



April 18, 2019

Cindy Acab
Resource Recovery Policy Branch
Ministry of the Environment, Conservation and Parks
40 St. Clair Avenue West
8th floor
Toronto ON M4V 1M2
Canada

Submitted via email: Cindy.Acab@ontario.ca

RE: Discussion paper on reducing litter and waste in our communities, ERO 013-4689

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 30 years.

To prepare our response, we reached out to a number of key stakeholder groups in the province who are also sharing their feedback. You'll likely notice a common theme in all of our submissions: Ontario farmers have a consistent, tangible and solid track record of good environmental stewardship and this includes a commitment to good waste diversion practices.

Organizations like ours tap into this commitment on a daily basis. With the right support, we can fulfil our mandate to offer a wider variety of recycling programs to farmers and support the province's broader waste diversion efforts.

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 waste diversion while supporting the agricultural sector.

Sincerely,

Kim Timmer
Manager, stakeholder relations

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



Discussion paper on reducing litter and waste in our communities, ERO 013-4689

Comments provided by Cleanfarms – April 20, 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, primarily plastic, 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 agricultural pesticide and fertilizer containers celebrated its 30th anniversary this year. Additional programs to collect non-refillable bulk pesticide containers, unwanted pesticides and old livestock medications, seed, pesticide and fertilizer bags, grain bags, other ag plastics help keep farms and rural communities clean.

While there are over 170 stewardship organizations across Canada, Cleanfarms is the only organization that works in the agriculture sector. We have approximately 10 sister organizations around the world, in places like Germany, France, and New Zealand. Cleanfarms collaborates with its sister organizations to share best practices, develop end markets and ensure harmonization and efficiencies.

About this document

Cleanfarms works in a very niche area: non-organic waste (primarily agricultural plastics (ag plastics)) that is mostly generated on farms. We operate much like other Producer Responsibility Organizations, however we primarily work on a voluntary basis. In other words, most of our programs were not developed in response to a regulation.

Our comments will therefore focus only on parts of the discussion paper that, in our view, may directly impact non-organic waste diversion within agriculture and producer responsibility principles.

2.2 Increase Opportunities for Ontarian's to reduce waste

2.2.2. What types of initiatives do you think would result in effective and real action on waste reduction and diversion for the IC&I sectors?

Our research shows that when convenient and cost-effective stewardship programs are available, farmers will overwhelmingly use them. This should be the end goal of any initiatives that involve Ontario's agricultural sector, which is part of the IC&I sector.

In 2018, our programs diverted 500 tonnes of empty containers and bags used by Ontario farmers. We would like to do more to help Ontario farmers recycle the 7,000 tonnes of ag plastics that are used on-farm each year.

Program development, when done right, is a multi-phased, multi-year initiative. A meaningful first step would be an investment, through government-funding, in pilot projects, stakeholder engagement and other data gather exercises (e.g. ag waste characterization studies and farmer research). Cleanfarms is working on a similar initiative at the federal level and we will keep the Ministry of the Environment, Conservation and Parks and the Ministry of Agriculture, Food and Rural Affairs informed of our progress.

2.2.3. What role do you think regulations should play in driving more waste reduction and diversion efforts from the IC&I sectors?

Smart regulations can be effective. For example, producer responsibility type regulation can help create a level playing field in the marketplace and engage producers (e.g. companies that sell farm inputs like ag plastics in Ontario) in waste reduction initiatives.

When developing regulations, we would recommend that Ontario look to other provinces for best practices. Regulations that focus on customized recovery targets for individual sectors/programs and that encourage industry to develop solutions are generally better received than high descriptive regulations.

On a similar note, our industry generally recommends practical and pragmatic regulations and only when necessary.

2.2.4. How can we get accurate information on waste reduction and diversion initiatives in the IC&I sectors?

As a first step, we would recommend that the Ministry reach out to various organizations and the private sector to determine what data might already be available. For example, Cleanfarms has an extensive material tracking system. This system provides aggregate data on the volume of relevant materials sold into the Canadian marketplace and volumes recovered in each province.

Initiatives like the one described in 2.2.2. could motivate producers to provide confidential sales data to a neutral third party to assist with benchmarking. Ag waste characterization studies would also help provide essential baseline data.

