail of new and innovative technology, building local knowledge and expertise. Private partners do expect to make money and to do this they will strive to innovate and operate more efficiently. User fees and performance requirements including environment regulations are fixed under the P3 contract. In considering the benefits of a P3, consider a smaller project such as the building of a home. Would a builder with a proven performance record motivated by efficiency, customer satisfaction and quality control, or a manager and workers employed in a system driven by minimizing harm to a political master provide best value to the owner? In a P3, government can focus on setting clear outcomes and have the private partner determine the best method to achieve the required performance.

P3s are being used extensively in other jurisdictions including Europe, the United States, and Australia. The UK is considered a leader and many other countries have modelled their systems on the success in the UK. Currently, P3s are growing in Canada with recent initiatives being announced by the provinces of Ontario and British Columbia. Many other provinces also make use of P3s including Nova Scotia, New Brunswick, Alberta and Quebec. In fact here in Newfoundland and Labrador we have been using P3s for several years. Health and education boards have entered into several energy performance contracts where public buildings have been retrofitted using private financing repaid through the resulting energy savings. Other P3 arrangements in the province include IT services and offshore monitoring and surveillance.

Where P3s have been used the results are impressive. Billions of dollars of private money has build public roads, bridges, airports, prisons, water systems, energy utilities, transit systems and hospitals, schools and housing.

4.4 Sharing Risk and Responsibility

P3 is partnering and must be done correctly. Proper vetting by government to verify performance, capacity, and appropriate expertise of potential partners is key to success. As with any business partnership there must also be synergies in working closely together. The risks and rewards need to be clearly identified and aligned. Clear lines of responsibility need to be established and benefits to taxpayers identified. Government needs strong project management in identifying the need, establishing a partner and developing a contract. With a contract in place government will need to continue to monitor outcomes and enforce requirements.

5 P3 Model for the Avalon Waste Management System

Given our current fiscal position, the need to invest in infrastructure and the economic development potential of P3s and the waste management strategy, NEIA is proposing a P3 model for government to move forward.

5.1 Dog Hill Environmental Assessment

With the significant work that has been accomplished to date on site and system selection, NEIA would encourage government to continue to proceed with the environmental assessment of the proposed waste system and site at Dog Hill. A waste facility site that has completed the environmental assessment process will be very attractive to a private partner. The completed environmental assessment will also reduce the capital investment required and remove some risk associated with the project. The reduced costs and risk will translate into more attractive user fees for waste generators and demonstrates commitment to prospective private partners.

5.2 Request For Proposals (RFP)

Once the environmental assessment is complete a request for proposals should be issued to seek a private partner to finalize design, obtain financing, and construct and operate the new waste system. The request for proposals can require the private sector to raise the entire capital or additional partners such as the federal government could be sought and incorporated in the P3. This would ultimately serve to reduce financial impact on the users of the new system. The request for proposals should also encourage the use of new technology and federal technology development programs such as the Industrial Research Assistance Program and Technology Partnerships Canada. This requirement will ensure use of best available technology, technology transfer, the development of local skills and capacity, and bring additional revenue to the project. In advance of the RFP a mechanism to access low interest Green Municipal Funds should be developed giving the private partner the option to obtain financing at a reduced interest rate. The enabling portion of the Green Funds should also be engaged for the final engineering design and background environmental data

collection work.

5.3 Capital Funding

Municipalities have suggested they are willing to take on the sole responsibility for the operation of the waste system and have committed to the system being self sustainable. However, capacity to take on the capital cost or have that cost amortized and incorporated into a tipping fee has not been demonstrated. At the same time the province is not in a fiscal situation to make significant investment in new infrastructure. Therefore, NEIA is proposing a system where the province would not provide a significant onetime outlay of cash. With a federal contribution of 50% and the private partner financing the balance, a potential tipping fee of \$60 - \$70 dollars may be charged, which includes a portion to amortize the capital. If the province were to participate with a shadow fee, which equals the amortization portion of the tipping fee, the user fee charged municipalities and other waste generators becomes \$50 - \$60 dollars per tonne and the province commits to an annual payment of \$1.5 - \$2 million for a period of 15 years. Considering that waste services would be self sustaining once the new system is in place, the \$1.5 - \$2 million annual investment may still result in a net annual saving to the province.

