

December 1, 2020

The Honourable Jonathan Wilkinson
Minister of Environment and Climate Change Canada
200, Sacré-Coeur Blvd, 2nd Floor
Gatineau, Quebec
K1A 0H3

Dear Minister Wilkinson,

Re: The Proposed Integrated Management Approach to Plastic Products to Prevent Waste and Pollution, published Canada Gazette Pt. 1, Vol. 154, N41

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.

We are pleased to take this opportunity to comment on some aspects of single-use plastics and management methods proposed by ECCC in the Integrated Management Approach to Plastic Products to Prevent Waste and Pollution.

Managing single-use plastics

Plastic alternatives will replace many single-use plastics, but there will also remain strong demand for many compostable and biodegradable plastic items. Until a plastic item has a replacement or compostable alternative that completely replaces the single-use item, the transition will mean replacements or alternatives will end up in landfills, to ensure they do not compromise existing recycle material processes. It is important that replacement material be completely degradable and that it is safe to landfill these materials. It is also important that these transition issues be clearly presented to the public.

Decision makers for Packaging use in Agriculture - Establishing performance standards

Agriculture production uses primary packaging, secondary packaging, and sanitary packaging for sterile items (for example, syringes and other veterinary products). The sector has little decision-making capacity on the use of these items. OFA is piloting collection of bulk plastics that are integral to farm production processes, to ensure rural and northern farmers are availed plastic waste management. It is important to highlight that any future policy that adds recycling or deterrent costs to farm plastics will be borne by farmers and cannot be passed on to the wholesale or retail agricultural commodity buyer.

Food packaging is critical in maintaining safe and nutritious food. OFA strongly recommends that any efforts to reduce plastic usage not compromise either food safety or food quality. The use of primary packaging such as food wrappers, and retail food and beverage packaging are determined by the processor, packaging brand holder, or retail or wholesale marketer, and not by the food producer. Decisions on the supply of secondary short life packaging such as grocery shopping bags, fruit & vegetable bags and bulk containers are determined by grocery companies. Finally, the choice of single-use plastics for some sanitary packaging for sterile items such as sharpies, veterinary supplies and pharmaceutical products are determined by health, safety, regulatory or technical concerns where these products may not be safely recycled using existing processes.

Ensuring fair end-of-life responsibility

We support ECCC targets for regional extended producer responsibility policies to be consistent, comprehensive, and transparent across Canada. Within regional jurisdictions it is also important to ensure rural and remote plastics consumers are not unduly burdened to absorb additional costs, passed on by packaging importers or packaging manufacturers, to manage waste in thinly populated and expansive regions.

OFA supports research initiatives introduced in the Integrated Management Approach document to standardized sampling and evaluating the effects of macroplastics and microplastics. The science indicates micro-plastics continue to pervade soils and the application of biosolids into soils can result in plastic pollution. We support efforts to ensure consistent monitoring of soils, post-digestate materials and compost materials. Because plastics serve as a means of transport for other chemicals, we recommend research focus on chemical additives and unbound monomers that can remain in, and react with, the environment over long periods.

We recommend research on the extent of decomposition of biodegradable, compostable, biobased, and oxo-degradable plastics in natural environments. This may also inform decision-makers on the risks to environments of chemical additives used in these items meant to achieve certain product characteristics. We support research to determine how microplastic pollution and plastic alternatives may impact crop production and livestock.

We are encouraged that this includes working with Indigenous communities, local governments and authorities, scientists, and others to find the best ways to keep our water safe, clean, and well-managed. Agricultural stakeholders are interested in contributing to this issue and OFA looks forward to working with Agriculture, Environment and Health ministries towards these ends.

Sincerely,

A handwritten signature in black ink that reads "Peggy Brekveld". The signature is written in a cursive, flowing style. A vertical line is positioned to the right of the signature.

Peggy Brekveld
President

cc: Director of the Plastics and Marine Litter Division, Environment and Climate Change Canada
OFA Board of Directors