

January 15, 2018

Ian Drew, Senior Policy Advisor
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Resource Recovery Policy Branch
40 St. Clair Avenue West, Floor 8
Toronto Ontario M4V1M2

Re: EBR Registry number 013-1814 - Food and Organic Waste Framework

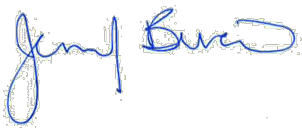
Dear Mr Drew,

We – Dietitians of Canada (DC), Ontario Dietitians in Public Health (ODPH), and the Ontario Public Health Association (OPHA), which houses the Nutrition Resource Centre – are writing to you collectively with our comments on the proposed Food and Organic Waste Framework published on November 16, 2017. Previously, on July 31, 2017, we provided our response to Minister Ballard on the Discussion Paper - Addressing Food and Organic Waste in Ontario. We are pleased to again have the opportunity to provide input into this next phase of consultation, as a joint response from our organizations. In particular, we applaud the Province's emphasis on prevention as opposed to resource recovery, as noted in the Ontario Food Recovery Hierarchy. Attached, please find our specific feedback on various points within this proposed Framework.

Together, our long-standing organizations represent over 5,000 Registered Dietitians and public health professionals working in health promotion across Ontario who provide extensive expertise, evidence and practice-based knowledge to support nutrition-related healthy public policies. In addition, we refer to work of the PROOF team in this response, recognizing their established credibility as an interdisciplinary policy research team at the University of Toronto, working to identify effective policy interventions to reduce household food insecurity in Canada.

We would appreciate an opportunity to discuss this feedback with you in more detail. Please contact any one of us to make arrangements. We hope that we can have a meeting with you to help you understand the specifics of this submission and why we continue to stress our original messages about household food insecurity and food waste reduction.

Sincerely,



Jennifer Buccino MEd RD
Regional Executive Director
Dietitians of Canada – Ontario
jennifer.buccino@dietitians.ca



Candace Einstross
Co-chair
Ontario Dietitians in Public Health
Candace.Einstoss@york.ca



Pegeen Walsh
Executive Director
Ontario Public Health Assoc'n
PWalsh@opha.on.ca



[Dietitians of Canada](#) (DC) is the professional association representing almost 6,000 members at the local, provincial and national levels with regional offices in British Columbia, Alberta and the Territories, Saskatchewan and Manitoba, Ontario, Quebec and Atlantic Canada. Our purpose is to advance health through food and nutrition. We provide evidence-based food and nutrition information, support easier access to adequate, safe and healthy food, promote professional best practices, and advocate for better access to dietitians to meet the health needs of Canadians.

The [Ontario Dietitians in Public Health](#) (ODPH) (formerly the Ontario Society of Nutrition Professionals in Public Health) is the independent and official voice of Registered Dietitians working in Ontario's public health system. ODPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents.

Created in 1949, the [Ontario Public Health Association](#) (OPHA) is a non-partisan, non-profit organization that brings together a broad spectrum of groups and individuals concerned about people's health. OPHA's members are united in providing leadership, which is achieved through information and analysis on issues affecting community and public health, access to multidisciplinary networks, advocacy on health public policy, the provision of expertise and consultation, and professional development.

Funded by CIHR, [PROOF](#) represents an interdisciplinary policy research team coordinated at University of Toronto-Nutritional Sciences, Faculty of Medicine, working to identify effective policy interventions to reduce household food insecurity.

Joint Response to Proposed Food and Organic Waste Framework - EBR Registry # 013-1814

We (the three organizations sending this response – DC, ODPH, OPHA) are pleased to once again respond to your Ministry's work and this Framework proposal, to address the issues associated with food and organic waste in Ontario.

To begin this submission, we reiterate **key points from our July 2017 submission** (encl):

1. **Remove all conflation linking the prevention or reduction of food waste to potential impact on household food insecurity** – this is an erroneous linkage and must not become part of public policy rationale. While some food charities have capacity to accept some foods that may otherwise be wasted, the donations of this diverted food waste do not make a substantial impact on the alleviation of household food insecurity. Only a minority of food insecure households access food charity, and these households receive only a small amount of the total food they need for their household needs. The most effective policies to reduce household food insecurity are those public policies that directly address the cause – which is poverty or lack of sufficient income/ income security. We therefore emphasize that there must be no policy assumptions in this document that the diversion of food waste is helpful to solving the problems of food insecurity. This is not a “win-win” situation of a scale that merits implied government endorsement and/or systematic entrenchment of linkages between food charities and reduction of food waste. Ideally, the problem of household food insecurity in Ontario should be addressed through poverty reduction strategies (to the point where there is no need for charitable food services/distribution) and the problem of food waste should be reduced through prevention strategies and regular channels for distribution within the food system.

