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Institut de l'environnement

Institute of the Environment

Mr. Barry Stemshorn
Assistant Deputy Minister
Environmental Protection Service
Environment Canada
Ottawa, ON K1A 0H3

February 24, 2005

Dear Mr. Stemshorn,

IJC / CMI OTTAWA ACTION: EAS INFO: Chair Gray / PP-K MC / JW / Bevacqua MAR 04 2005 FILE / DOSSIER 3-2-6-5

The purpose of this letter is to comment on a report which carries your name. Entitled The Canada – United States Air Quality Agreement, Progress Report 2004, it has been distributed by Peggy Farnsworth, Canadian Chair of the Subcommittee on Program Monitoring and Reporting, Air Quality Committee. Your name appears in the appendix of the report, under the heading “Canada Co-Chair”. The following observations and comments are made in the hope you may be in a position to reply so as to enable interested readers to appreciate better the extent of progress made so far and the goals yet to be achieved.

The first observation stems from the fact that having alluded on page 10 to the Air Quality Agreement of December 2000, readers are left wondering as to current progress in the implementation of the agreement itself, how the allocated funds have been invested, and how much still needs to be done in order to achieve the objectives of the agreement.

The next observation concerns Figure 1; here the SO₂ emission data do not extend beyond 2001, yet the corresponding data for the US include 2003. To what is this difference attributable?

On nitrogen oxides, one learns that Canada’s agenda “to reduce the largest source of NO_x emissions - from vehicles and fuels - is aggressive.” Yet the AQA report provides little in the way of data to substantiate this claim. Where, precisely, is the evidence that Canada’s agenda is indeed “aggressive”?

We learn on page 8 about the meeting in Vancouver, February 23-24, 2004, when the IJC’s Air Quality Advisory Board held a workshop on Clean Areas and PSD. It would certainly be useful to have a short summary of the output of that meeting, either in the report proper or the appendix.

On page 30 the observation is made that "the US has shown greater emission reductions than Canada for VOCs and NOx." This observation is significant and again, the question is: from what data is this conclusion inferred? The same can be said for figure 24 where an explanation would be most welcome as to why Canadian SO₂ emissions appear not to have declined significantly since 2003. What really counts, it seems to me, is the sulphate deposition per hectare per year, and the absence of such data is regrettable. Which raises the question: what will be achieved, in terms of kilograms per hectare per year, by 2010 through the Canada-Wide Acid Rain Strategy? It is unfortunate these data and goals are not included in the report.

Finally, there are certain observations regarding the quality of science in the report, summarized in the attached comments prepared by Prof. Scott Findlay of the University of Ottawa and Director of the Institute of the Environment. His comments and observations, particularly in relation to missing information, information presentation, and conclusions deserve close attention if Environment Canada believes, as I am sure you do, that there is always room for improvement in the issuing of reports. It seems to me his comments make a very valuable contribution. In addition, the current dispute between Environment Canada, on one hand, and the Pollution Watch, CELA and Environmental Defence Fund, on the other, surrounding their December 2004 report entitled Shattering the Myth of Pollution Progress in Canada: A National Report on pollution data make it desirable to ensure precision in the content of future reports.

Please feel free to let me know whether you would welcome additional comments on the content of this report which was discussed at the IJC office in Ottawa, on February 11, 2005, at a meeting called by the Right Honourable Herb Gray.

With best regards,
Sincerely,

Charles Caccia

1 enclosure

cc. Prof. Scott Findlay
The Right.Hon. Herb Gray
Hon. Karen Kraft Sloan