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Reply: Stephanie Gower  
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March 11, 2008

Brenda Hensler-Hobbs  
Executive Director  
Motor Vehicle Fuel Consumption Regulations Task Force  
Transport Canada  
330 Sparks Street  
Place de Ville, Tower C  
Ottawa ON K1A 0N5

Dear Ms. Hensler-Hobbs:

**Re: Motor Vehicle Fuel Consumption**

I am pleased to provide comments on Canada's plan to regulate motor vehicle fuel consumption. These comments relate to the information released by the Federal Government on January 17, 2008.

I support this effort. Motor vehicles produce harmful pollutants such as particulate matter, nitrogen dioxide, and carbon dioxide, a greenhouse gas. Reducing the total amount of fuel consumed will help prevent emissions of these pollutants into the air.

Air pollution is an important health issue for the City of Toronto. In a recent report, my staff estimated that air pollution from traffic gives rise to about 440 premature deaths and 1,700 hospitalizations per year in Toronto. The study found that traffic has considerable adverse health effects on both adults and children, such as increases in acute bronchitis and asthma symptoms. My staff also estimated mortality-related costs associated with traffic pollution in Toronto to be about \$2.2 billion per year.

The impacts of greenhouse gases in Toronto are more long-term. However, scientific evidence indicates that climate change is clearly happening and immediate steps are required to mitigate adverse impacts. Climate change is expected to cause more days of extreme heat which will result in increased heat-related illness, and also exacerbate the burden of illness due to smog in Toronto.

The government has stated that it will implement an "ambitious mandatory standard" suitable for the North American market. If Canada is to set standards that will result in meaningful reduction in vehicle emissions, our standards must surpass those proposed by the Government of the United States. At minimum, Canada should adopt California's proposed standards to reduce emissions of both air pollutants and greenhouse gases.

The standard must be integrated into a comprehensive sustainable transportation strategy for Canada. While improved performance of individual vehicles is an important tool, it is essential to ensure that total fuel use in Canada is reduced. Gains from fuel efficiency must not be eroded by a large number of vehicles travelling longer distances. Canada's strategy should include measures such as support for public transit, improved inter-city train services, and ways to encourage increases in urban density.

Detailed comments are attached. I look forward to further consultation as elements of the proposed Federal Regulatory Framework on air emissions are implemented.

Sincerely,

*Original signed by Dr. David McKeown*

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

Attach.

## **Additional comments from Toronto's Medical Officer of Health on the Proposed Motor Vehicle Fuel Consumption Regulations**

### 1) Adopting an ambitious standard

The government has stated that it will implement an “ambitious mandatory standard” suitable for the North American market. One option the Government is considering is to align with the currently proposed U.S. standards, which set a fleet average goal of 6.7 L/100 km by 2020. This level of fuel efficiency lags behind what has already been achieved elsewhere. This target has already been surpassed in Japan and Europe, and will soon be met in China and Australia. The technologies required to improve efficiency beyond an average of 6.7 L/100 km are already available internationally.

In Canada, fuel efficiency among new cars (but not the light duty trucks) already meets the U.S. target. Passenger cars make up a larger proportion of the vehicle fleet in Canada than in the United States, meaning that more of our fleet already achieves an average fuel consumption of 6.7 L/100 km. According to the International Council on Clean transportation, the United States passenger car fleet is currently the least fuel-efficient among several major regulatory jurisdictions. Adopting the U.S. standard, which is not scheduled for implementation until 2020, is not likely to result in substantial improvement from current fuel efficiency in Canada. For Canada to achieve real reductions, our target must surpass those proposed by the Government of the United States.

At minimum, Canada should adopt California's proposed standards for fuel efficiency. California proposed limits in terms of carbon dioxide-equivalents of 205 g/mile for passenger cars and small light trucks and 332 g/mile for large light trucks by 2016. These standards represent stringent but achievable targets which have been endorsed by many jurisdictions in North America. Fifteen U.S. States and at least five Canadian provinces are prepared to adopt the California standards, indicating that there is a desire among North American jurisdictions for stringent, protective regulation. Canada should also adopt California's vehicle classification scheme, which categorizes sport-utility vehicles (SUVs) and vans as passenger vehicles rather than as light-duty trucks.

### 2) Evaluating regulatory options

#### *Include health benefits from improved air quality*

To evaluate the various options for regulation, the Government has indicated that it will assess the costs and benefits associated with each. The Government indicated that this assessment will include social values of reductions in emissions and effects on safety (which presumably refers to road safety aspects of new vehicle designs). The benefits analysis for reducing greenhouse gases and air pollutants should explicitly and separately address benefits to health from improved air quality.