SEE ALSO:

3 reasons reducing food waste won't reduce food insecurity. CBC NEWS Dec 12/17
<http://www.cbc.ca/news/canada/prince-edward-island/pei-food-waste-tarasuk-1.4444330>

2. **Prioritize a comprehensive range of strategies that target the prevention of wasted food—** at its source points—across both industry and residential sectors. This will require different strategies for businesses (at the level of industry, commercial and institutions, and restaurants/food services) and for individual consumers (in their homes and also their food handling behaviours at restaurants/food services).
3. **Take a system-level approach to addressing food and organic waste in Ontario by ensuring that strategies are upstream and effectual.** We recommend a system of incentives and disincentives that will consistently prioritize prevention as the key strategy for waste reduction. While we understand that the handling of food donations and diversion of waste to compost are complex and require detailed procedural description in the Framework, the upstream prevention is nevertheless the most effective way to reduce environmental impact overall.

We will continue to focus on these key points in our review of and response to this proposed Framework.

Below, we have organized our feedback and remarks in response to this Framework proposal as “Recommendations”, with references to the Action Plan and Policy Statement sections within the Framework, by page number in the pdf version.

Recommendation 1:

Be consistent in use of definitions and terminology regarding food waste.

We note the reference on p 4, paragraph 2, “...*food and organic waste*, which includes food that could have been eaten or repurposed, as well as unavoidable waste, such as food scraps and vegetable peelings.” By comparison, on p 8, the first objective – *Reduce food and organic waste* – uses different terminology, referring to “surplus food” (e.g., “Rescuing surplus food when it occurs further reduces food waste and ensures that edible food does not end up as waste.”)

As well, we refer to pp 60 & 62 in the Glossary, where the terminology is defined as follows:

Food rescue organizations: means non-profit organizations that rescue, glean, transport, prepare and distribute *excess or surplus food* from food wholesalers, food processors, food retailers, grocery stores and restaurants.

Food waste: means the edible parts of plants and animals that are produced or harvested but that are not ultimately consumed.

Organic waste: means inedible parts of plants and animals, as well as other organic material that may be processed along with food waste. Examples of organic waste can include but are not limited to leaf and yard waste, compostable products and packaging, soiled paper, diapers and pet waste.

We recommend:

- 1. Distinguish between the two kinds of food waste: *wasted food* (edible food that is not consumed - “edible parts of plants and animals that are produced or harvested but that are not ultimately consumed”, *avoidable food waste*) vs *organic waste from food* (inedible parts of food – “the inedible parts of plants and animals”, *unavoidable food waste*). All other organic waste material would be non-food origin.**
- 2. Distinguish *food waste* by sector of origin (where the decision-making responsibility lies) – e.g., consumer/residential waste, IC&I waste.**

In the consumer or residential sector:

Consumer education will be an important strategy/action as incentive to reduce the wastage of food. Examples of strategies include preventing spoilage with better storage practices, educating to dispel misconceptions and increase knowledge about best before dates and to raise awareness about using food ingredients even when past their peak of freshness, decreasing volume of so-called “unavoidable waste” from vegetable/fruit peelings during preparation (learn to incorporate into recipes, increase dietary fibre intakes), decreasing volume of food scraps /plate waste by repurposing leftover foods instead of discarding.

At a public policy level, emphasize resident responsibility for streaming of food and organic waste – no plastics in green garbage collection, no food/organics in recyclables. Disincentives could include rejection for pickup of improperly sorted waste, a surcharge fee for excess volume of “garbage” to landfill (which includes mixtures of food/organic/recyclables/non-recyclables). Incentive would be no surcharge fee for properly sorted food/organic waste and dry recyclables.

