

## YUKON CHAMBER OF COMMERCE Suite 202 - 302 Steele Street, Y1A 2C5 Whitehorse, YT Ph. (867) 667-2000

May 27, 2025

The Honourable Ranj Pillai, Premier of the Yukon, and Minister, Economic Development & The Honourable Nils Clarke, Minister of Environment, and Highways and Public Works Government of Yukon
PO Box 2703
Whitehorse, Yukon Y1A2C6

Re: Yukon EPR Program Not Fully Cooked - Meeting Program Objectives Unknown

Dear Ministers,

In just 28 days, the first phase of the Yukon's new Extended Producer Responsibility (EPR) program is to launch. From a Yukon business, industry and consumer lens, this program is poorly understood, financially cost-prohibitive, overly complex and administratively expensive, destroying what little profit margin privately owned Yukon based-businesses have; all at the dawn of a pending global recession.

Economic Development is investing in Trade Resiliency programming that serves to enhance Yukoners buying local. Local tourism operators are welcoming American visitors to our home but keeping our money in our Territory during these economically challenging times. The Yukon has worked with the business community through 9/11, SARS, COVID recovery measures, and today, with a global tariff war underway, Yukon launches a program with significant financial implications and no evidence of effectiveness for its intent – to enhance consumer waste diversion and make consumers more conscious?

The Yukon, like the rest of our country is experiencing labour shortages, a shortage of affordable housing, exacerbated by Governments limiting the supply of land for housing construction, unwarranted delaying in construction permits and inspections, and more. Then the uncooked EPR program is launched without sufficient financial projections and impacts to business and consumers, complex and new administrative procedures and poorly understood intended impacts to environmental stewardship. As an example, one local business projects new costs from EPR to business exceeding \$100,000 annually. These new costs will be passed on directly to another consumer that will invariably be responsible for disposal and then be taxed again. Cost of goods in Yukon will rise.

This 'solution' – the EPR program - does not match viable or realistic Yukoner or program needs considering our small population and distance to market for appropriate recycling, not to mention that it appears as though the EPR is a tariff - a tax by a new name – and that this new YTG Tariff will be passed on to the consumer who will pay into multiple recycling or EPR programs each time the product is warehoused, distributed or consumed. This program will cause financial harm to businesses and to consumers, while misleading Yukoners, operators and consumers that the EPR will make a positive impact in environmental waste diversion.



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On behalf of the Yukon Chamber of Commerce members and all our partners that support economic prosperity, sustainability and being stewards of this land, delay this program. Reconsider timing, information sharing, impact to administrative and financial processes and costs to our economy.

The Yukon Government needs to truly understand how the recession will impact business. We need to share and show true, actual costs through diverse business models and ask ourselves, is a program that worked in a region with a 1,000 x the population and all the infrastructure accessible to recycle properly, is that program really a best-case example for a Yukon solution? If you cannot answer a resounding yes, and during these challenging economic times, we call on the Yukon Government to postpone the implementation of this program, do a deeper dive into the financial implications for Yukoners and stay open to alternative, realistic models that don't have our small business community and economy bearing sole financial responsibility to divert waste in our Territory.

YCC encourages Yukon Government to review the sustainability of existing waste management and landfill plans of Yukon Government for which we already pay for through our current taxes and user-fees.

Thank you for your urgent attention to this matter. I can be reached at (867) 332-2018 or by email to <a href="mailto:jcampbell@groundreflections.ca">jcampbell@groundreflections.ca</a>

Sincerely,

John Campbell, Chair

Yukon Chamber of Commerce

Cc: Whitehorse Chamber of Commerce
Dawson City Chamber of Commerce
St. Elias Chamber of Commerce
Yukon Contractors Association
Yukon Chamber of Mines
Leader of the Opposition, Currie Dixon
Leader of the NDP, Kate White