

Synthesis of Public Comment on the 2014 Progress Report under the Canada-United States Air Quality Agreement

International Joint Commission
Canada and United States

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Commission mixte internationale
Canada et États-Unis

Introduction

Under Article VIII of the 1991 Canada-United States Air Quality Agreement, the Governments of Canada and the United States established a bilateral Air Quality Committee to assist with implementation of the Agreement, to review progress made, and to prepare Progress Reports at least every two years. Environment Canada and the United States Environmental Protection Agency are the lead agencies on the Committee. Under Article IX of the Agreement, the International Joint Commission (IJC) is assigned responsibility to invite comments on each Progress Report prepared by the Air Quality Committee, to submit a synthesis of the comments received to the Governments, and to release the synthesis of comments to the public.

This report provides a synthesis of the comments received on the [2014 Progress Report](#) for the years 2012-2014.

The 2014 Progress Report, prepared by the bilateral Air Quality Committee, is the twelfth biennial report completed under the 1991 Canada-United States Air Quality Agreement. The report discusses key actions undertaken by Canada and the United States in the last two years to address transboundary air pollution within the context of the Agreement. Specifically, the report presents progress made toward meeting the commitments established in the Acid Rain and Ozone Annexes of the Agreement, and in implementing the underlying Agreement.

To prepare this report, the Air Quality Committee took into consideration the public comments received through the International Joint Commission (IJC) regarding the 2012 Progress Report. A synthesis of comments received can be found on the IJC website at http://www.ijc.org/en/Air_Quality.

Public Consultation Observations

Following the release of the 2014 Progress Report, the IJC invited public comment in a variety of ways and comment were requested from May 4, 2015 until July 31, 2015, through:

- A notice in the 2014 Progress Report;
- The IJC website;
- A special website constructed for the public comment process;
- A media advisory;
- Two sets of email invitations sent to a targeted list of approximately 350 industry, environmental education, and governmental contacts active on air pollution issues;
- Link to the Progress Report page sent in IJC newsletter digest to over 400 subscribers;
- Social media campaign on IJC's Twitter and Facebook including paid ads on Facebook.

The IJC increased its efforts to obtain comment on the 2014 Progress Report by advertising the public consultation on social media. The IJC created two sets of Facebook ads which reached a total of 25,164 people, and resulted in 355 clicks to the IJC's web page on the 2014 Progress Report. The link to IJC's 2014 Progress Report public consultation page was shared to over 700 followers on Facebook and over 1,600 followers on Twitter.

The IJC received a total of 3 responses (one from a public industry company, one from a non-for-profit organization and one from an individual).

A full listing of the respondents is provided in the appendices to this report and is available on the IJC website: http://ijc.org/en/air_quality_2014/submit_comment. The views expressed are those of the respondents, not of the IJC.

Public response to the Air Quality Progress Reports has been decreasing overtime (see table below). As both countries have met their targets and achieved their commitments under the Canada United States Air Quality Agreement the low response rate trend of public comment is expected to continue unless new annexes and new commitments are negotiated into the Agreement.

AQA Progress Report	Number of Comments Received
2002	32 responses
2004	35 responses
2006	25 responses
2008	15 responses
2010	12 responses
2012	4 responses
2014	3 responses

Synthesis of comments on the 2014 Air Quality Progress Report

The International Joint Commission received a total of three comments in response to an invitation to comment on the 2014 Progress Report under the Canada-United States Air Quality Agreement. The comments received were from the Ontario Power Generation (OPG), a joint letter from the David Suzuki Foundation and the Canadian Lung Association and from a concerned American citizen.

The comment from the OPG requests a correction on a section of the report that references OPG. The comments from the concerned citizen and the joint letter on behalf of the David Suzuki Foundation and the Canadian Lung Association both express that more effort is needed to reduce smog and improve air quality in Canada and the United States. The David Suzuki Foundation and the Canadian Lung Association joint letter provides substantial comments on how “Canada and the U.S. should update commitments under the Air Quality Agreement with a focus on meeting WHO guidelines for ambient air quality and continuous improvement” and on how Canada’s Air Quality Management System has yet to be implemented since it was approved in principle in 2012.