NEIA is further proposing that the province consider developing an infrastructure investment fund similar to those that are in place in countries such as the United Kingdom. These funds have been attractive where expert investors familiar with the provision of public infrastructure manage them. These types of infrastructure funds can accumulate pools of money from retail investors that would otherwise not invest in providing public services. The money raised can be used for P3 projects of various sizes and facilitate projects that may not have otherwise been attractive to larger investors.

5.4 Industrial Benefits

The private partner that would lead a P3 and sign the contract would not likely be the only firm involved in providing the waste services. In fact the P3 request for proposals should require local participation and partners. The lead firm or firms may include expertise from outside the

province but such a project must also incorporate local industrial benefits and technology transfer. There are several areas where local companies can participate including: site engineering, environmental monitoring, leachate collection and treatment, processing of recovered waste materials, composting, landfill construction, transfer stations and transport of waste.

5.5 Public Control and Ownership

A key issue in a P3 is the appropriate level of public control and ownership. While the risk of full privatization (full ownership of an asset by the private sector) may be considerable, developing infrastructure using a simple design-build contract will provide much less benefit. The design-build-finance-operate model has become one of the most popular P3 options around the world, especially involving assets with a revenue stream. This arrangement normally keeps the asset in government hands while offering the private partner access rights and some control during the agreement. Such a scheme allows the private partner to satisfy the needs of its lenders, who require some asset control in return for more favourable financial terms. In the case of long term contracts where benefits and risks can be greater, mechanisms including establishing formal security such as bonding and clear and realistic performance criteria related to maintenance can protect the public's interest in an asset.

In the above described model, once the P3 contact term is complete, a new P3 with the existing or a new private partner can be executed, municipalities can choose to operate the facilities themselves or a contract to operate and maintain the infrastructure can be established.

5.6 Private Partner Contribution

A private partner in an Avalon waste management P3 would provide the complete infrastructure and service as described in the action plan developed by the Avalon Waste Management Community Consultative Committee. The engineered landfill, the material recovery facility, the compost facility, the construction and demolition waste facility, the transfer

stations, household hazardous waste drop-off, bulk waste drop off and necessary trucks and heavy equipment would all be provided, operated and maintained by the private partner. Additionally, due to the long term commitment of residents in the in the area of the new facility, private partners may also offer infrastructure investment in parks, trails, recreation facilities, access roads and environment projects in the area of the Dog Hill site. These type of community investments and openness to work with, and become part of the community, have been demonstrated by NEIA members with P3 projects in other jurisdictions.

In addition to the recreation infrastructure investments referred to above, it is possible that additional investment in satellite construction and demolition waste facilities, bulk waste drop-off and household hazardous waste drop-off sites could be proposed by a private partner.

5.7 Economic Benefits

The model proposed for a P3 waste project on the Avalon would also see significant job creation. While there may be some job displacement with implementation of a new system, there would be a large net gain in jobs. The main facility itself would have over fifty direct positions with additional jobs at the transfer stations and operating transport vehicles. Besides those hired directly by the private operator many more jobs would be created in companies servicing the facility such as those providing environmental management services and ongoing construction of new cells.

The new waste system is also going to result in new businesses. Realistic tipping fees will create economic incentive to minimize, reduce and recycle waste. There will be opportunities for new businesses to provide waste auditing and minimization services as well as collecting and processing recoverable waste materials currently going to landfill. Hundreds and possibly thousands of new jobs will be created. As indicated earlier, Nova Scotia is claiming the creation of 3000 jobs since the introduction of their waste management system. The knowledge created in Nova Scotia to better manage their solid waste is now being sold to markets around the world. There is significant potential for the Newfoundland environment

industry to achieve and surpass the same goals.

6 Next steps

P3s have become a very effective tool in Canada and around the world in achieving infrastructure investment and value to taxpayers. The waste management project for the Avalon presents an excellent opportunity to both advance P3 in the province and implement badly needed waste management infrastructure.

