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Item No.14.1.2 Halifax Regional Council November 13, 2018

SUBJECT:	Regulatory Modernization Joint Project - Results and Next Steps
DATE:	October 11, 2018
	Jacques Dubé, Chief Administrative Officer
SUBMITTED BY:	Original Signed by
TO:	Mayor Savage and Members of Halifax Regional Council

<u>ORIGIN</u>

On October 4, 2016, Regional Council passed the following motion:

THAT Halifax Regional Council:

1. Authorize the CAO to commit a staff resource, reporting to the CAO, to work with the Nova Scotia Office of Regulatory Affairs and Service Effectiveness on red tape reduction for a period of six months with the possibility of extension of up to three years;

2. Approve funding in the amount of up to \$65,000 in 2016/17 to be allocated to the project, as per the Financial Implications section of the supplementary staff report dated September 19, 2016; and,

3. Have staff report to Regional Council on progress in six months.

LEGISLATIVE AUTHORITY

The Halifax Regional Municipality Charter (HRM Charter), subsection 59(3), "In addition to matters specified in this Act or another Act of the Legislature, the Council may adopt policies on any matter that the Council considers conducive to the effective management of the Municipality."

The HRM Charter permits the Municipality to undertake a variety of economic development activities. Sections 70 and 71 describe many authorities specific to Area Improvement and Promotion, and Business and Industrial Development, such as

70 (1) The Municipality may...(c) identify and promote a business district as a place for retail and commercial activity;

71 (1) The Municipality may

(a) solicit and encourage the establishment and development of new, and the establishment, development and expansion of existing institutions, industries and businesses in and around the Municipality;

...RECOMMENDATION ON PAGE 2

(b) publicize the advantages of the Municipality or any part of the Municipality and the surrounding areas as a location for the establishment and expansion of institutions, industries and businesses;

79 (1) The Council may expend money required by the Municipality for

(m) promotion and attraction of institutions, industries and businesses, the stabilization and expansion of employment opportunities and the economic development of the Municipality;

(ap) industrial parks, incubator malls and land and other facilities for the encouragement of economic development;

HRM Charter, subsections 34 (1), (3):

(1) The Chief Administrative Officer is the head of the administrative branch of the government of the Municipality and is responsible to the Council for the proper administration of the affairs of the Municipality in accordance with the by-laws of the Municipality and the policies adopted by the Council.

(3) The Council shall provide direction of the administration, plans, policies and programs of the Municipality to the Chief Administrative Officer.

RECOMMENDATION

It is recommended that Regional Council extend the Regulatory Modernization Joint Project collaboration with the Province of Nova Scotia and Business Advisory Panel for a period of two (2) years, to December 31st, 2020.

BACKGROUND

Halifax is reducing red tape to advance Council's priority outcomes to grow the economy and improve service delivery. This will make it easier to do business here, a key objective of the *Halifax Economic Growth Plan 2016-21* (HEGP). Red tape is a form of regulatory burden as it creates undue costs and loss of productivity for business. It also impacts regulatory performance and policy outcomes for all orders of government. While regulation is critical in addressing economic, social and environmental values for societies, outdated, over-reaching, and overly complex regulation places a measurable burden on government, business, and the entire community.

In October 2016, the Halifax Regional Municipality (HRM) partnered with the Province of Nova Scotia (PNS), through the Office of Regulatory Affairs and Service Effectiveness on the "Trial Arrangement for Joint Action to Reduce Regulatory Burden and Red Tape for Business" (the Joint Project Regulatory Modernization). A Memorandum of Understanding (MOU) was signed between the two parties to accomplish objectives to remove unnecessary regulatory burden for businesses in Halifax. An Advisory Panel made up of HRM, PNS and business organizations provides joint oversight for the Project and insight into key issues of regulatory burden for business.

The Joint Project objectives contained in the MOU were shaped by the Province's regulatory modernization initiative enabled under the 2014 Red Tape Reduction Act. They are:

- 1. Development and adoption by HRM of guiding principles of regulation based on the Atlantic Premier's Charter of Governing Principles, and adapted for Municipal use;
- 2. Identification of at least three areas of priority for change in municipal regulation to reduce regulatory burden, together with a plan for addressing each area, with a view to full implementation prior to the end of the Joint Project; and,

 Trial and adoption of a customer service strategy for business that includes elements of the business service plan developed for Nova Scotia by the Office of Regulatory Affairs and Service Effectiveness;

A 9-month red tape reduction action plan was developed by the Advisory Panel in collaboration with HRM and PNS staff in the Fall of 2017. The Action Plan was communicated to Council and the public in March 2018 and is accessible online at: <u>https://www.halifax.ca/business/doing-business-halifax/reducing-red-tape</u> Implementation is through a collaborative multi-business unit team of HRM staff and managers.

