Ontario Federation of Agriculture

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Fertilizer Program
c/o Premarket Application Submissions Office (PASO)
Canadian Food Inspection Agency
59 Camelot Drive
Ottawa, Ontario K1A 0Y9

Sent via email to: cfia.fertilizermodernization-modernisationengrais.acia@inspection.gc.ca

To whom it may concern,

RE: Implementation of the interim per- and polyfluoroalkyl substances standard for municipal biosolids imported or sold in Canada as fertilizers

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Canadian Food Inspection Agency (CFIA) on the *proposed implementation of the interim per- and polyfluoroalkyl substances (PFAS) standard for municipal biosolids imported or sold in Canada as fertilizers*. The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

OFA is committed to protecting agricultural lands in Ontario that grow food for today and for future generations. Healthy and productive agricultural soil is a non-renewable resource vital to food production and human wellbeing. Feeding a growing global population will depend on how well we manage this valuable, finite resource for future generations.

OFA supports the overarching principle of beneficial use of biosolids in Ontario as part of a strategy to manage healthy soils and efficiently use nutrients to grow crops. Building soil organic matter is a widely recognized soil health principle but there are limited ways that farmers can achieve this, and it is a long term process. Application of biosolids and organic amendments to agricultural land is a key addition of organic matter to the agricultural system that also recycles nutrients and diverts organic waste from other disposal methods – all of which contributes to climate resiliency.

Given the ubiquity of PFAS in the environment, OFA supports setting clear rules and procedures that are based in scientific evidence to limit exposure to this group of chemicals. While we generally support establishing a limit for biosolids sold or imported to Canada as commercial fertilizer intended for use in agriculture, OFA is concerned that further investigation is required to ensure the proposed limit is evidence-based, measurable and effective. Further, validated methodologies to measure PFAS and perfluorooctane sulfonate (PFOS) are still emerging and developing. This translates to a limited number of accredited labs available to conduct this work in a timely manner, and changing methodologies creates distrust and scepticism in the validity of the proposed limit which will ultimately hinder compliance. OFA recommends that the federal

government allocate resources to develop appropriate, accessible laboratory methodologies to effectively detect PFOS and other PFAS chemicals. In addition, resources need to be allocated to further develop the risk assessment to better quantify and understand the impacts of PFAS in land applied biosolids and the effectiveness of a quantified limit.

OFA also notes that a sensible approach to limiting PFAS concentrations should start at the source. Wastewater treatment plants, and ultimately biosolids, are passive receivers of what constitutes the wastewater stream, with little to no opportunity to affect concentrations of PFAS chemicals received. An effective and preventative approach would start with source control, addressing the use of PFAS in manufacturing and prior to the point of discharge to the wastewater treatment system. Michigan has taken this approach to limiting PFAS discharges and has demonstrated success in achieving PFOS, and therefore PFAS, reduction of up to 95% in wastewater effluent and biosolids. OFA strongly recommends that the federal government concurrently implement standards for source control of PFAS in conjunction with implementing a limit for biosolids, in order to effectively achieve the objective of reducing exposure to PFAS.

We appreciate the opportunity to provide our feedback and agricultural perspectives on this proposed interim standard to reduce exposure to PFAS in the environment.

Sincerely,

Drew Spoelstra

Drew Spoelstra
President

cc: Hon. Lisa Thompson, Minister, Ontario Ministry of Agriculture, Food and Rural Affairs
Hon. Lawrence MacAulay, Agriculture and Agri-Food Canada
OFA Board of Directors