

February 8, 2024

The Honourable Lisa Thompson
Minister of Agriculture, Food and Rural Affairs
77 Grenville St. 11th Floor
Toronto, Ontario, M7A 1B3
Sent via email to: minister.omafra@ontario.ca

Dear Minister Thompson,

Re: Upcoming Federal-Provincial-Territorial Agricultural Ministers meeting

On behalf of Ontario's agriculture sector, I want to thank you for championing our interests during Federal-Provincial-Territorial Agriculture Ministers meetings. OFA is pleased to provide you with the follow key items that we hope you will bring forward during your discussions with your fellow FPT ministers:

1. Bill C-234, An Act to Amend the Greenhouse Gas Pollution Pricing Act
2. Federal Fertilizer Emissions Reduction Target
3. Single Use Plastic Packaging Ban – Food Packaging
4. Red Tape Reduction - Specified Risk Material (SRM) Removal Requirements

1. Bill C-234, An Act to Amend the Greenhouse Gas Pollution Pricing Act

Farmers and farm organizations are united in our opposition to the amendments made by the Canadian Senate to *Bill C-234, An Act to Amend the Greenhouse Gas Pollution Pricing Act* after it was duly passed by the House of Commons in March of 2023. A blanket policy of carbon surcharges on natural gas and propane is hurting our producers, making them less prosperous and competitive, and expected to pull close to \$1 billion in working capital out of farms that could be used to invest in their operations as well as jeopardizing domestic food security. Bill C-234 will provide much-needed financial relief to our farmers, allowing them to remain competitive in a global marketplace, achieve environmental sustainability goals, and feed the world. We ask that you continue to pressure the federal government to reject the Senate's proposed amendments to Bill C-234 and immediately return the Bill to Senators in its original form so, it may become law as soon as possible.

2. Federal Fertilizer Emissions Reduction Target

The federal government set an ambitious national target to reduce greenhouse gas emissions associated with fertilizer application by 30% below 2020 levels by 2030. The response from Ontario's farmers, and from those across Canada, is that the target is not achievable within this timeframe in the absence of significant financial investments between now and 2030. We do not believe emissions from the agricultural sector are being accurately represented in the National Inventory Report from which this target was derived. Targets are being informed by inaccurate data that relies on the volume and timing of fertilizer application without critical insights into how farm-level practices impact emissions. We encourage you to reiterate to the federal government

the need for appropriate program funding towards emissions reduction from fertilizer, the need for better data that reflects the actions farmers are already taking to reduce emissions, and that actions to achieve this ambitious target must always remain voluntary, and no mandatory reductions will be imposed.

3. Single Use Plastic Packaging Ban – Food Packaging

In 2022, the Canadian ban on six single-use plastics came into effect as part of an effort to achieve zero plastic waste by 2030. In 2023, the federal government proposed a number of food industry specific measures, including banning non-industrial compostable PLU produce stickers, implementing a plastics registry and reporting requirements, and aggressive targets for fruits and vegetables to be sold in bulk and/or plastic free packaging (least 75% by 2026, at least 95% by 2028). OFA supports government initiatives aimed at reducing waste and increasing the effectiveness of recycling programs and recognizes that not all plastic packaging is an absolute necessity.

Research is underway in Ontario, and in other provinces, to find alternative materials to replace plastics used in food packaging and throughout the agri-food value chain. The produce sector has been a leader in identifying ways to reduce plastic packaging, and increase the recyclability of the plastics used. The reality is that many fruits and vegetables are not suitable for marketing and distribution in bulk, and require the specific features offered by plastic packaging. Alternative packaging must keep food safe by reducing food spoilage, guarding against germs, as well as preventing the opportunity to tamper with food products. Alternatives must comply with food safety regulatory requirements, including those required by the *Safe Foods for Canadians Act*. Packaging is also key to maintaining food quality and freshness, thereby reducing food waste and greenhouse gas emissions along the value chain.

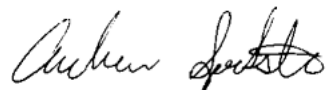
We support research and innovation directed towards finding solutions that lead to reduced plastic packaging use, however strongly caution against current policy approaches that will have significant value chain impacts while viable alternative materials are identified. We are also concerned about policy approaches that provide more power to large grocery retailers, who will be required to prepare and implement a plan to meet targets for reduction, reuse, and redesign of primary food plastic packaging, leading to increased pressure on primary food producers.

4. Red Tape Reduction - Specified Risk Material (SRM) Removal Requirements

Alongside our livestock industry partners in Ontario, OFA asks that you encourage the federal government to continue to work towards regulatory changes required to reduce the burden and costs associated with Specified Risk Material (SRM) removal in Canada. We ask for support from our federal government to create and maintain harmonization of Specified Risk Material removal requirements with the standards in the United States. Canada's beef industry has been under strict removal regulations for SRM due to Bovine Spongiform Encephalopathy (BSE) for many years. OFA, Beef Farmers of Ontario and others continue to advocate for measures aimed at addressing the challenges faced by abattoirs and processors of all size and scale to improve their financial viability and profitability. Local abattoirs continue to face severe financial challenges due in part to regulatory compliance costs. This has resulted in a shortage of local processing capacity that many livestock farmers rely on to be able to sell their meats to local customers. Harmonizing SRM removal requirements with the US through federal regulatory changes would reduce burden and costs associated with SRM removal and disposal in Canada.

Minister, thank you in advance for championing our diverse agricultural sector's interests by speaking to these important issues in your upcoming FPT discussions. We hope that you will be able to secure a commitment from the federal government to work with provinces and farm organizations to address these priorities.

Sincerely,



Drew Spoelstra
President

cc: John Kelly, Deputy Minister, OMAFRA
OFA Board of Directors