

Ontario Ministry of Agriculture, Food, and Agribusiness
Rachele Fischer
Food Safety and Environmental Policy
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Canada

RE: Canadian Biogas Association Response to the Proposal to add materials to the Off-Farm Anaerobic Digestion Materials Protocol (ERO Posting #019-9517)

The Canadian Biogas Association (CBA) appreciates the opportunity to provide feedback to the Ontario Ministry of Agriculture, Food, and Agribusiness' (OMAFRA) proposal to add materials to the Off-Farm Anaerobic Digestion Materials Protocol.

The CBA represents over 185 member companies that span the interests of biogas & RNG production, and regularly publish analysis reports, manuals, and meaningful thought leadership pieces to strengthen Canada's biogas sector. These members are committed to supporting Ontario's vision to meet our energy needs with clean, affordable and reliable energy.

We have consulted with members across Ontario with anaerobic digesters, and no concerns have been raised about the proposal to add materials to the protocol to resolve current inconsistencies regarding the eligibility of ingredient-based waste materials for Regulated Mixed Anaerobic Digestion Facility (RMADF) use.

Feedback has indicated that additional waste diversion opportunities will be beneficial to anaerobic digestion facilities and support renewable energy generation in the province by streamlining the access to feedstock.

The CBA agrees that by allowing the additional feedstocks, organic waste materials from the production of ingredients used in food, animal feed, pet food, ethanol, and biodiesel production, irrespective of the ingredients' production location, would not result in any additional environmental risks and it will also simplify the management of digestate in RMADFs since this off-farm waste is not harmful to crops.

For future revisions of the Protocol, the CBA recommends considering expanding the allowable organic materials going to RMADFs through an addition to Schedule 2A: "Organic waste matter from facilities that manage organic waste matter from facilities where food or feed is processed,

prepared or distributed, unless it is described in Schedule 1". This would increase available feedstocks for RMADFs and further support biogas systems.

The CBA appreciates OMAFA addressing the inconsistencies in the Protocol and that the additions are not intended to increase burden or compliance costs. The CBA and its members would appreciate updates on when this change will take place including any further relevant detail.

Sincere regards,

A handwritten signature in blue ink that reads "Jennifer Green".

Jennifer Green

Executive Director

Canadian Biogas Association