In the IC&I sector:

The IC&I terminology of “surplus food” would be equivalent to consumer terminology of “food that could have been eaten”. This food could be referred to as “excess or surplus” food [*does MOECC differentiate between excess and surplus?*] – it is edible food but is not sold/given to consumers due to supply chain issues within the food system (from production to distribution/retail).

The “avoidable” waste of food in IC&I is any surplus of food that doesn’t get to consumers whether by sale or donation (e.g., inferior quality or mispackaged/mislabeled product that can’t be sold (at industry processor level), a volume in excess of what can be sold within a certain window of time (at farm level), unwillingness or inability to distribute/transport to consumers (at retail level)). The decision to throw away food instead of selling or donating it while still edible is a business decision – there may be no cost-effective way to transport the surplus or it may be ‘cheaper’ to divert the food to garbage instead of sorting/repackaging/transporting), the food may have spoiled on location due to inadequate storage. Furthermore, encouraging consumers (and businesses) to donate wasted food, may actually discourage the prevention of wasting food in the first place.

The “unavoidable” organic waste from food (i.e., the inedible parts of the plant or animal that are left over after industry processing, after retail store does additional convenience preparation, after chef prepares in restaurant), or the food scraps in food service that customers opt to throw out instead of taking home to eat as leftover) is a different issue for IC&I sector – it is a regular stream of organic waste associated with that business. There may be some reduction of this waste if consumers are encouraged to take home leftovers and/or if smaller portions are available in the first place when they order food.

A question about comparing data and statistics: Figure 2 appears to be about food waste only (in Canada) – 47% by consumers, and the remainder from all other sources, whereas Figure 3 presents information about all food and organic waste (in Ontario) “Residential” (about 56%) vs “Industrial, Commercial and Institutional (IC&I)” (almost 45%). How do these figures compare with each other? Would “consumers” in Figure 2 not be comparable to “residential” in Figure 3?

Recommendation 2:

Include additional clarification in *Introduction* (p 3) and *Part A: Proposed Food and Organic Waste Action Plan* (p 11), about food system and acknowledge role for dietitians as health professionals with expertise in healthy eating promotion

- a. **Include an additional Principle under Key Guiding Principles (p 8) – *Ensuring the capacity and sustainability of Ontario’s food system to provide sufficient healthy food and beverage choices for all Ontarians.***

Rationale: This is a fundamental reason for emphasizing prevention and reduction of food waste – the impact of such strategies directly contributes to greater capacity and sustainability of the food system.

- b. **Add professional bodies with healthy eating promotion expertise** to the list of priority partners “to develop educational tools and resources, which could be tailored for various audiences” (p 12). **Recognize Ontario Dietitians in Public Health (ODPH) and the Ontario Public Health Association (OPHA)/ Nutrition Resource Centre (NRC)** as important partners in the promotion of healthy eating and food literacy, by specifically naming this professional organization in the Framework. Public Health services within municipalities have an important role to play here – Registered Dietitians and Public Health Inspectors are employed in Public Health Units across Ontario and have the mandate to provide such education and consultation at local levels. OPHA is well positioned to support coordination of projects provincial in scope, in partnership with ODPH expert colleagues. ODPH is also one of many public health constituent societies of OPHA, as well as public health inspectors who might be also engaged for various components of the strategy (e.g., nutrition guidelines for food redistribution). NRC has a provincial mandate for supporting public health and other health intermediaries in healthy eating and nutrition promotion across the province.

Rationale: Registered Dietitians have professional, evidence-based expertise in the promotion of healthy eating and food literacy – this will be particularly important to provide accurate and reliable advice with respect to:

- i. *Standardized promotion and education and guidance materials (e.g., best practices for meal planning and food storage, including tips on how to safely extend the life of food, through refrigeration and freezing)*
- ii. *Demonstrating market opportunities for imperfect produce and culled products for producers and processors.*

This addition will support both the key guiding principle of “Enhancing existing partnerships with stakeholders and building new relationships” (p 8) and the Food and Organic Waste Action Plan, 1. “Province to work with partners to develop promotion and education tools to support food waste prevention and reduction” (p 12).

- c. **Include *more upstream strategies actions/policies***, leveraging a combination of incentives and disincentives to systematically achieve prevention and a measureable reduction in industrial and residential food waste.

