

February 18, 2025

Rachele Fischer
Food Safety and Environmental Policy
2nd Floor,
1 Stone Road West,
Guelph, ON, N1G 4Y2

Re: ERO 019-9517 Proposal to Add Materials to the Off-Farm Anaerobic Digestion Materials Protocol

Dear Rachele Fischer,

Ontario Greenhouse Vegetable Growers (OGVG) are in favor of the proposal in updating the Off-Farm Anaerobic Digestion Materials Protocol, under the *Nutrient Management Act, 2002*. The proposed update would broaden the sources of currently eligible organic materials supporting waste diversion opportunities and enable lower costs. Waste management is a significant cost to greenhouse operations with total costs amounting to millions of dollars each year. Maintaining low-cost alternatives for organic waste are imperative to the 170 greenhouse farming families OGVG represents. Expanding eligibility by focusing on inputs rather than sources is consistent with red tape reduction and simplifying regulations.

Greenhouses use a broad range of methods to divert organic waste from landfills including land application and anaerobic digestion. Organic waste produced from activities like trimming leaves and culling fruits is suitable for anaerobic digestion and is an essential means of landfill diversion. Due to limits on anaerobic digestion capacity, the woody nature of vines, and 30% of greenhouse waste occurring within a few weeks period at cleanout, much of the end of the season organic waste is sent to landfills. By increasing the sources of materials for anaerobic digestion and creating a more consistent flow of organic waste, digesters will be better equipped to handle higher volumes or encourage a competitive market that opens more digesters and lowers prices. The by-product of regulated mixed anaerobic digestion facilities (RMADF) produce biogas, which is sold or used to generate electricity, saving energy costs and contributing to the local energy grid. The by-products of anaerobic digestion are commodities that support the growth of agriculture, lower costs for farms, and ultimately benefit Ontario families.

While many benefits exist, the outcomes of the proposal must be monitored for unintended consequences. As eligible organic waste volumes increase, a short-term increase in competition for digestion capacity, and more careful selection for feedstock quality, could cause higher prices until infrastructure catches up. Specifically, organic materials with higher water content, such as greenhouse waste, may become less desirable to anaerobic digester operations. It is crucial to keep on-farm waste a priority to ensure costs remain affordable for farmers. Expansion of current facilities and expediting new development to match need will be essential to ensure anaerobic digesters remain a viable option for all organic waste. To facilitate a smooth transition and ensure that the benefits of the protocol update are realized without undue strain on existing facilities, OGVG recommends:

- Encouraging the digestion facilities to sustainably integrate off-farming ingredients to not displace farm waste
- Continuing to prioritize on-farming ingredients to keep costs affordable for farms
- Provide funding and expedite approvals for new, or expansion of, anaerobic digester facilities.

OGVG is confident that the expansion will create more affordable waste diversion solutions for the greenhouse sector. Broadening the range of eligible materials for anaerobic digestion will lower costs, support local infrastructure development, to help Ontario achieve greater waste diversion, energy efficiency, and resource optimization.

Sincerely,



Richard Lee
Executive Director