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February 16, 2024

RE: Consultation on the Implementation of the Interim Standard on Per- and Polyfluoroalkyl Substances (PFAS) in Municipal Biosolids

The National Cattle Feeders' Association (NCFA) represents Canadian cattle feeders on national issues and works collaboratively with other stakeholders to strengthen the Canadian beef industry. Our members represent a significant volume of manure production and, subsequently, the potential for marketing manure, compost and digestate. As such, we appreciate the opportunity to provide comments for the *Consultation on the Implementation of the Interim Standard on Per- and Polyfluoroalkyl Substances (PFAS) in Municipal Biosolids*.

We recognize the critical importance of addressing the environmental and public health concerns associated with PFAS contamination. The release of the interim standard represents a significant step towards managing and mitigating the impact of PFAS in municipal biosolids.

Upon reviewing the proposed interim standard, we offer the following insights and recommendations:

1. **Comprehensive Monitoring and Testing:** Advocate for a clearly defined monitoring and testing program to assess PFAS levels in municipal biosolids. Accurate analyses will provide essential data for evaluating the effectiveness of the interim standard and adjusting regulations as needed.
2. **Collaboration and Research:** Encourage collaboration between regulatory bodies, research institutions, and industry stakeholders to advance scientific understanding of PFAS behavior in biosolids. Funding and supporting research initiatives will contribute to the development of effective long-term solutions.
3. **Consideration of Economic Impacts:** Evaluate the economic impacts of implementing the interim standard on municipalities, wastewater treatment facilities, and agricultural practices. Strive for a balanced approach that minimizes economic burdens while ensuring environmental and public health protection.

We appreciate the opportunity to contribute to the consultation process and believe that a collaborative effort will result in the successful implementation of the interim standard on PFAS in municipal biosolids. We look forward to the positive outcomes that will emerge from the collective efforts of all stakeholders involved.

Sincerely,

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