

Sent via email to: secretariat.normalisation@bnq.qc.ca

February 14, 2022

Mélanie M. Robitaille
Standards Developer
Bureau de Normalisation du Québec
333, rue Franquet, Québec, Québec G1P 4C7

Dear Mme. Robitaille:

Thank you for the opportunity to provide feedback on the development of this standard for compostable plastics. The Association of Municipalities of Ontario (AMO), City of Toronto, and Municipal Waste Association appreciate the work your committee has undertaken to review and update this standard.

We have attached our comments in the table form you have requested.

We do have some general comments regarding the development of the standard and ensuring that it actually works as intended in the field. To that end, we ask you to consider the following:

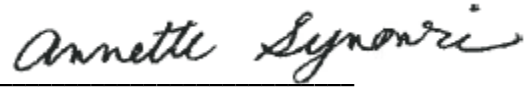
- The proposed standard does not consider the predominance of infrastructure that is in place within the jurisdiction to process food waste and organics. More municipalities within Ontario are moving to processing these materials using wet anaerobic digestion. It should be required that in field testing is completed to ensure these compostable plastics can be managed successfully within the majority of the processing capacity of the jurisdiction.
- We understand that Environment Canada and the Province of Ontario is engaged in a study to examine compostable products performance in aerobic composting and anaerobic digestion facilities and should be completed shortly. The results of their study should be considered in the development of this BNQ standards.
- Labelling requirements should be considered as part of this standard similar to those required for recycling i.e. they have to be collected and processed at scale (e.g. in 60% or more facilities in Canada)

Thank you again for the opportunity to provide comments on these proposed changes and we look forward to your response. We would be pleased to answer any questions you might have.

Sincerely,



Dave Gordon
Senior Advisor, Waste Diversion
Association of Municipalities of Ontario



Annette Synowiec
Director, Policy, Planning & Outreach
Solid Waste Management Services
City of Toronto



Melissa Kovacs-Reid
Chair, Municipal Waste Association