



September 13, 2021

Shareen Han  
Client Services and Permissions Branch  
135 St. Clair Avenue West  
Floor 4  
Toronto, ON M4V 1P5

Dear Shareen,

*Re: ERO 019-3544 Amendments to O. Reg. 79/15 to Further Streamline the Use of Alternative Low-Carbon Fuels*

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Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *Amendments to O. Reg. 79/15 to Further Streamline the Use of Alternative Low-Carbon Fuels*. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

With the Ministry of Environment, Conservation and Parks (MECP) looking to make amendments to the O. Reg. 79/15 in an effort to encourage the greater use of low carbon fuels to lower greenhouse gas emissions, BFO is particularly interested in the following proposed amendment:

- remove dead animals or dead animal parts from the list of restricted low-carbon fuels to allow materials such as bone meal and animal fat to be used as a fuel source

BFO would like to express our support for the MECP's proposed amendment on the removal of dead animals, dead animal parts and waste resulting from the rendering of animals or animal by-products from Schedule 1 of the Regulation.

It was clarified by MECP that the above proposed amendment specifically applies to animal bone meal, animal fat and hides as an alternative fuel that can be used by energy-intensive industries. Although the proposed amendment does not apply to all deadstock waste, the use of the above items by energy-intensive industries as an alternative fuel source has the potential to be an effective method to redirect deadstock by-product waste while reducing greenhouse gas emissions.

The proposed amendment related to deadstock is of interest to BFO due to the decline in deadstock removal companies that provide on-farm pick up services for farmers with cattle. Although there are options to dispose of deadstock on-farm, many beef farmers in the province rely on deadstock removal services to safely dispose of deadstock. Exploring other uses for deadstock, such as for use as an alternative low-carbon fuel source, could provide for an additional method for the disposal of deadstock in the future.



On behalf of BFO, thank you for the opportunity to provide feedback on the *Amendments to O. Reg. 79/15 to Further Streamline the Use of Alternative Low-Carbon Fuels* and to communicate our support for the proposed amendment around removing dead animals and dead animal parts from Schedule 1 of the Regulation.

Sincerely,

A handwritten signature in black ink that reads "Rob Lipsett". The signature is written in a cursive, flowing style.

Rob Lipsett  
President

