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519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

January 30, 2017

Attn: Marc Peverini
Policy Advisor,
Ministry of the Environment and Climate Change,
Integrated Environmental Policy Division,
Waste Management Policy Branch,
Non-Hazardous Waste Policy Section
40 St. Claire Ave. West,
Floor 8
Toronto, ON
M4V 1M2

Dear Minister,

Re: EBR 012-9356 Proposed Strategy for a Waste-Free Ontario: Building the Circular Economy

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

The government has set out an ambitious strategy with the visionary goal of working towards a waste free province. In order to achieve this goal, the strategy needs to prioritize reduction of waste, followed by emphasis on recovery of resources from waste. The vision statement proposed in the strategy is largely focused on the end-life of materials, rather than on preventing waste throughout the life-cycle of products. As the strategy is developed and implemented, greater emphasis needs to be placed on various methods and strategies to prevent waste of all kinds. The focus of the current strategy on better recovering resources from waste materials and diverting waste from landfills is an important first step towards the visionary goal.

Organic wastes are well suited to the proposed circular economy model. Farmers understand the value and efficiency when resources, especially organic “wastes” like manure, food waste and biosolids, can be used as fertile soil amendments. Organic wastes were traditionally managed in a cyclical fashion, but increasingly, as our cultural attitudes have become accustomed to linear wasteful models, the cycles that returned organic wastes to farm soils have been broken. Instead, compost, manure, and municipal biosolids, are being treated as waste, use up precious landfill space and create methane, a potent greenhouse gas. When treated as resources, these same materials have the potential to build soils, and be cycled back into enriching the quality of our food system.

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



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Action 13 in the strategy proposes to set environmental standards that will also create a foundation for increased marketability of waste resources. This is especially important for organic wastes as they are prepared to be used as soil amendments. The world in which we live is complex. Organic wastes are frequently mixed with inorganic substances such as plastics, and our water and biosolid wastes contain pharmaceuticals and other agents that then react and interact in ways we cannot predict. When kitchen wastes and biosolids are being used for soil amendments within our food system, and on our limited and valuable arable land, environmental standards need to be set, enforced, and evaluated on a regular basis to ensure the amendments are safe.

Action 8 in the strategy proposes to “establish promotion and education requirements to support public participation in resource recovery.” Promotion and education is important to get stronger public understanding and participation. But again, the notion of education here needs to go beyond just the resource recovery stage. In particular, in the case of organic wastes, education focused on greater food literacy will positively impact reduction of food waste. When consumers better understand how to safely cook and store the food they buy, and how to know if and when food has become unsafe to eat, they will waste less. Education on food literacy will also lead to better meal planning and food purchasing decisions, which also reduce home food waste.

Education for businesses and the public about the resource recovery stage needs to include focus on keeping problematic substances (like plastic and pharmaceuticals) out of our organic waste streams as much as possible. Products need to be clearly designed as either recyclable or compostable for consumer convenience.

Municipalities are finding various methods to encourage greater green bin use to divert household organic waste without issuing disposal bans. These methods should be encouraged, and efforts should be made to increase the availability of green bin programs to more Ontario households, before resorting to disposal ban policies, as suggested in action 15, for organic wastes.

As part of Action 2, policy statements to promote the provincial interest, focus on minimizing the generation of waste should include the ability to repair products as part of design. Government should require manufacturers to provide instructions and replacement parts for simple repairs, and reasonably priced access to more complicated repairs. It is especially important for farmers to be able to repair farm equipment to extend its working life.

Finally, the proposal of an Excess Soil Management Policy Framework recognizes the value of excess soils, but also the risks from improper management and regulation since not all soils are appropriate for further use. Better and earlier planning of the reuse of soils will ensure that far less of this valuable resource ends up in landfills. Planning for

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use of soils that are safe for beneficial use on farms needs to consider timely storage and transportation to promote preservation of the value of the soil for farming.

The CFFO sees benefits in the vision of a waste-free Ontario. In this system, farmers will play a key role in ensuring more organic “wastes” are not wasted, but reused as beneficial resources.

Thank you for this opportunity to provide our input.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence Nywening".

Clarence Nywening, President
Christian Farmers Federation of Ontario