

2014 REPORTABLE YEAR TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

Dare Foods Limited- Kitchener Facility

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1 INTRODUCTION AND FACILITY DESCRIPTION

1.1 INTRODUCTION AND FACILITY DESCRIPTION

In 2009, the Government of Ontario passed legislation known as the Toxics Reduction Act (TRA), 2009. The purpose of this legislation was “to prevent pollution and protect human health and the environment by reducing the use and creation of toxic substances.”(Section 1(a) of the Toxics Reduction Act, 2009).

The TRA applies to facilities in Ontario where manufacturing activities involve toxic substances listed in the National Pollutant Release Inventory (NPRI) Notice issued under the Canadian Environmental Protection Act. Manufacturing facilities that meet reporting criteria under NPRI or Ontario Regulation 127/01 are required to account, plan and report under the Toxic Reduction Act and Ontario Regulation 455/09. Specifically, the facilities that meet prescribed criteria including thresholds for the use and creation of toxic substances and number of employees are also required to:

- track and quantify the toxic substances that they use and create;
- develop plans to reduce the use and creation of these substances; and
- make a summary of the plan available to the public.

1.2 CLASS OF FACILITY

Section 4(1) of O. Reg. 455/09 specifies the types of facilities subject to toxic substance reduction planning and includes facilities that begin in North American Industry Classification System code “31”, “32” or “33” and “212”.

Darefoods operates an industrial baking facility at the Facility and produces a variety of cookies and crackers. The North American Industry Classification System (NAICS) code that best applies to the Facility is 311821 – *Cookie and Cracker Manufacturing*. Under the requirements of the TRA and O.Reg. 455/09, the NAICS code for the Facility is regulated; hence, the Facility is required by the Ontario Ministry of the Environment and Climate Change (MOECC).

1.3 TOXIC SUBSTANCE USED AND/OR CREATED

According to the Act and the regulation, reportable substances include those that are manufactured at the Facility, processed on the Facility, or otherwise used on the Facility, collectively referred to as “MPO”. Other than ammonia being produced as a by-product from the use of ammonium bicarbonate in the baking process, no other reportable Phase II toxic substances are MPO at the Facility.

Protection and sustainability of the environment is a fundamental value for Darefoods. This annual toxics substance accounting report has been prepared to meet the regulatory obligations specified in Section 10 of the Act and has been prepared in accordance with the requirements of Section 27(1) of Ontario Regulation 455/09, as amended from time to time. It summarizes the relevant reporting requirements and will be updated, as required by the Act and O. Reg. 455/09. For more information on the Toxics Reduction Act and O. Reg. 455/09 visit: <https://www.ontario.ca/page/toxics-reduction-program>

1.4 BASIC FACILITY INFORMATION

As per the requirement of the Act and the regulation, following is a summary of the Facility:

The legal and trade names of the owner and the operator of the facility, the street address of the facility and, if the mailing address of the facility is different from the street address, the mailing address.(See below)	Dare Foods Limited 2481 Kingsway Drive, Kitchener, Ontario N2G 4G4	
Facility NPRI identification number	7003	
The identification number assigned to the facility by the Ministry of the Environment for the purposes of Ontario Regulation 127/01.	Not Applicable – No declaration under 127/01	
Number of full-time employees	343	
North American Industry Classification System (NAICS) - 2, 4, and 6 digit codes	311821	
If applicable, the name, position and telephone number of the individual who is the contact at the facility for the public:		
Public Contact (if applicable)	David Lippert	
Title	Vice President – Human Resources	
Phone Number	(519) 893-3233 ext. 3230	
UTM coordinates, x and y	Zone 17 545005 E	4808921 N
Datum	NAD83	
Legal name of Canadian parent company, if your facility is a subsidiary of a Canadian parent company		
Parent company name	Dare Foods Limited	
Address 1	2481 Kingsway Drive	
	-	
City	Kitchener	
Province	Ontario	
Postal Code	N2G 4G4	
Percent Ownership	100	

The following sections provide the toxic substance reduction plan for the use of ammonium bicarbonate at the Facility in 2014. Ammonium bicarbonate produces ammonia as a by-product, the reported toxic substance.