Rationale: The majority of this proposed Framework concentrates on the recovery of resources from food and organic waste, and finding sustainable end-uses for products made from organic materials. The stated hierarchical priority to prevent/reduce food and organic waste is not reflected in the level of detail dedicated to discussion of resource recovery in this document. There is need for a more comprehensive range of *upstream* strategies here, targeting both industry and residential sources of food and organic waste. The strategies, especially for the IC&I sector, should not be focused on food rescue, but on reduced production of surplus and careful consideration of the environmental costs associated with production of various foods within our diverse Canadian diets. As previously stated, encouraging consumers (and businesses) to donate wasted food, may actually discourage the prevention of wasting food in the first place. The new evidence-based Dietary Guidance from Health Canada reflects an emphasis on plant-based foods for better health and environmental considerations (see <https://www.foodguideconsultation.ca/>)

Recommendation 3:

Position the prevention of food waste (including food rescue) as the # 1 priority in the Framework – Action Plan and Policy Statement.

The **overall** goal of the Framework should be “*Creating a culture of food waste avoidance*” (as per p 12). The “Ontario Food Recovery Hierarchy” (p 39) should be prominent as the basis for the Framework, in both the Action Plan and Policy.

We recommend however that the second level of the Food Recovery Hierarchy, between **Reduce** and **Recover**, be *revised*. **Please change** “ii. Feed People: safely rescue and redirect surplus food before it becomes waste.” **to** “**Redirect: safely rescue and redirect surplus food before it becomes waste, for consumption by people and/or animals.**”

Rationale: The emphasis on “feed people” is misguided, erroneously conflating food rescue/ redirection as a strategy to alleviate food insecurity. Reduction of food waste has potential to make the biggest impact for environmental sustainability. All the other actions – from rescue of surplus food to the recovery of resources from food and organic waste and finding sustainable end-uses for products made from organic materials – require resource inputs, including requirement for transportation, production of greenhouse gas emissions that require mitigation and potentially limited capacity for appropriate end-uses.

OUR SUGGESTIONS for additional text in the first step of the Food Hierarchy:**Reduce Food Waste – at the consumer and IC&I levels**

(pp 12-17; pp 42-44 in Policy Statement)

As per our suggestions in Recommendation 1, please divide the action plan according to consumers vs IC&I actions. This is already done quite effectively in the Policy Statement (pp 42-44), but is not clear in the Action Plan (pp 12-17).

** We recommend inclusion of Food Rescue as part of the IC&I strategy for Waste Reduction.

CONSUMER/ RESIDENTIAL FOOD WASTE REDUCTION:

This would include the points under the heading:

(under Action Plan) (p 12) 2. Province to enhance and incorporate waste reduction and resource recovery activities within schools

(under Policy Statement) (p 42-43) Promotion and Education

The promotion of strategies to reduce food waste must **include roles for dietitians and other food experts** to work with adult consumers, in addition to the recommended Framework activities within schools.

Food literacy should be identified and promoted in the report as an antidote to the residential sector's food waste. This will result in "adopting relevant best practices" (p 17), such as "purchasing habits, confusion over expiry and best before dates, as well as preparation, serving and storage practices (p 42).

1. The Framework should acknowledge the primary cause of food waste in the residential sector, which is essentially low levels of food literacy. There is need for a cultural shift toward greater value of food and food-related activities, and greater awareness of the contribution of food systems and food waste to negative impacts on the environment. In this context, food waste is primarily a symptom of undervalued food and lack of food literacy to properly manage/store food in the home.
2. The Framework should promote and support **Measuring Food Literacy in Public Health** (Public Health Ontario)¹ which includes development and testing of a tool for measuring food literacy. This will support the key guiding principle of "Using evidence to guide decision-making" (p 8) and developing a tool to measure food literacy will also help with establishing "performance measures" (p 57). **Data collection mechanisms for measuring progress on residential food waste reduction are essential**, "to ... assess effectiveness of behaviour change with regard to food and organic waste over time" (p 17) and provide "Clarification on how prevention ... can be counted towards the targets" (p 56).
3. The Framework should encourage collaboration with the Ministry of Education and school boards/schools to develop guidelines and training "to enhance and incorporate waste reduction and resource recovery activities within schools" (p 12), emphasizing healthy eating promotion (including sufficient time to eat lunches and snacks) and improved food literacy as a foundational support for the prevention of food waste. **Development of communications and workshops and skill-building sessions** (p 13) **must include the expertise of health professionals from the Ontario Dietitians**

