

Synthesis of Comments Received on the Canada / United States Air Quality Agreement

A Report to the Governments of Canada
and the United States

December 1995



International Joint Commission
Commission mixte internationale

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Contents

Introduction	4
Scope of the Agreement	5
Regional Considerations	7
Health Issues related to Air Quality	9
Specific Objectives Concerning Sulphur Dioxide and Nitrogen Oxides	9
Reporting Progress	10
Notification Provisions	10
Specific Considerations	10
Institutional Arrangements	12
Commissioner's Signature Page	13
Annex 1 - Letter(s) from Governments	15
Annex 2 - List of Respondents	17

Introduction

On March 13, 1991, the Governments of Canada and the United States (Governments) signed an agreement on air quality, the stated purpose of which is to establish “a practical and effective instrument to address shared concerns regarding transboundary air pollution.” The general objective of the Governments, as stated in the Agreement, is to control transboundary air pollution. The Agreement provides a framework for:

- the establishment of specific objectives for emissions limitations or reductions of air pollutants and adoption of the necessary programs and other measures to implement such specific objectives;
- undertaking environmental impact assessment, prior notification, and, as appropriate, mitigation measures;
- carrying out coordinated or cooperative scientific and technical activities, and economic research and exchanging information;
- establishing institutional arrangements;
- reviewing and assessing progress, consulting, addressing issues of concern, and settling disputes.

A bilateral Air Quality Committee was established to assist in the implementation of the Agreement and to review progress made. The Committee has published two Progress Reports on activities under the Agreement, the first in 1992 and the second in 1994.

Article X of the Agreement calls for the Governments to conduct a comprehensive review and assessment of the Agreement, and its implementation, during the fifth year after its entry in to force and every five years thereafter. The Governments have initiated this review and, by letters of July 5 and 19, 1995 (see Annex 1), requested the International Joint Commission to solicit public input for the review. As the Governments plan to publish their five-year review in the 1996 Progress Report on the Air Quality Agreement, the Commission was asked to submit public comment by December 20, 1995.

In response to the Governments’ request, the International Joint Commission held two public hearings to receive comment on the Agreement and its implementation. One was held in Ottawa, Ontario on November 28, 1995, and the other in Washington, D.C. on December 5, 1995. The Commission placed notices of the public hearings in the *Canada Gazette* and the United States *Federal Register*, as well as advertisements in selected newspapers. In addition, copies of the notice were mailed to an extensive list of individuals and organizations representing a broad spectrum of society in both countries, and the notice was placed on the Internet under Environment Canada, United States Environmental Protection Agency and the Great Lakes Information Network.

Interested parties were requested to provide comments at the Public Hearings or to submit written comments to the Commission's offices. While organizing the hearings, the Commission received a high level of interest from the Detroit-Windsor area. To accommodate this interest, a teleconference arrangement was organized to receive presentations *direct from a Windsor location* during the Ottawa hearing. Sixteen presentations were received at the public hearings of which seven were from the Detroit-Windsor location. Forty-eight written submissions were received. A list of the individuals who submitted presentations is given in Annex 2.

This report provides a synthesis of the comments received for use by the Governments of Canada and the United States in their review of the Agreement. The comments have been grouped under the following headings: Scope of the Agreement, Regional Considerations, Health Issues Related to Air Quality, Specific Objectives Concerning Sulphur Dioxide and Nitrogen Oxides, Reporting Progress, Notification Provisions, Specific Considerations, Institutional Arrangements.

Scope of the Agreement

While several presentations called upon the Governments to take this opportunity to revise or amend the Agreement, a general consensus of the submissions received indicated that the Agreement itself was broad enough to be able to address all transboundary air pollution issues and that it provided a good framework for addressing air quality concerns. Disappointment was expressed at the Governments' seeming reluctance to use the Agreement to address some of the key air quality issues of the day. Several commenters reported the view that less than satisfactory progress had been made in implementation of the Agreement because it fails to address transboundary air pollution issues other than the acid rain precursors, sulphur dioxide (SO₂) and nitrogen oxides (NO_x). While many acknowledged the utility of the existing Agreement, they considered implementation of its terms to be inadequate because the Governments have failed to incorporate into the Agreement public concerns about needed reductions in transboundary air pollution. Several presentations identified specific concerns that reinforce the fact that transboundary air pollution continues to be a significant problem along the Canada-United States boundary. They encouraged Governments, on both sides of the border, to adopt a more proactive stance in dealing with air emissions, thus reducing the possibility of transport of precursors or pollutants across the boundary.

