

Red Tape Reduction Consultations

Summary and Responses

DIGITAL GOVERNMENT AND SERVICE NL

Red Tape Reduction Consultations

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Prepared by Department of Digital Government and Service NL

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Introduction

The Provincial Government launched a Red Tape Reduction consultation process in 2020 to help alleviate some of the regulatory burden on the province's business sector. Since the onset of the COVID-19 pandemic and the implementation of various public health restrictions, the business community recommended a number of measures to help ease some of the pressures facing their establishments and organizations. One suggestion was an online tool where businesses could provide feedback on how to reduce government red tape.

Through the engageNL portal, starting on June 5, 2020, individuals and organizations were invited to complete an online questionnaire regarding their observations and suggestions about red tape. Written submissions were also accepted via email. The original deadline for feedback was August 31, 2020. This was extended to December 31, 2020.

This document collects and summarizes the information gathered through the questionnaire and the responses provided by each department. This information will help inform further discussion and action on reducing red tape.

Survey Overview

Participants were asked to describe their business (e.g. number of employees) and identify up to four red tape issues they would like addressed, including how the issues have impacted their business or not-for-profit. They were also asked to specify the Act or regulation to which the issue related, where possible; their proposed solutions; and whether any other provinces, territories or countries use a similar model. The majority of submissions highlighted specific red tape issues with the participants' own businesses or organizations, while others suggested general improvements to departmental procedures and processes.

As of March 31, 2021, 50 submissions were received, containing over 100 identifiable issues. Responses were received from every region of the province, the majority of which were from businesses. Private citizens and stakeholders from the not-for-profit sector also shared their concerns.

Common Themes

The following is a summary of common themes submitted by respondents.

- **Delays in application processing and approvals**
 - Perceived inability to reach government officials for long periods of time
 - Frustration with inter-departmental approval processes
 - Lack of clarity when applying for permits
 - Feeling that government employees are not assisting clients but hindering them

- **Complexity of applications**
 - Lack of clarity involving permit application processes, including licensing of trails and septic systems
 - Having to reach out to several departments for approvals, instead of having one department handle the application
 - Reporting is repetitive and not streamlined

- **Issues around obtaining Crown lands**
 - Frustration that the process takes a long time across multiple government departments
 - Feeling that it is too expensive
 - Duplication of fees associated with applications and land development from the province and municipality

- **COVID-19 restrictions**
 - No standardized re-opening guidelines
 - Guidelines around no food/food sharing at gatherings

- **Issues around funding for businesses and organizations**
 - Lack of multi-year funding agreements and delays in payments of funding agreements
 - Lack of information on types of activities that have been previously funded

- **Other Issues**
 - Limitations of online Motor Registration Division services

- Lack of highway signage for tourists
- Restrictions on Locked in RRSP and LIRA accounts
- Different regulations for short and long-term rentals
- Environmental assessment process conflicts with Environmental Protection Guidelines

Summary of Responses and Feedback by Department

Respondents identified red tape issues related to the following departments/entities:

- Children, Seniors and Social Development
- Digital Government and Service NL
- Environment and Climate Change
- Fisheries, Forestry and Agriculture
- Health and Community Services
- Immigration, Population Growth and Skills
- Industry, Energy and Technology
- Justice and Public Safety
- Municipal and Provincial Affairs
- Newfoundland and Labrador Liquor Corporation
- Public Engagement and Planning
- Tourism, Culture, Arts and Recreation
- WorkplaceNL

Children, Seniors and Social Development

Children, Seniors and Social Development (CSSD) received one submission regarding income support and housing-related issues. CSSD continues to work with provincial government departments and agencies as well as community partners to improve service delivery and coordinate access to appropriate supports in a timely manner.

Digital Government and Service NL

Digital Government and Service NL (DGSNL) received nine submissions regarding red tape. Comments unrelated to red tape issues and those where the disclosure might reveal the identity

of the respondent have not been included. Where appropriate and consent was received, the department followed up directly with respondents.

The main concerns expressed by respondents focused on long wait times, lack of transparency, and dealing with multiple departments for the same issue.

While the department recognizes the longer than usual wait times associated with COVID-19, issuing permits, licences, inspections, and permissions for commercial developments often requires co-ordination across multiple departments, depending on the complexity of the request. The department notes some of the issues relate to confusing application processes and is committed to further review. Additionally, the Minister of DGSNL is mandated to implement a Digital-by-Design service delivery model, and as such oversees the digitization of many government services, including renewals through the Motor Registration Division and Commercial Registrations. The department recognizes the need to increase digital production to allow individuals greater access to personal information, as well as to personal and commercial services. DGSNL continues to work together with the Atlantic Provinces to harmonize requirements for technical safety trades to increase mobility and reduce red tape for workers.

Environment and Climate Change

Environment and Climate Change (ECC) received seven red tape-related submissions. Four respondents addressed the Environmental Assessment (EA) process directly, each pointing to lengthy approval processes or unclear guidelines. While two respondents challenged EA timeframes and the approvals process as being unnecessarily burdensome or unclear, two others said strengthening the EA process should be a higher priority than reducing its red tape burden. Respondents noted the difficulties in navigating multiple departments, and one suggested a 'one stop shop' so applicants could avoid lengthy timeframes across multiple entities.

ECC has indicated that changes to the EA legislation and regulations are under review. ECC has also stressed the importance of balancing development interests and environmental protection through the EA process or through the submission of an Environmental Protection Plan. The department noted that communication across government departments might identify the requirement for EA registration earlier in the process. Updated EA legislation will clarify EA requirements.

Fisheries, Forestry and Agriculture

Fisheries, Forestry and Agriculture (FFA) received 19 red tape-related submissions. The majority of respondents identified specific constraints around timeframes, while several others expressed frustration at needing to reach out to various government departments for approvals. Most submissions focused on their inability to purchase and develop Crown lands, with particular emphasis on wait times associated with these purchases. Respondents also identified specific issues with the multiple levels of documentation required for permitting, the definition of farming, assistance to support farming, Labrador farming, and direct sales of fish to market.

FFA posts service standards, including a 90-day timeframe for the department to notify applicants of the status of their application for Crown lands. FFA indicated that the Crown Lands Division has undertaken initiatives to improve timelines, including creating an online application process, adjusting work practices to increase efficiency and realigning positions to better meet the needs of the Division. The documentation needed to allocate Crown lands, depending on complexity, may require the applicant to contact several other government departments or entities.

Regarding farming, farmers can contact regional Farm Management Specialists with FFA to discuss options to best utilize existing farm resources. The Farm Management Specialists provide advisory services to existing farmers and new entrants that will enable farmers to optimize agricultural production and agribusiness profits. The Canadian Agricultural Partnership Program Guide may assist farmers in understanding the funding application process and evaluation criteria.

Health and Community Services

Health and Community Services (HCS) received eight submissions outlining concerns around red tape. Community organizations submitted six responses, which included concerns around delays in funding, hosting gatherings during the COVID-19 pandemic, and a lack of clarity around COVID-19 guidelines. One organization has had difficulty preparing and submitting documentation required for funding, which can be complex, given the size and reliance on volunteers in the community sector.

HCS indicated that each concern can be resolved without legislative or regulatory reform. The department offered several online resources to help address some of the responses. In other

cases, current and future actions were communicated, from which respondents may gain perspective into the department's ongoing initiatives.

Immigration, Population Growth and Skills

Immigration, Population Growth and Skills (IPGS) received three submissions, which addressed a separate topic area within the department. Only two of these submissions were considered red tape reduction suggestions. One applicant described inefficiencies with the processes, technology and communication of the Office of Immigration and Multiculturalism (OIM), citing their extensive experience in dealing with the department on immigration-related matters. IPGS responded by recognizing the importance of improving immigration processing times (in particular, continuing to raise federal immigration processing times as an issue with the Federal Government), and describing the steps prospective newcomers must take in order to be considered a permanent resident in Canada. The department also conducted two Lean exercises in 2018 and 2019, to seek program efficiencies in OIM programs. In addition, IPGS is in the working with the Office of the Chief Information Officer (OCIO) to development an online application system which is anticipated to improve and streamline processes for its immigration programs.

Another applicant noted that government support programs for employers include funding to contract a third party business to conduct research, training and development of systems, which results in a lower level of funding for the employer and does not lead to success. While it was unclear exactly which programs the applicant was referencing, IPGS made note of the variety of programs on offer for employers, both within and without the context of the COVID-19 pandemic.

IPGS addressed each submission, and directed the applicant to specific online resources for additional information. Applicants are also encouraged to reach out to the department directly if they have further concerns.

