



May 11, 2026

Committees Branch
Legislative Assembly of Manitoba
Room 251, 450 Broadway
Winnipeg, MB R3C 0V8
Via email: committees@mbassembly.ca

To Whom It May Concern,

On behalf of the Association of Manitoba Municipalities (AMM), I am writing to provide some comments regarding Bill 18: *The Waste Reduction and Prevention Amendment Act (Strengthening Enforcement)*.

Firstly, the AMM would like to thank the Department for meeting with our organization in April to provide a technical briefing on the proposed legislation. We also appreciate the Department's efforts to communicate details of the legislation through the monthly CAO call hosted by the Department of Municipal and Northern Relations, which helped ensure municipal feedback and insights could be shared and provided municipalities with an opportunity to ask questions directly.

The AMM understands that enforcement activities are already occurring and that municipalities have not been identified as a primary concern. However, we are concerned that the proposed legislation could apply a broad enforcement framework to municipalities that work diligently to meet evolving environmental and operational standards. Municipalities also continue to face significant financial and administrative pressures in operating and maintaining waste disposal grounds – concerns that have been consistently raised with the Province.

The AMM is concerned that enhanced compliance, reporting, and enforcement requirements could create additional administrative burdens for municipalities, many of which already face limited staffing capacity and growing operational demands. Increased enforcement powers and the potential for penalties may also expose municipalities to added financial risk despite their ongoing efforts to remain compliant and deliver essential services responsibly.

As Manitoba approaches the 2026 general municipal election, the AMM believes there is an opportunity to prioritize education and capacity-building over punitive enforcement measures. Supporting municipalities through guidance, training, and proactive communication will help achieve stronger long-term compliance outcomes.



Municipalities are already facing rising costs associated with landfill management, waste diversion initiatives, and infrastructure upgrades. As such, the AMM encourages the Province to ensure that any new requirements introduced through future regulations are accompanied by adequate funding supports and sufficient resources to help municipalities meet any new obligations in a practical and sustainable manner.

Thank you for the opportunity to provide these comments. We look forward to continued collaboration with the Province to ensure that the implementation of Bill 18 is practical and reflective of municipal realities.

Respectfully and sincerely,

Denys Volkov
Executive Director

cc: Hon. Mike Moyes, Minister of Environment and Climate Change
Hon. Glen Simard, Minister of Municipal and Northern Relations
Deputy Minister Jocelyn Baker, Minister of Environment and Climate Change
Deputy Minister Maurice Bouvier, Manitoba Municipal and Northern Relations