



Secretary, Canadian Section
International Joint Commission (IJC)
23-1 Laurier Avenue West, 22nd Floor
Ottawa, Ontario K1P 6K6

February 16, 2005

Dear IJC,

The Canada-United States Air Quality Agreement Progress Report 2004 contains much useful information related to multiple aspects of air quality in the shared Canada-United States air shed. That said, I find that the text of the report must be read with the knowledge that the commitments of the two governments are presented without critical analysis by the IJC. This leaves the casual reader with the inevitable sense that all is well in the area of cross-border air quality. This conclusion is open to much scepticism. I communicated similar observations in comments that I submitted in response to the 2002 Progress Report.

This lack of critical analysis of governmental actions to achieve objectives committed to in the Air Quality Agreement may be defensible to a point. Credibility is sorely strained, however, when reading statements such as "Canada will comply with its commitment to cap NO_x emissions from large fossil fuel-fired power plants in the Ontario and Quebec portions of the PEMA at 39 kt and 5 kt, respectively".

I know and trust that many intelligent and talented people contributed to this report. It appears that guaranteeing the future is one of the skills possessed by the report authors. The report fails to state how this guarantee will be delivered. No mention is made of the difficulties that the Province of Ontario has encountered in maintaining security of electricity supply. Nor is there any mention in the report of the pressures being applied to the Government of Ontario to abandon its commitment to phase out coal-fired generation by 2007. In point of fact Ontario could be one substantial nuclear malfunction away from removing the ability of Canada to fulfill its Ozone Annex commitment.

In sum, I find this and previous progress reports to be useful reminders of government commitments and measurable progress toward achieving them. Beyond this narrow informational window, the usefulness of the reports is less clear. Citizens of both Canada and the United States look to the IJC to keep the two governments focused on the task at hand. The repetition of the two government's assessment of their own performance in the Air Quality Agreement Progress Report does little to inform the public of the risks and challenges ahead. The role of the IJC as the guardian of the Canada-United States Air Quality Agreement would be enhanced through a more critical evaluation of progress toward achieving the objectives and commitments contained in the Agreement.

Sincerely,

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