



February 8, 2024

Fertilizer Program

c/o Premarket Application Submissions Office (PASO)

Canadian Food Inspection Agency

59 Camelot Drive

Ottawa, Ontario K1A 0Y9

Letter sent by email: [cfia.fertilizermodernization-modernisationengrais.acia@inspection.gc.ca](mailto:cfia.fertilizermodernization-modernisationengrais.acia@inspection.gc.ca)

Dear Sir or Madam,

**Re: CFIA consultation on the proposed implementation of a per- and polyfluoroalkyl substances (PFAS) standard for municipal biosolids imported or sold in Canada as commercial fertilizers.**

Ontario Pork appreciates the opportunity to provide input on this consultation.

Ontario Pork is the voice of the province's 997 pork farmers, and a leader in the agriculture industry. Led by producers, Ontario Pork is committed to sustainable growth in the pork sector, delivering government representation, research investment, and industry improvements in areas including animal care and environmental sustainability, while growing the brand and reputation of producers and their product. Ontario's pork sector represents a significant part of the Canadian economy, combining – from “farm to fork” - \$1.34 billion in GDP, over 18,347 full-time jobs and \$3.51 billion in economic output.

Many Ontario pork producers grow their own feed products and use manure to fertilize their crops, thus completing the nutrient cycle. However, some producers also grow extra cash crops such as corn, soybeans and wheat. In some cases, they do not produce enough manure to fertilize these crops and need to use commercial fertilizer or municipal bio solids to augment manure application. Biosolids can also provide much needed micro elements essential for crop growth.

It has, however, come to our attention through this report that some biosolids can contain per- and polyfluoroalkyl substances (PFAS) and that these are contaminants of concern due to their inherent persistence and potential for negative effects on human health and the environment given they can be found in soil, air, water and in the waste stream, including municipal biosolids.

#### **Interim standard**

The CFIA is proposing to adopt a standard of less than 50 parts per billion (ppb) of perfluorooctane sulfonate (PFOS; as an indicator of PFAS contamination) in domestic and imported biosolids represented as commercial fertilizers.

To import or sell biosolids in Canada as fertilizer, proponents will need:

- a certificate of analysis (CoA) for PFOS as an indicator (dated within the previous 6 months), and
- an attestation from the responsible party (importer, manufacturer, or seller) that the certificate is valid.

Pork producers are vigilant when it comes to applying nutrients to our soil. Most producers follow a Nutrient Management Plan which strictly informs in what way, where, and how much nutrient can be applied. **We would welcome the availability of another source of nutrients, but need to be assured that anything we apply to our land is safe.**

The *Fertilizers Act* offers a range of inspector powers that the Agency can use to administer and enforce the newly proposed standard for PFAS in imported and domestic biosolids. Once the product is in the country, the CFIA inspectors will check the documentation (CoA and the attestation). Sales of domestically generated biosolids will be subject to the same compliance verification check to ensure level playing field and equitable treatment.

The proposal states that the CFIA conducted a scientific literature review of PFAS with particular focus on risks to agriculture. They also considered approaches and regulatory controls used by other departments and jurisdictions domestically and internationally. Based on this comparative review, they concluded that the approach implemented by the Michigan Department of Environment, Great Lakes, and Energy in March 2021 was a balanced, feasible and targeted approach.

The CFIA also considered potential impacts of a regulatory limit on the sector and waste diversion efforts across Canada. To that effect, the CFIA reviewed the beneficial uses of biosolids and data on levels of PFAS in biosolids collected by Environment and Climate Change Canada, and that a result of less than 1-part PFOS to 50 billion is achievable. Results of analysis from private companies voluntarily submitted to the CFIA revealed that the vast majority of domestic biosolids (92%) had PFOS (used as an indicator) concentrations below 50 ppb.

**Based on this information, Ontario Pork would like to endorse this proposed interim standard.**

On behalf of Ontario's pork producers, thank you again for the opportunity to participate in this consultation.

Sincerely,



John de Bruyn  
Board Chair