DISCUSSION

Regulation is an important tool for achieving public policy outcomes and managing issues of importance in the best interests of the public. Regulatory modernization is focussed on building more effective regulation that achieves its purpose with minimal impact and cost. Effective regulation comes from careful problem assessment, streamlining and simplifying rules and processes, good customer service, and performance measurement. Alternatively, regulatory burden comes from unnecessary and outdated administrative steps, rules, and decision-making processes that delay approval times and make compliance costly and difficult.

Status of the Joint Project Action Plan

The Advisory Panel and partners agreed to a September 2018 timeline to complete the Project objectives.¹ As of mid-October the action plan is 90% complete (see Attachment 1 for a summary of the key actions). The Project has focussed on making improvements to three types of regulatory burden. They and their related activities are outlined below.

1. <u>Rules and regulations</u> – reducing or eliminating regulatory requirements that are duplicative, ineffective in addressing their objectives, or excessive in terms of compliance time and cost.

Actions include: adoption of a *Charter of Governing Principles for Regulation Administrative Order* (AO),<u>https://www.halifax.ca/sites/default/files/documents/city-hall/regional-</u> <u>Council/171212rc1421.pdf</u>, development of regulatory and business impact assessment tools that help administrators consider the outcomes and costs of proposed regulation, and potential by-law amendments to streamline temporary sign licensing and noise exemption approvals for recurring events.

 Procedures and systems – reducing, simplifying, and streamlining administrative processes to make it easier for businesses to comply with regulation and reduce turn-around times for permits or licenses.

<u>Actions Include</u>: a streamlined sidewalk café license application for café renewals, new performance measurement reports to monitor processing times against service targets for sign permits, sidewalk café licenses and temporary sign licenses, and a review of the feasibility of an annual permit for sign contractors to occupy the ROW to conduct routine maintenance for on-premises signs.

¹ The MOU specifies October 2017 as the completion of the Trial Arrangement Joint Project however, delays in hiring a staff lead required an extension to end of September 2018.

3. <u>Communication and information exchange</u> – Improving customer service such as communicating regulation in easier to understand formats, making information more accessible, simplifying forms, and taking other measures to improve customer service satisfaction

<u>Actions Include</u>: customer service support for the Provincial Navigator Program call centre (to help businesses understand regulatory requirements), new communication materials and web-site information to help businesses navigate sign regulation, and new flow charts highlighting the process and expected timelines for five types of planning applications.

The actions not completed will continue to be advanced through HRM's Regulatory Modernization initiative and business unit deliverables under the 2018/19 business plan

Integration with HRM's Continuous Improvement and Strategic Efforts

Red tape reduction and regulatory modernization is not just a one-time project; it's a process of continually measuring and improving regulatory performance, and business procedures and systems. The Joint Project emphasizes the needs of the business customer and provides a stronger business lens to HRM's ongoing performance excellence and continuous improvement efforts being advanced through all business units.

Proposed Project Extension

The Joint Project has proven to be a successful collaboration with mutual benefits including:

- Sharing business insights to focus red-tape reduction efforts in the areas that will have the greatest positive impact on business and public service delivery;
- Reducing the risk of duplicating regulatory modernization efforts or spending public resources in areas that would have low-value; and,
- Collaborating around shared outcomes across government and business sectors with joint performance measures to raise business confidence in the Halifax region.

The Joint Project is also helping to advance the Province's objective to remove regulatory barriers for business across regional boundaries "through improved, more aligned and less regulation" for stronger economic growth.² The PNS-HRM collaboration to reduce regulatory burden for business is an innovative model and the first of it's kind in Canada.

The Province and HRM have recently met to discuss next steps for the joint-project. Both agree that there is benefit in moving forward with the next phase of the project and realize that there is benefit in working together for a two year term. A two-year timeframe for the next Phase of the Joint Project will help imbed the principles of regulatory modernization into the administrative culture of HRM and enable innovative solutions for improving regulatory performance. It will also allow time to develop a sound performance measurement framework and collect useful data to measure progress in reducing regulatory burden.

