



January 28, 2019

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Ministry of the Environment, Conservation and Parks  
Environmental Policy Branch  
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Submitted via email: [EnvironmentPlan@ontario.ca](mailto:EnvironmentPlan@ontario.ca)

**RE: Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan, ERO 013-4208**

Cleanfarms is an industry-led stewardship organization based in Etobicoke that develops recycling and waste management programs for Canada's agricultural sector. We have been a strong partner to Ontario's farming community for close to 30 years.

Our team appreciates the opportunity to provide comments on the province's plans to preserve and protect the environment.

Our feedback is targeted at the litter and waste reduction section because this directly impacts our mandate. Overall, we are supportive of many of the suggestions and themes put forward. As further strategies are developed, we recommend that government officials continue to use a structured and measured approach that includes ongoing stakeholder consultations.

We look forward to working with the Ministry of the Environment, Conservation and Parks and the Ontario Ministry of Agriculture, Food and Rural Affairs to ensure that organizations like ours can continue to make significant contributions to environmental protection while supporting the agricultural sector.

Sincerely,

Kim Timmer  
Manager, stakeholder relations

cc: Kinga Surma, M.P.P. (Etobicoke Centre)



**Preserving and Protecting our Environment for Future Generations:  
A Made-in-Ontario Environment Plan, ERO 013-4208**  
*Comments provided by Cleanfarms – January 28, 2019*

**About Cleanfarms**

Cleanfarms is a federally incorporated not-for-profit, industry-funded, stewardship organization committed to environmental responsibility through the proper management of agricultural waste. Our membership is comprised of manufacturers, distributors, and retailers of pesticides, fertilizers, animal health medications, seed and other farm inputs.

We make it possible for farmers to safely dispose of or recycle agricultural packaging waste through programs financed and supported by our private sector members.

Today, Cleanfarms has six programs, permanent and pilot, to recover ag-waste. Our collection program for empty containers (pesticide and fertilizer) will celebrate its 30th anniversary in 2019. Additional programs to collect non-refillable bulk containers, unwanted pesticides & old livestock medications, seed pesticide & fertilizer bags, grain bags, other ag plastics help keep farms and rural communities clean.

**Recognizing industry leadership**

We were pleased to read that the *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan* (The Plan) referenced individual leadership from municipalities and businesses.

As you are likely aware, there are many success stories across the province. The sectors we work with (primarily the pesticide, animal health medication and seed industries) have shown long-term leadership through their voluntary support of Cleanfarms' programs.

Three of our programs (empty pesticide & fertilizer container recycling, seed & pesticide bag collections and unwanted pesticide & animal health medication campaigns) operate on a voluntary basis meaning that they originated without a regulation that mandates producer responsibility.

This strong industry leadership and voluntary approach allows us to operate our programs efficiently. More importantly, it allows us to deliver harmonized programs across provinces or jurisdictions, which is key to ensuring support from the agricultural sector.

Our ask: If/when regulatory initiatives are introduced, they must ensure the ongoing success of voluntary, high-performing programs and promote harmonization.

**Reducing plastic waste**

The Plan made note of ongoing interest, globally and locally, to reduce plastic waste.

Managing on-farm plastic waste is our expertise. As the province's strategy to reduce plastic waste takes shape, we encourage government officials to consult with Ontario farmers, and organizations like ours, to ensure support from the farming community.

Our experience suggests that agriculture can be, unintentionally, negatively impacted by these types of projects because they don't take into account agriculture's unique needs and challenges.

Our ask: Consult directly with the agricultural industry on any strategies related to plastic waste.

**In closing**

A successful and vibrant agricultural sector is a shared responsibility. We encourage the Ministry of the Environment, Conservation and Parks to work with us to help farmers recycle and divert even more waste from landfills and keep Ontario farming communities clean.