Industry, Energy and Technology

Industry, Energy and Technology (IET) received four submissions. Most respondents pointed to general difficulties in identifying and receiving funding through the variety of programs, but did not offer specifics on which programs were difficult to access, or why they were difficult to

access. There were also general comments on timelines, efficiencies and reducing the impact of red tape on the department.

IET regularly works with its clients and the business community to facilitate access to various programs and reduce red tape. Many respondents opted not to provide their content information, so staff were not able to follow-up directly with all applicants. The department encourages individuals to contact departmental staff directly to speak more directly to their concerns.

Justice and Public Safety

Justice and Public Safety (JPS) received three submissions. The department requested that the applicants contact them directly in order to resolve these issues, as they involved complex and/or sensitive matters.

Municipal and Provincial Affairs

Municipal and Provincial Affairs (MAPA) received no submissions relating to red tape issues for which it is directly responsible, as property taxation and permitting is the responsibility of municipalities while permitting in Protected Road Zones is administered by DGSNL. MAPA did note that some issues relating to local discrepancies in taxation and permit requirements could be addressed in the future by regionalization.

Newfoundland and Labrador Liquor Corporation

The NLC received only one submission, suggesting that government should end its monopoly on liquor sales and implement a licensing system similar to the one used in Alberta. The submission claimed this would allow private businesses to open liquor retail operations.

Currently, large elements of the Province's liquor industry are privately owned. NLC has a robust licensing system already in place with over 700 privately owned Brewers Agents Licensees and over 1000 privately owned Restaurant and Lounge Licensees. NLC also has an extensive Liquor Express network with over 140 private retail stores and has 29 Corporate NLC Liquor stores carrying over 4,000 products. The NLC says that there are a wide range of views with respect to privatization in Alberta, and that the impact of privatization on inventory, customer selection, sales, government revenue, customer service and experience, employment,

and compensation issues, as well as other important issues like regulatory effectiveness, social responsibility and achievement of public policy objectives continue to be contested almost thirty years after privatization in Alberta. Privatizing the sale of alcohol would be a substantive policy shift for government and require legislative reform. The Liquor Corporation Act is the legislation that gives the NLC the authority to control the sale and distribution of liquor in the province. Government has hired a consultant to provide independent advice analyzing the costs and benefits of monetizing NLC.

Public Engagement and Planning

Public Engagement and Planning (PEP) received one submission regarding the practice of regulatory counting. The respondent believes focusing on counting the number of requirements has resulted in elimination only of requirements that were not meaningful, and “served merely to facilitate public announcements on superficial reductions.” While regulatory counting has been a requirement for some years, PEP says with the passage of time and government restructuring, few departments are regularly updating their regulatory counts, resulting in outdated and inaccurate numbers. PEP proposes seeking direction on the continuation of regulatory counting, with consideration given to undertaking a review/evaluation of the Regulatory Impact Analysis Guide, and researching other means of quantifying regulatory burden.

Tourism, Culture, Arts and Recreation

Tourism, Culture, Arts and Recreation (TCAR) received three submissions, two of which related to the need for updated legislation to allow accommodations for tourists such as Airbnb. This was achieved with Bill 52, the **Tourist Accommodations Act** (the Act), which received Royal Assent on November 5, 2020. The definition of a tourist accommodation in the new Act is more in line with the modern range of available accommodations, and it does not require a tourism accommodation to be licensed or graded by Canada Select. This Act is not yet in force, but will be proclaimed after the Regulations are complete.

The third comment to TCAR related to the moratorium on new outfitting businesses for big game hunting, which was introduced in 1999. Since then, the process for a new outfitter to acquire non-resident big game licenses is through the purchase of an existing main lodge outfitting business with a big game allocation. Since 2008, the number of available non-resident moose licences assigned to outfitting businesses remains at 3,948. TCAR says the purpose of

the moratorium was to enhance the sustainability of existing outfitting businesses and protect big game populations for the future.

WorkplaceNL

WorkplaceNL received two submissions. One suggested that laws, liabilities and responsibilities for small businesses should be simplified. The other related to the process of seeking reimbursement of an overpayment made to an employee who was later found guilty of fraud. The position of WorkplaceNL, is that their existing overpayments policy provides for cost relief in this situation, but they indicate that, for further clarity, they will advance a recommendation to their Board of Directors to amend the PRIME Overview Policy (PR-01) to include costs as a result of fraud, misrepresentation, or non-disclosure in the type of costs that are excluded from PRIME (the Prevention and Return-to-Work Insurance Management for Employers/Employees Program).

Next Steps

The Government of Newfoundland and Labrador is committed to providing services to communities, stakeholders, organizations and businesses in an efficient, thorough and timely manner. Challenges presented by the COVID-19 pandemic have also developed an opportunity for citizens to address their issues using online platforms. To this end, government is implementing a Digital-by-Design approach to address straightforward inquiries, such as those requiring renewals, basic applications and inquiries. Each department has been asked to make some or all of their services available on online platforms for ease of use. For communities and businesses without stable access to online services, telephone and in-person services remain in place to address more complex situations.

Responsibility for addressing red tape issues raised by respondents remains with the individual departments where the recommendations apply. Next steps and timelines, where applicable, have been noted in the tables found in Annex A.

Annex A: Detailed Breakdown of Red Tape Reduction Suggestions and Responses

Children, Seniors, and Social Development

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/regulatory reform? (Y/N)	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
<p>Administrative processes related to approvals for clients needing supportive housing (see document attached).</p>	<p>Children, Seniors and Social Development works collaboratively with all applicable provincial government departments and agencies and the community sector to coordinate provision of programs and services. For example, processes are in place for dedicated staff at CSSD to exchange information with Newfoundland and Labrador Housing Corporation to facilitate Income Support recipients accessing social housing supports.</p> <p>Children, Seniors and Social Development will continue to engage in discussions with the Newfoundland and Labrador Housing Corporation to identify efficiencies and review protocols in the provision of programs and services in this area.</p>	<p>Y</p>	<p>Children, Seniors and Social Development continues to work with provincial government departments and agencies as well as community partners to improve service delivery and coordinate access to appropriate supports in a timely manner.</p>	<p>Ongoing</p>
<p>Security deposits are not high enough given current rental market.</p>	<p>Benefit amounts for security deposits are specified in Income and Employment Support Regulations, and are not a matter of policy. Provincial government approval is required to make changes to Income and Employment Support Regulations.</p>	<p>N</p>	<p>Income Support benefit amounts are regularly reviewed.</p> <p>Provincial government approval is required to make changes to Income and Employment Support Regulations.</p>	<p>N/A (based on provincial government direction)</p>

Digital Government & Service NL

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/ regulatory reform? (Y/N)	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
<p>Commercial Registrations: 1. Simplify the process of incorporating small companies, including share transfers, change directors and carry out other business that requires approval</p>	<p>For complex incorporation changes, please consult legal or accounting assistance. Otherwise, a business may amend articles of incorporation or change the directors by downloading forms from Companies and Deeds Online. Further moves to digitize government services will assist companies as well as individuals in accessing the forms they require.</p>	<p>Yes</p>	<p>Incorporation of a digital by design approach through the enhancement of online services.</p>	<p>Complete</p>
<p>Engineering and inspections: Challenges in trying to get building permits and accessibility permits, etc.</p>	<p>The process of applying for accessibility permits in all situations can be complex. The thorough applications and processes are necessary to ensure that new / existing buildings are equipped with the proper safety and regulatory requirements. Builders may contact the department directly if they feel their situation requires priority processing.</p>	<p>Yes</p>	<p>N/A</p>	<p>N/A</p>
<p><u>Engineering and Inspections:</u> 1. Experiencing long wait times relating to projects (one instance of five months waiting for a Building Accessibility Design Registration)</p>	<p>Interdepartmental communication and consultation can result in some delays. However, five months is typically longer than usual.</p>	<p>Yes</p>	<p>DGSNL strives to co-ordinate efforts to approve projects in a timely fashion.</p>	<p>N/A</p>
<p>Gov. Services: Exclusion of local farms from supplying food businesses; permitting for selling certain foods; process too arduous.</p>	<p>Farmers are permitted to sell unprocessed fruits, vegetables, berries and honey through farm gate methods, roadside stands, farmers markets and</p>	<p>Yes</p>	<p>DGSNL-Environmental Health is in the process of developing a brief document on the difference between manufacturing and homebased food preparation.</p>	<p>6-12 months</p>