The majority of the respondents urged that the scope of air quality issues dealt with under the Agreement be expanded to include regional smog and elevated ground-level (tropospheric) ozone concentrations, inhalable particulate matter, air toxics, both organic compounds and metals, and acid aerosols. It was suggested that the urgency of the first three, from the perspective of human health impacts,

more than adequately justified the need to expand the Agreement. Other specific suggestions for inclusion were: volatile organics, carbon dioxide, ionizing radiation, persistent radioisotopes, mercury, PCBs, dioxins, furans and airborne pesticides. Each of these chemical substances was felt to fit the Agreement's definition of air pollution and the commenters urged Governments to develop cooperative arrangements to ensure that these pollutants receive the priority attention that they deserve. It was recommended that Annexes to the Agreement should be added with specific objectives for reducing and eliminating emissions of each of these pollutants and their precursors, as well as timelines for action. It was also suggested that a revised Air Agreement should include detailed annexes on expanded monitoring programs, emission inventories, modelling efforts to further characterize dispersion patterns and source-receptor relationships.

One set of comments from an industrial association opposed expanding the Annexes of the Agreement to include additional pollutants, especially toxic air pollutants, noting a proliferation of international fora and arrangements aimed at controlling these chemicals and arguing that those fora were more appropriate for such actions because they included other countries besides Canada and the United States. This submission also suggested that the second five-year review would be a more appropriate time to consider the need for additional mechanisms to monitor or control transboundary toxic air pollutants, because most of the international initiatives aimed at managing persistent organic pollutants are likely to be concluded by that time. Another respondent commented that the terms of the Agreement and its implementation are adequate to address the issues covered. Since there are a number of initiatives underway at the federal and provincial levels dealing with transboundary air pollution, it would not be appropriate, during these times of limited resources, to initiate additional independent work.

The Commission also received, via Internet E-mail, comments from individuals in Japan and India who expressed considerable pleasure with the fact that an Agreement existed and that bilateral and binational arrangements about specific air pollutants could be addressed by neighbouring countries. These commenters felt that the Air Agreement could serve as a model for action for other countries with similar air quality problems. In addition, they suggested that technical aspects of sulphur dioxide and nitrogen oxides reductions are well understood but political and economic factors hinder more aggressive actions for control of emissions. The commenters also indicated the need for the Governments to rethink national and international energy development, production and consumptive use strategies, as this sector is mainly responsible for the acid rain precursor pollutants.

Regional Considerations

Some of the dissatisfaction expressed with respect to the lack of progress by Governments under the Agreement was attributed to a lack of focus on regional or local transboundary air quality issues. Presentations were received which outlined concerns in three regions of the boundary. The Detroit-Windsor region, New Brunswick-Northeastern States region and the State of Washington-British Columbia region. It was suggested that the Agreement should be used as a focal point for cooperative efforts across the boundary aimed at abating and preventing the flow of transboundary pollutants. As one respondent from the Detroit-Windsor region suggested: transboundary air pollution is not only a national problem, but also a local one as well, and expressed a sense of frustration or disenfranchisement for the Agreement process because it did not provide for input or actions on transboundary air pollutants that are of local concern.

Seven submissions were received from the Detroit-Windsor region. The commenters expressed the view that both the Agreement and the Governments had been ineffective in dealing with the major regional and local transboundary air pollution issues which were identified as elevated ground-level ozone concentrations, fine particulates and toxic substances. The suggestion was made that the Agreement should become a framework for action to ensure that the international border does not become an excuse for states or provinces to avoid reasonable obligations to their neighbouring jurisdiction. Means should be explored through which adjacent Canadian jurisdictions have the same recognition as adjoining states under the Clean Air Act provisions relating to adjoining states. Several of the submissions from the Detroit-Windsor region highlighted recent health studies and urged Governments to take a more proactive stance to reduce emissions contributing to the deterioration of local air quality.

Ground level ozone was identified as a major transboundary health and environmental problem in Southern Ontario and was generally considered to be an issue requiring attention under the Agreement. The rationale for this was expressed in terms of the serious human health effects of ground-level ozone and its precursors, nitrogen oxides and volatile organic compounds, as well as significant negative effects on vegetation, such as agricultural crop loss and noticeable leaf damage. The presentations pointed out that ground-level ozone is a significant problem in this region for three basic reasons: the characteristics of weather patterns, the persistent nature of the chemicals involved, and the large amount of nitrogen oxides and volatile organic compounds produced in the greater airshed area. The Province of Ontario and several states share the common airshed and emissions in one source area can affect air quality in the whole airshed. It was suggested that 50% of the ground level ozone in Ontario comes from emissions in the United States and even if all of the sources of precursors are eliminated in Ontario, they would still have an ozone problem. It was also pointed out that United States legislation does

not require air quality Implementation Plans under the Clean Air Act to consider international transboundary effects, thus resulting in inequitable treatment for a downwind province as opposed to a neighbouring state.

