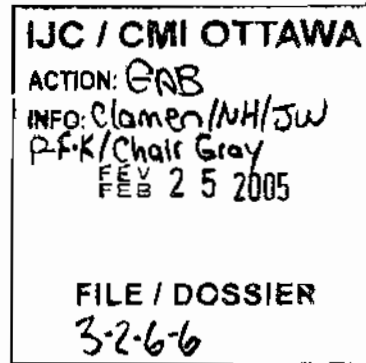


Community & Neighbourhood Services
Eric Gam, CommissionerPublic Health
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Tel: 416-338-8097
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February 24, 2005

Mr. Murray Clamen
Secretary, Canadian Section
International Joint Commission
234 Laurier Ave West, 22nd floor
Ottawa, Ontario K1P 6K6

Dear Mr. Clamen:

Thank you for the copy of the 2004 Progress Report on the Canada-United States Air Quality Agreement. The report provides a very good summary of the initiatives and achievements in meeting the commitments made by Canada and the United States.

While the report notes that parties to the Agreement have generally met or exceeded their commitments, the report could be strengthened with an evaluation of the overall impact of the emissions reductions achieved. For example, you refer to a recent study (Driscoll, et al., 2001) which "reports positive progress as a result of the implementation of the Clean Air Act but that more emission reductions are needed for full recovery to take place." It would be useful to know if the commitments made are achieving overall health and environmental protection goals.

The report provides overall average trends but this can obscure important variations in local areas. As the report notes: "Ozone trends are nearly flat for the period, though there is a complex regional pattern." It would be helpful to look at trends at a more regional scale, such as major metropolitan areas. In addition to annual averages, more information on the frequency and magnitude of high pollution events would be useful indicator of potential health impacts.

The report includes a section "Anticipated Additional Control Measures and Indicative Reductions". A review of the potential impact of the proposed "Clear Skies Legislation in the United States on the commitments made in the Air Quality Agreement and in achieving the overall health and environmental goals of the Agreement would have been useful and should be considered in future reporting.

There is increasing concern about transboundary pollution from persistent toxic chemicals such as mercury. It is my view that the Agreement will need to be enhanced to address these pollutants. It would be useful to have future reports include a section on emerging issues that might need consideration by the parties, including changes to the Agreement.

For further information please contact Ronald Macfarlane at 416-338-8097 or rmaefar3@toronto.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "David McKeown". The signature is fluid and cursive, with a large initial "D" and "M".

David McKeown, MDCM, MHSc, FRCPC
Medical Officer of Health

copy: Ron de Burger, Director, Healthy Environments