

December 3, 2020

The Honourable Jeff Yurek
Minister of Environment, Conservation and Parks
College Park, 5th Floor,
777 Bay Street
Toronto, ON
M7A 2J3

Dear Minister Yurek,

Re: ERO # 019-2579 - A proposed regulation, and proposed regulatory amendments, to make producers responsible for operating blue box programs, The Blue Box Transition

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA welcomes the opportunity to comment on some aspects of the proposed transition to producer responsibility for recycling from municipal blue box management, specifically related to rural and agricultural communities and businesses. This transition will result in making the producers of products and packaging responsible for the blue box program costs instead of municipal taxpayers.

Regarding compostable materials, we support data collection on the types and quantities of these materials entering the waste stream to better inform future targets for compostable packaging. Until there is clear consensus on what constitutes compostable materials and complete processes to ensure compostable material is correctly handled, it is important that government play a key role in educating brand holders, packaging material producers and the public about acceptable compostable, biodegradable and mixed material packaging.

Under this proposal, producers would be permitted to engage producer responsibility organizations (PROs) to help them meeting their responsibilities. Through the common collection system, producers would be required to collect a consistent set of materials across the province achieve their regulated outcomes.

OFA supports a design for packaging material producers, through their PROs, to meet reasonable material recycling targets by allowing them the flexibility to establish the rules needed to reach and improve those targets over the transition timeline.

We support the design that tasks these producers with not only reaching provincial target compliance, but also regional targets, to ensure smaller, less densely populated and more rural municipalities will be served with improved recycling. These areas will likely be less profitable for PROs to manage but must not be unfairly priced through the framework.

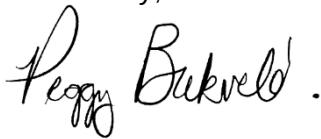
We recommend the framework continue to evolve to ensure packaging material producers and brand holders are encouraged to use clean, inexpensive, and easily to reuse and recycle materials, and discouraged from use of difficult to process materials.

As reuse processes ensure no material loss compared to recycling which has, in some cases, significant material losses, we recommend the government revisit the method of counting quantities of material recovered, to recognize material sent for reuse, at a high value, than weight of material recycled.

Although outside of the scope of the blue box transition, OFA supports the development and use of compostable bioplastics and the application of compost and post-Anaerobic Digestion materials to farm soils. OFA encourages MECP to work with farm experts and our local Federations of Agriculture to facilitate and promote innovative projects in these areas.

As a strong advocate for rural communities and farm businesses, OFA looks forward to working with Ministry staff to ensure rural concerns, challenges and opportunities are considered as the transition to producer responsibility proceeds over the three-year (2023-2025) timeline.

Sincerely,



Peggy Brekveld
President

cc: Jamelia Alleyne, Senior Policy Analyst, Resource Recovery Policy Branch, MECP
OFA Board of Directors