As a starting point to resolve this discrepancy across the international boundary, it was suggested that the two federal governments take all necessary steps to achieve harmonization of their ozone standards/objectives. This harmonization should be established at a level comparable to Ontario's current objective or at a more stringent level. It was also recommended that the Agreement outline an approach for Canada and the United States to achieve this harmonized ozone objective, that control strategies be developed on the basis of entire airsheds, rather than being constrained by international boundaries, and that the Agreement be the mechanism for implementation.

The impacts of transboundary pollution on human health and the environment in New Brunswick was indicated to be of great concern to people living in the region. The current acid deposition programs, particularly in the United States, even when fully implemented were reported as being less than adequate to protect the lakes, soils and vegetation in eastern Canada. The Air Resource Management Areas concept being utilized by the Province was suggested as a model mechanism for multi-stakeholder involvement in air quality decision-making.

Submissions received indicate that the Agreement has provided a useful mechanism for cooperative actions in the British Columbia-State of Washington region but further support for cooperative efforts is required to ensure continued monitoring, source-receptor relationship investigations, emission inventories and compatible data management systems. It was suggested that the objective in this area is to develop an air quality management plan for the entire airshed.

Three submissions pointed out that Alaska shares a long border with Canada and that provisions of the Agreement should also apply to the jurisdictions along that portion of the boundary. The primary issues of concern from a transboundary perspective were reported to be smoke from open burning and wildfires, as well as ice fog and haze. Despite the sparse population in the region, it was suggested that cleaner methods for power generation, heating and transportation are required and that nitrogen oxide emission limitations should be applied in Alaska.

Health Issues Related to Air Quality

Several commenters called for a revised Agreement to contain a meaningful commitment to health issues related to air quality. It was also suggested that Governments need to assign higher priority to air quality issues because of the growing body of evidence demonstrating the environmental and human health effects of toxic air pollution. Several submissions characterized the adverse health effects of air pollutants, in particular, elevated ozone levels, toxic contaminants, fine particulate matter, and sulphate concentrations (an indicator of acid aerosol). The Air Committee's findings that long term exposure to acid aerosols has been linked to a decrease in lung function in children, was also seen to add a new sense of urgency to the air pollution issue.

The Agreement review provides an opportunity to make the Agreement a much more significant instrument for joint assessment and action. It was suggested that citizens on both sides of the border deserve comparable protection and that Governments should work cooperatively to establish regionally harmonized, uniformly enforced standards that protect human health. Specifically, the call for harmonized ozone standards was seen as *being a realistic goal, since both countries are currently reviewing their standards*

Specific Objectives Concerning Sulphur Dioxide and Nitrogen Oxides

Although recognizing that the commitments outlined in Annex 1 to the Agreement with respect to sulphur dioxide and nitrogen oxide emission releases were made under other domestic programs, significant progress by Canada on sulphur dioxide emission reductions was applauded. No emission reduction results have yet been reported for the United States as their legislation requires reductions to commence in 1995. Concern was expressed that even when full implementation of the measures identified in the Agreement has been achieved, the emission reductions will not be adequate to prevent transboundary pollution with resulting impacts, such as acidification of water bodies, forest decline and human health risks, in the north-eastern United States and eastern Canada.

It was also pointed out that the broad series of amendments to United States environmental legislation that are now being considered have raised considerable controversy over the extent to which the United States emission reduction commitments will be achieved. Phase II reductions could be in serious jeopardy. Commenters pointed out that retrogressive legislative amendments, being extremely shortsighted, would result in inevitable implications on human health and costs to the health care system.

Reporting Progress

In their comments, several respondents referred to the Air Quality Committee's Progress Report 1994. Comments ranged from good over-all document to a document short in detail. It was also suggested that the progress report tends to minimize the impacts of air pollution on trees and forests in the eastern United States and Canada and paints to optimistic a picture of how air pollution is being reduced, mainly because of the limited nature of reporting requirements. The noticeably absent mention of delays and obstacles in achieving the goals of the Agreement was also identified as a shortcoming.

