



**Canadian Vehicle
Manufacturers' Association**
Association canadienne
des constructeurs de véhicules

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Secretary
Canadian Section
International Joint Commission (IJC)
234 Laurier Avenue West, 22nd Floor
Ottawa, ON K1P 6K6

Subject: Canada-U.S. Air Quality Agreement – Draft 2018 Air Quality Agreement Progress report

Dear Secretary:

The Canadian Vehicle Manufacturers' Association, representing Ford Motor Company of Canada, Limited, General Motors of Canada Company, and Stellantis (FCA Canada Inc.) appreciates the opportunity to provide comments on the Draft 2018 Air Quality Agreement Progress Report.

We are pleased to receive the draft report and see that efforts are continuing between Canada and the U.S. to address transboundary air quality issues. For the automotive industry, the continued alignment of a harmonized regulatory approach for vehicles and fuels are a priority and key to ongoing improvements. As noted in the report, significant progress has been made in reducing criteria emissions from the light and heavy-duty on-road vehicle fleets through technological advancements made by the automotive industry. The same applies for GHG emissions reductions across the vehicle fleet. The harmonized regulatory approach allows for the leveraging of North American economies of scale that will continue to provide Canadians with the greatest access to advanced vehicle technologies and their commensurate environmental benefits; driving year over year reductions in criteria air contaminant (CAC) emissions as the on-road fleet is turned over. Harmonization also provides regulatory certainty in Canada and allows vehicle manufacturers to focus their efforts on meeting these progressively more stringent CAC emission regulations on a national and North American level.

The benefit of harmonized vehicle-related regulations needs to be recognized in the work undertaken by the Air Quality Agreement given that smog-related emissions are not constrained by international borders. Efforts do need to be coordinated even though the Agreement provides a flexible framework for both countries (i.e., harmonization with the U.S. on vehicle-related emissions and fuels are essential). This was recognized with the work undertaken under the Canada-U.S. Regulatory Cooperation Council's action plan and is expected to continue under the Road Map of the Renewed Partnership.

With respect to the report, we note that it outlines progress to 2018. It would have been helpful if the report outlined progress to 2020 to reflect more recent conditions. For the Emission Inventories and Trends section of the report, we believe it would be beneficial to break down what is meant by on-road and off-road transportation for the readers.

In closing, CVMA does appreciate the opportunity to share our views on the report. Some clarity about the purpose of sharing the report at this time would be helpful and recommend that the draft report include a section that celebrates the significant improvements that have been achieved and continue to be made under the Agreement in improving air quality since its signing.

I would be pleased to address any questions on our input.

Yours sincerely,

A handwritten signature in black ink that reads "Yasmin Tarmohamed." The signature is written in a cursive, slightly slanted style.

Yasmin Tarmohamed
Vice-President, Environment, Health and Safety

cc M. Cauchi, Environment and Climate Change Canada