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June 4, 2026

Nova Scotia Regulatory and Appeals Board  
Box 1692, Unit M  
Halifax, NS B3J 3S3

Email: [board@novascotia.ca](mailto:board@novascotia.ca)

Dear Members of the Nova Scotia Regulatory and Appeals Board,

I am writing on behalf of the Eastern Shelburne Amalgamation Steering Committee, which represents the Municipality of the District of Shelburne, the Town of Shelburne, and the Town of Lockeport.

As you are aware, the Steering Committee was established by the three councils to examine whether municipal amalgamation may represent the most appropriate long-term governance model for our region. Throughout this process, the committee has sought to approach this work in an objective, evidence-based manner, with a focus on ensuring that any future recommendation to councils is supported by a thorough understanding of the financial, operational, governance, infrastructure, and service delivery implications.

Recently, the Steering Committee requested that the Province of Nova Scotia commit to funding the studies and analyses that would be required to support a potential amalgamation application. In response, the Minister of Municipal Affairs advised that municipalities must first determine whether they are prepared to proceed with an application to the Nova Scotia Regulatory and Appeals Board before discussions regarding provincial funding would be appropriate.

This response has created a significant decision-making challenge for the three municipalities.

The councils are being asked to consider whether they are prepared to enter a formal amalgamation process before having access to much of the information they believe is necessary to determine whether amalgamation is in the best interests of their residents and

taxpayers. At the same time, the Province is understandably reluctant to discuss funding for studies until there is greater certainty regarding the requirements of the regulatory process.

In an effort to find a practical and responsible path forward, the Steering Committee is seeking clarification from the Board regarding the studies and analyses that would likely be required should the three municipalities submit an application for amalgamation.

Specifically, we would appreciate the Board's guidance on the following matters:

1. Would the Board be prepared to identify, to the greatest extent possible, the specific studies, reports, analyses, and supporting documentation that would likely be required following receipt of an amalgamation application from the Municipality of the District of Shelburne, the Town of Shelburne, and the Town of Lockeport?
2. Would the Board be willing to provide a preliminary indication of the scope and nature of those studies so that the municipalities may better understand the information requirements associated with the process?
3. In particular, would the Board expect a comprehensive financial sustainability analysis that extends beyond the preparation of consolidated pro form financial statements and includes:
  - Long-term operating and cash flow projections;
  - Long-term capital expenditure forecasts;
  - Analysis of infrastructure liabilities and future asset replacement requirements;
  - Human resource and organizational structure requirements;
  - Projected taxation impacts on residents and businesses;
  - Alternative taxation strategies and implementation options; and
  - An assessment of the long-term financial sustainability of the proposed amalgamated municipality.

The Steering Committee believes that this type of financial analysis would be critical to understanding the practical implications of amalgamation and would likely represent one of the most important decision-making tools available to councils and the public.

In addition, we would respectfully request confirmation regarding the flexibility of the process itself. Specifically, if the three municipalities were to submit an application, and subsequently complete the studies and analyses required by the Board, would the municipalities retain the ability to withdraw their application prior to a final determination by the Board should the information obtained indicate that amalgamation is not the preferred path forward?

This question is particularly important to the participating municipalities. The intent of any application would not be to predetermine the outcome of the process, but rather to obtain the information necessary to make an informed decision. The councils would therefore


benefit greatly from understanding whether participation in the process would allow for reconsideration once the required evidence has been assembled and evaluated.

The Steering Committee's objective in seeking this clarification is straightforward. If the Board can provide reasonable certainty regarding the studies likely to be required, the committee would then be in a position to approach the Province with a specific request that it commit to funding those studies. Should the Province indicate a willingness to fund the work required by the Board, the committee would then be in a much stronger position to seek direction from the three councils regarding whether they are prepared to submit an application and proceed with the formal review process.

We appreciate that the Board cannot prejudge any future application. However, any guidance that can be provided regarding likely information requirements and process considerations would be of significant assistance to the municipalities as they work to determine the most appropriate path forward.

Thank you for your consideration of this request. We would welcome the opportunity to discuss these matters further with Board staff if that would be helpful.

Respectfully submitted,



**Derek Amalfa**

Mayor, Town of Lockeport

Chair, Eastern Shelburne Amalgamation Steering Committee

*On behalf of the Eastern Shelburne Amalgamation Steering Committee:*

- Warden Penny Smith, Vice Chair, Municipality of the District of Shelburne
- Mayor Stan Jacklin, Town of Shelburne
- Deputy Mayor Craig Hillen, Town of Lockeport
- Deputy Warden Heidi Wagner, Municipality of the District of Shelburne
- Councillor Terese Cruz, Town of Shelburne