

Bailey, Edward A.

From: Paul Miller [pmiller@cec.org]
Sent: Friday, February 25, 2005 3:21 PM
To: Commission
Cc: Bailey, Edward A.; McDonald, John
Subject: Comments on 2004 Progress Report

I am submitting informal comments on the 2004 Progress Report under the United States-Canada Air Quality Agreement. These comments reflect my own personal opinions, and are not official comments of the Commission for Environmental Cooperation (CEC) where I work, nor of the governments of Canada, Mexico and the United States that comprise the membership of the CEC.

I found the report well written and an excellent summary of national efforts relating to air quality issues that affect the Canada-US border region. I describe below my two comments on the content of the report.

1. While the report provides a nice summary of national programs and their progress, I would be curious to know in a report of this type if there are any measures that have ever been undertaken by the two countries solely to address air pollution in the border region in terms of enforceable commitments to reduce specific air pollution amounts. My general impression is that the Progress Report tracks programs that are typically national in nature that, as a secondary matter, also affect the border region. It is less clear to me if the countries have ever undertaken specific air pollution reduction measures (this would not include the planning and feasibility studies mentioned in the report) over the duration of the US-Canada Air Quality Agreement that targeted the immediate vicinity of the border itself, apart from national or large domestic regional programs. If no such measures have been undertaken, it would be useful to know if this is because of lack of authority to do so, or if the border air problems are viewed as not distinctly different from air pollution problems being addressed through other national or broad regional programs, which presumably might have occurred even in the absence of the Air Quality Agreement.
2. There is one item of text in the 2004 Progress Report that, in my opinion, may understate the potential importance of the electric power sector in Canada as a source of sulfur dioxide (SO₂) emissions. In Section 3, page 28, it states that "Canadian SO₂ emissions stem mostly from coal-fired combustion in the industrial sector, *with few emissions from the electric power sector*, due to the large hydroelectric capacity in Canada" (emphasis added). Based on a recent compilation by the CEC of North American power plant SO₂ emissions during 2002 [1], the electric power sector in Canada contribute about 20% of national SO₂ emissions, or one-fifth of the national total. This amount is also consistent with the pie chart of Canada's 2002 SO₂ emissions shown in Figure 21 on page 29 of the Progress Report. I suppose the relative importance of "20%" can be a subjective opinion, but I don't think it would fall within the plain language meaning of "few emissions" relative to the whole. Also keep in mind that the collective pie portion of "industrial" SO₂ emissions is itself made up of various sectors. Therefore, in the case of Canada where coal electricity generation isn't as dominate as it is in the U.S., it isn't necessarily accurate to compare just one sector (electric power) against a collection of other sectors (industry). If one were to break down "industry" into sectors to put it on a more comparable basis with the electric sector, I believe one would find that the non-ferrous mining and smelting would be the top sector at about 30%, with the electric power sector (~20%) and upstream oil and gas (~15%) in the following positions. Therefore, in a comparison *across sectors*, electric power generation may in fact be the second largest source of SO₂ emissions in Canada. From an air management point of view, it seems that if there is a future national strategy in Canada to further reduce SO₂ emissions, one would want to consider the electric power sector as one sector among several where a sizable contribution of SO₂ emissions continues to occur. Looking at this sector for potential further reductions, however, might be undermined if it is perceived to have "few emissions" according to the 2004 Progress Report.

Reference cited:

[1] North American Power Plant Air Emissions, Commission for Environmental Cooperation, Montreal, QC Canada (2004), see Table 1.1. Available at www.cec.org.

I hope you find these comments useful, and I appreciate all the effort it takes to pull together in a concise manner

all the information provided in the 2004 Progress Report. It's a worthwhile endeavor, and provides a unique bi-national perspective on shared air goals between the two countries.

Sincerely,

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