



November 13, 2020

Atif Durrani
Manager, Policy Development
Ministry of the Environment, Conservation and Parks
Atif.durrani@ontario.ca

RE: ERO Number 019-2498: Proposal to amend the Food and Organic Waste Policy Statement

Dear Mr. Durrani:

The Region of Peel (Region) appreciates the opportunity to provide comments on the proposal to amend the Food and Organic Waste Policy Statement. The Region's comments are in line with and in support of the comments jointly submitted by the Association of Municipalities of Ontario, City of Toronto, Regional Public Works Commissioners of Ontario and the Municipal Waste Association.

1. The Region of Peel does not support the revised direction that source separated organics collection programs "should" accept "certified" compostable pods and bags

The Region shares the government's goals in the Food and Organic Waste Policy Statement to improve the management of food and organic waste. However, we do not support the proposal's revised direction from 'encouraged' to 'should' for municipal source separated organic collection programs to accept certified compostable coffee pods and bags.

The number of products and packaging for consumer goods labelled as compostable has increased with many inadvertently placed into our green bin program. Unfortunately, many of these items do not breakdown in composting or anaerobic digestion systems as actual organic processing capabilities do not currently match the process to certify these products for composting.

In addition, it is important to recognize that compostable products and packaging make up a small fraction of the organic waste stream; less than 0.2% of the total waste stream in Peel. Accepting this small amount of material in the green bin would, however, require significant operating and capital expenses. To be clear, the inclusion of compostable products and packaging has the potential to:

- Significantly increase processing costs for the entire organics stream with minimal benefit
- Lead to contamination in both the green bin and blue box streams due to consumer confusion and lack of standardization amongst compostable products and packaging and non-compostable like items
- Lead to additional contamination issues which could impact the value of the end product
 - The Region's current end markets are primarily (75%) to the agricultural sector where compost is applied to agricultural land.

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Peel's main third party processor, AllTreat Farms, markets the remaining 25% of the compost in bags through retail channels for residential use.

- The addition of non-nutrient material (e.g. bio-plastics) to the feedstock could accumulate on a long-term basis on farmland and eventually in the food system
- End markets may eventually move away from procuring our compost
- Send the wrong message to the public if the items cannot be processed and end up being sent to disposal as residue
 - This would require additional support from bylaw enforcement and public outreach to eliminate contaminants in the green bin resulting from resident confusion over acceptable materials.

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2. The Region recommends an evidence-based, multi-pronged approach for the management of compostable products and packaging such as pods and bags

The Region and other municipalities have a shared goal, and proven track record, of increasing opportunities for Ontario residents to divert waste. The approach undertaken should, however, consider and ensure improved environmental outcomes including enhanced recovery of already accepted organics to yield greater diversion. Ultimately, the Region seeks to avoid the potential of increased contamination or a situation where compostable products and packaging cannot be properly processed and are instead sent to disposal.

Moving forward, the Region recommends the three-fold approach developed by the Ministry of the Environment, Conservation and Parks led Compostable Products Technical Working:

- Develop and agree on an acceptable provincial certification standard for compostable products and packaging, including the potential to support the development of a national standard
- Designate and obligate collection and management of compostable products and packaging exclusively in the new Blue Box Regulation under the Resource Recovery and Circular Economy Act (2016) to ensure producers are responsible for their proper management
 - Addressing compostable products and packaging through two policy measures (Policy Statement and Blue Box Regulation) could cause responsibility confusion and potentially lead to unintended consequences such as increased contamination in two diversion streams: green bin and blue box
- Encourage pilot programs between producers, municipalities and the manufacturers of compostable products and packaging
 - The Province has a critical role to play in the development of standards, ensuring results are based on real world processing capabilities, have broad agreement from all stakeholders and are aligned with developments at the national level
 - It should be highlighted that these types of pilots can be resource intensive as they impact regular operation of busy facilities.



Accordingly, it is the Region's expectation that on-site research pilots would be funded by the producers and manufacturers of compostable products and packaging.

As noted above, the Region strongly supports this three-fold approach and does not support measures that would ultimately force the public sector to make costly changes to their systems based on product and packaging design and marketing decisions of multinational companies. The Region, along with other municipalities, holds as an important value the transparency to the public on the actual way these materials are managed. In that regard, the Region supports the inclusion of language and/or requirements in the Policy Statement that ensures clear information on the proper disposal of compostable products and packaging is available for consumers at the point of purchase.

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3. The Province should support and encourage Producer funded innovation in new processing capacity and to process compostable packaging and products

The Region respects the inclusion of a direction to encourage existing source separated organics operators and new source separated organics processing capacity to consider the ability to process compostable packaging and products as a reasonable addition to the Policy Statement. This type of consideration is something municipal governments undertake on a regular basis.

4. Development of detailed provincial guidance materials are required

Although not included in these amendments, the Region recommends that the Province produce additional guidance materials with details and examples for stakeholders regarding the Food and Organic Waste Policy Statement such as:

- How targets will be calculated and measured
- Further clarification on which businesses and entities are obligated to meet targets
- Data and record-keeping expectations

Thank you for the opportunity to comment on the proposed amendments to Ontario's Food and Organic Waste Policy Statement. The Region looks forward to further dialogue with the Province and other stakeholders on improving the management of food and organic waste.

Sincerely,

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