

Michelle Whitbread
Senior Policy Analyst
Ministry of the Environment
Integrated Environmental Policy Division
Waste Management Policy Branch
135 St Clair Avenue West
Floor 7
Toronto Ontario
M4V 1P5
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EBR number 010-6515: A Regulatory Framework for the Management of Non-Agricultural Source Materials and Regulatory Amendments Concerning Milking Centre Washwater and Anaerobic Digestion

Dear Ms. Whitbread,

I believe Category 3 NASM should NOT be used on farmland that grows food for human or animal consumption. I am particularly concerned about the use of sewage sludge on farmland. The negative impacts can affect: 1) the environment (land, water, air, vegetation and animals); 2) farmers; 3) neighbors of farmers that spread Category 3 NASM; and 4) consumers of food. I believe the risks far outweigh any nutrient benefit.

1) Environment: For up-to-date research, please read as part of my submission **Case for Caution Revisited: Health and Environmental Impacts of Application of Sewage Sludges to Agricultural Land** <http://cwmi.css.cornell.edu/case.pdf> by Ellen Z. Harrison, retired Director, and Murray McBride, Director, Cornell Waste Management Institute, Dept. of Crop and Soil Sciences, Rice Hall, Cornell University, Ithaca, NY. September 2008 (updated March 2009). Scientific research has demonstrated that sewage sludge can have severe long term negative impacts on the environment and, therefore, it should be kept away from farmland that is used for food production.

2) Farmers: Farmland is often the retirement fund for a farmer. If the value drops due to contamination from Category 3 NASM, trusting farmers will have lost what they have worked hard to gain and hold. At the July 13 meeting I asked, "If in the future we learn that NASM should not have been spread on farmland – WHO will be responsible (accountable) for the toxic legacy? Does the farmer have protection?" I don't recall an answer being given to the first question, but "NO" was definitely the answer to the second. User beware!

In a **Case for Caution Revisited: Health and Environmental Impacts of Application of Sewage Sludges to Agricultural Land** Harrison and McBride clearly state, "Agricultural soils are a unique and valuable resource. Protecting agricultural soils requires anticipating and avoiding potential harms since once

contaminated with persistent pollutants, the damage will remain for the foreseeable future. Once contaminated, stopping the application of pollutants such as metals and many organic chemicals that are in sewage biosolids will not correct the problem. The contamination will remain for decades or centuries. It is thus critical to prevent this essentially permanent degradation.” There must be absolutely no possibility that harm can be done by any material or process that you approve. The Precautionary Principle must prevail.

3) Neighbors of farmers that spread sewage sludge and 4) Consumers: Neighbors and consumers receive NO WARNINGS related to the use of sewage sludge on farm fields. How can either avoid the risks to their health and possible contamination of their land or food from this practice?

A June 2009 Q&A sheet provided on July 13 at the London NASM Framework Consultation states, “The Ministry has been approving the land application of sewage biosolids and other NASM for over 30 years.” It has been during the past thirty years that steady increases in the prevalence and incidence of many diseases have been documented. I am not suggesting that Category 3 materials such as sewage sludge are the only cause, but rather that they contribute to the overall degradation of our environment and pose a risk to human and animal health.

According to the **Autism Society of Canada**, Autism is now recognized as the most common neurological disorder affecting children and one of the most common developmental disabilities. Based on studies that are now several years old, approximately 1 in 165 Canadian children will have some form of autism and the number of cases is increasing worldwide. The US Centers for Disease Control (CDC) released new data from multiple communities in the U.S. in February 2007 and reported that the prevalence rate of ASD in the United States was 1 in 150. The majority of children with Autism Spectrum Disorder in the areas studied had developmental concerns before age three.

As part of my submission, please read the total collection of articles compiled by the **Autism Society of America** on the increasing awareness of links between Autism Spectrum Disorder (ASD) and environmental toxins.

http://www.autism-society.org/site/PageServer?pagename=research_envirohealth_articles

Dr. Martha R. Herbert’s article titled **Time to Get a Grip** clearly states the case for caution. <http://www.autismcanada.org/pdfs/TimeToGetAGrip.pdf>

Also, cancer rates are increasing according to **Statistics Canada** and the **Canadian Cancer Society** states that more than 40 per cent of Canadian women and almost 45 per cent of men will develop some form of cancer during their lifetimes. Again, there is ample scientific evidence that a toxic environment is a contributing factor. I am drawing to your attention the increases in these two diseases, because it is

important to be clear that suffering and death can result from bad decisions on the part of MoE and OMAFRA staff.

At a time when consumer confidence in the safety of our food is so low, I believe it is essential that we keep sewage sludge away from food crops, rather than encouraging its use. When a farmer that is using sludge creates a health problem for consumers, the ill consumers endure physical suffering and possible long term health effects, and many farmers that are growing the same crop suffer economic loss, as consumers avoid the product. As long as we combine industrial, household and medical waste with nutrient rich feces, the resulting material can never be declared 100% safe for use on food growing farmland.

Sludge generators and spreaders do not represent the majority and they do have their own agenda. It is interesting that the people who will be most affected by the spreading of Category 3 NASM on farmland were not an integral part of your consultation process. Protectors of our environment, such as **Lake Ontario Waterkeeper**, farmers and farm organizations, neighbors and consumers were largely excluded. The short notice for the meetings in July made it difficult for many to attend and the July 29 deadline makes it impossible for many to respond. I believe the submission deadline should be a minimum of 90 days, but if you are interested in comments from farmers, it must be extended to the end of 2009.

The mandate to divert waste from landfill may seem like a noble goal, but if spreading sewage sludge and any other controversial Category 3 materials, such as paper sludge and paper sludge 'products' cause suffering, then there can be no justification.

Farmland must be protected. We owe it to current and future generations.

Yours truly,

Chris Dancey
Farmer and
President of the **Elgin National Farmers Union**