	other retail locations. Processed products would have to be tested for pesticides, bacterial counts and follow quality control quality assurance from the manufacturing process.		This will elaborate more on home-based side/artisan business versus the more lucrative businesses of manufacturing. It address the permits that are required for selling processed foods and the steps to obtain certification from an HACCP (Hazard Analysis and Critical Control Points) certifying body, along with start-up tips.	
Developing parcels of land deemed as protected roads and falling under municipal jurisdiction; duplication of regulation	Once a Town has a municipal plan in place, it supersedes any Protected Road Zone Plan covering the same area. Therefore, there is no duplication. The Town would be the authority to issue development permits, within its planning area boundary. However, permits may still be required from DGSNL, such as septic fields, etc. MAPA does not establish or regulate the fees for the Town nor DGSNL.	No	N/A	N/A
Registration of a new trailer at Motor Registration - information is not useful and the form does not clearly address the requirements of a new trailer. Once I figure out the form, I am also told that there is a five-15 day processing time.	DGSNL has a new form for registering a trailer that is available on its website. DGSNL reviewed some of the most popular forms to make them more user friendly.	No	The trailer form was reformulated and simplified for convenience. Please find the form here: https://www.gov.nl.ca/motorregistration/files/Registration-Homemade-Trailer-fillable.pdf	N/A
Transferring Registration of a vehicle: Technical Difficulties reported with the online system. Calling the MRD Office in Mount Pearl has resulted in long wait times.	The limitations of the move to online delivery of this service was quickly recognized and since then DGSNL has implemented a two-phase approach to implementing a more efficient online service option. In Fall 2021, a temporary online service was launched (Vehicle Transfer - Digital Government and Service NL) which provides customers the ability to submit the	No	Vehicle transfer services will be made available through MyGovNL in the near future.	N/A

	required paperwork to transfer vehicle registration. Upon review of the paperwork, MRD staff contacts customers for payment. The intent is to move this service into MyGovNL so that all processes (payment and paperwork) can be done through one service experience.			
Pensions: Red tape restrictions should be removed from locked-in RRSP and LIRA Accounts. Should also be able to unlock a pension and transfer it to a RIF	The department underwent a full consultation process on this issue in Summer/Fall 2020, culminating in changes to the legislation that took effect March 1, 2021. Locking-in restrictions were loosened, giving fund owners the ability to unlock some funds under some circumstances of financial hardship.	No	Consultations and legislative changes took place to address the issue of unlocking funds from a LIRA, LIF, or LRIF. There are no plans to address the separate related issue of unlocking directly from a pension plan.	Changes were implemented effective March 1, 2021

Environment and Climate Change

Red Tape Issue identified	Departmental response to issue identified	Can this issue be resolved without legislative / regulatory reform?	What is the department's plan to address this issue?	What is the department's timeline for addressing this issue?
<p>Environmental Assessment processes. EA requirements conflict with the Environmental Protection Guidelines. For example: Stream buffer requirement consistency. FLR EPG's requires a 20-meter buffer on streams, this is founded in science. EA quotes 30-meter buffers based on unknown source.</p>	<p>The Environmental Assessment (EA) process collects scientific and technical advice provided by provincial and federal government departments and agencies that review projects. Buffers required by different agencies are not always aligned and may be specific to each project, e.g. a wider buffer may be required for the protection of a public water supply, or a salmon river as compared to a less sensitive water body or wetland. Thirty meters is the standard buffer required by FFA, ECC, DGSNL, IET and ECCC for various projects.</p>	<p>No</p>	<p>A minimum 30-meter undisturbed buffer is a consistent requirement from multiple government departments for most projects, in order to provide protection of waterbodies and wetlands. This buffer is sometimes increased based on the environmental effects of a project and the sensitivity of nearby receptors.</p>	<p>The issue is addressed by the scientific and technical advice provided to the EA process by government reviewers.</p>
<p>The ability to license ATV trails, to successfully operate my outfitting business. It's inconceivable for the departments of Environment and Wildlife to think I can operate four big game lodges with a total of 135 moose and caribou tags, without having trails to access my hunting lodges and hunting areas. I have passed the environmental assessment stage and was given approval by the Minister in 2015. I still have no licensed trails. I have helicopters on me constantly with the Wildlife Officers that he has set on me. We are being ticketed, brought to court and it doesn't ever stop. It's had a very negative impact on my business to the point it's almost impossible to</p>	<p>A project may be released from EA subject to conditions. In this scenario, a proposed Outfitter project and ATV trails was released from EA, subject to the proponent submitting an Environmental Protection Plan, for the Minister's approval prior to project construction. The EPP is required to describe ATV trails that avoid wetlands, and to date, such a plan has not been submitted. ECC recognizes that Outfitter Camps are profitable businesses and important contributors to the Tourism sector. These enterprises must be constructed and operated in a manner that does not cause the destruction of wetlands and wetland functions.</p>	<p>No</p>	<p>The appropriate legislation is in place to support the Outfitter industry and uphold the protection of wetlands and waterbodies.</p>	<p>The EA Division (ECC), Water Resources Management Division (ECC) and FFA are working with this proponent in the development of an Environmental Protection Plan to be submitted for the Minister's approval.</p>

<p>operate. I have completed one EPP that was turned down and I have another one just completed that cost me \$15,000. I employ 20 people and I am treated very unfairly.</p>				
<p>A) The waiting period is much too long for results of funding proposal (of any kind). The behaviour of the bureaucrats goes against "serving the people". B) Keep the Environmental Assessment for oil and gas projects as it is. Reducing the "red tape" for these projects will only serve the industry and not the environment/people.</p>	<p>A) Not under purview of ECC. B) Recommends EA process remain as is.</p>	<p>No</p>	<p>B) The Environmental Assessment Regulations and legislation are under review.</p>	<p>ECC continues to review and update Environmental Assessment legislation and regulations.</p>
<p>Like other jurisdictions, we need a "one stop shop" based on the activity being sought. As an example, if mineral exploration approval is requested, that department should be first and foremost the liaison for the exploration company. It is unfortunate, but many referral agencies have very little knowledge of what mineral exploration is, and this results in requests for permits that do not apply or the mandating of conditions that are simply unrealistic.</p>	<p>Some mineral exploration projects will require registration for environmental assessment. The nature of the exploration activities (e.g. length of new roads/trails, proximity to scheduled salmon rivers, and volume of material to be extracted) will determine whether EA is required. For exploration projects that trigger registration for EA, the project must undergo and be released from the EA before any other provincial or federal government licences, permits or authorizations can be issued. Through the EA process, a proponent is advised of the permits, licences and approvals that are likely to be required for a project. In cases where EA is not required, regulatory oversight is primarily within the mandate of the Mineral Lands Division of IET, however, other government permits, licences and approvals may apply.</p>	<p>Communication between IET and EAD may help identify for exploration proponents earlier in the application process that registration for EA may be required. EA legislation is under review and can be improved to clarify EA requirements for the mineral exploration industry.</p>	<p>The Environmental Assessment Regulations are under review and opportunities to clearly identify mineral exploration activities that require registration for EA will be reviewed.</p>	<p>ECC continues to review and update Environmental Assessment legislation and regulations.</p>
<p>Environmental Control Water and Sewage Regulations, 2003 Schedule B lists a selection of analysis</p>	<p>Work in Protected Water Supplies Areas may require this to prevent impact on drinking water sources. On a case-by-case basis, the ECC</p>	<p>Yes</p>	<p>ECC WRMD and IET have agreed to address this matter for future projects</p>	<p>This matter will be addressed through revised permitting</p>

<p>parameters for testing water as they are released from a drill program. They include cyanide, chlorine and other components that simply would not occur from drilling and add additional costs to analysis. Mineral exploration is not an industrial activity like a mine, mill or plant! The department is not willing to make that distinction.</p>	<p>WRMD reserves the right to include a sampling condition in the approval dependent on the project. The necessity of this sampling condition will be determined following submission of final drilling locations and the location/design details of sump(s) and control/risk mitigation structures. If deemed necessary, samples are to be taken at the locations and at the frequency outlined in the sampling plan, and analyzed as per the specified parameters.</p>		<p>through revised permitting terms and conditions. The revised terms and conditions are based on a Layered Risk Mitigation Approach.</p>	<p>terms and conditions.</p>
<p>The mandated removal of drill cuttings from an exploration program.</p>	<p>WRMD agrees with IET's suggested Layered Risk Mitigation Approach, which would not require removal of drill cuttings. They would have to be buried in a rehabilitated sump.</p>	<p>Yes</p>	<p>ECC WRMD and IET have agreed to address this matter for future projects through revised permitting terms and conditions. The revised terms and conditions are based on a Layered Risk Mitigation Approach.</p>	<p>This matter will be addressed through revised permitting terms and conditions</p>
<p>While the administrative tasks associated with environmental assessments likely contains a lot of waste and unnecessary costs, the process needs to be improved, not removed. The red tape is an important paper trail for reference and accountability. The quality of the assessment and output can be greatly improved which is different than easing of the restrictions. Use Lean Experts to improve the process, save money, and improve the quality of the assessments.</p>	<p>This EA process will remain rigorous and comprehensive.. The EA process ensures that projects proceed in an environmentally acceptable manner. When the potential environmental effects of projects are of concern, the process generates real benefits by: (i) providing for comprehensive project planning and design, (ii) maximizing environmental protection, (iii) enhancing government coordination, accountability and information exchange, and (iv) facilitating permitting and regulatory approval of projects.</p>	<p>Yes</p>	<p>The Environmental Assessment Regulations and legislation are under review.</p>	<p>ECC continues review and updated Environmental Assessment legislation and regulations.</p>

