



**Ontario Public Health Association**  
 l'Association pour la santé publique de l'Ontario  
 Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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**Constituent Societies**

- Association of Ontario Health Centres (AOHC)
- Association of Public Health Epidemiologists in Ontario (APHEO)
- Association of Supervisors of Public Health Inspectors of Ontario (ASPHIO)
- Canadian Institute of Public Health Inspectors (Ontario Branch) (CIPHIO)
- Community Health Nurses' Initiatives Group (RNAO)
- Health Promotion Ontario (HPO)
- Ontario Association of Public Health Dentistry (OAPHD)
- Ontario Society of Nutrition Professionals in Public Health (OSNPPH)
- The Ontario Association of Public Health Nursing Leaders, (OAPHNL)

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**OPHA Comments on EBR 013 – 0094 – Discussion Paper – Addressing Food and Organic Waste in Ontario – July 2017**

The Ontario Public Health Association (OPHA) is supportive of the efforts put forth in “Discussion Paper: Addressing Food and Organic Waste in Ontario”, and the impact that this initiative would have on preventing food waste, providing quality food to those in need, reducing greenhouse gas emissions and diverting waste from landfill.

**General Comments:**

**Reducing food waste helps mitigate impacts of climate change**

Reducing food waste throughout the supply chain can help the Ministry meet its greenhouse gas reduction targets. When food is wasted, the energy, water and other resources used to grow, harvest, process and transport that food are also wasted. Each step in the process of food production and disposal results in greenhouse gas emissions. Cumulatively, this represents a significant quantity of emissions for food that is simply discarded. OPHA supports the Framework’s focus on food waste reduction throughout the value chain by working with municipalities, farmers, food processors, restaurants and retailers.

**Partner with Public Health agencies and community based organizations on food education programs**

OPHA recommends that the Ministry partner with Public Health agencies and provide funding support for food education programs at the local level, which are accessible to municipalities and community organizations. This could include, but not be limited to: school and youth education programs, cooking and meal planning skills, gardening and composting, linking food production and food waste to climate change, and food safety/storage practices.

**Promotion should include a strong focus on informing the public on best before dates**

Education is also required to clarify the meaning of best before dates. Municipal curbside audits identify that a significant portion of green bin

material is uneaten food. Consumer confusion around the meaning of best before dates is one contributor to this type of avoidable food waste. In many cases, best before dates on food packaging reference product freshness limits not food safety. The Ministry could work with public health agencies at all levels of government as well as food retailers and producers to standardize the definition and use of best before dates on food packaging. Consumer education on this issue is also necessary to reduce confusion around interpretation of best before dates (versus expiry dates) while ensuring food safety and protecting those that are most vulnerable including pregnant women.

**It is recommended that promotional efforts include the link between food waste and climate change**

As part of the Ministry's Communication and Outreach initiatives, it is important to increase awareness of the link between food waste and climate change i.e. the real costs of food production associated with greenhouse gases (GHGs). GHGs associated with food and organic waste ranges from the processing and manufacturing of food, the transportation of food and organic waste, to the disposal of food and organic waste.

**Food security and Public Health stakeholders must be engaged in discussion about food donation programs**

The food industry may look to donation to divert food that is no longer sellable but still edible. Caution is needed in supporting donation programs so that food waste is not simply passed from one sector to another. OPHA recommends a focus on reduction before donation with efforts made to change the practices leading to food waste. While food donation may provide a short term solution, it does not address broader economic and social issues underlying food insecurity. If donation is to be part of the framework, consultation with food security organizations is essential to ensure concerns are addressed. Public Health agencies must also be included to ensure donated food is handled, stored and distributed safely.

**OPHA Responses to Discussion Questions:**

**Discussion question 1: What food and organic materials should be a priority and as such addressed in the Framework?**

OPHA is in agreement with the examples provided in the discussion paper. We strongly support an emphasis on preventing food from becoming waste by addressing surplus food – food that is safe for donation or redistribution. This approach would also support the Province's food security strategy. This would require education on two fronts – 1. Educating consumers on ways to reduce the amount of food they waste (e.g. meal planning) and 2. Providing guidance on what food can be safely donated or redistributed.

**Discussion question 2: What actions should the ministry consider in preventing food from becoming waste?**

Under the policy tool example of Communication and Outreach, it is also important to link food waste to climate change, and increase awareness of the real costs of food production associated with GHG emissions e.g. GHGs associated with transport of foods to processors and consumers, transport to waste disposal sites, and methane from breakdown of waste at final disposal site.

**Discussion question 3: What are the most important actions to take first?**

Education programs are necessary to increase awareness regarding reducing food waste and informing the public about the meaning of ‘best before’ dates. Currently, there is confusion regarding the role of best before dates, and a lot of food that is safe to consume is discarded because it has passed the “best before” date.

The implementation of green bin services for multi-unit dwellings is an important step towards diverting residential food waste from landfills, particularly given that housing is shifting towards multi-unit dwellings. In order for this initiative to be successful, there would likely need to be measures put in place to address odour issues associated with the storage of large amounts of organic matter. If this issue is not adequately addressed, it could produce nuisance effects, especially in the summer months. Currently, the odours from green bins are diluted over the distance between residences, but the odours could become quite overwhelming if the food and organic waste from a high rise apartment building were to be left decomposing in the summer heat over the course of a week.

The implementation of green bins for apartment buildings is also an important consideration for the disposal ban proposed on page 22. Who would this ban apply to and how would it be implemented and enforced? This is an important consideration in light of the fact that a large proportion of Ontario’s population does not currently have access to green bin services. It is not practical to implement such a ban without disposal alternatives in place for those living in multi-unit dwellings or small communities that do not offer green bin services.

**Discussion question 4: What are the barriers to reducing food waste and why is more not recovered at present?**

An important consideration in reducing food waste is the role of the food industry in the issue. Currently, food waste is in industry’s best interest – the more that people buy, the better it is for industry. The costs of food waste are currently external to the food industry.

**Discussion question 6: What are the most important tools and actions to take first?**

Educational and awareness programs will likely play a key role in this initiative. In order for it to be successful, it will require the participation of many different sectors and stakeholders as well as a

shift in the way that Ontarians view food waste. It will be important to demonstrate to various stakeholders how they will benefit from reducing food and organic waste. This is particularly relevant for the IC&I (industrial, commercial and institutional) sector, given the large disparity in costs between landfill disposal (\$134/tonne) vs. diversion of organic waste (\$205/tonne).

OPHA would like to thank the Ministry for considering these comments on the Addressing Food and Organic Waste in Ontario discussion paper. Addressing the problem of food and organic waste in Ontario will require strong action using innovative solutions. OPHA would be happy to discuss any of the items included in this response.

***More about the Ontario Public Health Association***

*OPHA has established a strong record of success as the voice of Public Health in Ontario. We are a member-based, not-for-profit association that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.*

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