

February 13, 2024

Trevor Robak  
Food Safety and Environmental Policy  
Ontario Ministry of Agriculture, Food and Rural Affairs  
1 Stone Road West, 2<sup>nd</sup> Floor  
Guelph, ON  
N1G 4Y2

Sent via email, to: [trevor.robak@ontario.ca](mailto:trevor.robak@ontario.ca) and submitted online through the Environmental Registry of Ontario

Dear Trevor Robak,

**RE: ERO 019-8075 – Proposed changes to how verification certificates are issued for incinerators regulated under the Nutrient Management Act**

On behalf of the Ontario Federation of Agriculture (OFA)'s more than 38,000 farm family members, thank you for the opportunity to participate in the consultation process for "Proposed changes to how verification certificates are issued for incinerators regulated under the Nutrient Management Act".

Incineration remains a very important option for deadstock disposal for Ontario's farmers. It must remain a viable option for the sector, particularly with the current shortages in deadstock collectors. Incineration also remains an effective management tool for ensuring biosecurity protocols and minimizing the spread of potentially devastating disease, such as Avian Influenza and African Swine Flu.

OFA agrees with the need for incinerators to meet the existing standards for human and environmental health. Compliance with these standards remains important. However, we believe that whatever certification or verification process is developed, it must not add responsibilities or costs to the farmer, or burdensome red tape.

Sincerely,



Drew Spoelstra  
President

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cc: OFA Board of Directors