

December 29, 2023

SENT VIA EMAIL

Doug Crawford  
Executive Vice President - Operations  
American Iron & Metal Company Inc.  
9100, Henri-Bourassa Est  
Montreal, QC H1E 2S4  
[dcrawford@aim-global.com](mailto:dcrawford@aim-global.com)

Dear Mr. Crawford:

**Re: AIM Recycling Atlantic – Salvage Dealer Licence 1517701 81 002**

This letter is further to your correspondence dated December 22, 2023 (“**AIM Response**”), responding to my letter of December 8, 2023 providing American Iron & Metal Company Inc. (“**AIM**”) with the opportunity to be heard under subsection 18(1) of the *Salvage Dealers Licensing Act* (“**Act**”). The AIM Response identifies certain remedial measures that your business intends to implement; however, it does not substantively address the numerous community health, safety and environmental risks and impacts arising from AIM’s operations at this location, identified in the Report of the Task Force on American Iron & Metal Operations and September 14, 2023 Fire, and the related Investigation Reports (collectively, the “**Reports**”), which were provided to AIM.

Among the proposed steps set out in the AIM Response is the intention to develop a plan to comply with the National Fire Code, when such compliance should have always occurred, and the intended training by consultants of AIM personnel to operate a new water truck, with no evidence such steps will create the capacity to deal with a significant fire at this site in the future. The AIM Response attempts to minimize future risks and hazards, contests the findings of the Task Force and Investigation Reports, and asserts that AIM’s operations at this site are no worse than other industrial operations elsewhere.

Despite the notice provided by my December 8, 2023 letter that, as Minister, I was considering whether it was in the public interest to revoke AIM’s licence for this location, the AIM Response does not substantively address the public interest, but largely addresses AIM’s commercial interests and makes assertions of future intentions.

In making my decision under subsection 18(1) of the *Act*, I have reviewed and considered the documentation referred to herein, including the AIM Response, and considered the following:

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- (a) the content of the Reports, including the risks and hazards identified in the Reports respecting the likelihood of fires and the environmental, health, and safety risks associated with the AIM operations at this site;
- (b) the history of the actual AIM operations at this site since 2011, which have been negative in many respects as set out in the Reports, and the significant consequences of the September 14, 2023 fire;
- (c) the insufficiency of previous plans submitted by AIM including the insufficiency of the EIA submitted by AIM in 2010 to adequately address environmental issues and hazardous events;
- (d) the proximity of the AIM operations to the Saint John community, on the harbour and adjacent to a residential neighbourhood, and the risks of such a location;
- (e) the negative socio-economic impacts on the greater Saint John community of the AIM operation and the lack of acceptance by the community;
- (f) the failure of the AIM Response to adequately address the public interest as it relates to AIM's continued operations at this site; and
- (g) the direction provided by paragraph 18(1)(b) of the *Act* and section 12 of the *Unsanitary Premises Act* that salvage yards shall not be maintained, operated or located within 300 m of public parks and public playgrounds.

I am satisfied as the responsible Minister under the *Act* that it is in the public interest to revoke, and I do hereby revoke immediately, the salvage dealers licence issued to American Iron & Metal Company Inc., licence number 1517701 81 002 for the facility located at 1 Protection Street, Port of Saint John, NB. Please note that, pursuant to section 19 of the *Act*, this decision is final and shall not be appealed.

Sincerely,



Hon. Kris Austin  
Minister of Public Safety and Solicitor General

c.c. Michael J. Comeau, K.C., Deputy Minister  
Tina Burke, Chief Regulatory Officer  
Mr. Herbert Black, President