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Ian Drew
Senior Policy Advisor
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Resource Recovery Policy Branch
40 St. Clair Ave. W.,
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Dear Minister,

EBR 013-1814 Proposed Food and Organic Waste Framework

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. While food waste has many definitions, organics that end up in landfills are certainly a waste of what should be recoverable resources. Diverting organics away from landfills and expanding processing and recovery of nutrients and energy from these materials is laudable.

However, to truly address the issue of food waste, more direct emphasis needs to be put on understanding and addressing the underlying causes. Greater focus is needed on how to prevent good food from becoming “waste” in the first place.

In the *Strategy for a Waste Free Ontario*, the government has set an ambitious goal of working towards a waste free province. In order to more meaningfully contribute to achieving this goal, the *Proposed Food and Organic Waste Framework* needs to prioritize actions directed at reduction of food waste to a much greater extent, followed by emphasis on recovery of resources from organic waste. The heavier focus of the Framework 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 circular economy model. Farmers understand the value and efficiency when resources, especially organic “wastes” like manure, biosolids and food scraps and other organic waste can be used as fertile soil amendments. Organic wastes were traditionally managed in a cyclical fashion, but increasingly, as we

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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 or produce energy and can be cycled back into enriching the quality of our food system.

Reduce Food and Organic Waste

This needs to be the highest priority for action. Success here will mean greater efficiency in our food system overall, and lower costs for adding or increasing collection, processing, marketing and further infrastructure.

Research

Action #6 addresses research on reducing and recovering food and organic wastes. The issues that lead to food waste are complicated and interconnected with many other systems. When considering how to reduce and prevent food waste, every stage of the food system needs to be considered. Research on social and economic factors (within our whole food system) that contribute to this waste is needed in order to find effective solutions.

Research will have to include the expertise of many different disciplines including sociology and behavioural sciences, economics, as well as environmental and agricultural sciences.

Education

Action #1 focuses on promotion and education tools. Education in the broadest sense should include focus on food and soil (including food waste and organic soil amendments) at all levels of education from elementary school up to and including research within the universities outlined above. Understanding the relationship between organic amendments and soil health, as well as the complete cycle of the food system from production to consumption to resource recovery for energy and soil amendments, should be part of our overall education system.

Action #13 which focuses on training for resource recovery system staff addresses another aspect of education, that is to say specific technical and procedural training or education for those working in the food system. Government should increase standards of education and training for all those in specific roles within this overall system.

Citizens have an important role to play. At multiple points along the food chain, ordinary citizens have the opportunity to prevent food waste, divert it from landfills, as well as impact the quality of source separated materials through their use of public receptacles

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and curbside collection. Education and clear and consistent labeling and instructions are vital for enabling citizens to take action and make positive contributions to enacting solutions. This connects with **Action #3**, working with the Government of Canada on food labeling, and **Action #11**, best management practices for more effective use of public waste receptacles.

This type of education for the general population should occur on many fronts. Food literacy (including meal planning, meal preparation and safe storage of food) is important for adults and school children alike. Education on what food scraps or leftovers are safe to feed to household pets and backyard chickens, for example, is a way to capture surplus food at a household level from going to waste.

Household level composting, be that in backyards or vermicomposting, is another valuable way to capture and reuse organic materials while minimizing transportation, further processing and infrastructure costs. This also gets citizens directly involved and better educated on the complete cycle of food from growth, harvest and decay back to growth.

Education for citizens on the full cycle of recovering organic wastes through large scale processing and resource recovery efforts 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.

Capturing Surplus Food for Consumption

Action #5 addresses safety guidelines for the safe donation of surplus foods to food rescue organizations. Food rescue organizations like Ontario Christian Gleaners collect surplus production and imperfect produce from farms and dries and packages it for distribution worldwide. Efforts like this are needed along all stages of the food system from production, transport, marketing and consumption in order to rescue good and safe food for consumption—by humans or animals—whenever possible

The Framework does not clearly state if the rescue organizations as defined in the document are collecting food for human consumption only or in some instances for animal consumption. Furthermore, the Food Recovery Hierarchy includes “Feed People” but does not include “Feed Animals” before getting to the level of resource recovery for use as soil amendments and fuel generation. Coordination and standards on recovering surplus food safely for animal feed (both for pets and livestock) should also be in place. Feeding animals should be included in the hierarchy as well.

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Use of Technology

The Framework states that “the ultimate aim is to have an Ontario where excess food is no longer produced or wasted.” However, there is very little in the strategy that attempts to address overproduction head on. **Section 3.6ii** of the Framework’s Policy Statement suggests that technology can be used to help with logistics in recovering and distributing surplus food. Technology can also be helpful in better matching supply to demand to help prevent or avoid some instances of surplus food.

One of the benefits of our supply managed systems, for example, is that they better manage supply to match demand and stabilize prices, helping to significantly mitigate market factors that can lead to food waste from the farm all the way to the consumer. While this system is not appropriate for export-oriented commodities, greater improvements could be achieved in more closely coordinating supply with demand.

Recover Resources

It is important to distinguish between unavoidable and avoidable organic wastes. Unavoidable waste products include things like biosolids, soiled paper, leaf and yard waste, food processing waste products and home food 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 resource recovery systems designed primarily to deal with the unavoidable wastes 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 generating energy or creating and marketing soil amendments. Government needs to be cautious they do not create a new economy from food waste, rather than genuinely encouraging prevention in the first place.

Greater Access to Collection Programs

In order to effectively recover organic materials all sectors need convenient access to collection options. Access to green bin programs needs to be expanded within both the residential (single family and multi-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.



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Action #9, a province wide ban on organic wastes from disposal sites, should be a last resort. Efforts and incentives to increase participation in recovering organic materials need to be implemented first.

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.

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 large-scale processing is too high.

Support Resource Recovery Infrastructure

The CFFO supports especially **Action #13** requiring standardized training for owners and operators of resource recovery systems involving composting and anaerobic digestion. This will help to ensure that safety and quality standards for the compost and digestate produced are being met, which is vital for use of these products on farms.

Promote Beneficial Uses

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 enforced and evaluated on a regular basis to ensure the amendments are safe and effective.

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

For agricultural uses, 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. As markets for these products grow, production capacity will grow as well.

Summary

The CFFO recognizes the significance of the problem of food waste within Ontario, and encourages the government to move forward through actions and policy set out in the

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Framework on many fronts to better address this problem. The most important actions for the farm sector include research and technological innovation that will help reduce direct food waste within the agricultural sector; safety standards and strategies for recovering surplus food for livestock feed; and enforcement and regular evaluation of standards on soil amendment products, including training for operators of composting and anaerobic digestors.

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

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario
SA