



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3  
Tel: (519) 821-8883 • Fax: (519) 821-8810 • [www.ofa.on.ca](http://www.ofa.on.ca)

July 27, 2017

Mr. Ian Drew, Senior Policy Advisor  
Ministry of the Environment and Climate Change  
EE and E Policy Division, Resource Recovery Policy Branch  
40 St. Clair Avenue West, Floor 8  
Toronto ON  
M4V1M2

Dear Mr. Drew,

**Re: Environmental Registry EBR 013-0094**

The Ontario Federation of Agriculture (OFA) is the largest voluntary, general farm organization in Canada, representing over 36,000 farm families across Ontario. As a dynamic farmer-led organization based in Guelph, Ontario, OFA works to represent and champion the interests of Ontario farmers through government relations, farm policy recommendations, lobby efforts, community representation, media relations and more. OFA is the leading advocate and voice for Ontario farmers.

About one third of Ontario's 11.6 million tonnes of annually generated waste is comprised of food and organic waste. Every year Ontarians divert 1.4 million tonnes of food and organic waste from landfill streams, and yet 2.2 million tonnes are sent for disposal. Each segment along the supply chain, from producer through consumer, is responsible for some waste. Almost 90% of this waste is attributed to the residential and the Industrial, Commercial, and Institutional (IC&I) sectors, another 10% on-farm, while an estimated 4% generated during distribution.

Residential and ICI sectors must be engaged, through a collaboration between supply chain leaders and governments, to establish reduction targets. A critical tool needed to reach waste reduction targets is informing and educating manufacturers, processors and retail sectors on

- climate change costs, to encourage efforts to improve and significantly increase recycling, and
- waste as resource values, to help increase the volume of surplus organics we divert from landfills.

While agriculture does not produce significant waste streams not already reinvested to farm processes (organic matter used as a soil amendment), agriculture must be part of the food and organic waste discussions to address unique considerations and solutions for urban and rural Ontario.

Special considerations are needed for rural, northern and remote Ontario. Community size and geographic distribution present unique issues under existing organic waste resource recovery legislation. For example, smaller communities struggle to participate in recycling and collection of leaf and yard waste, as mandated for larger municipalities under O. Reg. 101/94.

Support is needed to develop regional solutions, including partnerships among municipalities, industry and communities for community based solutions such as organic waste processing infrastructure, small-scale composting, and small-scale biogas and biomass energy generation facilities for rural, Northern and remote areas.

During MOECC consultations on reducing Ontario's food and organic waste, stakeholders suggested that agriculture could do more to divert on-farm food waste to community food banks. Ontario's agriculture sector is already engaged in supplying many food products to community food services. However, most farm businesses do not have the resources to increase food contributions.

As such, OFA appreciates the Ontario government's Community Food Program Donation Tax Credit for Farmers. Providing this tax credit, in addition to the charitable donation tax credit, assists eligible farmers to donate agricultural products to eligible community food programs in Ontario, including food banks. In addition to tax credits, gleaning activities provide a means to harvest produce with volunteer labour, thus lowering the cost burden on farmers. However, such gleaning activities must be conducted in such a way as to not compromise on-farm biosecurity measures.

As mentioned, food and agricultural products left on farm is not deemed to be "waste". However, gleaning and food donation programs allow it to be diverted to a deemed "better use" in providing otherwise unavailable food access.

Regulatory barriers also impede waste diversion. For example, a significant number of food recalls, either voluntary or ordered by the Canadian Food Inspection Agency, are due to undeclared food ingredients on the label. Undeclared food ingredients pose health risks to some with specific food allergies. However, those same products would be considered safe to be consumed by others.

Clearly there are opportunities to further reduce residential and ICI wastes. Once new solutions are adopted to reduce these wastes, and divert to additional food consumption and animal feed streams, the remaining tonnage (currently about 2.3Mt annually) will be diverted to aerobic, anaerobic digestion (AD), and composting.

Agriculture, along with municipalities and communities will be important partners for strategically sited regional AD with the dual purpose of final stage organic waste consumption, and production of low or net-zero energy. To realize these opportunities, consistent and clearly defined support is needed, in the form of

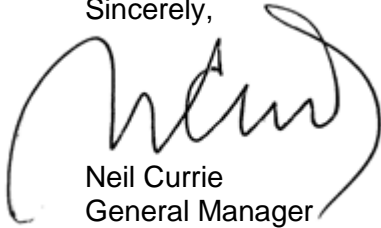
- investments in long-term infrastructure for two-way natural gas pipelines,
- commitments for biogas-to-renewable natural gas refinement infrastructure,
- adoption of a renewable natural gas fuel standard,
- best management practices (BMP) and adoption of BMPs for compost application, and community or farm post-digester and non-agricultural solid materials NASM application
- BMPs should consider the financial viability to agriculture accepting higher volumes of NASM and composts

- regulations to enable municipal governments to participate in private public partnerships for energy generation
- the significant increase in transported volumes will necessitate regulations aimed to facilitate safe transport of organic wastes, post-digester composts and NASM. Higher volumes and frequency of deliveries through rural Ontario must also be addressed through regulations aimed to ensure on-farm biosecurity measures remain intact.

The agriculture sector is integral to the beginning of the food and organic waste resource circuit, and agriculture will continue to strive towards 100% of on-farm organic waste diverted to higher level consumption, or reinvested to farm processes. Agriculture is also integral to the final stages of the food and organic waste resource circuit, and agriculture will be an important partner in the distribution of composts and post-digestates.

We thank you for this opportunity to provide our input.

Sincerely,



Neil Currie  
General Manager