A key focus for HRM's regulatory modernization initiative is to operationalize the *Charter of Governing Principles for Regulation* (Charter of Principles) to understand the impacts and costs of proposed regulation (or alternative tools) before decisions are made. Two primary tools have been developed:

- A Regulatory Impact Assessment (RIA) Screening tool (Attachment 2), the qualitative policy analysis component. It provides a simple check-list of questions aligned with the Charter Principles

² The Office of Regulatory Affairs and Service Effectiveness 2017/18 ANNUAL REPORT

to help assess the policy rationale and cost-benefits of proposed regulation early in the decisionmaking process

- A Business Impact Assessment (BIA) tool (Attachment 3), *the quantitative costing component*. It estimates the dollar impacts (costs or savings) of regulatory proposals including fees, time spent, one-time expenditures and ongoing costs for businesses to comply with regulation.

The Province and HRM have agreed to jointly share resources and focus on the following initiatives over the next two years.

- Identification of a stretch goal for HRM that can be showcased by both PNS and HRM. PNS will work with HRM in researching baseline data to see where it is that HRM can become best in class in Canada for an identified service that customers see as a barrier to doing business. Ideally any changes made in HRM would be able to be adopted by others.
- 2. We will also look at means to streamline the inspection process, starting with customer service training for both PNS and HRM inspectors. The longer-term goal would be to explore opportunities for a joint inspection program.
- 3. Customizing the Business Impact Assessment Tool (BIA) for HRM's use for evaluating the internal cost of regulation. The Province has offered to provide training on the use of the tool for Finance and Asset Management staff, this will assist with the early adoption of the tool among staff in HRM.
- 4. The original advisory committee has been very helpful in directing the work in the first phase of the joint partnership. Now that we are moving into the next phase of the partnership expanding the membership of the Advisory Committee so it is more inclusive and representative of our community will ensure that we are addressing the concerns of a number of stakeholders.
- 5. Establishing a working group with PNS and HRM staff will be a catalyst for having regulatory modernization become part of the daily conversation in our organization.
- 6. Provincial support in the provision of secretariat support to the Committee.

Next Steps

With Council's extension of the Joint Project staff would continue to work with the Province and business Advisory Panel to develop objectives and priorities for a two-year action-plan. At a high level staff would see the next steps working with the Advisory Committee inclusive of the following:

- Wrap-up of the Trial Arrangement MOU Nov. 2018
- Setting next phase objectives and measurable outcomes Nov./Dec.
- Priority-setting, detailed actions, and work-planning Jan./Feb. 2019
- Performance measurement framework (metrics, baseline data, and reporting) Jan./Feb
- Launch implementation of Phase II work-plan Feb./March

A Joint HRM/PNS bi-annual reporting schedule would keep Council informed of progress and any potential project risks. Joint reporting could also help foster a strong partnership with mutual outcomes and performance measurement, in collaboration with the business community.

FINANCIAL IMPLICATIONS

A two-year extension of the Joint Project would be supported by a staff resource already leading the project under Corporate and Customer Services. There is capacity under the current 2018/19 Budget to fund the position till March 31, 2019. The position will need to be considered as a Corporate Cost for the next Budget

cycle for 2019/20 and 2020/21. The Project action plan would be developed with participating Business Units and prioritized using criteria that considers operational capacity and cost-benefits for HRM. Priorities will be aligned where possible with existing business plan priority deliverables. Staff resources to advance project actions will be required by business units who manage the affected processes and programs within existing operating budgets. Any unanticipated financial implications associated with prioritized actions would be outlined in a future report to Council.

RISK CONSIDERATION

There are some moderate risks to the recommendation in this report which are associated with operational capacity within business units and corporate priority-level of the Project. These risks are manageable and have been lowered since the beginning of the Joint Project pilot. Risks will continue to be lowered through ongoing cross-functional collaboration, corporate priority, and integrated business planning. In addition to the risk considerations below, other implications of approving the proposed recommendation are contained in the discussion section of this report.