1.5 STATEMENT OF INTENT

Darefoods is committed to protecting the environment and ensuring the health, safety and security of their employees, their families and the communities where they work and live. Darefoods strives to provide exceptional product stewardship in support of their customers, suppliers and the markets that they serve.

At the Kitchener Facility, ammonium bicarbonate is used as raising agent used in the cracker batching process to control leavening. From the use of ammonium bicarbonate, ammonia is gassed off during the mixing and baking processes. Whenever technically and economically feasible, Darefoods will eliminate, or reduce the use of ammonium bicarbonate, in other words, ammonia in full compliance with all federal and provincial regulations.

1.6 OBJECTIVES OF THE PLAN

Darefoods intends to monitor new methods and investigate ways to reduce or eliminate the use of ammonium bicarbonate, eventually the production of ammonia as a by-product. At this time, a reduction target is not set but Darefoods will monitor and implement, whenever feasible.

1.7 PURCHASE AND USAGE OF AMMONIUM BICARBONATE

Ammonium bicarbonate is typically purchased in bulk quantities. Based on a review of the final purchase records and the composition concentrations of 99% concentrated ammonium bicarbonate, a total of 53,071 kg was purchased, of which 52,450 kg was used for the baking process. During the baking process, engineering estimates 100% of the ammonium contained in the product is transformed into ammonia, carbon dioxide and water vapor.

Ammonia is also present in a cleaning product, Germarc, which is used to disinfect process equipment at various stages of the operation and reportedly, 99% of the cleaner is released to wastewater when the machines are rinsed with water. A total estimate of 100 kg of Germarc, containing 5 to 10 % of ammonium bicarbonate, was purchased. Based on the average composition concentration of 7.5 %, a total of 7.5 kg of ammonium bicarbonate was used for disinfecting purposes.

1.8 TOXIC SUBSTANCE OPTION ANALYSIS

At the time of preparing the TSRP, Darefoods indicated that the Facility invested significant resources to optimize the baking profile process and has a sophisticated control system for monitoring and controlling of the Facility operations. This TSRP did not identify any reduction option for the production of ammonium bicarbonate at the Facility. Hence, no option will be implemented at the Facility.

1.9 ANALYSIS OF TECHNICAL AND ECONOMIC FEASIBILITY

This TSRP did not identify any reduction option for the production of ammonium bicarbonate at the Facility, hence, a technical and an economic feasibility analyses has not been undertaken.

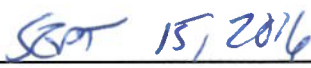
6 CERTIFICATION STATEMENT – AMMONIA

As of September 7, 2016 I, Tim Yoworski, certify that I have read the toxic substance reduction plan for toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and, with the exception of the regulatory deadline, it complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09.

As per the regulatory requirement, this toxic substance reduction plan was not prepared by December 31, 2015. This was the first year Dare Foods Limited has exceeded the reporting threshold, but by such a small amount that we did not feel necessary to report on.




 Tim Yoworski
 Senior Director, Manufacturing Operations
 (Highest Ranking Employee)



 Date

As of September 7, 2016, I, Wasef Jamil, certify that I am familiar with the processes at Dare Foods Limited, Kitchener Facility that use or create the toxic substances referred to in subparagraphs 7iii, iv and v of subsection 4(1) of the Toxics Reduction Act, 2009 that are set out in the plan dated July 26, 2016 and that, with the exception of the regulatory deadline, the plan complies with the Act and Ontario Regulation 455/09 (General) made under that Act.



 Wasef Jamil
 Toxic Substance Reduction Planner
 Licence # TSRP0134

September 7, 2016

 Date