Finance

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/regulatory reform? (Y/N)	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
<p>Single year funding for non-profits. Many small/medium non-profit organizations have limited resources and are usually without dedicated administrative/proposal writing resources. When required to submit a new proposal annually, our valuable resources are re-allocated from other areas/tasks, placing undue stress and hardship on an organization that typically is doing 'more with less' already. Further, the re-submission is often redundant, as the work and the financial requirements seldom change from year to year.</p>	<p>GNL is reviewing and in the process of developing an approach for multi-year funding.</p>	<p>Unknown at this time.</p>	<p>Policy change</p>	<p>2022-2023</p>
<p>Delay in delivery of payments, especially first payment in the fiscal year (April 1). In years past, our organization utilized many resource hours (ours and the department's) in coordinating funding to ensure there was sustainability for the remainder of the fiscal year. Often, the budgeted funds do not allow for carry-over into the next fiscal year, yet organizations are expected to 'float' the organization for up to six weeks. In some instances, this is simply not possible.</p>	<p>GNL is reviewing and in the process of developing an approach for multi-year funding.</p>	<p>Unknown at this point</p>	<p>Policy change</p>	<p>2022-2023</p>
<p>Having to apply for support for community agencies for CSSD each year when our request for additional funding is always rejected, and we get the same amount as the year before. The application is long and in-depth and a multi-year funding agreement would make more sense. Each year we are delayed in getting the application which delays funding being released each April. April is a particularly rough time to be waiting on funds for our organization.</p>	<p>GNL is reviewing and in the process of developing an approach for multi-year funding.</p>	<p>Unknown at this point.</p>	<p>Policy change</p>	<p>2022-2023</p>

Fisheries, Forestry and Agriculture

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/regulatory reform? (Y/N)	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
Crown lands: Wait times of 2.5 years for all the approvals necessary because the land is on protective roads.	The Crown Lands Division registers applications in a first come first served manner. Throughout the process, applications can get ahead of earlier ones registered depending on the type of application, need for a field visit timing for referral responses, etc. While there have been cases where applications are expedited, this only happens in extraordinary circumstances.	Yes	<p>A development permit is required to build on land within the building control lines of a Protected Road or within the boundaries of a Protected Area. This process is administered by Digital Government and Service NL.</p> <p>DGSNL notes that the approval process can take some time due to interdepartmental communications, complex situations, and the department's duty to ensure that all applicable environmental considerations have been addressed. In some cases, developments may require amendments to the Protected Road Zoning Regulations, which takes additional time. Applicants are always encouraged to reach out to Department officials to inquire about requests that have taken longer than usual to process.</p>	We will post a link on our website to the Protected Roads page immediately and will request that DGSNL consider adding additional information regarding the process.
Planning a project to repair a fish ladder. Our project has been released from Environmental Assessment but cannot proceed until we receive Crown Lands approval and we have been unable to determine the timeline	The respondent did not provide consent to share their contact information with the department. Without additional information, we cannot speak to the specifics of this application.	Yes	The Division does aim to maintain a 90-business day service standard for routine applications. Non-routine applications such as those requiring additional levels of authorization, such as EA, will not be able to meet this standard. The Division regularly reviews	N/A

<p>for such a decision to be made. Additional permit requirements under the Water Resources Act also hinge on Crown Land approval. Work depends on external funding and it is difficult to plan projects that not only benefit the environment but also contribute to the local economy when a timelines for attaining Crown Land approvals are unknown. If we are unable to proceed with this project this year (Department of Fisheries and Oceans recommendations indicate the project should be completed by [date redacted as may provide indication of identity of the business], it is unknown whether we can access the funding that was secured to complete the work. It is very difficult to secure funding and plan work when timelines are unknown.</p>			<p>application status and assigns additional resources when required.</p>	
<p>We are working on a commercial sawmill licence. I will have the mill delivered but not allowed to operate because of more government application.</p>	<p>The Forestry Act requires anyone who operates a sawmill to obtain a licence. The Mill Regulations under the Forestry Act outline the conditions related to domestic and commercial sawmill licences. A site inspection is required before issuance to ensure saw mill waste will not cause undue harm to the environment nor cause a fire hazard. Depending on the location of the sawmill, other provincial/municipal permits may be required which are the responsibility of the sawmill owner to obtain and outside the mandate of FFA.</p>	<p>Yes</p>	<p>The Forestry Act requires anyone who operates a sawmill to obtain a licence. The Mill Regulations under the Forestry Act outline the conditions related to domestic and commercial sawmill licences. A site inspection is required before issuance to ensure sawmill waste will not cause undue harm to the environment nor cause a fire hazard. Depending on the location of the sawmill other provincial/municipal permits may be required which are the responsibility</p>	<p>Ongoing</p>

			of the sawmill owner to obtain and outside the mandate of FFA.	
Farms need more assistance in accessing programs and services.	FFA has agriculture funding programs available to provide financial assistance to farmers and farm organizations; as well, we have program staff available that provide guidance and direction to applicants on the application process. Other FFA staff are also available to provide support for business planning and farm development. Applicants can contact FFA staff to seek assistance and information on agricultural development programs; and dedicated email accounts are available to submit questions or funding applications. Program Guides and applications can also be found on the FFA website.	No	Policy	N/A
Farmer waiting three years for Crown land approval. He dealt with four different locations and over twenty people. One person could manage the Crown lands on Baccalieu Trail and made a decision in a few months. Far too many people in positions of power that have no qualifications negotiate behind closed doors. Open government and transparency is crucial to bring us forward	The Crown Lands Division has undergone several changes in the last number of years to improve timelines including creating an online application process, adjusting work practices to increase efficiency and realigning positions to better meet the needs of the Division. Applications are now submitted by email, a timestamp is generated and applications are entered and processed in a first come first served manner. Changes to application intake and processing along with filling of vacant positions has improved the application process and we continue to regularly review service gaps and reallocate resources when required. A 90-business day service standard has been introduced for routine applications.	Yes	. Applications are submitted by email, a timestamp is generated and applications are entered and processed in a first come first served manner. Changes to application intake and processing along with filling of vacant positions has improved the application process and we continue to regularly review service gaps and reallocate resources when required. A 90-business day service standard was introduced for routine applications.	Ongoing
The extremely long time for applications for licenses to occupy and other permits required from Crown lands to be	Applications are now submitted by email and a timestamp is generated. Applications are entered and referred in a first come first served manner. Changes to application intake and processing	Yes	Applications are registered in the order that they are received. Changes to how front line staff conduct their work and the	Ongoing

processed and acted upon. Referrals not being entered into the tracking system when they are received.	along with filling of vacant positions has improved the application intake process.		application process has improved registration times.	
Crown lands, and the lack of work they have done and how difficult it is to get anything done. I have lodges and camps on unlicensed land for 10 years since the expropriated land from Abitibi. If they done there job this would be taken care of.	In 2009, there were significant communications to the public to come forward with applications for Crown Lands on the former Abitibi Holdings. Many people have yet to come forward and often only do when there is an urgent need to proceed. This can cause stress and challenges for both the applicant and the Division. The Crown Lands Division processes thousands of applications annually and responds to tens of thousands of inquiries. Staff within the Division work hard to meet expectations of the public and administer Crown lands in a responsible manner to the benefit of the province.	Yes	Continue to accept applications for uses which were approved by Abitibi.	Ongoing
Those with active agricultural businesses (particularly those operating on private land) who are at their limits of development be given clear and concise instruction on how to move forward with their business plans.	Farmers can contact a regional Farm Management Specialist with Fisheries, Forestry and Agriculture to discuss and analyze options to best utilize existing farm resources. The Farm Management Specialists provide advisory services to existing farmers and new entrants that will enable farmers to optimize agricultural production and agribusiness profits.	Yes	N/A	N/A
Long wait times for leasing crown lands for farming. Land should be zoned and prepared for farming and then offered to potential farmers. When the farm is working (proved) the title is given to the farmer.	In 2017, FFA initiated programs such as the Agriculture Areas of Interest and Large Scale Land Development to address zoning and land development requirements. Farmers can apply for these lands via the FFA website (https://www.gov.nl.ca/ffa/)	Yes	FFA addressed these concerns in 2017.	Complete
In Labrador the misunderstanding of the potential for producing 'other' crops (i.e. grain, berries, fruit, cattle, sheep, poultry).	Issue is unclear, FFA does provide support to Labrador farmers.	Yes	FFA has several programs that provide support to Labrador Farmers. A full listing of programs offered can be found on the FFA website (https://www.gov.nl.ca/ffa/)	N/A

