

What We Heard Report:

Licensing of Drinking
Establishments, Body Rub
Centres, Massage
Therapists, and Scrap
Metal Recyclers

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Edmonton

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INTRODUCTION

Administration is in the process of comprehensively reviewing and updating the City's Business Licence Bylaw for the first time since it was introduced in 2002. In May of 2019, Administration presented the first of two information reports on the Business Licence Bylaw Renewal to the Urban Planning Committee. This first report outlined 23 recommendations for a new Business Licence Bylaw general framework and fee structure that were informed in part by engagement with a broad range of business owners, as well as local business associations and Business Improvement Areas.

In May of 2020, Administration will present the second information report, which will outline the new Business Licence Bylaw, including further recommendations for changes to business licence categories - in other words, requirements and regulations that apply to specific types of businesses and industries.

This "What We Heard" report summarizes feedback from business owners and operators in four key areas: Drinking establishments, body rub centres, massage therapy, and scrap metal recycling. The contents of this report will help to inform recommended changes to the corresponding business licensing requirements in the new Business Licence Bylaw.

DRINKING ESTABLISHMENTS

On November 25 and December 4, 2019, Administration hosted two round-table meetings with owners and operators of Minors Prohibited drinking establishments, and representatives of the Responsible Hospitality Industry Association. In total, 10 participants attended a session.

Administration hosted these sessions with the following objectives:

1. Understand what barriers and pressures businesses face, especially related to licensing.
2. Share some of the proposed changes to the Business Licence Bylaw with businesses.
3. Hear from businesses about how we might make licensing requirements easier for drinking establishments to meet.

Barriers and Pressures for Businesses

As business owners and operators, what barriers and pressures do you encounter?

Increasing costs and poor economic conditions were common themes among participants. Labour costs in particular have increased significantly due to the recent minimum wage increase. Staff earning minimum wage are now paid more to comply with the increase; however, in some cases businesses also had to pay higher earners more to maintain pay equity and retain staff. Other costs such as liquor, property taxes, and insurance also continue to increase at a time when sales are declining.

Some businesses have raised prices at the risk of losing customers. Some local businesses are closing, while others can't afford to close due to the amount of money owners have invested. Overall, participants agreed that businesses cannot handle any more increasing costs right now. A couple of participants were being enticed by smaller municipalities around Edmonton to relocate their businesses where it is less costly and easier to do business.

How does City licensing affect you and your business? What has your experience been with licensing?

Many participants were frustrated by their experience with the permitting and licensing process as a whole. Most participants found the annual requirement to provide Police Information Checks (PIC) for anyone in care or control of the business to be unnecessarily onerous and extremely costly. In addition to the cost of the PICs, businesses must also pay employees for a minimum of three hours to obtain their PICs. Some individuals also own, operate, or manage multiple businesses and are required to submit multiple PICs throughout the year.

Participants were somewhat divided on the control plan requirements. While most participants seemed to appreciate the value of the control plans, some felt that the annual control plan review is onerous and should be easier to meet without completing an entirely new document every year. Others did not support the annual requirement of a control plan at all, particularly for long-established businesses where operational changes are less likely to occur from one year to the next.

Additional concerns raised by participants were as follows:

- Permit requirements for land use, building codes, and signage are complex and unpredictable. Permits for seemingly small changes like installing a new sign, adding a patio or sidewalk cafe, or hosting “pop-up” tastings are difficult, time-consuming, and costly. Businesses need to try new things to stay competitive, but the City makes it difficult or impossible. There is little opportunity for businesses to learn the permitting and licensing process because the requirements are different every time.
- The City does not provide clear and consistent information to businesses. Businesses get different answers from different people at the City. Expectations are not made clear upfront, and businesses do not know who to talk to. Businesses are surprised when a small change (e.g. replacing a broken piece of equipment with the same) triggers a requirement to meet updated code requirements at significant cost. One participant suggested the City is becoming increasingly “faceless”.
- Businesses have to fulfil similar requirements more than once. Some of the requirements for a business licence are similar to those for insurance, liquor licences, health permits, or Best Bar None accreditation. These requirements are not aligned, so businesses are duplicating efforts.