¹ Food Literacy for Life. A Call to Action for Healthy Eating: Using a Food Literacy Framework for Public Health Program Planning, Policy, and Evaluation. The Locally Driven Collaborative Project: Measuring Food Literacy in Public Health. July 2017.
<https://www.publichealthontario.ca/en/ServicesAndTools/Documents/LDCP/Food%20Literacy%20Call%20to%20Action.pdf>

in Public Health (ODPH), the Ontario Public Health Association (OPHA), which houses the Nutrition Resource Centre, and the Ontario Home Economics Association (OHEA). This aligns with our mandates for capacity building, to support and train health intermediaries – such as teachers – engaged in the promotion of healthy eating and nutrition. We have called for a new requirement for secondary school graduation, to include the completion of at least one course (credit) in life skills, with a substantial component of food literacy development (<http://www.ohea.on.ca/blog/a-call-for-mandatory-food-and-nutrition-courses-in-ontario-schools>). ODPH should be identified as a key partner providing consultation/advice to municipalities to “develop and implement their own promotion and education programs aimed at preventing food waste ... reaching consumers directly through information that will assist consumers in preventing and reducing food waste.” (p 43).

We therefore recommend consideration for additional strategies, as points to include in this section on Action Plan:

- consumer education – provincial government commitment to public education and media campaigns on food waste reduction, with partnerships at municipal government levels – examples include:
 - design & provide social- and mass- media education on food waste reduction and management of food waste (to educate adult population, beyond school-age),
 - “standardized promotion and education and guidance materials (e.g., best practices for meal planning and food storage, including tips on how to safely extend the life of food, through refrigeration and freezing)” – including the use of “....imperfect produce” (p 12) - OPHA/NRC is a key provincial partner in developing educational tools and resources, and specifically for the promotion of standardized education materials.
 - plan programs that support *improved food literacy* among consumers.
- strategies of incentives/disincentives aimed at consumer level behaviour change – examples include:
 - user-pay fees for unsorted residential garbage that includes food waste – to improve separation of food and organic waste in garbage streams to enhance profitability of municipal resource recovery efforts,
 - credit/discount for consumers who bring their own containers for takeout food/beverage purchased at restaurants/food services,
 - active promotion of smaller portions and/or take-home containers for leftovers in foodservice settings.

IC&I FOOD WASTE REDUCTION AND FOOD RESCUE:

This would include points about food rescue as part of IC&I food waste reduction:

- 1. Province to work with partners to develop promotion and education tools to support food waste prevention and reduction (p 12)**
- 3. Province to work with the Government of Canada on preventing food waste (p 13)**
- 4. Province to work with partners to support innovative approaches and tools to rescue surplus food (p 14)**
- 5. Province to develop food safety guidelines to support the safe donation of surplus food (p 15)**

- this could also refer to information included in Policy Statement (pp 43-44), about:
Reducing Food Waste by Businesses; Rescue of Surplus Food

- strategies of incentives/disincentives aimed at IC&I level behavior change – examples include:
 - user-pay fees for all food and packaging waste from IC&I sources, evaluated to compensate for full environmental cost of the waste in the supply chain (e.g., compensate for GHGE generated in the production/transport/storage of the food ingredients up to the point of processing, since none of that food will be made available in the supply chain to consumers),
 - pickup fees paid to food rescue organizations – to pay those organizations for the costs involved in pickup of product, sorting and distribution by food charity organizations (note: these fees will help to support the charities and cover the value of their service in assisting industry to prevent food waste and paying for waste disposal),
 - tax credits for all *healthy* food donations, but remove tax credits for donations of *unhealthy* foods – to discourage the marketing and promotion/distribution of unhealthy foods/beverages (e.g., use nutrient profile criteria, currently under development by the federal government within the Healthy Eating Strategy, and healthy food policies developed by food banks),
 - “ii. demonstrating market opportunities for imperfect produce and culled products for producers and processors.” (p 12)

Recommendation 4:

Revise all sections within the Framework addressing Food Redirection and Rescue – clearly specifying the very limited and temporary association with outcomes related to household food insecurity.