<p>The regulations burden. How about this one: The Minister announcing to potential farmers that clearing of land would no longer require a tree-cutting permit! However the forestry department announced that an 'operation' permit AND a 'burning' permit was required.</p>	<p>Under the Forestry Act anyone who cuts timber during the fire season must obtain an operating permit. Under the Forestry Act, during the forest fire season no person shall ignite a fire within 300 meters of forest land without a permit to burn. The Forest Fire Regulations outline the conditions related to the operating permit and the permit to burn. These are not new regulations and have always been in place. Although the Forestry Branch do not have specific positions for navigating the application and approval processes, anyone with questions can contact a district office for assistance.</p>	No	<p>These are regulations under the Forestry Act and there is no plan to make changes to these regulations.</p> <p>There are no costs associated with obtaining a permit to burn or an operating permit.</p>	N/A
<p>Regulation regarding farm gate sales. Requirements for expensive processing of products. Meat and milk for instance. It has hindered me by not being able to sell products that sell at 'farm gate' in most of the world (If a farmer sells a poorly grown or handled or processed his customers won't buy again and will spread the bad word). If the product is good the customer will buy again and spread the good word! And government is out of it.</p>	<p>Sale of horticultural products at farm gate is not regulated. Sale of meat and milk products without certification is prohibited at farm gate, which is to ensure food safety for the consumer.</p>	No	<p>The department has no plan to make changes to the Acts/Regulations in this regard.</p>	N/A
<p>The Department of Agriculture should deal with all other departments on behalf of farmers for their issues. Often we have to get to three or four other departments to get matters taken care of and have delays each time.</p>	<p>Depending on individual circumstances, multiple agencies may be required to approve certain activities. This may be best accomplished by experts in those areas.</p>	Yes	<p>The department has no plan to make changes to its operations in this regard.</p>	N/A
<p>The issue on granted land is a deterrent to farming and is one</p>	N/A	No	<p>There are no plans to issue grants for the purpose of agricultural production.</p>	N/A

<p>of the main reasons why we are not feeding ourselves. In other provinces they are over producing.</p>			<p>Only one per cent of the land-base within the province is suitable for agricultural production. Land should not be granted as it could potentially not be utilized for agricultural purposes. Agricultural land should be protected and monitored by the Crown (leases) for continued and future agricultural production.</p>	
<p>1. NL Agriculture The issue seems to be in the decision making process, many times once the decision is made to go ahead the year is half gone with very little time to complete the project that we are approved for.</p> <p>a. Not being able to sell our beef we have no licensed processing facility or abattoir. This is a major setback because for three years we have had to support the farm with off farm income. I applaud the government for taking steps to establish more red meat abattoirs in NL. I hope we can move forward soon on establishing one here in Labrador.</p>	<p>The Canadian Agricultural Partnership Program Guide provides details on the criteria used to assess funding applications, including general eligibility criteria and the merit-based application evaluation criteria. An Implementation Committee was appointed to make project recommendations based on assessments completed by FFA staff. Program staff involved in the assessment process are required to ensure that the proposed project meets eligibility under the CAP Bilateral Agreement and Program Guide. Final authority and contract signatures are provided by the Minister.</p> <p>FFA continues to investigate means to provide abattoir services to producers in Labrador to support the establishment of viable local livestock operations.</p>	<p>Yes</p>	<p>No changes to the Canadian Agricultural Partnership application evaluation process or decision making delegation process have been considered. Applications for funding require assessment as outlined in the Program Guide and must follow the Canada - Newfoundland and Labrador CAP Governance Structure and Application Assessment Process.</p> <p>FFA continues to investigate means to provide abattoir services to producers in Labrador to support the establishment of viable local livestock operations.</p>	<p>N/A</p>
<p>2. NL Crown lands In order to expand our farm and have more farmers start we need the approval process for getting agricultural land to be faster. I understand the good people at Crown lands are doing their best but the system and levels of approval they have to work with can take years before</p>	<p>FFA has made changes to the application intake and processing and are filling vacant positions. This will improve the application process and reduce timelines. With the improved changes with respect to the intake process, this will translate to improved timelines resulting in a faster more streamlined approval process.</p>	<p>Yes</p>	<p>FFA has made changes to the application intake and processing and are filling vacant positions. This will improve the application process and reduce timelines. With the improved changes with respect to the intake process this will translate to improved timelines resulting in a faster more streamlined approval process.</p>	<p>2 months</p>

<p>a lease application can be approved. This is a major problem for farmers and would be farmers because a growing farm needs more land to produce for animals and crops to sell. And for potential farmers, they could go through a whole carrier change or family circumstance before they get approved for land and then they may not be in the right place to start a farm anymore.</p>				
<p>Lost revenue, loss of applying for student Job helpers, delays in starting back up for the season and location restrictions causing delays and less vendors and customers in attendance.</p>	<p>Further information is required to clarify the issue. The respondent did not provide consent to share their contact information with the department.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Confusion between Deed and Crown land. Crown Lands and Deeds should be communicating with each other to help resolve land use issues. Currently Crown lands does not recognize Legal deeds as ownership of land and creates nightmares for business owners and individuals trying to start or sell land.</p>	<p>The department has no plan to make changes to its operations in this regard.</p>	<p>No</p>		<p>N/A</p>
<p>Unclear, unsupported decisions on what is recognized as farming in the province. This has led to an inability to establish a multi-use farming enterprise in rural Newfoundland. Commercial</p>	<p>The Lands Branch Policy outlines the policy for tenure on agricultural land. It is the policy of Government to maintain control over its agricultural land by means of a Land Leasing Program. This program has identified the following five basic types of farming:</p>	<p>Yes</p>	<p>The department has no plan to make changes to the Acts/Regulations in this regard.</p>	

<p>woodlot farming is not recognized as a legitimate farming activity by the province, even though it is recognized by CRA for income tax purposes, and will not be approved by the Agriculture Division. This effectively eliminates a whole sector of agriculture in the province that has the potential to help those living in rural Newfoundland and Labrador. Repeated inquiries as to why this activity is not recognized as farming in the province have gone unanswered. If not prevented by current policy, regulation or Acts approve these business developments in the province. If prevented by a policy, regulation, or Act, make amendments to bring the province in line with the Ffederal stance on commercial woodlot farming.</p>	<p>1) Commercial Farming; 2) Part-time Commercial Farming; 3) Part-time Farming 4) Hobby Farming; 5) Gardening.</p> <p>"Farm operation" in the province means an agricultural activity conducted by a farmer for gain or reward or with the expectation of gain or reward and includes</p> <ul style="list-style-type: none"> (i) growing, producing, raising or keeping animals or plants or the primary products of those animals or plants, (ii) composting, (iii) clearing, draining, burning, irrigating or cultivating land, (iv) using farm machinery, including vehicles on public roads, equipment, devices, materials and structures, (v) applying fertilizers, manure, pesticides or biological control agents, (vi) operating farm produce stands or agricultural tourist operations, including U-Pick farms or roadside stands, (vii) preparing farm products for distribution for wholesale or retail consumption including the cleaning, grading or packaging of those products; <p>The Agriculture and Lands Branch do not issue Crown land agriculture leases for woodlot management. The Forestry Division should be consulted for comments on commercial harvesting permits and land tenure.</p>			
<p>Despite an amendment being made to the regulations in 2015, it remains difficult for inshore fish harvesters to facilitate direct sales of their fish to the consumer.</p>	<p>Comments will be taken into consideration during the next legislative review.</p>	<p>No</p>	<p>Comments will be taken into consideration during the next legislative review.</p>	<p>N/A</p>

<p>According to the 2015 release, the amendment was made in response to restaurants and the tourism industry to enable direct from the wharf sales to suit the needs of those industries. While this amendment can work well for larger purchases by restaurants, it needs to be clarified or further amended to ensure that harvesters can provide fresh local seafood to the consumer both to meet local demand for our excellent resource and to help address food security.</p> <p>Direct fish sales will be permitted from the fish landing station or a harvesters fishing establishment, of finfish, live crustaceans, squid, seal meat, and scallop meat to individuals solely for personal consumption;</p>				
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Health and Community Services

