



Ontario Federation of Agriculture

Ontario AgriCentre

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Mr. Ian Drew, Senior Policy Advisor
Ministry of the Environment and Climate Change
Resource Recovery Policy Branch
40 St. Clair Avenue West, Floor 8
Toronto, ON M4V 1M2

Via Email: ian.drew@ontario.ca

Dear Mr. Drew:

Re: EBR 013-1814 - Proposed Food and Organic Waste Framework

The Ontario Federation of Agriculture (OFA) is the largest voluntary, general farm organization in Canada, representing over 37,000 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.

The proposed Food and Organic Waste Framework recognizes all sectors across the supply chain need to improve waste reduction and diversion goals to address the over 2.3 million tonnes of food and organic waste not diverted, but still sent for disposal each year. While agriculture does not produce significant waste streams not already reinvested to farm processes (feed, bedding, soil amendment), agriculture must be part of the food and organic waste discussions to address unique considerations and solutions for urban and rural Ontario.

OFA Food and Organic Waste Recovery Positions

- Rural Ontario needs an integrated waste management system that incorporates strong diversion, reuse and recycling components.
- Agricultural product packaging and organic waste needs an integrated approach using best management practices and guidelines throughout the supply chain instead of imposed prescriptive regulations.
- OFA will continue to work with governments, industry, and the agricultural sector to develop fair and equitable processes for rural Ontario to manage organic wastes.
- Agriculture sector producers engaged in small scale aerobic composting or anaerobic digester processes that accept off-farm food and organic waste feedstocks must have Best Management Practices (BMPs) and training on existing regulations to understand their rights and obligations.

Key Points:

- Farmers already engage in re-using and recycling, so our interest is to ensure farmers do not bear an unfair responsibility on eliminating waste.
- It is vital that the Waste Free Ontario Act and accompanying regulations expand recycling programs for pesticide and fertilizer containers, feed, seed and pesticide bags, plastic bale wrap and many other items used on the farm.
- A Producer Responsibility Framework should recognize the barriers of rural, northern, and regional waste diversion costs for pick-up, drop-off, and collection, to determine the logistics of cost-effective recovery of waste resources, beyond the proposed targets based on community size, density and geographic distribution.
- A Producer Responsibility Framework should recognize that there is no capacity for Agriculture to bear the responsibility for reduction, reuse or recovery of packaging used for the sale of farm production, and that responsibility should lie further along the distribution route. This strategy reconciles the mismatch between packaging for products originating outside the province with Ontario origin product packaging.

OFA supports Framework Resource Recovery Targets that will consider community size, density, and geographic distribution. These qualifiers highlight unique constraints under existing organic waste resource recovery legislation. For example, smaller communities struggle to collect and recycle organic waste, as mandated for larger municipalities under O. Reg. 101/94. OFA supports further discussions to validate outliers, establish interim targets, and establish open ended targets for sparsely populated rural and remote regions.

OFA is encouraged that the Framework will support approaches and tools for cross-sectoral partnerships (e.g. supermarket recovery program). A Framework developed provincial food security strategy will need to support and develop regional solutions. This includes partnerships among municipalities, industry and communities for local solutions such as organic waste processing infrastructure, small-scale composting, biomass, biogas and biogas-to-RNG refining for rural, northern, and remote areas.

Ontario Food Recovery Hierarchy - Reduce: prevent and reduce waste at source

OFA supports that the Framework will promote waste reduction and diversion education tools, including working with Foodland Ontario. Collaboration on reduction and diversion, across the entire supply chain – from primary production through to final consumer, is best reached by understanding the obligations and constraints experienced along all parts of the supply chain.

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. There are significant opportunities for undeclared ingredient products, and products at best marketed date.

Ontario Food Recovery Hierarchy - Feed people: safely rescue and redirect surplus food

Ontario's agriculture sector is significantly invested in supporting community food services. Most farm businesses do not have the resources to further increase food contributions, collection activity or further risk biosecurity breaches. The Community Food Program Donation Tax Credit for Farmers and the charitable donation tax credit help farmers to donate agricultural products to community food programs and food banks – both remain vital to redirecting food supplies.

Gleaning activities that provide access to otherwise unavailable food, offers a means to harvest produce with volunteer labour, thus lowering the cost burden on farmers. Still, such gleaning activities must be conducted in such a way as to not compromise on-farm biosecurity measures. As the government creates policies to further enable food rescue, ensuring bio-security also remain vital to redirecting food supplies.

Ontario Food Recovery Hierarchy - Resource recovery: recover waste for a beneficial use.

Agriculture producers and rural communities will be important partners for strategically sited regional aerobic composting, and anaerobic digesters as final stage organic waste conversion to low or net-zero energy. And, non-landfill methane collection, combustion and avoidance projects involving organic waste streams, including manure are best management practices already adopted in agriculture, and are fostered in the Climate Change Action plan as practices that avoid GHG emissions. To realize these opportunities, consistent and clearly defined support is needed, in the form of:

- training on best management practices for compost application, and community or farm post-digester and non-agricultural source materials (NASM) application; BMPs should follow the Guideline for the Production of Compost in Ontario, Ontario Compost Quality Standards, and practices outlined in the OMAFRA's document Non-Agricultural Source Materials (NASM). BMPs should also consider financial viability of agriculture accepting higher NASM and compost volumes.;
- commitments for biogas-to-renewable natural gas refinement infrastructure, investments in long-term infrastructure for two-way natural gas pipelines, and adoption of a renewable natural gas fuel standard;
- Framework support to promote additional training for small scale and low-risk anaerobic digesters and composting sites to ensure operators are sufficiently trained, know their rights and rights of refusal, minimize nuisance impacts and ensure high-quality products;
- regulations to enable municipal governments to participate in private public partnerships for energy generation, ensuring facility location and ownership models are communally desired;
- regulations should encourage community level waste water, solid waste, and biomass combined heat and power (CHP) energy production for northern, rural and remote locations, but also for urban communities, where significant amounts of biomass are available feedstocks for sustainable power and biofuel systems;
- training on existing regulations, necessitated by the significant increase in transported volumes, aimed to facilitate safe transport of organic wastes, post-digester composts and NASM, and aimed to ensure on-farm biosecurity measures remain intact; and
- strong standards and clear requirements for soil amendments to protect the environment and human health, regulatory review of approaches to soil amendments (on and off-farm), and promoting beneficial use of soil amendments, aligned with Agricultural Soil Health and Conservation Strategy.

The agriculture sector will continue to strive towards 100% of on-farm organic waste repurposed to farm processes or diverted to higher level consumption. Agriculture is integral to all stages of the Food and Organic Waste Framework hierarchy, and an important partner in the distribution of composts and post-digestates generated from residential, and Industrial, Commercial and Institutional sector wastes. As such, the sector should be fully engaged in all decisions related



to policies for waste resource recovery infrastructure, especially related to regional, rural, and northern approaches.

We thank you for this opportunity to provide our input.

Sincerely,

A handwritten signature in black ink, which appears to read "Keith Currie". The signature is written in a cursive style with a large initial "K".

Keith Currie
President

cc: OFA Board of Directors