



February 8, 2024

Food Safety and Environmental Policy
1 Stone Road West
2nd Floor
Guelph, ON N1G 4Y2
Letter sent by e-mail: trevor.robak@ontario.ca

Dear Mr. Robak,

Re: ERO number 019-8075, Proposed Changes to How Verification Certificates are Issued for Incinerators Regulated under the Nutrient Management Act, 2002 (NMA)

Ontario Pork welcomes 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.

Ontario Pork believes that incineration will add one more option for pork producers in particular, where deadstock pickup/burial or composting is not available as an option, or not feasible due to regulatory issues, costs and complexities. Further information on this is provided below.

Many pork producers would consider incineration, as it is a relatively sanitary system, is bio secure, and it can be automated and sized according to the farm's requirements. However, we must point out that while incineration is listed as an acceptable option for deadstock disposal under the *Nutrient Management Act*, there are presently no certified units available for purchase for the swine sector. We understand that the company that is required to issue the Verification Certificates for incinerators (ETV Canada Incorporated) no longer administers the ETV program and cannot issue the required verification.

Also, presently, obtaining a Verification Certificate through the ETV process is a time consuming and expensive process that requires detailed technical and scientific knowledge that can make it difficult for individual manufacturers to achieve, especially for the smaller on-farm units.

In terms of regulatory issues, costs and complexities, burial can be a convenient on farm solution, but these methods are sometimes unavailable to pork producers because of siting issues such as sandy soil conditions, bedrock, systematic tile drainage systems or frozen soil in winter.

While composting could potentially be used, again, it would come with its own issues such as the need for continued management, lack of substrate, and it can also be difficult to achieve because of potential siting issues such as soil conditions and drainage issues.

The consultation asks for input and advice on alternatives to the ETV process that would reduce the burden and costs of verifying incinerator performance without changing the performance standards.

According to the consultation information, the intent of these amendments is to provide a viable pathway to compliance through the ISO 14034:2016 standard, while also allowing for previously issued verification certificates under the former ETV program to continue to meet the requirements of the regulation. It is also proposed that verification certificates need only be issued once for a given incinerator. This part of the proposed regulation would be directed mostly at incinerator manufacturers and suppliers.

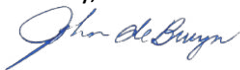
Therefore, **a proposal to update O. Reg. 106/09 to streamline and simplify on-going verification of incinerators for disposal of dead farm animals on-farm would be welcomed by pork producers.**

This may go a long way to increasing the availability, and possibly reducing, the cost of on-farm incinerators. We would also like to point out any new or updated proposal must not be burdensome to producers in terms of having to prove or defend that the incinerator works to the appropriate standards.

Ontario pork producers would also welcome a process that would reduce the burden and costs of verifying incinerator performance without changing the performance standards of these units.

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

Sincerely,



John de Bruyn
Board Chair