



December 23, 2011

Transport Canada Marine
730 – 800 Burrard Street
Vancouver, BC
V6Z 2J8

Attention: James McQuibban – Boating Safety Officer

Dear Sir:

Re: Current Status of Marine Flare Recycling Program

This is just to give you an update on the status of the Marine Flare Recycling Program in British Columbia. Pacific Blasting was asked by the RCMP to take over the marine flare recycling program in the summer of 2009. They chose Pacific Blasting because we have the trained blasters required to safely handle and dis-assemble the products for recycling, licenced storage facilities and properly equipped powder trucks for the safe transport of the product, and a high-energy burner for disposal of the propellants.

Since taking over the program, we have instituted the following:

- Blaster training from the RCMP on proper safe disassembly of the products.
- Installation of licenced storage facilities at Slesse Creek near Chilliwack, BC and in Victoria, BC.
- We have contracted with Sumas Environmental Services for the proper testing and disposal of ash left over from the burning process.
- We have continued to use the same charge out rates put in place by the RCMP.
- We have set up collection depots at the following locations:

Pacific Blasting & Demolition Ltd.
3183 Norland Avenue
Burnaby, BC
(604) 205-6890 – ask for Mark
or (604) 291-1255

Ellice Recycling
524 David Street
Victoria, BC
(250) 383-4342 – Chris

Parker Marine
1605 Comox Road
Courtenay, BC
(250) 334-4808 – Scott

Parker Marine
1920 Wellington Road
Nanaimo, BC
(250) 741-1618

West Vancouver Yacht Club
5854 Marine Drive
West Vancouver, BC
(604) 921-7575

Each of these locations has been supplied with Type 6 explosives magazines for the safe and secure storage of the expired flares.

We have also participated with the following organizations in the holding of special functions for their members that give them the opportunity to turn in expired flares for proper disposal:

- Vancouver Yacht Club
- Burrard Yacht Club

These organizations and companies are committed to boating safety and the environment and have volunteered to participate in the recycling program to the benefit of the marine industry.

We have also approached the following vendors of marine flares to see if they would be willing to participate in a program to promote the proper recycling of the products:

- Steveston Marine
- Thunderbird Marine
- Mosquito Creek Marina
- Sewells Marina

The general consensus with the marine chandlers is they are only willing to assist with the collection of expired marine flares if they are mandated to do so by Transport Canada.

The simplest method for the collection and recycling of the expired marine flares would be to set up a recycling fee when the product is purchased. The vendors

currently have a surcharge to cover the dangerous goods component of transport costs, however, they do not charge a recycling fee. This needs to be addressed by Transport Canada.

To encourage boaters to participate in a drop off and recycling program, we propose that Transport Canada should institute an amnesty program covering a defined period of time where boaters can drop off flares at established depots without having to pay a recycling fee. This should be done in conjunction with a program to institute a recycling fee by the vendors. At the expiration of the amnesty program, boaters would be expected to drop off their expired flares when they purchase new ones, or if not purchasing replacement flares, they would be charged a recycling fee to dispose of the expired product. Transport Canada would be expected to cover the actual recycling cost for the flares collected during the amnesty period.

We are now at a point where we need participation by Transport Canada to help move the program forward. Can we count on your action and support? I have attached a copy of the current recycling fee program. If you have any questions or suggestions on how Pacific Blasting & Demolition Ltd. can further assist with the expired flare recycling program, I would like to hear from you.

Yours truly,

Pacific Blasting & Demolition Ltd.

A handwritten signature in blue ink, appearing to read 'Ron J. Elliott', with a stylized flourish at the end.

Ron J. Elliott, ASCT
Vice President – Blasting Division

cc. Sgt. Victor Cunha, P.E.T. – RCMP Explosives Disposal Unit
Corry Goumans – Rock Superintendent – Pacific Blasting