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/regulatory reform? (Y/N)	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
#1 - Standardized opening guidelines in regards to COVID-19 restrictions	There are standard COVID-19 guidelines for businesses, including retail, as follows: https://www.gov.nl.ca/covid-19/employers/businesses/overall-guidance/	Yes	The COVID-19 guidelines provide standardized reopening information across sectors, including retail.	Complete
#2 - Guidelines for the safe provision of food by volunteers at gatherings #3 Guidelines for the safe provision of food at events organized by recognized organizations	HCS offers Standard Food Safety Guidelines for Not-For-Profit Organizations. In addition, the COVID-19 Guidelines for Distanced Gatherings states that "If food is necessary, have one individual designated to serve food after washing their hands and while wearing a non-medical mask." Finally, the COVID-19 Guidelines for Indoor Recreation provide details about safely serving food at events organized by groups or individuals.	Yes	The COVID-19 guidelines provide information about safely providing food at gatherings and events.	Complete
#4 - Inappropriate use of Eastern Health's Mental Health and Addiction Emergency Fund (submitted by CMHA-NL)	Health and Community Services would not necessarily categorize use of the Eastern Health Mental Health and Addiction Emergency Fund as described in Case Study 1 as inappropriate. While it is unfortunate that it must sometimes be used, it is available to support clients as a supplement to other sources of funding when required.	Yes	Health and Community Services is committed to working collaboratively with internal government departments, the regional health authorities, the Newfoundland and Labrador Housing Corporation and community organizations to address barriers to timely access to affordable housing. We will continue to work with our partners to improve coordination of service delivery and access to supports.	Ongoing

<p>#5: Single year funding for non-profits</p>	<p>Health and Community Services recognizes the administrative burden completing annual funding applications has on community organizations and is committed to working with them to reduce burden and minimize negative impact. The three-year funding pilot for community organizations concluded on March 31, 2021. Multi-year funding continues to be considered.</p>	<p>Yes</p>	<p>The three-year funding pilot for community organizations concluded on March 31, 2021.</p> <p>Internal discussions on how to better support community organizations are ongoing, with a focus on exploring a dedicated resource that could liaise with community groups directly, reducing inefficiencies and improving support.</p>	<p>Ongoing</p>
<p>#6 - Delay in delivery of funding payments, especially the first payment in the fiscal year (submitted by CHANNAL)</p>	<p>Health and Community Services recognizes the impact a delay in receipt of funding can have on community organizations and acknowledges how challenging the beginning of the fiscal year can be. The department is committed to working with community organizations to minimize funding delays and associated impacts. One-time funding was recently allocated to CHANNAL to support the 2021-22 fiscal year and ensure no lapse in funding.</p>	<p>Yes</p>	<p>One-time funding was allocated to CHANNAL to support the 2021-22 fiscal year, and ensure no lapse in funding. Regular annual funding is provided to CHANNAL on a quarterly basis.</p> <p>Additionally, internal discussions on how to better support community organizations are ongoing, with a focus on exploring a dedicated resource that could liaise with community groups directly, reducing inefficiencies and improving support. This resource would work directly with community organizations to facilitate the funding application process.</p>	<p>Complete</p>
<p>#7 - Having to apply for support for community agencies through CSSD each year when the request for additional funding is always rejected (submitted by Planned Parenthood)</p>	<p>Health and Community Services recognizes the administrative burden completing annual funding applications has on community organizations and is committed to working with them to reduce burden and minimize negative impact.</p>	<p>Yes</p>	<p>A three-year pilot project through which 22 community organizations received a multi-year funding contract from 2018-19 to 2020-21 concluded on March 31 2021. The Department of Health and Community Services remains available to support community organizations throughout the application process.</p>	<p>Ongoing</p>

<p>#8 - Delays in receiving funding applications and subsequent funding (submitted by Planned Parenthood)</p>	<p>Health and Community Services recognizes the impact delays in receiving funding applications can have on community organizations and is committed to exploring solutions to minimize negative impact. Going forward, the department plans to work with affected community organizations to disseminate funding applications in the fall in advance of the next fiscal year and support them throughout the application process.</p>	<p>Yes</p>	<p>When feasible, Health and Community Services disseminated funding applications for the 2022-23 fiscal year to community organizations in the fall of 2021. This will allow the organizations ample time to complete the application and avail of departmental support, as required.</p>	<p>Complete</p>
<p>As a volunteer non-profit group, we like to provide meals for less fortunate and families during times of loss during COVID-19 this has become not allowed putting extra stress on people.</p>	<p>Community Food Programs continue to operate during the COVID-19 pandemic. For some programs, this has meant a change in model, for example preparing meals for pick up rather than gathering in large groups for meals or food hamper delivery rather than visiting food banks in person. Government provided funding to Food First NL to facilitate a Community Food Program Support Fund to support programs shifting their models to accommodate public health guidance. As public health guidance changes, programs have pivoted their models as appropriate for client, volunteer and staff safety. A provincial food security working group convenes community food programs to discuss challenges and develop strategies to meet the needs during the pandemic. There is no policy related barrier that we are aware of that would limit community groups from providing emergency food supports.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

Immigration, Population Growth and Skills

Red Tape Issue identified	Departmental response to issue identified	Can this issue be resolved without legislative / regulatory reform?	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
<p>We have had for the past 20 years a near impossible task in recruiting of experienced qualified staff for our firm. We have actively worked with this office and programs since 2006. The processes, technology and communication for this office are outdated and inefficient. We currently have about 20 per cent of our staff who we bought to NL under this office's programs, but the time to do so averaged between 18 and 27 months. Another 20 per cent of our staff came to NL with other employers and they say that employer had a similar experience. As a consequence, we have lost many others who accepted positions in other Provinces due to the delays.</p>	<p>All provincial immigration programs include a two-step immigration process:</p> <ol style="list-style-type: none"> 1. A provincial nomination (Provincial Nominee Program) or provincial endorsement (Atlantic Immigration Program), which is administered by the Office of Immigration and Multiculturalism, and enables applicants to apply for a work permit, if abroad, and arrive in the province once the Federal Government has approved their work permit. If workers are already in NL, the nomination/endorsement clears them to apply for the second step below. The provincial nomination/endorsement process takes an average of 25-40 business days (one to two months). Once approved, workers who are abroad may apply to the Government of Canada for a work permit, which may take the federal government 14-34 weeks to process if the worker is traveling to NL from a non-visa exempt country (most countries other than the US, UK, EU, Australia, NZ); 2. Permanent residency application process, which is administered by the Government of Canada, through Immigration, Refugees and Citizenship Canada, and which can currently take anywhere from nine (9) to 22 months for the Government of Canada to process, depending on the category/immigration program pursued. More information on federal processing timelines is available here: https://www.canada.ca/en/immigration-refugees-citizenship/services/application/check-processing-times.html 	<p>Yes.</p> <p>Improving immigration processing times is a priority for the department. These improvements must include streamlined processes at both the provincial and federal level.</p> <p>Recognizing the importance of smooth and timely transitions to permanent residency, the department continues to advocate for lowering federal processing times.</p>	<p>The department has conducted two Lean exercises, in 2018 and 2019, to seek processing efficiencies in the Provincial Nominee Program. These included opportunities to explore reductions in access points to officers (for example, through a 1-800 system; email accounts; staff phone numbers), to ensure a focus on processing; and providing greater clarification on federal-provincial roles in immigration. The department continues to seek new opportunities for efficiencies in its immigration program processing. The department is also in the process of implementing and updating its online application system, with the OCIO.</p>	<p>N/A – The department continues to raise this matter during every bilateral engagement with the Government of Canada</p>

	<p>This two-step process is consistent among all provinces in Canada.</p> <p>The department is also working with the Office of the Chief Information Officer (OCIO) to implement and update the immigration IT system used by the department, to create an online application system. To date, the Provincial Nominee Program has been incorporated into the system, with business immigration application processes. The Atlantic Immigration Program should be added by fall 2022. These technology advancements are anticipated to improve immigration processes, resulting in greater efficiencies.</p>			
<p>What is available for my employees after their EI runs out in October? They have no work as all events has been cancelled by our clients this year. No income at all to keep business afloat and cannot afford to have a business loan and make payments over the winter months.</p>	<p>The Federal Government has announced a number of measures to support individuals and employers impacted by COVID-19. For further details, please visit: https://www.canada.ca/en/services/benefits/covid19-emergency-benefits.html</p> <p>Immigration, Population Growth and Skills provides a variety of services to assist individuals in finding and maintaining employment. Anyone interested in exploring employment and training programs and services that they may be eligible, a Request for Service can be completed at: https://www.gov.nl.ca/ipgs/files/Request-for-Service-October-2020.pdf</p> <p>If a person is unable to find or maintain employment and has no other means of support, Children, Seniors and Social Development, through the Income Support Program, provides financial benefits and other services to eligible low-income people to assist in meeting daily living expenses.</p> <p>Following employment supports, the Income Support Program provides financial benefits and other services to</p>	N/A	N/A	N/A

