



Comments on

Canada – United States Air Quality Agreement – Progress Report 2004

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This report bears a note of undue complacency when it concludes “The United States and Canada have continued to fulfill the obligations set forth in the Air Quality Agreement successfully” and “ Human health and the environment have benefited greatly from progress made under the U.S. – Canada Air Quality Agreement”¹.

The main purpose of the U.S. – Canada Air Quality Agreement was to establish a practical and effective instrument to address shared concerns regarding transboundary air pollution². However, the continuation and proliferation of coal-fired power plants in the United States undeniably increase the transboundary air pollution problems in Canada. More than 50% of electricity needs in U.S. are met by coal-fired power plants. Approximately half of all smog in Ontario is blown in by prevailing winds from sources in the Midwestern United States³. Ontario shares its airshed with approximately 200 coal-fired power stations and assorted industries in states such as Michigan, Indiana, Illinois, Ohio, and Missouri.

Individual Performances:

Canada is still a top producer of harmful air pollutants such as Sulphur Dioxide (SO₂), (NO_x) and Volatile Organic Compounds (VOCs) among OECD Organization of Economic Cooperation and Development) countries on per capita basis. In absolute terms, the United States produces the maximum amount of these air pollutants among all OECD countries⁴. The Progress Report does take cognizance of these facts.

Health Effects:

Fine particle pollution from U.S. power plants cuts short the lives of nearly 24,000 people each year, including 2,800 from lung cancer. Power plant pollution is responsible for 38,200 non-fatal heart attacks per year. The vast majority (at least 90 percent or 22,000) of the deaths due to fine particle pollution could be avoided by capping power plant sulfur dioxide and nitrogen oxide pollution at levels consistent with the installation of today's best available emissions controls⁵.

Emissions Trading:

Emissions trading may give rise to problems of localized air pollution problems adversely affecting the environment and health in certain communities by creating **Pollution Hot Spots**. The emissions trading program will supposedly allow a large source of NO_x and SO₂ emissions in one locality to maintain higher levels of emissions by buying credits or allowances from another source in a distant locality. Obviously, this will intensify regional imbalances in environmental health. Wind effects may also negate the purpose of emissions trading and affect transboundary movements of air pollutants.

In the United States, there have already been several instances of troubles caused by emissions trading.

In a recent report, it is mentioned that New York and Vermont were the first states to pass comprehensive clean air legislation and enforce it. Consequently, these power plants are now much cleaner than federal law requires. The cleaner our plants become, the more federal pollution rights they have leftover at the end of each year. But if those rights are sold to the Midwest, much of the local investment in clean air in New York and Vermont is rendered useless. Those same tons of pollution avoided emitting in these states are coming out of a smokestack upwind and dropping acid rain⁶. Apart from a Vermont power company selling thousands of tons worth of pollution, other New England upwind pollution transfers since June 2004 are: (i) The William F. Wyman power plant in Maine sold 130,132 tons worth on Sept. 25 to Morgan Stanley, a Wall Street broker, (ii) The Devon, Montville and Norwalk Harbor Station plants in Connecticut sold 38,671 tons worth on June 27 to two coal-fired power plants in Western New York that cause acid rain in the Adirondacks and New England, and (iii) The Cleary Flood power plant in Massachusetts sold 12,500 tons worth in July to Pennsylvania Power & Light and Dominion Power of Virginia. Both companies' power plants cause acid rain in the Adirondacks and New England. New Hampshire.

We are quite apprehensive of the results of a possible emissions trading between U.S. and Canada, whose feasibility study is underway now, as mentioned in the report⁷.

Transboundary Mercury Poisoning:

Waterkeeper Alliance has recently alleged that U.S. coal-fired power plants are using Canadian waters as toxic waste dumps and are poisoning Canadian fish with mercury⁸. U.S. sources account for 38 per cent of mercury deposits in the Canadian portion of the Great Lakes. A lot of Canadians live closer to U.S. coal-fired plants than Americans do. To add to the problem, as natural gas prices rise, the U.S. is considering building more coal-fired plants to meet increasing demand⁹.

In order to maximize the success of the U.S. – Canada Air Quality Agreement, it will be necessary to completely phase-out of coal-fired power plants and find alternatives for coal-burning methodologies in industries on both sides. Till a complete phase-out, the polluting coal-fired plants must be made to comply with modern emission control

standards. Imposition of more stringent caps on all air pollutants, including nitrogen oxides and sulfur dioxide, particularly from the power sector, is necessary.

¹ Canada – United States Air Quality Agreement - Progress Report 2004, Conclusion, P. 42.

² IJC 2002, Agreement Between the Government of Canada and the Government of the United States of America on Air Quality, Revised January 2002

<http://www.ijc.org/rel/agree/air.html> (Retrieved February 16, 2005)

³ Ontario's Clean Air Action Plan, June 21, 2004.

⁴ Boyd D.R. 2001 Canada Vs. The OECD: An Environmental Comparison, Eco-Research Chair of Environmental Law and Policy, University of Victoria.

<http://www.environmentalindicators.com/htdocs/indicators/1sulph.htm> (Retrieved February 16, 2005)

⁵ CATF 2004, Dirty Air, Dirty Power: Mortality and Health Damage Due to Air Pollution from Power Plants, Clean Air Task Force, Clean Air Task Force, Boston, MA, June 2004,

http://www.catf.us/publications/reports/Dirty_Air_Dirty_Power.php (Retrieved February 16, 2005)

⁶ Adirondack Council 2004, Vermont power company sells thousands of tons worth of pollution rights that could come back to Vermont as acid rain, Adirondack Council September 30, 2003,

<http://www.adirondackcouncil.org/vermallowpr.html> (Retrieved February 16, 2005)

⁷ Canada – United States Air Quality Agreement – Progress Report 2004, Related Air Quality Efforts, P. 27.

⁸ Solyom C. 2004, Coal-fired power plants skirt rules: Kennedy, Montreal Gazette - Friday, September 17, 2004 - Page A10, Cited in http://www.sierralegal.org/media_articles/media04_09_17.html (Retrieved February 16, 2005)

⁹ *Ibid.*