Recommendation: Extend the Joint Project for two years and commit a staff resource to lead the Project					
coordination as outlined in the Recommendation on page 2 of this report)					
Risk	Likelihood (1-5)	Impact (1-5)	Risk Level (L, M, H, VH)	Mitigation	
Business units may not have operational capacity to deliver on the project deliverables within expected timelines	2	3	M	 Continued corporate sponsorship of the Joint Project and Regulatory Modernization efforts Reporting on regulatory burden reduction to show measurable progress A joint business unit work-plan for advancing Project actions Business planning coordination for 2019/20 to identify mutual priorities and business unit champions for specific initiatives 	
Businesses may not see enough results or fast enough progress	2	3	Μ	 A communication strategy to communicate the actions and promote progress Performance measurement and reporting that includes customer satisfaction and business confidence metrics 	

COMMUNITY ENGAGEMENT

The Advisory Panel has been engaged throughout the Project and business members on the Panel have promoted and shared the work through their community base. These business organizations include:

- Canadian Federation of Independent Business
- Halifax Chamber of Commerce
- Halifax Partnership
- Restaurants Canada
- Spring Garden Road Business Association (representing all BID's)
- Urban Development Institute

Engagements have also taken place with the Sign Association of Canada in conjunction with local sign industry representatives and sidewalk café businesses through the annual engagement process with café owners. A "Reducing Red Tape" web-page on HRM's website communicates the action plan and status of deliverables to increase accountability and transparency. <u>https://www.halifax.ca/business/doing-business-halifax/reducing-red-tape</u>. Social media has been used to draw attention to the webpage and promote the work. The next phase of the Project would use the same engagement tools with more emphasis on communication and promotion through social media and stakeholder networking. Engagement moving forward would also focus on gathering data for performance monitoring including customer satisfaction and business confidence indicators.

ENVIRONMENTAL IMPLICATIONS

There are no environmental implications identified with the recommendation in this report.

ALTERNATIVES

- Alternative 1: Regional Council could refuse to extend the Joint Project but continue to advance HRM's regulatory modernization and red-tape reduction efforts identified under the 2018/19 business plan and through the organizational performance excellence program.
- Alternative 2: Regional Council could make the decision to collaborate with the Province and/or the business community using a different partnership model

ATTACHMENTS

 Attachment 1 Regulatory Modernization Joint Project (Pilot) Summary of Progress and Project Milestones Status
 Attachment 2 Regulatory Impact Assessment – Stage 1 Screening Tool
 Attachment 3 Business Impact Assessment (BIA) – Regulatory Costing Tool

A copy of this report can be obtained online at <u>halifax.ca</u> or by contacting the Office of the Municipal Clerk at 902.490.4210.

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Regulatory Modernization Joint Project (Pilot)

Attachment 1

% COMPLETE

90%

SUMMARY OF PROGRESS

As of October 10th the Project Work-Plan was 90% complete. For red tape reduction results visit: www.halifax.ca/business/doing-business-halifax/reducing-red-tape

HRM has completed 6 of 10 priority actions to reduce regulatory burden for business including:

1. Adoption of a Charter of Governing Principles for Regulation AO and implementation tools for assessing the impact and cost-tobusiness of proposed regulation

2. A more streamlined sidewalk cafe license application for cafe renewals, saving businesses time and cost

3. New communication materials and web-page to help businesses navigate requirements for sign regulation

4. Performance measurement reports on processing times for sign permits, and sidewalk cafe and sign licenses with regiular reporting at Halifax.ca

5. A review of methods to simplify the Streets and Services and Encroachment By-laws to enable an annual permit for sign companies to maintain signs in the HRM right-of-way

6. HRM has aligned customer service delivery with the Province's Business Navigator Service by providing a staff liasion to help streamline regulatory information for business customers

The following actions have not been completed but will be advanced through HRM's ongoing Regulatory Modernization work:

1. Proposed amendments to the Noise By-law to reduce red-tape for recurring special events seeking noise exemptions

2. Proposed amendments to the Temporary Sign By-law to reduce red-tape for sign companies by streamlining the licence process

3. Flow charts outlining the application and approval process for five types of planning applications to help developers plan projects and HRM manage service delivery standards

