

December 8, 2023

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

Dear Mr. Crawford:

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

I am writing as Minister of Public Safety in respect of the above licence issued to American Iron & Metal Company Inc. (“AIM”) in respect of the AIM operations at 1 Protection Street, Port Saint John, NB. I am responsible for the administration of the *Salvage Dealers Licencing Act* (“Act”).

Subsection 18(1) of the Act is as follows:

18(1) *After extending to the licensee an opportunity to be heard and to be represented by counsel, the Minister may suspend or revoke a licence if he or she is satisfied on reasonable grounds that*

- (a) the licensee has failed to comply with a duty imposed on the licensee by this Act or the regulations or has otherwise violated this Act or the regulations,*
- (b) the licensee has failed to comply with section 12 of the Unsightly Premises Act, or*
- (c) it is in the public interest to do so.*

I have received the *Report of the Task Force on American Iron & Metal Operations and September 14, 2023 Fire*, and the related Investigation Reports (collectively the “Reports”). The Reports have been sent to and received by AIM.

The Task Force Report contained 12 important findings and the following findings are relevant and material with respect to the application of subsection 18(1) and whether the above AIM licence should be revoked, as follows:

- AIM did not, and does not, have an emergency plan capable of effectively responding to the September 14, 2023 fire or a similar fire in the future.

- AIM operations carry a significant risk of explosion and fire, with a high likelihood of future fires at the AIM site, including a material risk that a catastrophic fire similar to that of September 14, 2023 could recur.
- The location of the AIM operation, in the middle of the Saint John community, adjacent to the harbour and a residential neighbourhood, is entirely inappropriate given its now known hazards and risks.
- The negative socio-economic impacts of the AIM operations at its present site are unacceptable to the City of Saint John, its residents, and surrounding communities.
- The AIM operations are an environmental, health and safety risk to Saint John, surrounding communities, and their citizens.

I note also the presence of one or more playgrounds/public parks within 300m of the current operations contrary to subsection 18(1)(b) of the *Salvage Dealers Licencing Act* (the "Act") and section 12 of the *Unightly Premises Act*. An aerial view of the AIM site showing the residential properties, public playgrounds, public parks and other facilities within 300m of the AIM site is attached. This raises further concerns about the AIM operations and whether it is in the public interest for AIM to continue to hold a Salvage Dealers Licence for this location.

In accordance with subsection 18(1) of the Act, this letter is to extend to AIM the opportunity to address and be heard respecting the above issues and the information contained in the Reports before I, as Minister, decide whether AIM's licence should be revoked. I require AIM's response in writing no later than December 22, 2023.

Sincerely,



Hon. Kris Austin
Minister of Public Safety and Solicitor General

c.c. Michael Comeau, K.C., Deputy Minister
Tina Burke, Chief Regulatory Officer.
Ms. Rita Demirjian, Lawyer
Herb Black, AIM CEO



**AIM PROPERTY
ENGINEERING
CONSULTATION**
ADJACENT PROPERTY

PROPERTY OVERVIEW
FIGURE #2

- Beach Volleyball Courts
- Community Gardens
- Ballfield
- Splash Pad
- Playground
- Pump Station
- Property Boundary
- AIM Lease Area
- 300 m Offset
- 30 m Offset
- Properties Within 300 m Offset**
- Ball Field
- Curling Club
- Infrastructure
- Park
- Playground
- Residential

SCALE 1:5,000
0 25 50 100 m



MAP DRAWING INFORMATION:
N/A

MAP CREATED BY: [Name]
MAP CHECKED BY: [Name]
MAP PROJECTION: NAD 1983 UTM Zone 18N



PROJECT: 22-001
DATE: 2022-11-02

Map data © OpenStreetMap contributors, Imagery © Mapbox