From: James P. Bruce [mailto:jpbruce@sympatico.ca]

Sent: Tuesday, January 04, 2005 3:23 PM

To: Clamen, Murray

Subject: Canada-US Air Quality Agreement - Progress Report 2005

Hello Murray,

Thanks for the opportunity of reviewing this Progress Report. It is full of valuable information and is well presented.

Acid Rain: The reduction of SO2 and NOx emissions and reduced acid deposition appears to have proceeded well although SO2 emissions have largely leveled off in the period since 1995 leaving wet deposition of Sulfate and Nitrate still at worrisome levels in 2002 in some regions. However, it is disconcerting to see maps (pg 5) with no data in some of Canada's most sensitive areas e.g. Muskokas and north on Canadian shield.

Ozone Annex: Again, gratifying progress has been made in reducing ozone precursors NOx and VOC, but ozone concentrations remain unacceptably high (pages 21 and 22) and composite trends of max 8 hour concentrations have even gone up in 2002. Some further analysis of why ozone concentrations have not declined with the precursors would be worthwhile - especially as a warmer climate may exacerbate the problem further in future. It would seem that much tighter CAFE standards for vehicles could address some of the more intractable emission controls.

PM: Stronger CAFE standards would help address this issue as well.

Related Air Quality Issues: I was surprised that airborne transport of mercury appears to be ignored. With the knowledge about gradual leap-frogging from water bodies to eventually reach the Canadian Arctic at unacceptable concentrations, it seemed that some focus on transboundary movement should be addressed by IJC.

Finally, I assume that it is a deliberate omission, but this report would be greatly strengthened and be of more value to governments, if it contained some recommendations for further action.

in particular, this should include recommendations to:

- 1. improve observation networks especially acid deposition in Ontario
- 2. move bilaterally to strengthen CAFE standards for vehicles
- 3. further examine why ozone concentrations have not fallen with NOx and VOC emissions. Are we missing something here?
- 4. ask governments to adequately monitor mercury emissions and deposition to include a report on this important topic in subsequent Progress Reports.

Jim

James P. Bruce, Canadian Policy Representative SWCS 1875 Juno Avenue Ottawa, ON

K1H 6S6

Tel: 613 731 5929 Fax: 613 731 3509

email: pbruce@sympatico.ca