



April 19, 2019

Cindy Acab
Senior Policy Advisor
Ministry of the Environment, Conservation and Parks
Environmental Policy Division
Resource Recovery Policy Branch
40 St Clair Avenue West, Floor 8
Toronto, Ontario M4V 1M2

Dear Ms. Acab,

Re: EBR # 013-4689: Discussion paper on reducing litter and waste in our communities

The Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments in response to the discussion paper from the Ministry of the Environment, Conservation and Parks (MECP) on reducing litter and waste in our communities. BFO represents the 19,000 beef farmers across Ontario by advocating in the areas of policy planning, industry development and research, environment, animal health and welfare, and domestic and export market development.

While MECP's discussion paper covers a broad range of topics and issues regarding waste reduction, our comments focus on the issue of plastics used in agriculture, especially the plastic film used for hay bale wrap and hay silage. Beef farmers are committed to sustainability on their farms, and BFO is interested in working with government, agricultural plastic manufacturers and other stakeholders on finding recycling options for these materials.

Agricultural plastics can be a complicated material. They come in a variety of forms, they are typically not centrally located in heavily populated areas or easily accessible by municipal waste management services, they can be difficult to transport in large quantities, and they are often contaminated beyond acceptable levels for most recycling options. However, they are also a necessary material in agricultural production.

There is currently a patchwork of options for farmers to recycle and/or dispose silage plastic wrap in Ontario, depending on the municipality and region. Several organizations, including Cleanfarms Inc. and Northern Ontario Farm Innovation Alliance, have had various projects over the past few years scoping out the problem of managing agricultural plastics, including bale wrap plastic, and investigating solutions. However, a coordinated strategy for recycling options led and supported by the province is the necessary next step.



BFO recommends that a provincial plan for managing and recycling agricultural plastics be developed in consultation with the agricultural sector, as farmers can best understand the reality of dealing with these materials on the ground. This coordinated plan should also include engagement with municipalities, as many across Ontario are eager to find recycling or management solutions for agricultural plastics. Ideally, the provincial plan should prioritize consensus-building and gathering of baseline data on the quantity and type of agricultural plastics being used in the province, as well as their related recycling challenges. Investigation into recycling options for agricultural plastics should also include looking at the potential for using this material in the production of fuel.

Program development, when done right, is a multi-phased, multi-year initiative. A meaningful first step would be an investment, through government funding, in pilot projects, stakeholder engagement and other data-gathering exercises (e.g. agricultural waste characterization studies and farmer research).

Current barriers to reducing agricultural plastic waste include underdeveloped logistics networks for collecting plastics and other waste in rural and northern regions, thinly distributed networks of facilities needed to recycle and process waste, weak market support for reprocessed plastics materials, biosecurity concerns with reusing some plastic items, and limited compostable alternatives to plastic wraps, films, twines and netting. Due to these barriers and the valuable role plastics often play in agricultural production, BFO cautions against an outright ban on single-use plastics in the agricultural sector.

Many plastics used for feed, bale wrap, etc. in agriculture are considered single use, and there are currently no viable or consistent recycling options for most of these agricultural plastics. Education, awareness-building and waste management programs within agriculture are likely to yield better stewardship activities and results than banning single-use plastics.

Beef Farmers of Ontario looks forward to further discussions and consultations on reducing waste in Ontario, especially regarding recycling options for agricultural plastics. We thank the Ministry of the Environment, Conservation and Parks for the opportunity to provide comments.

Sincerely,



Joe Hill
President

cc: BFO Board of Directors
Kim Timmer, Cleanfarms Inc.