Proposed Changes to Business Licensing

Participants were given a brief overview of some of the recommendations for a new Business Licence Bylaw general framework and fee structure, specifically:

- A clearer and simpler fee schedule
- A single fee for businesses with more than one licence category
- No additional consultation or administration fees
- A discounted renewal fee when licences are renewed on time
- Clearer requirements for posting of the business licence.

This presentation was to inform participants of upcoming changes to provide context for the next part of the discussion. Although participants were not asked to comment on these recommendations in detail, most participants were receptive to the changes overall. However, a couple of participants indicated that the requirement to post the licence on the premises interferes with the aesthetics of their businesses.

Making Licensing Easier

Prior to this discussion, participants were informed about the current business licence application and renewal requirements for Minors Prohibited drinking establishments, specifically Police Information Checks (PICs) for owners, directors and managers; a current Corporate Registry Search document; and Control Plans. Participants were asked to comment on what might make these requirements easier to fulfil.

How might the City make it easier for you to meet the licence application and renewal requirements?

Participants said they would like to see **relief from the requirement to provide Police Information Checks (PIC) every year**, and provided several ideas about how this could be achieved:

- PICs should be required at the time of application only
- When renewing a licence, only PICs for new staff hired within the last year should be required
- PICs should only be required to renew a licence when there are problems with a particular business
- PICs should not be required from well-established businesses
- PICs should only be required for those who are operating the business, not silent partners (especially those who live out of town)

- Staff should provide correct and complete information about the PIC requirement (e.g. not required for shareholders)
- Copies of PICs should be accepted, especially since AGLC also requires PICs

Some participants suggested **changes to the Control Plan Requirements**. The City should provide businesses with minimum standards or best practices that would make it easier to complete the Control Plan. When renewing licences, businesses should be given the option to review their existing control plans and acknowledge if no operational changes have occurred in lieu of submitting new plans. Businesses should be able to complete and submit their Control Plans online.

Participants also suggested that **control plans should be used primarily as an educational tool to promote responsible operations**, and less as an enforcement tool. One participant described an instance where a business was fined for violating its control plans after it unknowingly allowed a gang member inside. The gang member used a sophisticated fake ID that was not detected by the patron scan system.

Another participant was concerned that enforcement action could be applied when businesses use reasonable discretion to deviate from their control plans, for example, by not scanning celebrity / VIP guests who are public figures through the patron scan system.

In order to ease both the Police Information Check and Control Plan requirements, a couple of participants suggested that **businesses should be given the option to purchase a longer-term licence** (e.g. renew every three years instead of annually).

Additional Feedback

Participants suggested a number of improvements to general permit and licensing requirements that are not specific to licensing of Minors Prohibited drinking establishments:

- Align Heritage requirements and Zoning Bylaw requirements. One participant invested money in a new sign after a sign permit was issued, and was later told that the sign did not meet Heritage requirements.
- Make it easier and more affordable for businesses to make small changes to their business premises. For example, Building, Zoning, and Fire Code requirements should be “grandfathered” when making changes to only a small portion of the premises (e.g. minor renovation, patio, etc.). Pulling permits to replace defective equipment with the same (e.g. HVAC unit) should not require engineering drawings. Businesses want to follow the rules, but the extra barriers and costs are a disincentive.

- Provide a single point of contact for the night time economy. Business owners would appreciate a single point of contact to guide them through all City and non-City licences, permits, and approvals.
- Provide accurate and complete information upfront. Business owners cannot be surprised by added expenses part-way through the permitting or licensing process. Business owners need to know who to talk to (and how to reach them), and what other requirements (City or non-City) may apply.