#### *Ensuring that absolute emissions reductions are achieved*

Fuel consumption regulations are designed to reduce the amount of fuel required to cover a given distance. If fuel prices are stable, this may mean that people can afford to drive more often or drive further. The European Environment Agency recently concluded that in Europe, increased transport demand is outpacing gains made in fuel efficiency, and that greenhouse gas emissions from passenger vehicles are still increasing. The proposed regulation will only result in benefits if less total fuel is consumed, so it is important that this regulation not result in people using their vehicles more.

The Government must be able to demonstrate that the regulations will reduce both individual and total fuel consumption. I encourage the Government to indicate the total fuel consumption reductions that are anticipated from implementing the regulation. Once the regulation is in place, it will be important for the Government to track total fuel consumption and take further action to reduce vehicle use and/or fuel consumption if targets are not met.

### 3) Measures to complement the regulation

The Government is considering several complementary measures to the fuel consumption regulation, including an education program about fuel economy and tire replacement programs. A more broadly scoped health promotion program would better support the new standards. This type of program could make people aware of the implications of their transportation choices for the environment and for their personal expenditures. Concrete advice on how to reduce transportation-related emissions should be provided to consumers. In Toronto, Toronto Public Health runs a social marketing campaign called “20/20 the Way to Clean Air” which provides resources to residents in the Greater Toronto Area to help them reduce home energy use and vehicle use by 20 per cent. The program, which benefited from federal funding in the past, provides practical advice to residents of the City to help them save money and energy. Evaluations of the 20/20 campaign have demonstrated real emissions reductions. Programs such as this, which are already operational and are tailored to local conditions and resources, would benefit from increased federal investment.

An incentive program should be designed to help to draw clean vehicle technologies into the market. There may be many ways to achieve further improvements in vehicle fuel efficiency, such as using alternative materials, fuel additives, technological options to reduce idling such as automatic engine shut-off mechanisms, and various aftermarket devices. Incentives programs can also be used to encourage consumers to choose fuel-efficient vehicles. Although the ecoAUTO program was recently cancelled, it could be redesigned as an effective tool to support greener vehicle choices. The Government should also consider a retirement program to accelerate replacement of older, more polluting vehicles.

### 4) Sustainable Transportation

The motor vehicle fuel consumption regulations are one element of a national sustainable transportation strategy. An effective approach to sustainable transportation requires a multi-pronged approach to reduce vehicle-dependence. Policies that encourage densification of urban areas with mixed land-use can make it easier to engage in active modes of transportation such as walking and cycling. Progressive policies to improve environments for walking and cycling also help shift peoples’ transportation choices away from vehicles.

Expanding and improving public transit in cities is also a priority. An effective public transit system supports transportation needs in dense urban neighbourhoods, reduces reliance on vehicles, and eases congestion – all of which reduces air pollution and reduces greenhouse gas emissions. Some have suggested that a fuel tax should be used to provide sustainable funding for transit systems. Higher fuel taxes discourage fuel use and therefore reduce fuel consumption in Canada. If public transit services are improved at the same time, they offer a natural and viable alternative to driving.

Improving transit for longer travel distances is also important. Compared to trains and buses, planes and automobiles use more fuel and emit more carbon dioxide per passenger for a given distance

travelled. Improved surface transportation for inter-city travel can provide an alternative of choice and help reduce dependency on automobiles and airplanes used for regional travel.

The Government should also continue to look at innovative ways to green heavy-duty fleets. For example, many anti-idling technologies are now available for heavy-duty vehicles. Providing incentives for implementing them could reduce fuel consumption and emissions from large trucks and buses, and help meet overall targets for reductions in fuel use.

#### 5) Manufacturer flexibility in meeting standards

The Government has indicated that biodiesel could have a role in achieving emissions reductions. It is not appropriate to include flex-fuel vehicles as a means to meet fuel consumption standards, because there is no guarantee that biofuels will be used during vehicle operation. In addition, the Government should not depend on biodiesel to meet greenhouse gas emissions reduction targets until there is sufficient evidence to show that biodiesel provides a net life-cycle benefit as compared with diesel.

#### 6) Implementing the Standard

Since the fleet average consumption will depend on annual sales, manufacturers will need to depend on predictions of future buying patterns in order to meet the standards. The Government must be clear about (i) how these predictions are to be made, and how often they are to be revised and (ii) how much latitude will be allowed to manufacturers in achieving the anticipated fleet mix.