2.3 Make producers responsible for their waste

2.3.4. What additional materials do you think should be managed through producer responsibility to maximize diversion?

We are assuming that this question is asking which additional materials should be managed through regulated producer responsibility. We offer the following advice:

- Prioritize harmonization and look to other provinces for best practices and efficiencies.
- Successful voluntary-led producer responsibility programs like most of the ones operated by Cleanfarms do not require regulation. In fact, a non-regulated approach can be more practical, cost effective and lead to better buy in in the agriculture sector.
- As a first step, however, we recommend looking at the agricultural waste characterization studies that have already been completed (www.cleanfarms.ca).

2.5 Reduce plastic waste going into landfills or waterways

2.5.4. Would a ban on single-use plastics be effective in reducing plastic waste?

We would recommend caution with respect to single-use plastic bans that impact the agricultural sector. Factors like biosecurity (integral to our food supply) may limit reuse of some plastic items that are used on-farm.

2.5.5. What are your views on reducing plastic litter through initiatives such as deposit return programs?

Deposit return programs are effective at reducing plastic litter and increasing recovery rates particularly for household items. It should be noted that deposit return programs on other products can increase program costs but also add administrative burden, which is an important consideration, particularly for areas like agriculture which already has extensive regulations to follow. Harmonization, again, needs to be considered.

Further to this, a deposit refund system is but one method of addressing litter. Better public education and more enforcement of littering and open burning laws would be useful to end these environmentally harmful practices.

2.7 Recover the value of resources

2.7.1. What role do you think chemical recycling and thermal treatment should have in Ontario's approach

to managing waste?

Innovation is a key ingredient in the recycling and agricultural sectors. Both chemical recycling and thermal treatment, where appropriate, can play a role in helping the province manage waste.

2.7.2. What types of waste materials do you think are best suited for thermal treatment?

Thermal treatment may be ideal for non-recyclables.

Cleanfarms currently uses waste to energy to manage non-recyclables like empty seed and bags because recycling markets are not available. Our team is working hard to develop recycling markets for these, primarily multi-walled, bags. Until that time, waste to energy is an ideal solution.

2.7.3. How can we clearly and fairly assess the benefits and drawbacks of thermal treatment?

Cleanfarms recommends an evidence-based approach, along with stakeholder consultations, to evaluate thermal treatment plans.

4. We want to hear from you

4.1. Of all the initiatives detailed in this discussion paper, what do you think should be a priority for early action?

Cleanfarms would strongly recommend initiatives, similar to what is described in 2.2.2., to encourage engagement from the agricultural sector.

Thinking more broadly, education and awareness campaigns about the value of waste as a resource and the benefits of recycling may be another early priority.

Finally, more capacity for recycling infrastructure is needed in Ontario. This shortfall has been exacerbated by the shutdown of China's recycling markets over the past two years. Ontario should focus on keeping plastics in the Ontario economy thus creating jobs and improving environmental performance.

4.2. How do you think Ontario can best maintain its competitiveness and growth while reducing the amount of waste going to landfill and litter in our communities?

Harmonization efforts are critical to ensuring competitiveness for farmers and producers. When it comes to producer responsibility programs, activities and regulations, or lack thereof, from neighbouring provinces can significantly impact a program's success. Cleanfarms generally recommends broader, more regional approaches to managing ag plastics because it ensures a more level playing field for producers and farmers and encourages efficiencies. It also encourages local end markets, entrepreneurship and job creation.

Cleanfarms is also working on similar initiatives in each Canadian province, a few of whom are further ahead in waste diversion for agricultural wastes than Ontario. It is highly recommended that Ontario look to these other initiatives and implement programming in a harmonized approach.

4.3. How do you think we can make Ontario a leader in waste reduction and diversion once again?

We are very encouraged by this paper's focus on performance measures and evidence-based decisions and would encourage a similar, ongoing focus.

On a separate note, it is important to note that Ontario is already showing leadership in waste diversion. In our view, the voluntary nature of Cleanfarms' programs and the uptake in Ontario's farming sector are tangible examples of this.

In closing – needs to be improved

Reducing litter and waste in rural communities goes hand and hand with sustainability initiatives already underway in agriculture. We look forward to seeing how the Ministry of the Environment, Conservation and Parks will support these initiatives.