BODY RUB CENTRES

On November 26, 2019, Administration hosted a round-table meeting with 12 owners and operators of Body Rub Centres. Administration hosted these sessions with the following objectives:

1. To understand what barriers and pressures businesses face, especially related to licensing.
2. To understand how the Adult Services industry is changing.
3. To hear feedback from businesses about some proposed changes to adult services licensing.

Barriers and Pressures for Businesses

As business owners and operators, what barriers and pressures do you encounter?

Several participants were frustrated that Escorts increasingly provide in-call services from their homes without the same licensing requirements and fees as Body Rub Centres. Body Rub Practitioners are using Body Rub Centres as “training centres”, and after a period of time, they leave to work as independent escorts from their homes.

Many participants felt that the development and building permit requirements are onerous. One participant recounted that it took eight months to get a development permit and building permit for a new location. Another participant found it impossible to expand their business to a neighbouring suite in the same business complex due to the separation distances from daycares, parks, and liquor stores. Several participants agreed that separation distances make it very difficult for new or expanding businesses to find suitable business locations.

A couple of participants were concerned about the implications of the Community and Public Services Committee’s recent motion directing Administration to report on the merits of a five-year exit strategy for licensing Body Rub Centres. Some participants also felt that in the past, the Centre to End All Sexual Exploitation (CEASE) had too much influence on the City’s decision-making. Participants were concerned about the impact CEASE might have on the new Business Licence Bylaw. Participants pointed out that not all Body Rub Practitioners are exploited, and that the bylaw must also reflect the needs of business owners.

What has your experience been with licensing?

Many participants felt that the annual Control Plan requirement is too onerous. Alternatives suggested by participants include providing an annual list of operational changes, and an annual phone call with the City to discuss changes to determine if a new Control Plan is required. Similarly, some participants felt that providing the Corporate Registry Search document annually is a hassle.

Some participants were critical of the Edmonton Service Centre, and felt that better integration between teams (Edmonton Service Centre, Development Approvals, Safety Codes, and Business Licensing) is required. One participant noted that the documents they provided to the Service Centre were not scanned properly. However, one participant spoke favourably about the licensing process, specifically that it is more streamlined and licences are issued faster than they were in the past.

A couple of participants spoke of difficulty providing CPTED reports as part of their development permit applications. One participant attended a CPTED training course to be able to prepare their own CPTED report as this was significantly less expensive than having the report prepared professionally.

Changes in the Adult Services Industry

What changes or trends are you seeing in the adult services industry?

Participants identified the following emerging trends in the Adult Services industry:

- Escorts - Increase in advertisements for in-call services from private residences
- Non-compliant foot rub clinics and health enhancement centres - Increase in adult services from businesses that do not have Body Rub Centre licences
- Travelling / temporary workers - Workers come to Edmonton for a short time, but cannot get licences due to the information course only being offered every two weeks.

Feedback on Proposed Changes to Adult Services Licensing

The services of a Body Rub Practitioner may only be provided on the premises of a Body Rub Centre. An Escort may not provide dating or companionship services on the premises of an Escort Agency.

Participants generally agreed with creating a distinction between in-call and out-call businesses. Body Rub Centres are the safest option for sex workers, so the City should make it easy to licence Body Rub Centres.

The person in care and control of the business premises can be a licensed Body Rub Practitioner, but cannot provide body rub services while in care and control.

Participants were divided on the two-person minimum requirement overall. Some participants said they want the minimum requirement removed entirely, and drew comparisons to other businesses that do not face similar restrictions (including Escorts and virtually all non-adult oriented businesses).

Others believe the two-person minimum promotes a safer work environment, but that both Body Rub Practitioners on shift should be allowed to accept clients at the same time. Body Rub Practitioners only get paid when working with clients, so this requirement affects their livelihoods. It also requires businesses to turn away clients that could otherwise be accommodated. Body Rub Centres can implement security measures like security cameras, panic buttons, or locking doors when both practitioners are occupied, and these would adequately protect the practitioners.

