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Mayor Allan Thompson and Committee
Caledon City Hall
6311 Old Church Road
Caledon, Ontario

Delivered electronically to: Agenda@caledon.ca

RE: The Industry's Response to City Staff Firework's Report 2021-0117,

As the leading national voice in the fireworks industry, the Canadian National Fireworks Association, (CNFA) advocates for our members in our mission to promote fair access and safety in the sale and use of fireworks. We achieve this through education, advocacy with regulators as well as strong and engaged member compliance.

We were extended an invitation by Mayor Thompson to discuss the recommendations within Staff Report 2021-0117 with town staff and we thank them for that opportunity. Our conversations focused on safety, education and the negative effect the restrictions on sales would have on local retailers. While we think it's great that Caledon is recommending increased cultural celebrations, we're disappointed that the report ignored the effects this proposed bylaw will have on local retailers.

The report recommends the sale of *only* non-aerial fireworks only in Caledon. A non-aerial firework is a product that discharges less than 5 meters into the air. So that this committee understands the magnitude of this recommendation by staff, you must understand the consumer firework industry. The Explosives Regulatory Division, the department within Natural Resources Canada, is assigned with regulating consumer fireworks. To date, it has approved a total of 4178 products for sale. If you allow only non-aerial products in Caledon you have limited local retailers the ability to inventory less than 4% of available firework products. They can no longer compete with other retailers outside of Caledon and you are inevitably putting up to 30 local retailers out of business.

The CNFA is a not-for-profit organization that works with all levels of government to ensure fair access to fireworks, while improving education and safety standards across the country. We have worked with nearly twenty municipalities to create new firework bylaw legislation that requires a stronger emphasis on education and training for industry employees. Two of these municipalities include Toronto and Edmonton.

Thinking that by instilling stricter regulations and increased fines will solve an outstanding safety concern is a mistake. The CNFA focuses our resources on the 99% of people that want to use fireworks safely by ensuring they have access to proper safety and compliance information at the point of sale. Expecting people to go to city websites for bylaw requirements is unrealistic and proven to be unsuccessful. Everything they need to know to be a safe and responsible fireworks user should be available at the point of purchase.

A big part of this campaign is our Vendor Certification and Employee Training program. It's an online course that educates retailers and their staff on ERD regulations for the storage and sale of consumer fireworks and local bylaw content. We believe anyone working within our industry needs to be properly trained so they can share accurate information with their customers. The course is offered by the CNFA and is free to our members.

Our purpose for this letter is not to be critical of Report 2021-0117 or question the expertise of staff, but many of their recommendations for a new bylaw are already required through the Explosives Act. Their comments about engaging the public through surveys and comprehensive public engagement has to be questioned by the fact that no retailer within Caledon received written notice of the intent to engage their comments or raise awareness that this bylaw was being considered.

The CNFA ask your committee to recommend a deferral of report 2021-0117 until the community, stakeholders and industry have a proper opportunity to speak on their concerns.

I thank you for your consideration,

Sincerely

Perry Logan

Executive Director
CNFA