	<p>eligible low-income people to assist in meeting daily living expenses.</p> <p>Income Support benefits are considered as the last possible option for income. If there is potential for income from another source (for example, Employment Insurance or Canada Pension Plan), individuals must first avail of that before applying for Income Support.</p>			
<p>Most government support programs provide funds for local businesses to contract a third party business to conduct research, train staff, or develop systems. This puts money in the consultants / third party businesses pockets. It provides local businesses with direction in theory but does not actually lead them to success over time and does not provide them with the necessary financial support.</p>	<p>Immigration, Population Growth and Skills provides funding directly to individuals, employers, employer organizations, industry/sector groups, and community agencies for a variety of program and support measures.</p> <p>The department delivers a number of wage subsidy programs through which employers are directly funded to create employment opportunities for unemployed or underemployed individuals, students, recent graduates, apprentices and persons with disabilities. More information can be found here: https://www.gov.nl.ca/ipgs/employ-support/foremployers/wagesubsidy/</p> <p>As well, the Canada-Newfoundland and Labrador Job Grant (CNLJG) provides funding to eligible businesses and organizations to help offset the cost of training for their existing and future employees. The program provides up to a maximum of \$10,000 per year towards training an existing employee and up to a maximum of \$15,000 for training an unemployed participant. The employer contributes at least one-third to the cost of training, with the exception of an unemployed participant. The employer must have a job for all participants at the end of training. More information can be found here: https://www.gov.nl.ca/ipgs/employ-support/foremployers/canada-nl-job-grant/</p>	N/A	N/A	N/A

Industry, Energy and Technology

Red Tape Issue identified	Departmental response to issue identified	Can this issue be resolved without legislative / regulatory reform?	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
The government has to listen to business stakeholders who are leading the way of innovation, provide support AND solutions to issues rather than straight denial without a possible path forward.	Further information is required to address this specific concern. The client is encouraged to contact the department directly.	Yes	Increased industry engagement through Tourism Board Vision process industry engagement	Ongoing
Delays for offshore projects.	There may be delays in offshore projects for a variety of reasons, some of which may not be within the purview of the provincial government. The respondent did not provide consent to share their contact information with the department. The client should contact the department directly for assistance with the concerns noted.	Unknown	To be determined	N/A
There is a government loan program called Business Credit Availability Program (BCAP) which is 80 per cent backed by the EDC. Must apply in person at your branch managers office. Well BMO in Stephenville does not have a branch manager or a commercial person. Corner Brook was supposed to a person by the name of Samantha call me two weeks ago. No call.	The program referenced is not delivered by the Government of Newfoundland and Labrador. Furthermore, the issue as described relates to a private banking institution.	N/A	N/A	N/A
1. The process of getting funding for business expansion: We had been meeting with TCII/ACOA/BDC for approximately one year discussing options for moving forward. It was already a long process getting answers, but COVID-19 set us back even more and now we are back at square one..	The respondent did not provide consent to share their contact information with the department. The department is committed to working with businesses on its various funding programs and encourages the client to reach out directly to discuss this matter.	Yes	Continued engagement with industry.	N/A

Justice and Public Safety

Red Tape Issue identified	Departmental response to issue identified	Can this issue be resolved without legislative / regulatory reform?	What is the department's plan to address this issue?	What is the department's timeline for addressing this issue?
<p>There is potential for more offenders to be managed in community rather than be incarcerated. During COVID, we saw non-violent offenders given early release, decrease in remands, and decrease in people serving intermittent sentences -- showing that they could instead be managed in community. These are measures that Turnings has long been requesting. Perhaps this is the time to look at changing the legislation around minimum sentences, removing remands from general prison population, and greater interaction with community agencies and services. With the slow-down of COVID, we see numbers beginning to increase naturally and may soon be back to pre-COVID levels.</p>	<p>Not a red tape issue. Department requested that the applicant contact them directly on this issue.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Contradiction of services and denial of services to incarcerated individuals (especially regarding opioid agonist treatment) leaves many falling through the cracks and becoming desperate for street drugs or other substances.</p>	<p>Not a red tape issue. Department requested that the applicant contact them directly on this issue.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>"Capping" populations in correctional institutions. This would reduce overcrowding and encourage more creative sentencing practices within the province.</p>	<p>Not a red tape issue. Department requested that the applicant contact them directly on this issue.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

Municipal and Provincial Affairs

Red Tape Issue identified	Departmental response to issue identified	Can this issue be resolved without legislative / regulatory reform?	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
<p>Trying to get building permits and accessibility permits, etc. for protective roads where there is no town council. Took over six months to get approval so we could upgrade electrical.</p>	<p>MAPA is not responsible for unincorporated areas. Protected Road Zone permitting is done by DGSNL, not MAPA. MAPA has no control over how quickly permits are issued, and some land uses require public advertisement and response reviews before a permit can be issued.</p>	<p>No</p>	<p>Regionalization may address this issue. DGSNL notes that while permitting can take longer in unincorporated communities, residents should avail of the BizPal service to assist in the process.</p>	<p>Work is ongoing related to regionalization and associated legislative mandates and powers for regional governments</p>
<p>Real property tax is charged to us for usage of the entire church basement and the entire school gymnasium as if we have 100 per cent access to these spaces 365 days a year, as our landlords are tax exempt. In actuality we only have 10 per cent access during regular operations and now have zero access, yet the Town of CBS will not consider a reprieve. This request has been made multiple times to the Town of CBS Finance Committee, however, they have refused to exercise their ability to decrease the tax amount proportionate to usage (or to waive property taxes completely.) I have requested information about the appeals</p>	<p>The imposition and collection of taxes is the responsibility of individual municipalities, under authority of Part V of the Municipalities Act, 1999. All issues of taxation are usually referred back to the Town. MAPA is currently drafting new legislation to replace the Municipalities Act. Individuals may contact the department directly for additional information on new legislative provisions that may address this issue.</p>	<p>No</p>	<p>N/A</p>	<p>N/A</p>

<p>process from the Chairperson of the Finance Committee, the Mayor and the Manager of Finance twice, however, they have ignored my requests.</p>				
<p>Municipal issues: Permitting, zoning and above all taxation. The Humber Valley is a disjointed area with businesses inside the Municipality, outside the Municipality both in service districts and Development Zones established by the Provincial Government. The economic playing field is corrupted by this reality and business operations working within the municipal governance areas are strongly disadvantaged as those outside pay little or no tax and have no requirement to comply with zoning or pre-permit regulations and/or oversight.</p>	<p>MAPA is not responsible for unincorporated areas. The imposition and collection of taxes is the responsibility of individual municipalities, under authority of Part V of the Municipalities Act, 1999. All issues of taxation are usually referred back to the Town. The Towns deal with zoning and permitting. In LSDs and UIAs with Protected Road Zone plans, DGSNL issues the permits.</p>	<p>No</p>	<p>Regionalization may address this issue, if it includes a regional level of government that has taxation authority. Regionalization could address the land use planning issues, if the regional authority enacted a regional plan for the area.</p>	<p>Work is ongoing related to regionalization and associated legislative mandates and powers for regional governments</p>

Newfoundland and Labrador Liquor Corporation

Red Tape Issue identified	Departmental response to issue identified	Can this issue be resolved without legislative / regulatory reform?	What is the department's plan to address this issue? (e.g., regulatory and/or legislative changes, policy change, LEAN strategy)	What is the department's timeline for addressing this issue?
<p>NL should end the NLC monopoly on liquor sales and allow private businesses to be licensed to sell all beverage alcohol products. Private distribution should also be allowed. This would allow for better inventory, more sales, more revenue via taxes, more selection, better service from more businesses and more people hired. See Alberta's reforms.</p>	<p>Currently, large elements of the Province's liquor industry is privately owned. NLC has a robust licensing system already in place with over 700 privately owned Brewers Agents Licensees and over 1000 privately owned Restaurant and Lounge Licensees. NLC also has an extensive Liquor Express network with over 140 private retail stores and has 29 Corporate NLC Liquor stores carrying over 4,000 products. The NLC says that there are a wide range of views with respect to privatization in Alberta, and that the impact of privatization on inventory, customer selection, sales, government revenue, customer service and experience, employment, and compensation issues, as well as other important issues like regulatory effectiveness, social responsibility and achievement of public policy objectives continue to be contested almost thirty years after privatization in Alberta. Privatizing the sale of alcohol would be a substantive policy shift for government and require legislative reform. The Liquor Corporation Act (https://www.assembly.nl.ca/Legislation/sr/statutes/l19.htm) is the legislation that gives the NLC the authority to control the sale and distribution of alcoholic liquor in the province.</p>	No	N/A	N/A

