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Dear Minister,

EBR 013-0094 Discussion Paper: Addressing Food and Organic Waste in Ontario

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

Food waste is a significant problem globally, within Canada, and within Ontario. Although the government's *Discussion Paper: Addressing Food and Organic Waste in Ontario* opens by addressing the significance of this food waste issue, the discussion paper then concentrates on one key problem, and that is diverting organic wastes from landfills.

In the *Strategy for a Waste Free Ontario*, the government has set out an ambitious goal of working towards a waste free province. This discussion paper addresses action #10 in the *Strategy*. In order to contribute to achieving this goal, the discussion paper needs to prioritize reduction of food waste, followed by emphasis on recovery of resources from waste. The focus of the discussion paper on diverting organic waste from landfills and better recovering soil amendment and energy resources from organic waste materials is an important step towards the visionary goal set out by the province but is not sufficient in itself.

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

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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 or produce energy and can be cycled back into enriching the quality of our food system. The CFFO's response to the discussion questions are outlined below.

Discussion Questions

The Scope of the Food and Organic Waste Framework

1. *What food and organic materials should be a priority and as such addressed in the Framework?*

The Framework should include all organic wastes listed in the discussion paper (excluding as indicated agricultural, forestry and wood processing residues). However, some of these organic wastes are unavoidable waste products (biosolids, soiled paper, leaf and yard waste, food processing waste products, home preparation scraps). Focus on recovering and processing these for end markets is appropriate. For surplus food and spoiled food (food waste), greater focus should be placed on prevention and avoidance and on capturing this food for human or animal consumption before it becomes spoiled. When this fails, then incorporating it into systems designed primarily to deal with the unavoidable wastes above is appropriate.

It is not appropriate to create a system where the loss of surplus and spoiled food intended for human consumption is considered desirable because of the benefits that are created from using this waste for energy or soil amendments.

2. *In addition to the examples given, what actions do you think the ministry should consider in preventing food from becoming waste?*

The issues that lead to food waste are complicated and interconnected. When considering how to reduce and prevent food waste, every stage of the food system needs to be considered. Above all, with household waste as a significant contributor, social and economic factors (within our whole food system) that contribute to this waste need to be better understood in order to effectively address them.

3. *What are the most important actions to take first?*

Continued action to improve food literacy including education in schools and for adults of all ages is important.

Actions to Reduce Food and Organic Wastes Going to Disposal

4. *What are the barriers to reducing food waste and why is more not recovered at present?*



Access to green bin programs needs to be expanded within both the residential and IC&I sectors, along with accompanying processing capacity. Incentives for use (such as reduced collection of garbage and more frequent collection of green bin waste) are also effective tools.

In order to ensure that food and other organic wastes can be used as soil amendments within our food system and on our limited and valuable arable land, environmental standards on compost and fertilizer products made from these resources need to be set, enforced, and evaluated on a regular basis to ensure the amendments are safe and effective.

5. *In addition to the examples given, what tools and actions do you think the ministry should consider to increase diversion of food and organic wastes?*

The government should consider the most cost-effective way to achieve the highest compliance with organic waste diversion. A ban will be ineffective if it is too costly to enforce. Furthermore, a ban may not be necessary if there is demand for the products created from organic wastes, and an effective system for diversion from landfills.

6. *What are the most important tools and actions to take first?*

Capacity for collection and processing needs to be built across the province. Addressing the cost of diversion vs. disposal will also help overcome low diversion rates. More innovative solutions for local reuse of organic wastes may be needed in regions where the cost of collection and processing is too high.

Actions to Support processing capacity and stimulate end-markets for food and organic wastes

7. *In addition to the examples given, what actions can the ministry take to support viable end markets for food and organic materials?*

Research and information on the benefits, risks, and suitability of the various soil amendment products created from organic waste materials should be made available for certified crop advisors and farmers. This will help ensure informed decision-making about the use of these products on farms and also promote the benefits when used appropriately. Ontario's Soil Health Strategy should include a connection to these organic inputs. As markets for these products grow, production capacity will grow as well.

8. *What are the most important actions to take first, and who is best positioned to lead the action?*

Quality standards need to be high in order for farmers and other consumers of these products to be confident in their benefits and that risks are sufficiently



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limited. Ongoing research and review needs to be conducted to ensure public trust in the creation and use of these products.

Education for citizens on the full cycle process will help people to think carefully about what they put in their toilets, sinks and green bins. This will help them keep in mind that what we flush and throw away does not disappear, but comes full circle through recovery of organic wastes.

We appreciate this opportunity to respond to this discussion paper, and thank you for consideration of our comments.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario