

July 17, 2026

Kyle Daspen
Ministry of the Environment, Conservation and Parks
Climate Change Programs and Partnerships Branch
40 St Clair Ave West, 14th Floor
Toronto, ON
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Submitted via email to kyle.daspen@ontario.ca and uploaded to the Environmental Registry of Ontario

Dear Kyle Daspen,

Re: ERO-026-0595 Proposed Renewable Energy Approval Amendments to Recognize the Biogenic Portion of Municipal Solid Waste

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, representing more than 38,000 farm family members. OFA is a strong voice for the agri-food industry on issues, legislation, and regulations administered by all levels of government. We are dedicated to ensuring that the agri-food sector and rural communities are considered and consulted on any new or amended legislation that could affect the stability and growth of farm businesses.

OFA appreciates the opportunity to provide input on consultation ERO-026-0595, which proposes recognizing the biogenic content in residual municipal waste as a renewable energy source when processed by Energy from Waste facilities.

According to the State of Michigan's 2025 Solid Waste Report, Ontario ships approximately 2.7 million tonnes of municipal and commercial waste to Michigan each year. Although annual volumes were significantly higher prior to the 2010 municipal phase-out of household waste exports, the trend over the past 15 years has remained relatively flat, representing about 15% of all waste managed in the state.¹

¹ 2025 Report of Solid Waste Landfilled in Michigan <https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Legislative/MMD/Part-115/Report-FY25-Landfilled-Solid-Waste.pdf?rev=3f1b35b6d7b745a58d5584698068a971>

It is not sustainable for Ontario to continue shipping large quantities of industrial, commercial, and construction waste across the border, particularly when this practice is driven by significantly lower landfill disposal fees in Michigan. Over time, interjurisdictional relations and environmental concerns are likely to further restrict the amount of waste that can be landfilled across North America.

OFA encourages processes that increase the diversion of municipal solid waste from landfills. Recognizing the biogenic content of this feedstock as carbon neutral when processed through Energy from Waste thermal treatment would strengthen the business case for diverting this waste domestically, while increasing energy recovery from waste produced in Ontario.

OFA supports programs that enable the collection of agricultural plastics, such as bale wrap, for recycling. Unfortunately, these efforts are stymied by reprocessing costs and a lack of viable end markets for these materials. We recognize that Energy from Waste processing ends the reduce, reuse, recycle loop. However, until decisionmakers and the public commit to reprocessing end of life materials, Energy from Waste, it is far preferred to landfilling recycled plastics

OFA appreciates the opportunity to provide its feedback and perspectives on the proposed amendments.

Sincerely,



Drew Spoelstra
President

cc: OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.