Public Engagement and Planning

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/regulatory reform? (Y/N)	What is the department's plan to address this issue?	What is the department's timeline for addressing this issue?
<p>Letters, forms, websites and most all methods of outgoing communication are not presented with clear language in mind. Processes are overly complex even though red tape reductions efforts have been in place since 2005-06.</p>	<p>This falls under the purview of the Disability Policy Office. Outgoing communications is guided by the Accessible Communications Policy, which instructs all departments to use clear, plain language.</p> <p>https://www.gov.nl.ca/cssd/files/disabilities-pdf-accessible-communications-policy.pdf</p>	N/A	N/A	N/A
<p>Past attempts at regulatory reduction focused on counts and eliminating requirements; in many instances these requirements were not meaningful. The counts served merely to facilitate public announcements on superficial reductions.</p>	<p>For many years, departments have been required to submit quarterly updates on their regulatory counting, noting changes in the number of regulatory requirements. However, with the passage of time and government restructuring, there are actually very few departments still doing this. Regulatory counts on file are therefore outdated and most certainly inaccurate. Yet, the Regulatory Impact Analysis (RIA) Guide used by departments when seeking decisions from Cabinet that have legislative or regulatory impacts does ask departments to note the number of regulatory changes (additions, eliminations and net change). Further, there is a Replacement Principle in the RIA which states that one regulatory requirement must be removed for every new one added. Direction will be required as to whether Government wishes to continue the requirement to count and track changes in</p>	Yes	<p>The Public Engagement and Planning Division proposes seeking direction on the continuation of regulatory counting. As part of that decision, consideration should be given to undertaking a review/evaluation of the RIA Guide and researching other means of quantifying regulatory burden.</p> <p>The updating of other RIA Guide components may be necessary depending on the outcome of the review/evaluation.</p>	Pending direction

	<p>regulatory requirements and the application of the 1:1 Replacement Principle.</p> <p>It is to be noted that other aspects of the RIA remain relevant and useful, namely:</p> <ul style="list-style-type: none"> Cost-benefit analysis Competitive analysis Jurisdictional harmonization Use of plain language Timeliness of regulatory response Transparency of regulatory requirements Results-based focus Reverse onus need Sunset provisioning 			
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Tourism, Culture, Arts and Recreation

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/regulatory reform? (Y/N)	What is the department's plan to address this issue?	What is the department's timeline for addressing this issue?
<p>Making owners of alternate type Airbnb's criminals simply because the regulations and Canada Select are not with the times. Tourists want different types of accommodations. Why are there so many regulations for short-term rentals but nothing for long term rentals?</p>	<p>Bill 52, the Tourist Accommodations Act (the Act) received Royal Assent on November 5, 2020. The Act is a modernization of the previous Tourist Establishments Act and Regulations. The definition of a tourist accommodation in the new Act is more in line with the modern range of available accommodations. The new Act does not require a tourism accommodation to be licensed or to be graded by Canada Select. The new Act does include mandatory registration with the TCAR for all tourism accommodations (traditional and online platform).</p>	<p>No – the legislation should be complete by the spring 2022.</p>	<p>The new Tourist Accommodations Act will be in force once the Regulations are complete. Expected in the spring 2022.</p>	<p>Spring 2022.</p>
<p>Accommodation licensing.</p>	<p>Bill 52, the Tourist Accommodations Act (the Act) received Royal Assent on November 5, 2020. The Act is a modernization of the previous Tourist Establishments Act and Regulations. The definition of a tourist accommodation in the new Act is more in line with the modern range of available accommodations. The new Act does not require a tourism accommodation to be licensed or to be graded by Canada Select. The new Act does include mandatory registration with the TCAR for all tourism accommodations (traditional and online platform).</p>	<p>No – the legislation should be complete by the spring 2022.</p>	<p>The new Tourist Accommodations Act will be in force once the Regulations are complete. Expected in the spring 2022.</p>	<p>Spring 2022.</p>
<p>Outfitting moratorium</p>	<p>In 1998/99, a moratorium on new outfitting businesses was announced in consultation with the Newfoundland and Labrador Outfitters Association (NLOA), in order to enhance the sustainability of existing outfitting businesses and protecting big game populations for the future.</p> <p>Since 1999, the process for a new outfitter to acquire non-resident big game licenses is through the</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

	<p>purchase of an existing main lodge outfitting business with a big game allocation. Since 2008, the number of available non-resident moose licences assigned to outfitting businesses has remained at 3,948.</p> <p>The Departments of Fisheries, Forestry and Agriculture (FFA), and Tourism, Culture, Arts and Recreation (TCAR), jointly manage and regulate the non-resident hunting industry. FFA monitors and assesses big game populations and establishes sustainable harvest quotas and policy for moose and caribou, and TCAR manages the allocation of established non-resident big game licences assigned to outfitting businesses.</p>			
Trailway Permit/Temporary Access permits.	<p>Budget 2016 raised the fees for T’Railway permits to \$250/ha/month. This permit is for all commercial users of the T’Railway and is a separate matter from the upgrade of the T’Railway undertaken and paid for by Corner Brook Pulp and Paper Limited (CBPP).</p> <p>CBPP offered to upgrade and pay for the 1.1 km of T’Railway and carry out repairs to the North Brook Bridge in order to access wood harvesting rights, which would be of benefit to the company. The alternative for CBPP would have been to spend significantly more money to build a new road to access the wood.</p>	N/A	N/A	N/A
Acquiring funding from TCAR - there are no examples of what would be approved for a grant. Very little information. No listing of businesses that received funding or what it was used for. Seems secretive. Little information at all available and the rules seem to change depending on the recipient and the government worker and if they like you.	<p>TCAR has several granting programs under each of its primary sectors: Tourism; Arts and Heritage; and Recreation and Sport. A full listing is available here: https://www.gov.nl.ca/tcar/funding-programs/. Each program has guidelines and appropriate application forms as well as contact emails and phone numbers. Department officials are available to answer any questions and support the application process.</p>	N/A	N/A	N/A

WorkplaceNL

Red Tape Issue Identified	Departmental response to issue identified	Can this issue be resolved without legislative/regulatory reform? (Y/N)	What is the department's plan to address this issue?	What is the department's timeline for addressing this issue?
Simplify laws, liabilities and responsibilities for small businesses.	WorkplaceNL strives to maintain a responsive system to balance the needs of injured workers and employers. This involves sustaining the injury fund to provide coverage for workplace injuries, without increasing administrative costs to the system as a whole. Small businesses can reach out to us at any time to discuss their concerns. Having said that, there is an established process to validate claims, which is consistent with workers' compensation systems across the country. The process includes a review of all the information available such as the worker's report of the injury (Form 6); the employer's report of the injury (Form 7); medical reports; and any other relevant evidence. Everything on the file is reviewed and weight is given to each piece of evidence. A decision is completed based on the weight of the evidence. Mechanisms are also in place for either party to request a review of a WorkplaceNL decision if they disagree. This involves a review of one or more decisions, not the whole case. There are two levels of independent review in place.	Y	N/A	N/A

<p>Workers Compensation and it's related legislation. The legislation doesn't encourage Workers Compensation to validate injury claims. A staff person is injured, they take time off and visit a related health care professional. No cause and effect investigation occurs and nobody reviews the reports with the goal of validating a clients claim. In the past, I have insisted on investigation and the wheels turned very slowly until I did get an investigator on the case. The client was found guilty of Workers Compensation Fraud. The period of time between the time of injury and the final hearing was more than a year of claims. The record of the injury and the costs of that claim remain on the employers file and the costs are not reimbursed. Workers Compensation will not impose a retroactive correction to the account. Dispite the lack of any kind of validation process they hold the employer responsible when client/staff defraud the system making the employer a victim of two</p>	<p>Policies have been reviewed and Overpayments Policy (EL-04B) provides for cost relief in this type of situation. For the purposes of further clarification, a recommendation will be advanced to the Board to amend the PRIME Overview Policy (PR-01) to include costs as a result of fraud, misrepresentation, or non-disclosure in the type of costs that are excluded from PRIME.</p>	<p>Yes - Nothing prevents the concerned employer from contacting WorkplaceNL to request the removal of the claim cost charges due to fraud, as mechanisms exist to address overpayments, as outlined in the Overpayment Policy.</p>	<p>However, in the spirit of transparency and clarity, a change to the PRIME Overview policy (PR-01), will be advanced.</p>	<p>Operationally the policy could not be changed until 2023, if approved by the Board.</p>
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