On page 15 of the Framework report, we read the following:

“The province will work with partners across sectors to help ensure that surplus food does not become waste. This will help create opportunities for local organizations to meet immediate needs, and engage their communities on food issues. For example, through the 2017 Budget Talks process¹², the province is providing \$600,000 to Second Harvest, a *food rescue organization*, to pilot a food rescue program aimed at preventing food from becoming waste. This initiative will build capacity for:

- Food related businesses to donate perishable surplus food.
- Social service organizations to safely transport fresh, nutritious food for distribution to those experiencing food insecurity.

In addition to such efforts to make better use of surplus food, Ontario also needs to address the key drivers of individual and household food insecurity. The province is developing a food security strategy with a vision where every person has dignified access to high-quality, safe, nutritious and culturally appropriate food, to support them in leading healthy and active lives.”

We urge you to re-write this section, to remove conflation of food rescue from association with solutions for household food insecurity and poverty. *The following is our suggested re-write:*

Ontario must address the key drivers of individual and household food insecurity, namely poverty and income insecurity. The province is developing a Food Security Strategy within its Poverty Reduction Strategy. Every person must have dignified access to high-quality, safe, nutritious and culturally appropriate food, to support them in leading healthy and active lives.

The province will work with partners across sectors to help ensure that surplus food from the IC&I sector does not become waste, which is the primary goal of the Framework (to reduce edible food waste).

The redirection and rescue of surplus food can be accomplished through:

- a. quick sale, reduced pricing of foods within retail outlets or local alternative food retail markets;*
- b. donation of products to local charitable food distribution channels for human consumption;*
- c. donation of products to participating farmers for consumption by livestock.*

Priority should be given to procedures that minimize further expenditure of resources (e.g., transportation to other facilities, prolonged cold storage) and maintain dignified access to food, through purchase at low cost.

The challenges of charitable food organizations must be considered – they often do not have capacity to respond to changing volumes of surplus food (i.e., limited transportation for pickup and delivery to new venues, limited storage space, limited volunteer help for sorting and packaging, no budget to pay for disposal of inedible organic waste from spoiled food) and their needs are for healthy (safe and nutritious) foods, to redistribute such food for emergency measures. Food charity and social service organizations must have the autonomy to be able to refuse proposed donations of unhealthy food products. In general, food banks can manage their flow of food products more efficiently when they receive financial donations and can buy quality food at wholesale prices, according to the needs of their clientele.

Food redistribution and rescue by donation can create opportunities for local organizations to meet immediate needs and engage their communities on issues related to poverty (which is the primary cause of household food insecurity). For example, through the 2017 Budget Talks process, the province is providing \$600,000 to Second Harvest, a food rescue organization, to pilot a food rescue program aimed at preventing food from becoming waste. “Second Harvest works across the supply chain from farmer to retail to capture surplus food before it ends up in the landfill and negatively impacts our environment.....FOODRESCUE.CA is a simple, practical way for us all to make a difference in our amazing community.”² This initiative can build capacity for:

- Food-related businesses to donate perishable surplus food, and*
- Social service organizations to safely transport fresh, nutritious food for re-distribution.*

We further recommend that the MOECC examine potential for incentives/disincentives to reduce food waste and to ensure that food charity is not pressured to accept foods that do not fit in their policy and/or donations timed to conflict with capacity for handling.

At a minimum, IC&I strategies must not view food donations to charity as ‘free disposal’ – the responsibility for disposal and who pays should be considered within this Food Waste Action Plan & Policy. Factors include the actual costs for pickup and disposal of waste from IC&I sites, landfill capacity, resource recovery cost and capacity, cost effectiveness of resource recovery vs climate change impacts etc.

Many food banks and other charitable food programs are developing policies to emphasize healthy food donations (which are needed more than the unhealthy foods, especially since the clientele are already at risk for/ affected by various chronic health conditions). The potential for food rescue for unhealthy foods is therefore likely to be much reduced for IC&I diversion/donation strategy. Furthermore, capacity in food charity organizations is limited, often relying on volunteers for pick-up, delivery, sorting and handling of food. There is potential here for these organizations to begin charging IC&I a fee for pickup and handling costs, and to ensure full recovery of the cost of disposal at their sites (e.g., especially when there is spoiled or near-spoiled food mixed in with edible food donations).

