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September 19, 2005

Cynthia Wright, Director General  
Strategic Priorities Directorate  
Environmental Protection Service  
Department of the Environment  
Gatineau, Quebec K1A 0H3

**Subject: Agreement respecting the Canada-wide Standard for Mercury Emissions from Coal-fired Electric Power Generation Plants**

Dear Ms. Wright,

I am pleased to offer the following comments on the Agreement respecting the Canada-wide Standard (CWS) for Mercury Emissions from Coal-fired Electric Power Generation Plants, as published in the Canada Gazette, Part I on July 23<sup>rd</sup>, 2005. The health impacts of mercury to children and the developing foetus are well known. I support the goal of reducing mercury emissions across Canada and have the following comments on the CWS.

1) Source reduction versus emission capture

Pollution prevention should be given priority over pollution control. Therefore, mercury source reduction is preferable to mercury emission capture. Reducing sources of mercury can include replacing coal-fired electricity generation with energy generation from cleaner sources. It can also include reducing the need for coal-fired electricity generation capacity through energy efficiency or by shifting demand from peak to off-peak times. In contrast to emission capture, mercury source reduction provides the co-benefit of reducing emissions of other pollutants from coal-fired electricity generation, including sulphur dioxide and oxides of nitrogen. The federal government should encourage provinces to meet the mercury emission caps through mercury source reduction, rather than relying on mercury emission capture. The federal government should also work with the provinces to ensure Canadian energy needs are met through sustainable energy solutions.

## 2) Existing Electric Power Generation Plants

The draft CWS sets a cap for each province on mercury emissions from existing coal-fired power plants, to be met by 2010. I am encouraged that Ontario's mercury emission cap is zero kilograms per year. Provinces should be encouraged to follow Ontario's lead which will be achieved through the bold step of phasing out coal-fired power generation by 2009. I urge the federal government to work with the other provinces to minimize mercury emissions to the best of their ability.

With the exception of Ontario, the draft CWS awards the largest emission caps to those provinces with the highest historical emissions. This approach rewards poor past performance, and I urge the federal government to explore other alternatives.

A substantial mercury reduction by 2010 is a positive first step. However, the proposed mercury emission limits would be in place until 2018, without motivating provinces to show continuous improvement over time. I believe that this timeline is not ambitious enough. I urge the federal government and provinces to move the deadline for lowering mercury emission limits from 2018 to 2015. I strongly urge the federal government to work with the provinces, with the goal of eliminating coal-fired electricity generation in Canada as soon as possible. As part of this strategy, provinces and the federal government must actively engage in research and implementation of energy conservation methods, and clean, reliable energy sources that are mercury-free.

## 3) New Electric Power Generation Plants

The draft CWS sets maximum emission rates for mercury from new coal-fired electric power generators, including replacement units. Given our understanding of mercury's health effects, I believe that all steps should be taken to prevent the creation of new mercury sources. I urge the federal government to encourage all provinces to phase out mercury emissions from electricity generation by making sustainable energy choices.

In the draft CWS, the maximum mercury emission rates from new and replacement coal-fired units vary depending on the type of coal burned. The table in the draft CWS under "new facilities" shows that some types of coal (bituminous coal and blends) must limit emissions to 3 kg/TWh, while other types (lignite) may emit five times that much. In the interim, while an end to new coal-fired units is being negotiated, I urge the federal government to require that all types of coal meet the stricter limit of 3 kg/TWh.

Thank you for the opportunity to comment on the CWS for coal-fired electricity generators. Sarah Gingrich of my staff would be happy to discuss these comments with you.

Sincerely,

*Original signed by Dr. David McKeown*

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