18. Government Commitment

A key first step in moving forward with P3s and the Avalon waste management project is government commitment. There are challenges in moving forward but the opportunity and benefits will prove to be well worth any risk. Much of the success in the United Kingdom can be attributed to their government's fundamental belief in the value of delivering infrastructure through the private sector. Political and bureaucratic champions within government are necessary to advocate the benefits of P3, lobby for the planning investment needed, and communicate the return that will come in economic growth and increased wealth. To achieve these benefits government has to become committed to moving forward and by the end of 2004 the planning and development resources required need to be put in place.

To demonstrate commitment government needs to immediately meet with communities now using open burning to manage their waste sites and assist them to plan for the phase out of open burning in 2005. Closing these sites and beginning to consolidate the current 240 waste facilities will demonstrate a will to move forward on waste management and meet our national emission reduction commitments.

19. Establish a P3 Secretariat

A P3 secretariat or infrastructure investment initiative should be established in Executive Council to lead and oversee research on P3, review and develop the policy necessary for successful P3, establish benchmarks or public sector comparators, and develop a standard request for proposals and P3 contract documents. The new secretariat should also be

responsible for researching and developing policy on an infrastructure investment fund for Newfoundland and Labrador.

P3 has been tried and perfected in other jurisdictions and research and review of others, particularly the UK, should be carried out to determine the key criteria and processes for successful P3. The past challenges and successes of P3 can be used to develop positive experiences in Newfoundland and Labrador.

20. Establish Benchmarks

In promoting P3 it will be necessary to demonstrate value for money. In order to achieve an apples to apples comparison on the value of P3 versus a traditional design and build project, a third party with no vested interest should be engaged to generate accurate comparisons. Application of consistent accounting principals and similar treatment of capital expenditures will be necessary to attain a useful comparison.

21. Complete the Environmental Assessment

Government should encourage and support the Greater Avalon Regional Waste Management Committee to proceed with the environmental assessment of the proposed action plan and Dog Hill site. At the same time the assessment is proceeding the P3 secretariat should be created and begin its work to establish the policy and standard documents required for a successful P3.

22. Create the Avalon Regional Authority

With the environmental assessment process complete, the Greater Avalon Regional Waste Management Committee must become a regional authority. Once the Committee is a regional authority the process of transition from the 43 existing sites to the Dog Hill facility should begin and the authority should immediately work with the new P3 secretariat to prepare a P3 request for proposals.

23. Issue a Request For Proposals

The P3 request for proposals should be issued within six months of the authority being formed. The process of selecting a partner should be thorough as was discussed previously and will require strong project management.

24. Finalize and Sign a P3 Contract

Once a partner is selected the process of finalizing contract documents, based on the standard documents created by the new secretariat, will need to be completed. With the partner selected, contract documents signed, bonding in place, environmental assessment completed, the investment and construction get underway.

7 Conclusion

While there are many demands on the province's fiscal resources to provide public services, the province must invest in economic development for these services to be sustainable. The provision of infrastructure facilitates business investment and thereby generates economic growth and wealth. P3s present an opportunity to provide much needed infrastructure and enhanced public services and also facilitate economic development .

The Newfoundland and Labrador economy has performed strongly in recent years. To continue the province's economic performance, investment and incentives need to be provided to stimulate business activity. A province of Newfoundland and Labrador's population needs to take advantage of the potential to implement change that is not readily implemented in larger jurisdictions. Moving forward with initiatives like P3 requires policy change and flexibility. Leadership with strong will and vision will be necessary to overcome bureaucratic challenges. To move forward on P3s government will need to focus on the resulting advantages and economic growth, rather than the shorter term hurdles and obstacles. The province should see our smaller size as an opportunity and move towards a system of bureaucracy that puts less government in front of business and is more appropriate for a population of 500,000.

Protecting our environment appropriately and using innovative tools such as Private-Public Partnering, are necessary to bring this province forward and have Newfoundland and Labrador companies compete in an ever more global marketplace. NEIA is recommending that government work with stakeholders and provide leadership in establishing a collaborative approach to managing our solid waste in a sustainable manner. Such an approach not only protects our environment and public health, but also facilitates business development and leads to innovation, improved competitive position and economic wealth.