Some participants indicated that hiring a dedicated receptionist is not a realistic solution. The nature of the business makes it very difficult to hire and retain receptionists who are not also Body Rub Practitioners.

Body Rub Practitioners must attend the information course every three years.

None of the participants were in favour of this requirement. Participants felt that attending the course once when applying for the initial licence is sufficient. Participants suggested two alternatives: Either the City can provide updated information to Body Rub Practitioners by email, or the Body Rub Centre owners and operators can provide information to the Body Rub Practitioners on the City's behalf.

Many participants were interested in the course being offered in an online format instead of in-person. This would allow Body Rub Practitioners to start working sooner, and would allow travelling or temporary workers the opportunity to be licensed.

Body Rub Centres may be open later than 11:00 p.m.

Generally speaking, participants were not opposed to the 11:00 p.m. cap currently in place. Most participants were not interested in opening later than 11:00 p.m. since the late night tends to attract less desirable types of clients. However, participants were strongly in favour of a "soft close" approach to avoid turning away clients that arrive shortly before closing. Businesses would continue to close no later than 11:00 p.m.; however, Body Rub Practitioners would have until 12:00 midnight to finish working with clients already in session.

Body Rub Centres must have security cameras at client entrances and common areas (not in client rooms or washrooms). Cameras must have recording capabilities and footage must be retained for a period of time.

Most participants indicated they already use security cameras because they are a good business practice. Participants use cameras to protect their business premises, identify and recognize problem clients, and protect Body Rub Practitioners.

Many participants did not support security cameras being a bylaw requirement, and felt that owners should have the option of deciding if and how to use security cameras. One participant acknowledged that no other businesses are required by the City to have security cameras.

Are there any other changes to the bylaw that you would like to see?

Participants suggested several other changes to the Business Licence Bylaw:

- Offer a **single licence** that allows individuals to work as a Body Rub Practitioner and an Escort
- **Reduce the fees** for Body Rub Centre licences
- **Update the information course** to include more details about sexual health, risk prevention, and supportive resources
- **Allow Body Rub Centre owners to attend the information course**

Participants expressed significant frustration with visits from EPS and Community Standards, particularly when officers knock on doors to client rooms to request business licences from practitioners while they are in session. Participants recommended that **officers allow a reasonable amount of time for practitioners to finish their sessions** before requesting their licences. Otherwise, the interruption disrupts the client experience and adversely affects practitioners. Clients who are scared off by the interruption may leave without paying, and may never return. If a practitioner is able to continue with a session following the interruption, that session is effectively re-started from the beginning.

One participant suggested that businesses that are grandfathered in a location should still be allowed to expand their businesses to an adjacent suite in the same building.

MASSAGE THERAPY

From November 20 to 26, 2019, Administration conducted telephone interviews with four massage therapy associations in Alberta, and the Transitional Council Massage Therapists of Alberta (the “Transitional Council”). Interviews were conducted with the following objectives:

1. To understand the massage therapy association membership practices.
2. To understand recent changes in the industry, specifically work done in pursuit of provincial regulation.
3. To share some of the proposed changes to the Business Licence Bylaw and get feedback.

Massage Therapy Association Membership Practices

Massage therapy association membership criteria and benefits

Each of the four massage therapy associations offers a variety of memberships that establish a scope of practice, provide liability insurance coverage, and offer health and dental benefits to members.

Different associations recognize different types of therapeutic and holistic massage practices; however, all the associations have **one membership type that allows members to practice massage therapy without any scope limitation, and with full insurance coverage**. The current requirements for this type of membership are generally consistent, and include:

- Completion of a two-year program from a recognized school
- **Police information check**
- Cardiopulmonary resuscitation (CPR) training
- Government-issued photo identification
- Proof of English language proficiency

Other membership options, particularly those that limit the scope and insurance coverage of members, are not consistent across all associations. For example, only one association offers membership for practitioners who strictly limit their services to the head, hands and feet.

