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February 25, 2003

**To: Secretary, Canadian Section
International Joint Commission**

**Re: 2002 Progress Report on activities under the 1991 Canada-
United States Air Quality Agreement**

Dear Secretary:

I am writing to you on behalf of the Ontario Public Health Association (OPHA), a non-profit, volunteer organization that represents many of the staff working in public health units across Ontario. Our members include the physicians, environmental health managers, epidemiologists, nurses, toxicologists, researchers, and policy analysts responsible for maintaining public health in their communities. As such, our members are deeply concerned about air quality and its impact upon human health.

In November 2002, the OPHA published the attached report entitled, "[Beyond Coal: Power, Public Health and the Environment](#)" in which we articulated our concerns about the contribution of coal-fired power plants on both sides of the Canada/U.S. border to air pollution, global climate change, acid rain and mercury contamination of the food supply.

Air pollution is an enormous problem in south-western Ontario. The Windsor-Montreal corridor is recognized by all parties in Canada as the one area of the country that may not be able to comply with the Canada Wide Standard of 65 ppb for ground-level ozone by 2010. It is also an area that experiences excessive levels of fine particulate matter on a frequent basis. Computer modelling suggests that a significant percentage of the ozone and sulphates that affects air quality in southern Ontario originates as nitrogen oxides and sulphur dioxide in the United States; a large portion of which are emitted from coal-fired power plants. We also know that coal-fired power plants in Ontario contribute to poor air quality and acid rain experienced by U.S. states that are downwind from Ontario.

So, while we were very encouraged by the signing of the Ozone Annex by Canada and the United States, we are concerned that neither the federal government, nor the Ontario government, have taken the steps necessary to ensure that Ontario will comply with the commitment to cap nitrogen oxide emissions from all fossil-fuelled

generators in central and southern Ontario to 25 kilotonnes (kt)(NO) by 2007. With the province's existing regulatory framework for coal-fired power plants, it appears that nitrogen oxide emissions could exceed the 25 kt cap by nearly 8 kt (see page 41 of the attached report for details). Given the enormous contribution of U.S. emitters to air quality in southern Ontario, it is extremely important that Ontario meet, and if at all possible, exceed its commitment under the Ozone Annex. We believe that the International Joint Commission is in a position to highlight this concern, and to encourage action from the federal government to rectify it.

We are also very anxious to see Canada and the United States develop a Particulate Matter Annex under the *Canada-U.S. Air Quality Agreement*. Clear and consistent increases in non-traumatic deaths and hospital admissions have been documented at daily PM10 and PM2.5 levels as low as 25 and 15 ug/m³ respectively; levels that are frequently exceeded in communities across southern Ontario (see page 21 & 22 of the attached report). We believe that the International Joint Commission should highlight the significant contribution of coal-fired power plants on both sides of the border to air levels of particulate matter in southern Ontario, and encourage parties on both sides of the border to proceed quickly with the development of a Particulate Matter Annex that would address health impacts experienced on both sides of the border.

Yours sincerely,

Dr. Jack Lee,
Executive Director