² Second Harvest: <http://secondharvest.ca/what-we-do/>

We note the views expressed from PROOF investigator, Valerie Tarasuk³ :

- Any system that provides tax breaks for donated food is diverting tax dollars in the wrong direction, Tarasuk said. "It makes no sense that we would give tax credits to large, multinational food processors for donations to food banks," she said. "If anybody needs a tax credit, it's the people using food banks."
- Tarasuk pointed out there is already legislation in place protecting businesses from liability for donated food, and that there are savings to be had by not having to pay the tipping fees associated with sending waste food to the dump.

There is need to research and collect data on the impacts of these policies on IC&I waste volume:

1. Does food rescue and charitable tax receipt for donated food indirectly provide "incentive" to continue to produce surplus food?
2. Does encouragement of donating wasted food by either consumers or business discourage food waste prevention practices?
3. Could disincentives be instituted to discourage the IC&I sector from producing surplus food and contributing to the need for redirection and rescue of food? e.g., increased disposal fees for food/organic waste, a legislative ban as an upstream lever to correct the environmental impacts and financial costs to the public of industry food waste.
4. Should there be limits imposed on the IC&I sector's access to charitable tax receipts for donation of surplus food to remove potential "reward" or "incentive", since this practice may encourage continued over-supply and wastage?

Recommendation 5:

Expand "Resource Recovery" to reflect a comprehensive and systematic approach, including Food & Organic Waste Management, Infrastructure for Waste Management & Resource Recovery, Research & Data Collection, and Promotion of Beneficial Uses.

Rationale: This section is really about Waste Management – assuming this volume of Waste has already been reduced through prevention and rescue. The approach to Resource Recovery should be comprehensive and systematic, including discussion of all factors required for Recovery, such as Infrastructure for Waste Management and Resource Recovery, Research & Data Collection, and Promotion of Beneficial Uses.

The section is essentially a business plan for municipalities, with provincial and federal government components, addressing all food and organic waste that is not preventable and examining cost-effective opportunities for resource recovery.

³ K Yarr. **3 reasons reducing food waste won't reduce food insecurity.** (Tax breaks aimed at the wrong target.) CBC News, December 12, 2017. <http://www.cbc.ca/news/canada/prince-edward-island/pei-food-waste-tarasuk-1.4444330>

For clarity, we suggest the text in this Framework could be somewhat re-organized:

Action Plan Section #2. could be renamed:

FOOD & ORGANIC WASTE MANAGEMENT & RESOURCE RECOVERY

- **WASTE MANAGEMENT AND RESOURCE RECOVERY**, as well as the Infrastructure for these activities, need to be considered together.

- Additional points about **RESEARCH & DATA COLLECTION** (from Section #1.) and **PROMOTION OF BENEFICIAL USES** (Section #4.) could be included under Section #2. – this could include:

- *Section #2 Recover Resources from Food and Organic Waste (pp 18-21) and*
- *Section #3. Support Resource Recovery Infrastructure (pp 22-25), as well as*
- *Policy Statement, from p 45 (4. Recover Resources from Food and Organic Waste) to p 55 (7. Promote Beneficial Uses)*
- **RESEARCH & DATA COLLECTION** could include Points 6 and 7 from Section 1:
 - 6. Province to support academic research aimed at reducing and recovering food and organic waste (p 16), and*
 - 7. Province to develop data collection mechanisms for measuring progress in waste reduction and resource recovery of food and organic waste (p 16.)*

Our suggestion here is to emphasize cost effectiveness and how the resource recovery strategy fits in with the **Strategy for a Waste-Free Ontario: Building the Circular Economy**
<https://www.ontario.ca/page/strategy-waste-free-ontario-building-circular-economy>.

It is our understanding, within models for sustainable food systems, that the cost and greenhouse gas emissions associated with resource recovery from food/organic waste can be quite substantial⁴. The market for compost and the cost of transportation must also be factored in. This is another reason why municipalities need clear direction from the Province and federal government – to understand the environmental and economic impacts and benefits, and to make the most reasonable decisions within such a circular economy goal.

⁴ HLPE (High Level Panel of Experts). ***Food losses and waste in the context of sustainable food systems***. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security. Rome, June 2014. Available at www.fao.org/cfs/cfs-hlpe