Membership opportunities for practitioners with training outside of Alberta

All of the associations provide some membership opportunities for practitioners who are formally trained outside of Alberta or Canada; however, formal education is usually required.

Associations grant memberships for graduates of recognized schools from across Canada. Practitioners who are trained outside of Canada can complete a prior learning assessment to evaluate the practitioner's level of education. Qualified practitioners must complete both a written and practical exam before membership may be granted.

Prior practical experience without formal education or training generally is not counted toward membership.

Revoking membership

All four associations have formal complaint investigation processes. These are internal processes for handling a variety of complaints against members, including insurance fraud or criminal activity. If complaints are substantiated, associations may revoke memberships at their discretion.

Massage Industry Regulation in Alberta

Efforts by the Transitional Council to advance the regulation of the massage industry in Alberta

In 2016, three of the four massage therapy associations jointly submitted an application to the Ministry of Health (Alberta) requesting the provincial government regulate the massage profession. A fourth association was later formed and independently submitted another application to the province. The province asked the four associations to work together (as the Transitional Council) on recommendations to regulate the massage industry.

The Transitional Council's goal is for the massage profession to be governed by the Health Professions Act (Alberta). The Transitional Council is actively working with industry stakeholders (City of Edmonton, EPS etc.) to address public safety issues.

What might regulation look like?

The Transitional Council would like to see a **provincial regulatory body** to oversee the massage therapy profession. Massage therapists would practice under a common set of bylaws, a code of ethics, and standards of practice. A tribunal would be formed to resolve disputes and disciplinary issues.

In order to use the Registered Massage Therapist (RMT) designation, practitioners would require **formal education** from a recognized school program, and would be required to pass an **entrance exam**. Other basic requirements such as **police information checks and government-issued photo identification** would be part of the application requirements.

Practitioners who would not be eligible to use the RMT designation would still be required to have some formal training. Other associations would continue to exist to regulate them.

Feedback on Proposed Changes to Massage Licensing

Massages as part of an aesthetic service; and massages of only head, hands, and feet would fall under an expanded definition of Personal Services Shop.

The Transitional Council, and most of the massage associations supported the idea of licensing massages of head, hands, and feet; and massages provided as part of an aesthetic service, under the Personal Services Shop business licence category. However, one association cautioned that some practitioners of special disciplines might feel as though their profession is no longer part of the mainstream massage service.

Amend the Health Enhancement Practitioner category to allow the City Manager to consider membership in other massage therapy associations as long as the association meets certain criteria (e.g. education and continuing education requirements, code of ethics, disciplinary process, etc.)

Massage associations expressed mixed opinions about accepting membership from other associations not currently identified in the Business Licence Bylaw. Some associations supported the proposal; however, others expressed concern that making it easier for associations to be recognized by the City Manager would trigger interest in forming new associations, which could impact the progress that has been made toward establishing massage therapy as a provincially-regulated health profession. The Transitional Council shared these concerns.

Create a second category of Health Enhancement for non-accredited practitioners.

Most massage therapy associations, and the Transitional Council expressed support for a second licence category for non-accredited Health Enhancement practitioners who do not provide adult services. The Transitional Council suggested that practitioners should check with the associations first to see if there is an opportunity or pathway to become a member eligible for the accredited Health Enhancement Practitioner licence.

The Transitional Council also recommended that the City deter illicit services by:

- regularly inspecting non-accredited Health Enhancement Centres,
- notifying associations of members who hold multiple licences, and
- limiting the hours of operation at non-accredited Health Enhancement Centres.

One association expressed concern that a second category would create confusion and a false sense of assurance for customers accessing massage services, particularly since the term “accredited” leaves room for misinterpretation.

Both the Transitional Council, and one association suggested that insurance should be an application requirement if a second category is implemented.

