

February 23, 2022

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

Via email to ian.drew@ontario.ca
and online to the Environmental Registry of Ontario

Dear Ian Drew,

Re: ERO # 019-4867 Environmental assessment requirements for advanced recycling facilities under the Environmental Assessment Act (EAA)

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses, and their communities.

We appreciate the opportunity to provide an agricultural perspective to the proposed updates to the thresholds for determining the environmental assessment requirements for advanced recycling facilities under the Environmental Assessment Act (EAA).

OFA supports government efforts to enable advanced recycling (AR) technologies to process hard-to-recycle materials. For example, advanced recycling processes may be appropriate for recycling many farm plastics after their designed use, including pesticide containers, bale wrap, and greenhouse crop netting. Balancing the development and operation of these AR facilities with environmental impacts is an important undertaking. We support initiatives that enable both the innovative technology and mitigate the impacts they may present to agriculture.

We continue to stress the need for mandatory Agricultural Impact Assessments (AIA) for projects that have a potential to impact agricultural land or operations including projects that need comprehensive or streamlined environmental assessment, or exempt projects. We recommend AIAs regardless of Recovery Thresholds, Daily Tonnage of Treated Waste, and all projects that receive an extension to their approvals under the *Environmental Assessment Act*.

OFA recommends all types of environmental assessments address the full lifespan of a project, including design, construction, operation, and decommissioning. Environmental mitigation components are instrumental at all stages of a projects duration to consider when evaluating the potential environmental impacts of a project.

Agriculture is an integral part of Ontario's economic recovery. We recognize an opportunity to pilot farm waste and biomass feedstocks in AR recycling and energy facilities sized to meet rural needs and remote urban populations, along with AIAs to ensure the sustainability of farming in Ontario. We look forward to further discussions with the Ministry to see how we can work together to support innovative AR technology, sustain our farms, and enable solutions for hard-to-recycle materials present throughout Ontario.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors