

September 13, 2021

Shareen Han  
Ontario Ministry of the Environment, Conservation and Parks  
Client Services and Permissions Branch  
135 St. Clair Avenue West, 4<sup>th</sup> Floor  
Toronto, ON  
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Sent Via Email [Shareen.Han@ontario.ca](mailto:Shareen.Han@ontario.ca)  
and submitted online via Environmental Registry of Ontario (ERO)

Dear Shareen Han,

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

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

We are pleased to provide comments from an agricultural and rural Ontario perspective on proposed regulatory amendments to streamline the use of alternate low-carbon fuels (ALCF) in emission-intense manufacturing. OFA supports reducing barriers for these facilities, to supplant the use of coal and petroleum coke with end-of-life material based low-carbon fuels, to reduce greenhouse gas emissions and divert waste from landfills.

OFA supports efforts to ease regulatory burdens on industry, to improve efficiencies and increase participation. Using accepted secondary documentation to estimated fuel CO2 emission

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intensities is a reasonable way to reduce individual effort and time needed to validate fuel substitutions.

Expanding the list of ALCF types and increasing tonnage limits used in demonstration projects will recover more waste resources and enable industry to quickly respond to fuel feedstock market supplies.

Ontario Regulation 79/15 provides industrial access to non-recyclable, non-hazardous wastes such as treated wood and plastic packaging that cannot be recycled. OFA supports the addition of dead animals, and waste resulting from the rendering of animals or animal by-products to the list of allowable low-carbon fuels to better use this waste resource. This aligns with other jurisdictions. We support the continued requirement to follow existing provincial and federal rules that manage the disposal of dead animals.

We encourage the Ministry to continue reviewing of the list of restricted Energy From Waste materials (Schedule 1 in the Regulation) to further reduce harmful emissions produced by these industries and divert more waste from landfills.

Sincerely,



Peggy Brekveld  
President

cc OFA Board of Directors