Use the Body Rub Practitioner licence category exclusively for licensing adult or erotic massage services.

All four massage therapy associations supported the proposal to reserve body rub licences exclusively for services of adult or erotic nature, and indicated that other major municipalities already do this. The Transitional Council also supports the proposal since the city is considering phasing out the licensing of body rub centres in five years.

Only fully-accredited members of an association can be licensed as a Health Enhancement Practitioner. Partially-accredited practising members are licensed in the proposed non-accredited category.

Most associations did not have concerns with their members holding non-accredited health enhancement practitioner licences, as long as the association memberships are not part of the application criteria for this category of licence.

Fully-accredited members of a massage therapy association can work at both accredited and non-accredited Health Enhancement Centres.

Associations did not have concerns with their members practising at both accredited and non-accredited Health Enhancement Centres.

Additional Feedback

The Transitional Council provided additional suggestions with respect to future licensing requirements:

- Consider a consultation process with the associations before granting licences
- Prohibit individuals from holding both Body Rub Practitioner and Health Enhancement Practitioner licences at the same time. Some associations already prohibit this.
- Share practitioner licensing information with associations.

The Transitional Council also suggested that the City create a multi-agency working group to identify issues and gaps, implement municipal solutions in the absence of provincial regulations, and help inform the provincial framework for massage as a regulated health profession.

The Transitional Council also asked the City to consider a municipal task force to combat human trafficking to address illicit massage businesses, body rub centres, child exploitation, and resources and support for victims.

SCRAP METAL RECYCLERS

Between December 5, 2019 and January 2, 2020, Administration completed interviews with six scrap metal recycling businesses in Edmonton, the Recycling Council of Alberta, and the Canadian Association of Recycling Industries. Interviews were completed by telephone; however, questions were provided to participants in advance.

The objective was to understand how scrap metal recycling businesses might be affected by proposed changes to the Business Licence Bylaw.

Feedback on Proposed Changes to Scrap Metal Recycler Licensing

Scrap metal recycling businesses must obtain photo identification from sellers before accepting scrap metal.

Most business operators indicated that they **already request identification from customers** (usually a driver's licence), though not always consistently. Some operators request the seller's vehicle registration to ensure it was not stolen. One operator felt that requiring ID from sellers should be mandatory; while another indicated that collecting ID from sellers is in the business' best interests to avoid receiving stolen goods that are later confiscated by EPS. Another business operator suggested that the only acceptable form of ID should be an Alberta driver's licence.

One operator indicated that they do not ask for identification because some sellers do not have ID. However, this operator records details of the transaction, including the seller's name and phone number, and has several security cameras on-site to discourage the sale of stolen materials. A couple of other business operators indicated that they also use security cameras and find them to be an effective deterrent.

Interviewees identified a number of other reasons why they might not request ID, including:

- Repeat customers who are well-known to staff
- Utility company customers have uniforms and marked vehicles
- Corporate customers who want to avoid paying corporate taxes on income from scrap metal

Interviewees provided a number of suggestions with respect to the proposed requirement:

- The bylaw should **specify what type of ID is, and is not acceptable** (e.g. valid Alberta driver's licence, no copies of ID, no non-resident ID, etc.)
- The bylaw should **specify when ID must be requested** (e.g. accepting ferrous goods only, goods over a particular weight or value, all transactions, etc.).

- Licensing requirements should **apply to all scrap metal dealers, not just commercial yards**. Most stolen goods are sold to “bandit vans” - these operators advertise on Kijiji, pick up scrap metal in other municipalities and sell it to scrap yards in Edmonton.
- Require only **one piece of identification**. Calgary requires two and this is problematic since many sellers do not have multiple pieces of ID on them at the time of the transaction.
- **Avoid unnecessary bureaucracy**. Focus on regulations that prevent the theft of non-ferrous materials.

Scrap metal recycling businesses must record information about the transaction when receiving scrap metal. This includes the seller's name and contact information, the date and time of the transaction, and details about the goods received.

