

November 6, 2020

The Honourable Jeff Yurek
Minister of Environment, Conservation and Parks
College Park, 777 Bay Street
Toronto, ON
M7A 2J3

Dear Minister Yurek,

RE: ERO 019-2498 Proposal to Amend the Food and Organic Waste Policy Statement

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses, and their communities.

Agriculture is integral to the food and organic waste resource circuit and strives towards 100% of on-farm organic waste diverted to higher consumption or reinvested to farm processes. Ontario farms directly support foodbanks, and where practicable, in-field gleaning for food banks to distribute or market in support of other food poverty initiatives.

OFA supports the Food and Organic Waste Policy Statement. We are pleased to comment on proposed updates to the Policy Statement surrounding compostable materials, hard to process materials, and reduction of food and organic waste.

Challenges with the introduction of compostable material alternatives include:

- Consumer confusion to correctly sort waste and recyclable materials properly.
- Compostable materials mixed into organic waste typically decompose poorly.
- Compostable material mixed into recycled waste streams will compromise some reprocessed plastics or, at a minimum, lower feedstock quality and value.

During a transition to compostable materials, to ensure the integrity of waste feedstocks, much of these materials will be landfilled. Introducing more compostable plastics into the equation will add confusion unless combined with education campaigns timed to coincide with single-use plastics bans.

The agricultural sector presents an opportunity to explore the use of compostable material to replace traditional farm plastics because of a lower risk of contaminating conventional plastic recycle streams. The agriculture sector is a preferred candidate for research and pilots using compostable plastics in outdoor environments, meant to balance decomposability and durability for use in Canadian climates.

In response to ER013-4689 (Reducing Litter and Waste in Our Communities Discussion Paper), OFA highlighted the need for research focused on producing compostable baling twine, netting, and films designed to withstand prolonged outside exposure, or exposure in greenhouses, but able to decompose or be edible when shredded into livestock feed. In an effort towards addressing this research need, OFA provided its support for the Biodegradable Bale Wrap project, which is currently underway at the Bioproducts Discovery and Development Centre located at the University of Guelph.

Large-scale solutions for F&O waste streams include composting and anaerobic digestion that will ultimately augment organic material in agricultural soils. OFA recommends the Ontario government continue to engage agricultural sector stakeholders and OMAFRA expertise to advise government on best management practices needed to produce safe materials and cost-effective handling methods, and safely increase the amount of waste diverted from landfill to higher value processing streams.

OFA would like to partner and work with MECP to support projects that will increase the use of composite materials in agricultural processes and ensure the safe and healthy application of composts and post waste process biomass to Ontario soils.

Rural Challenges and Opportunities

OFA challenged MECP under its Made-in-Ontario Environment Plan to support thinly populated rural and northern solutions be driven through OMAFRA's Rural Affairs department. These regions will struggle to support viable logistics needed to collect, divert, and process waste materials. OFA recommends the provincial government provide funds for research to quantify and qualify the waste resource portfolio in rural and northern regions.

OFA supports the Ontario government interest in reducing red tape and modernizing environmental approvals to support new waste processing infrastructure and sustainable end markets for waste. Rural Ontario needs an integrated waste management system that incorporates strong diversion, reuse, and recycling components. In recognition of the unique challenges rural areas endure to manage waste resources, OFA supports recovery targets that consider community size, density, and geographic distribution. OFA recommends expanding rural

recycling programs to accept pesticides and fertilizer containers, bale wrap, bags, compostable products, and other items used on the farm.

To drive increased waste diversion, we support an approach that will engage directly with farmers to assess how and where waste reduction and recycling occurs and find cost-effective Diversion and Processing solutions. This includes helping farm businesses innovate and apply this expertise to increase diversion and minimize regulatory burden while remaining competitive.

Difficult to Process Materials

OFA recommends the province work with municipal associations to encourage projects to recover the value of waste (such as hard to recycle materials) in rural Ontario where there are already constraints on existing waste management infrastructure.

To better facilitate diversion in rural, northern, and agricultural communities, Ontario needs to develop local facility solutions and expand biotechnologies to incorporate more types of difficult to process organic wastes and complex plastic material feedstocks. To help these local community efforts, OFA recommends the province backstop municipal sector - waste management partnerships that develop plastics-to-biochemical and organic bioenergy models.

We also strongly support municipalities, and the communities they represent, be given decision-making input for landfill siting approvals to protect the environment and ensuring landfill capacity. Although agricultural lands may share similar physical characteristics with ideal landfill site characteristics, agricultural lands must be protected. Ontario's agricultural lands are a finite and shrinking resource that all Ontarians benefit from, not only for the ability of these lands to provide us with a secure supply of safe, affordable and environmentally sustainable food, fibre and fuel but also for the concurrent environmental and ecological goods and services that all Ontarians derive from our agricultural lands, in alphabetical order, include; aesthetic and recreational space, air quality, including oxygen production, biodiversity, carbon sequestration, climate change mitigation, nutrient cycling, pollination services, soil erosion control, water cycling (purification, retention, flood mitigation, groundwater recharge), and wildlife and endangered species habitat. OFA strongly recommends that despite the desire to streamline environmental assessments or exempt various projects from environmental assessments, that agricultural impact assessments (AIAs) be an integral part of project planning, design, and construction. OFA firmly believes in the widespread use of AIAs to ensure that any negative impacts of proposed developments are first avoided, then minimized and lastly mitigated. OFA recommends the government seek agricultural sector expertise to ensure that proposals for new and expanded landfills are subject to rigorous assessment processes for design, siting, operation, closure, post-closure care requirements and financial assurance. OFA strongly recommends that AIAs be mandatory with regards to the siting of landfills.

OFA supports consultation between landfill proponents and impacted stakeholders, Indigenous communities, and adjacent communities early in the approvals process, while ensuring municipalities hold a determining role, with meaningful, auditable steps.

Easing regulatory burdens for rezoning closed rural landfills will help attract municipal and community group partnerships to establishing plastics and organics chemical treatment facilities, including AD and pyrolysis to convert wastes to bio-chemicals and green fuels. Remaining materials post-processing must be assured to be safe for release into the environment.

Post Digestate and Composted Organic Material Application on Soils

OFA supports the position that Resource Recovery systems that produce digestates or composted organic material for sale or application should:

- only accept source separated food and organic waste to avoid contamination issues
- demonstrate that recovered materials meet environmental quality standards
- adhere to Municipal biosolids management plans, including processing technologies and co-management practices that support nutrient recovery.

OFA considers excess soil as an important resource requiring stringent rules to limit soils being sent to landfill, while supporting beneficial reuses that are safe for the environment and human health. Contaminated soils must not be relocated to farms. Having clear rules and standards around soil management, relocation and reuse allows businesses to follow the safest practices for soils to be disposed of or treated before reuse.

We look forward to constructive consultation with MECP to improve prospects for rural and agricultural food and organic waste reductions and diversions, and to encourage regional solutions tailored to the needs and capacities of the region.

Sincerely,



Keith Currie
President

cc: Atif Durrani, Manager, Policy Development, Resource Recovery Policy Branch, MECP
Judy Dezell, Director Enterprise Centre, Business Partnerships, Association of
Municipalities of Ontario (AMO)
OFA Board of Directors