

Thank you for giving our industry the opportunity to comment on this issue. **Brant Scrap Metal** has been operating in **Brantford** for **10** years. We provide jobs for **4** members of our community, and represent a vital part of an international industry that is essential to the global manufacturing chain, global economy, and the health of our local and global environment. Our company has been a member of the Canadian Association of Recycling Industries for **7** years, an industry association formed in 1941 to help drive the scrap effort during the war. CARI and its members have been working with law enforcement to combat metal theft since 2005.

Our industry is a major target for metal thieves, so preventing metal theft is very important to us. However, we have specific concerns with the proposed changes to the Licensing Bylaw:

1. IT IS DISPROPORTIONATELY WEIGHTED AGAINST THE METAL RECYCLING SECTOR

- a. The proposed strategy of prohibiting and restricting materials does not target thieves, protect material, or seek to create an offence of interfering with critical infrastructures. Instead, it is aimed at lawful, licensed businesses supporting an essential industry
- b. The additional administrative and financial burden placed on scrap metal dealers will drive some smaller dealers out of business
- c. The market for stolen material is driven by unlicensed mobile dealers and online marketplace sellers, not by licensed dealers

2. IT WILL NOT STOP MATERIAL THEFTS

- a. Metal recycling is a global industry, and material flow is not contained within one city. A would-be thief can easily take their stolen material to a yard outside the city, into another province, across the border, or online
- b. Metal theft is not a new problem; it becomes more flagrant when the costs of metals rise. Metal theft increases when commodity prices do, and because commodity prices fluctuate, so do the materials that are "in demand" by thieves. Creating a list of prohibited materials today may not reflect what materials thieves target in a year or two
- c. Most material received at a scrap yard is indistinguishable. It does not have a serial number or conspicuous markings. Thieves often alter material in order to transport or to make it less distinguishable (large pieces are cut down, bent, or flattened, etc.)
- d. Police agencies have directed few resources to metal theft, and metal theft is categorized as low-priority property theft. Without dedicated law enforcement officers, they cannot respond in a timely manner to tips from scrap yards about questionable material or sellers. **Without dedicated resources law enforcement will not be able to review the overwhelming number of transactions that occur in our yards each day**

3. WE ARE ACTIVELY WORKING TO FIGHT METAL THEFT

- a. We have policies in place to deter thieves and help mitigate metal theft. These policies include setting up seller accounts; using video cameras throughout their facilities; training staff to notify a supervisor if suspicious-looking material is brought in; and working with law enforcement.

- b. To facilitate the partnership between recyclers and law enforcement, CARI and ISRI (the U.S. recycling association) launched www.ScrapTheftAlert.com in 2008. This website is a free metal theft reporting tool available to law enforcement officers, recyclers, and other stakeholders. It allows law enforcement officers to alert recyclers of reported stolen material in their area, and allows recyclers to alert area law enforcement if they receive material they suspect was stolen
- c. Thieves know metal recyclers keep records of their purchases and sales, and they know they have alternative markets for those materials. To eliminate “the ease with which thieves can sell” these materials, enforcement must focus on mobile and online dealers

Thieves steal wherever there is opportunity and profit to be had. Rather than penalizing the good actors, any Bylaw targeting metal theft must recognize that scrap metal dealers are not the criminals. We wish to see regulations and policies that clearly and meaningfully address metal theft. **Rather than adding a list of prohibited and restricted materials to the Licensing Bylaw, we recommend any amendment state that such materials may only be purchased by metal recyclers with a fixed place of business.**

A thriving recycling industry is in Brantford’s best environmental and economic interest. We welcome the opportunity to work with you on this issue, and we thank you for engaging with scrap dealers.