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Ian Drew, Senior Policy Advisor
Ministry of Environment and Climate Change
Climate Change and Environmental Policy Division
Resource Recovery Policy Branch
40 St. Clair Avenue West, Floor 8
Toronto, ON M4V 1M2

January 15th, 2018

Re: Food and Organic Waste Framework (EBR 013-1814)

Dear Mr. Drew,

The Atmospheric Fund (TAF) is a public agency established in 1991 by the City of Toronto and endowed by the City and the Province of Ontario. TAF works closely with stakeholders across the Greater Toronto and Hamilton Area (GTHA) to test and advance innovative programs to reduce greenhouse gas (GHG) emissions and air pollution. However, the views expressed in this submission do not necessarily represent those of the City of Toronto, the Province of Ontario or other GTHA stakeholders.

TAF would like to commend the Ministry of Environment and Climate Change (the Ministry) for its comprehensive work on promoting a circular economy through the Food and Organic Waste Framework. As mentioned in the Framework, 5% of Ontario's total GHG emissions for 2015 were produced by the waste sector. Furthermore, there are significant GHG emissions associated with the production of food that is then unconsumed and sent to landfill.¹ These represent opportunities for the Ministry to implement policies that will achieve deep GHG reductions and we are pleased to see these opportunities addressed in the Framework.

Below, TAF would like to provide several recommendations related to the Framework:

¹ http://www.downloads.ene.gov.on.ca/envision/env_reg/er/documents/2017/013-1814_Framework.pdf

TAF supports the proposed food and organics reduction and recovery targets for municipal, multi-residential and Industrial, Commercial and Institutional (IC&I) sector buildings outlined in section 2 of the proposed policy statement. As they currently stand, the targets provide sufficient time for compliance. TAF recommends that the proposed targets and timelines be maintained as is in order to stay on track and achieve meaningful reductions in waste production.

We were pleased to see the creation of data collection mechanisms in the Framework. It is important to have reliable data on progress made and to respond proactively when milestones are being missed. This is particularly important for the IC&I sector, where 2/3rds of waste outputs are currently not tracked.

TAF is supportive of the proposed disposal ban on food waste, as well as the proposed timeline for phasing it in beginning in 2022. Further, we support the Ministry's proposal to work with municipalities and other stakeholders to expedite the approvals processes for anaerobic digestion and composting facilities. Ontario currently does not have adequate organics processing capacity to implement an organic waste disposal ban, and current approval processes are not quick or straightforward enough to support the expansion of this capacity at the required pace². Therefore, TAF recommends that the Ministry implement changes to the approval process to enable the rapid expansion of organics processing capacity while ensuring adequate protections for human health and the environment.

Keeping food and organic waste out of landfills will directly reduce GHG emissions, but to achieve the full emissions reduction potential Ontario needs to ensure that wherever feasible, biogas is collected through organic waste processing and is used for energy rather than being flared. The implementation of the Framework and related policies and programs needs to be coordinated with the development and implementation of carbon offset protocols under Ontario's cap and trade system, as well as Ontario's proposed voluntary offset system. Working together, these and other policies can ensure growth in both the supply of biogas, and the demand for renewable natural gas, which together will support the development of a sustainable bioenergy market.

Finally, TAF is also supportive of the hierarchy established in the Framework. However, we propose that the hierarchy recognizes that some end wastes are more

² <http://docs.assets.eco.on.ca/reports/special-reports/2017/Beyond-the-Blue-Box.pdf>

valuable than others, and that more valuable end wastes should be put to a use that is equal to their value.

We appreciate the opportunity to provide feedback on this important policy to support waste diversion and the associated GHG emission reductions. Please do not hesitate to contact us directly should you have any questions.

Sincerely,
Bryan Purcell
Director of Policy & Programs
The Atmospheric Fund