

October 18, 2024

Krista Friesen
Resource Recovery Policy Branch
40 St. Clair Avenue West
8th floor
Toronto, ON
M4V 1M2
Canada

Sent via email to Krista.Friesen@ontario.ca and uploaded to the Environmental Registry of

Dear Krista Friesen,

RE: ER-019-8866 Amendments to Regulations Under the Resource Recovery and Circular Economy Act (RRACE)

On behalf of over 38,000 farm family members of the Ontario Federation of Agriculture (OFA), we appreciate the opportunity to provide a rural and agricultural perspective on proposed amendments to regulations under RRACE. 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. Related to this proposal, we support waste management regulations that promote flexibility, reduce administrative burden, and simplify compliance requirements.

For example, allowing producers to offset a limited number of collection sites within upper-tier municipalities, that is, allocate a site in the adjacent municipality instead of the municipality originally required, as long as it improves accessibility for residents and businesses, in addition to improving the producer's collection network.

Additionally, allowing flexibility between the number of collection sites and public collection events is necessary in more rural and less densely populated areas.

We support amendments that would ensure tire producers without retail locations to maintain collection sites relative to the municipal population. This ensures municipal residents that would otherwise need to travel significant distances to a retail outlet to recycle tires are able to recycle tires in their community.

We similarly support take-back flexibility for recycling Hazardous and Special Products (HSP) so consumers in rural and remote areas are able to return the HSP at no charge and in a manner similar to how the HSP were supplied.

The task at hand is to provide a framework to deliver waste management services for consumers, while ensuring a business environment that is flexible and not overly burdensome for producers. We recognize the challenges in meeting the needs of smaller and more rural communities.

There are 13 single and lower tier municipalities in Ontario with land areas between 1,000 and 3,300 square kilometres and low population densities; 11 of these municipalities have populations below 10,000. While OFA understands that proposed amendments aim to help producers create practical collection networks throughout Ontario's 444 municipalities, we support a framework that prioritizes accessibility for residents and businesses. Producer flexibility should not be at the detriment of consumers in difficult to manage municipal collection areas. Proposed amendments that continue to ensure consumers have reasonable avenues to recycle waste should be a key priority, as consumer actions are the first step in getting these waste materials to the producers responsible for their end of life management.

OFA appreciates the opportunity to provide our feedback and agricultural perspectives on the issue of effective waste management.

Sincerely,



Drew Spoelstra
President

cc: Hon. Andrea Khanjin, Minister of Environment, Conservation and Parks
Hon. Rob Flack, Minister, Ontario Ministry of Agriculture, Food and Agribusiness
Hon. Lisa M. Thompson, Minister of Rural Affairs
OFA Board of Directors