4. A new customer service training session tailored to municipal inspectors and business customers

PROJECT MILESTONES STATUS

Name	Start	Finish	% Complete
MOU signed	Mon 10/31/16	Mon 10/31/16	100%
Project plan approved	Thu 12/14/17	Thu 12/14/17	100%
MOU for HRM/PNS data sharing	Mon 10/16/17	Mon 10/16/17	100%
Council Approves Charter of Principles	Tue 1/9/18	Tue 1/9/18	100%
Sidewalk café deliverable complete	Thu 3/1/18	Thu 3/1/18	100%
Sign customer service deliverable complete	Tue 7/31/18	Tue 7/31/18	100%
Temp Sign By-law deliverable complete	Tue 7/31/18	Tue 7/31/18	65%
Annual sign permit deliverable complete	Fri 8/31/18	Fri 8/31/18	100%
Noise Exemption By-law deliverable complete	Tue 7/31/18	Tue 7/31/18	75%
Planning Applications - customer service deliverable complete	Mon 4/30/18	Mon 4/30/18	90%
Inspections - customer service deliverable complete	Mon 4/30/18	Mon 4/30/18	45%
HRM CPED presentation - project awareness	Thu 1/18/18	Thu 1/18/18	100%
Project results to HRM Regional Council	Tue 10/2/18	Tue 10/2/18	90%

Regulatory Impact Assessment - Stage 1 Screening Tool

As part of it's regulatory modernization efforts the Municipality adopted Administrative Order 2017002-ADM Charter of Governing Principles for Regulation (Charter of Principles), to help ensure good regulatory performance.

The RIA stage 1 screening is best used at the early point of the policy development process. It does not replace the comprehensive analytical framework for comparing, selecting and developing policy instruments rather, it provides a consistent approach to implement the Charter of Governing Principles for Regulation to determine whether proposed regulation is likely the best option.

This Stage 1 Screening Tool will be used to assess all regulatory proposals that apply under AO 2017002-ADM including:

- Consideration and development of new by-law regulation
- Consideration and development of amendments to existing by-laws
- Implementation of by-law regulation

The AO does not apply to land use by-laws or by-laws imposing local improvement charges. All other "general application" by-laws apply.

Regulatory Impact Assessment - Stage 1 Screening PART 1: Regulation Overview

1. Title of the regulatory proposal

2. Origin and scope of the Regulatory Proposal (Council initiated? New regulation, amendment? Etc.)

3. Lead Business Unit and Support

PART 2: Regulatory Impact Checklist

Step 1.0: Understanding the Problem and Regulatory Outcomes

Principle #1: The policy objectives and the purpose of the regulation should be clear at the outset

Principle #2: Regulation should respond to an existing community need rather than a current event and be proportionate and targeted at the stated purpose

Principle #3 Success of a regulation should be measurable and its outcomes monitored.

1. Regulatory Intent and Scope			
	Yes	No	N/A
1.1 Has the problem that the regulation would address been clearly identified? If the answer is no – do not continue			
1.2 Is the proposed regulation related to a current policy objective?			
1.3 Is there convincing evidence that the regulatory proposal is responding to a regulatory need rather than reacting to a current event?			
1.4 Is the proposed regulation proportionate to the scale of the issue?			
1.5 Would the proposed regulation have clear outcomes and impacts that could be measured?			
1.6 Have affected stakeholders and groups been identified and considered for consultation?			

Step 2: Exploring the Alternatives and Costs

Principle #4: Regulation should not impose undue costs and obligations on business, social enterprises, individuals and community groups unless a cost benefit analysis shows that the regulation is warranted.

Principle #5: Regulation should be easy to comply with and include administrative processes and customer service to achieve efficient and effective regulatory performance with the minimum impact.

1.0 Policy Options			
	Yes	No	N/A
1.1 Are there non-regulatory options like education or engagement, that could effectively address the issue?			
1.2 Have the non-regulatory options been considered and assessed?			
1.3 Would the non-regulatory options achieve the outcomes at lower cost than regulation?			
1.4 In stead of developing a new by-law, have opportunities to align with existing regulation, or existing voluntary efforts or program delivery been considered?			

1.5 Is there a likelihood that the regulation would result in any negative		
environmental or community impacts?		

2.0 Costs and Market Impact			
	Yes	No	N/A
2.1 Could the regulation negatively impact business productivity by adding to fixed costs?			
2.2 Would there be any new restrictions imposed on business that could require an increased investment of time or money?			
2.3 If new restrictions are being imposed, has a business impact assessment been conducted? If no, do not proceed until a BIA has been carried out			
2.4 Have the required administrative resources and costs to implement the regulation been calculated?			
2.5 Is there a likelihood of administrative costs increasing over time to impose increased burden on the Municipality?			