Although most businesses already record transactions, most interviewees felt that **recording every transaction is not reasonable or realistic**. One business operator did not agree and felt that all transactions should be recorded. A couple of businesses were **not in support of recording vehicle information** as scrap yards are not in a position to determine if a vehicle is stolen or not.

All businesses operators interviewed indicated that **they use an electronic system for purchasing / invoicing** that includes the customer's name, contact information, and driver's licence number; date; weight, volume, and description of the load; and the price paid. One company uses a “Rapid Dealer Reporting Site” for electronic recording of transactions, which is linked directly to EPS.

Interviewees provided some suggestions with respect to the proposed requirement:

- The bylaw should **identify specific instances where transactions must be recorded**. Examples include:
 - Loads that exceed a certain weight or value
 - Loads containing non-ferrous metal (or just copper)
 - Loads or sellers that seem suspicious
- Frame **transaction recording requirements specifically around critical infrastructure items** rather than scrap metal generally.

Scrap metal recycling businesses must refuse certain types of materials unless the seller can demonstrate ownership or the right to sell. Examples of restricted goods could include stripped copper, burnt copper, marked utility company wire, manhole covers, street signs, memorial plaques, gravestones and LRT / train materials.

Most business operators did not support restrictions on which goods can be accepted, for several reasons:

- Sellers acquire scrap metal in a number of different ways and there are too many variables to manage.
- Most infrastructure items are brought in by legitimate sellers.
- Stripped and burnt copper wire cannot be identified, so it would be impossible to provide it is, or is not stolen. The economic impact on businesses would be significant if they had to refuse to accept all of it.

Business operators expressed that they do not want to knowingly be complicit in accepting stolen goods, and generally felt that requiring ID from sellers and recording transactions involving non-ferrous materials would be sufficient deterrents for most criminals. Businesses would also like to exercise their own discretion and use their own screening criteria and experience to screen out illicit sellers. For example, business operators may refuse loads that appear to them to be suspicious, or they may ask the seller if they would be willing to wait until the police can inspect a suspicious-looking load before they agree to complete the transaction.

Some interviewees suggested focusing regulations on measures that ensure businesses have reasonable justification for accepting restricted goods rather than requiring goods to be refused altogether. For example, the City could establish a list of criteria that sellers must meet, or the sellers could be required to produce a letter from the City or utility company.

Additional Feedback

Businesses operators identified a variety of practices they use to deter sellers of stolen goods, including:

- **No cash payment** (account with direct deposit only)
- Requiring a **letter of salvage** authorizing the sale of infrastructure items and plaques (e.g. from the City, utility companies, cemeteries, etc.).
- **Security cameras**
- Service **by appointment** (no walk-in customers)

Interviewees also offered a number of other points to consider with respect to scrap metal licensing:

- Focus on regulations that address **non-ferrous metal and infrastructure theft** rather than regulating every material and every transaction.
- **Goods holding requirements will not work for scrap metal recyclers** due to commodity pricing which changes daily with the market. Businesses need to be able to sell when prices are highest.
- Rules, regulations, and enforcement efforts **must apply to everyone dealing in scrap metal - not just the commercial scrap yards**. "Bandit vans" (particularly those advertising on Kijiji with no local address) attract illicit sellers because they do not check ID or record transactions.
- Provide messaging to **alert businesses to the new changes**.
- **Ensure the City has the resources needed** to enforce the bylaw and prosecute metal thefts. Calgary's "Operation Metallica" is a good case study where a dedicated scrap metal enforcement team worked with local scrap metal dealers.
- Consider if municipal legislation is even required given that **the province is moving to regulate the scrap metal industry**.
- New requirements may result in Edmonton **scrap metal recyclers losing business** to scrap metal recyclers just outside of Edmonton who are not regulated.
- **Utility companies and developers bear some responsibility** for preventing theft by securing their own job sites and materials.