Finally, the joint letter proposes the addition of a new particulate matter (PM) Annex to the Canada – United States Air Quality Agreement. Similar public comments to include a new PM Annex to the Agreement have been made in the past as noted in the [2006](#), [2008](#) and [2010](#) Synthesis of Comments on the Air Quality Progress Reports.

Appendix

Sources of comments received on the 2014 Progress Report under the Canada-United States Air Quality Agreement

Joint letter from the David Suzuki Foundation and the Canadian Lung Association

Victoria Johnstone, Wichita, Kansas

Robert Lyng, Director of Environmental Policies and Programs, Ontario Power Generation



David
Suzuki
Foundation



July 30, 2015

Secretary, Canadian Section
International Joint Commission
234 Laurier Avenue West, 22nd Floor
Ottawa, Ontario K1P 6K6

To Whom It May Concern:

Re: Public Consultations on the 2014 Air Quality Agreement Progress Report

Please accept this letter as comments from the David Suzuki Foundation and the Canadian Lung Association on the 2014 Air Quality Agreement Progress Report.

Air pollution is still a health and environmental risk

The World Health Organization identifies air pollution the world's largest single environmental health risk and has called on countries to "redouble their efforts to identify, address and prevent the health impacts of air pollution."¹ Fine particulate matter (PM_{2.5}) has the greatest effect on human health and is associated with lung cancer, chronic obstructive pulmonary disease (COPD) and cardiovascular diseases.² The global burden of deaths attributable to air pollution is borne largely by low- and middle-income countries. Nevertheless, the Canadian Medical Association estimated that air pollution caused 21,000 premature deaths in this country in 2008 alone.³ Although air quality has improved in many areas of Canada, current ambient levels of pollution routinely exceed World Health Organization guidelines in some places.⁴

Furthermore, as noted in the 2014 Air Quality Agreement Progress Report, many environmentally sensitive areas across Canada continue to receive levels of acidifying depositions in excess of critical loads. Some pollutants that affect air quality also contribute to climate change (in particular, nitrogen oxide) — and a warming climate in turn exacerbates air quality problems.⁵

¹ Health and the environment: addressing the health impact of air pollution. Resolution of the 68th World Health Assembly, Geneva, May 2015. http://apps.who.int/gb/ebwha/pdf_files/WHA68/A68_75-en.pdf

² WHO. Global Health Observatory Data. Ambient Air Pollution
http://www.who.int/gho/phe/outdoor_air_pollution/en/

³ *No breathing room: National illness cost of air pollution*. CMA: Ottawa, 2008.

⁴ Environment Canada. Air Quality Indicators (2012). August 22, 2014. <http://www.ec.gc.ca/indicateurs-indicators/default.asp?lang=en&n=7DCC2250-1>

⁵ Public Health Agency of Canada. Climate change, air contaminants, and your health. March 28, 2013.
<http://www.phac-aspc.gc.ca/hp-ps/eph-esp/fs-fi-b-eng.php>

We therefore support the WHO's call for governments to redouble efforts to address air pollution and urge Canada and the U.S. to reduce emissions of air pollutants and improve ambient air quality.

Canada's Air Quality Management System has yet to be implemented

While we recognize important achievements since 1991 in reducing acid rain, we are concerned that many of the more recent "actions" included in the 2014 Progress Report are policy proposals that have yet to be implemented. In particular, implementation of key aspects of Canada's Air Quality Management System (AQMS) has largely stalled since being approved in principle by federal and provincial environment ministers in 2012. For example, the Multi-Sector Air Pollutant Regulations (MSAPR), although published in draft form June 7, 2014, have not been finalized. The MSAPR are intended to enforce base-level emissions reduction standards for 13 industrial sectors and three types of industrial equipment. However, this initiative will not deliver any acid rain reductions or ambient air quality improvements until the regulation is finalized and implemented. Furthermore, the draft regulations, as published, would apply only to three sectors/types of equipment (the cement sector, non-utility boilers and heaters, and stationary engines), with some requirements not taking effect until 2026 or later.