3.0 Implementation, Compliance, and Service Standards				
	Yes	No	N/A	
3.1 Is the regulation written to be understandable in everyday language to help ease compliance for those being regulated?				
 help ease compliance for those being regulated? 3.2 Will the implementation of the regulation include any of the following: reducing the length of processes or wait times for decisions by coordinating services or reducing steps eliminating duplication reducing the complexity of rules, forms or information increasing access to information Improved customer service 		No	N/A	
3.3 Is there an intention to monitor the success of the regulation using performance indicators?				

PART 3: Selecting the Course of Action

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Step 1: Choosing Regulation or other Option

Principle #6: Regulation should never be an instrument of first resort and should only be used when necessary and where there is clearly no better policy alternative.

3.0			
	Yes	No	N/A
3.1 Do the costs outweigh the benefits?			

3.2 Are you confident that regulation is the appropriate response and the right tool to solve the problem?		
3.3 If regulation is not the right tool has an alternative been proposed?		
3.3 Is municipal regulatory intervention needed?		

Business Impact Assessment (BIA)– Regulatory Costing Tool

After the initial Regulatory Impact Assessment (RIA) has been completed by the analyst (staff member), the BIA tool may be applied to determine costs to business firms (i.e.; non-budgetary). Originally developed for Finance Departments in the EU, the BIA methodology has been endorsed by the OECD for quantifying regulatory burden. The BIA used by HRM was developed by the Province of Nova Scotia and shared with the Municipality through the Joint Project for Regulatory Modernization.

The tool is used to estimate potential costs or savings to businesses of proposed regulation and provides an additional level of data to staff and Council when considering new regulation or amending existing bylaws.

It uses real time data from Statistics Canada for prevailing wage rates, industry classifications and types of firms. It provides an estimation of potential costs to firms, but relies on the skill and understanding of the user to input reliable information into the cost calculator.

Applying the BIA:

As part of the RIA process staff research industry specific data and analyze policy objectives to ensure the problem is clearly defined and a range of regulatory and non-regulatory policy tools are considered. If the RIA determines that a proposed regulation and its implementation could require an increased investment of time or money by business, a BIA is conducted.

BIA Step 1: The analyst completes the first stage of the BIA analysis, by selecting all relevant industries expected to be impacted by the proposed regulation. Industries are classified as per Statistics Canada hierarchies.

BIA Step 2: Approximate one-time costs and/or savings expected to arise from the regulation and in some cases these are capital expenditures for the business. They may also include staff training or new space requirements.

BIA Step 3: Approximate ongoing costs and or savings expected to arise specifically from complying with the regulation. This step identifies ongoing costs, often additional labour hours through extra administrative work.

BIA Step 4: Approximate any direct fees or payments associated with the regulation payable to HRM.

After the BIA steps have been competed a "Cost to Business Summary Sheet" is produced. A sample summary is shown below.

Estimated Annual Change of Regulatory Burden to Business

Estimated one-time costs (savings) for impacted businesses	\$0
	Annual
Estimated one-time costs (savings) annualized (over 10 years)	
Estimated ongoing costs (savings) for impacted businesses	(\$120,180)
Estimated fees	\$0
Estimated / indicative total costs (savings) per year	(\$120,180)
Estimated number of businesses impacted	50
Estimated average cost (savings) per business	(\$2,404)
One-for-One Assessment Not Required	1-for-1

One-for-One Assessment Not Required

Summary of impact to industries and businesses

	BUSINESSES
Sector	Total # of enterprises in industries selected
Agriculture, forestry, fishing and hunting	0
Mining, quarrying, and oil and gas extraction	0
Construction	0
Manufacturing	0
Wholesale trade	0
Retail trade	0
Transportation and warehousing	0
Information and cultural industries	0
Finance and insurance	0
Real estate and rental and leasing	0
Holding companies	0
Management of companies and enterprises	0
Administrative and support, waste management and remediation services	0
Educational services	0
Health care and social assistance	0
Arts, entertainment and recreation	0
Accommodation and food services	0
Other services	0
Tot	al 50

This sample regulatory proposal is estimated to save affected firms \$2,404 per year assuming fewer hours would be needed for business to comply. There were no additional capital or municipal fees associated with this example but it indicates labour hours would be freed up from the regulatory proposal. This is a modest amount but indicates the adoption of the regulation would not add, and modestly reduces impacts to firms.