Canadian Ambient Air Quality Standards (CAAQS), a second pillar of the AQMS, were established in 2012 for ground-level ozone and fine particulate matter (PM_{2.5}). However, as the *Canadian Medical Association Journal* noted in a recent editorial,⁶ the new 24-hour CAAQS for PM_{2.5} (28 µg/m³) does not meet WHO guidelines (25 µg/m³).⁷

New CAAQS for sulphur dioxide (SO₂) and nitrogen dioxide (NO₂) have yet to be finalized and it seems unlikely that this work will be completed by 2015, as indicated in the 2014 Air Quality Agreement Progress report.

Continued effort is needed to improve air quality

Having met their original (1991) commitments to reduce total SO₂ and nitrogen oxide emissions, and in light of new evidence about the health and environmental risks of current levels of air pollution in many areas, Canada and the U.S. should update commitments under the Air Quality Agreement with a focus on meeting WHO guidelines for ambient air quality and continuous improvement.

This should include:

- Coordinated action to reduce ambient levels of PM_{2.5};
- Action on transboundary sources; and
- A new PM Annex to the Air Quality Agreement.

⁶ Moneeza Walji and Ken Flegel, Adopting global guidelines for air pollution: protecting the health of Canadians, *CMAJ* July 20, 2015 <http://www.cmaj.ca/content/early/2015/07/20/cmaj.150722>

⁷ WHO Air quality guidelines for particulate matter, ozone, nitrogen dioxide and sulfur dioxide. Global update 2005. WHO: Geneva, 2006. http://whqlibdoc.who.int/hq/2006/WHO_SDE_PHE_OEH_06.02_eng.pdf?ua=1

If both the U.S. and Canada met the WHO guidelines this would remove disparities in contributions to transboundary air pollution.

Please contact us if we can provide any assistance in explaining or further exploring these comments.

Yours truly,



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Wichita, Kansas

I am an industrial and climate refugee. Mankind has produced some great inventions, but often the side effects have been pollution and a change in our climate. That pollution that is pumped into our air affects our ability to breathe and our health. I developed adult onset asthma after having grown up in and living in southern Ontario, Canada much of my life. My family and I made the decision to leave our home and go somewhere where I could breathe better and we could live. It has not been easy to find that place, and air quality continues to be an issue as we have traveled across Canada and the U.S. Currently, we live in the midwest U.S., specifically Kansas. I have read the IJC 2014 Air Quality Agreement Progress Report. I appreciate that transboundary air pollution is addressed. Good for Ontario, Canada getting rid of coal as a means of producing electricity. It is good to see that steps have been and are being taken to improve air quality. I look forward to more of that in the future. As I write this, however, there is still smog and poor air quality in much of Canada and the U.S. Making money and a clean environment can and should exist together. There is enough technology today and more being developed that we should not have a problem with better ways of functioning as a society while keeping air and water clean and health safe. Better and new jobs are a positive by-product of this new age. Thank you again, IJC for your invaluable service. We all look forward to cleaner air.

Robert Lyng

Ontario Power Generation

Toronto, Ontario

Congratulations on producing a high quality and informative report. I offer one comment for your consideration. On page 16, reference is made to OPG preserving some of the Lambton and Nanticoke units. Please note that a decision was recently made not to preserve Nanticoke units. For reference, please see the news release at the link below. http://www.opg.com/news-and-media/news-releases/Documents/20150715_Lambton-Nanticoke.pdf