Notification Provisions

Several presentations suggested that the notification provisions of Article V needed strengthening and clarification. It was recommended that notification should be mandatory when evidence of transboundary pollution is received and that item 6 should be amended to require either Party to notify and consult the other Party when they become aware of an air pollution problem, not only when immediate response is required. It was also suggested that Article V should be amended to require the Governments to consult with potentially affected communities and not only amongst themselves. Procedures and responsible parties should be identified so as to ensure common understanding of the intended implementation procedures for this commitment. It was also pointed out that notification, consultation, conciliation, cooperation, referrals and study are all good, but action and clean air are better!

Specific Considerations

The following specific suggestions for incorporation into a revised Agreement were offered by respondents:

- the words "to control transboundary pollution" in the General Air Quality Objective are inappropriate. Control does not reflect current thinking and the concepts of pollution prevention, precautionary approach and virtual elimination of emissions of persistent toxic pollutants should be incorporated into the text of the Agreement.
- give recognition and encouragement to voluntary actions.
- recognize the increasing importance of air emissions. Through success in dealing with pollution in other media, air emissions have become an ever increasing priority. The example is given of air emissions reported in

the Canadian Chemical Producers Association report from 1992 to 1994. Despite an overall decrease in air emissions, the proportion of air emissions to total emissions has increased from 47 percent to 82 percent.

- recognize principles adopted in other international, as well as national, fora for the management of persistent toxic pollutants.
- amend Article III to include the general objective to eliminate the use and generation of persistent toxic substances that will, or have the potential to, cause transboundary air pollution.
- incorporate language from Annex 15 of the Great Lakes Water Quality Agreement with respect to reducing and eliminating atmospheric deposition of toxic substances.
- clarify terms like “significant” in Articles V(1) and XII or develop guidelines to ensure common understanding of their intent.
- review and consider the recommendations of the Canadian Environmental Network Atmospheric Caucus and adopt the proposed Clean Air Agenda and expand it to include the U.S.
- include western Canada and western United States, including Alaska and those parts of Canada which border on Alaska, in implementation of the existing Agreement and in new national or bilateral arrangements and strategies.
- ensure that focus on research is maintained and that adequate funding is available to promote the required research. The question was raised as to how the Governments are going to maintain their commitments to scientific, technical and economic research activities during times when budgets are being reduced?
- have Canada develop a program to prevent significant deterioration of air quality and to protect visibility.
- clearly spell out the mechanism for resolving disputes (Article XII and XIII).
- analytical methodology and information reporting need to be normalized. Uniformity in methodology was pointed out as being essential to obtain usable-comparable data. Uniformity must also be established in reporting data as the current progress reports contain data and information that are not compatible.

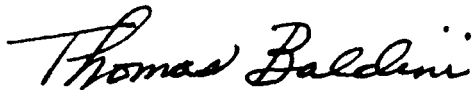
Institutional Arrangements

Several respondents recommended that membership on the Air Quality Committee should be broadened to include important stakeholders (i.e. technical specialists, environmental groups, the public, industry) . At present, no opportunity exists for non-governmental involvement in the deliberations of the Air Quality Committee. Regional transboundary air quality committees were suggested as a means of ensuring better management of local issues such as elevated ozone levels in the Detroit/Windsor-Quebec corridor.

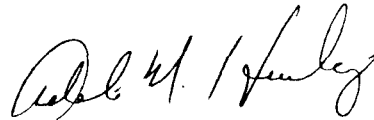
Strong support was expressed by five respondents of the need for a third-party oversight body. Such a body would be responsible for monitoring the actions of Governments under the Agreement, undertaking studies, reporting on progress and making recommendations on how to improve the air quality regime along the boundary . It was suggested that a role similar to that assigned to the International Joint Commission by the Governments under the Great Lakes Water Quality Agreement would be an appropriate arrangement and that the International Joint Commission was the institution best able to undertake such a role. The current role assigned to the Commission under the Agreement was described as being of marginal value.

Public participation and education were highlighted as necessary components for effective implementation of air quality controls. Comments received indicated that information on the Agreement has not been adequately disseminated as many interested individuals and groups were not aware of its existence. It was suggested that Governments need to develop an action plan for disseminating appropriate information and to build a constituency for input and feedback to the actions taken or proposed under the Agreement.

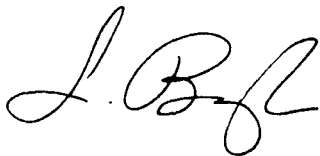
Signed on this 20th day of December, 1995 as the synthesis of comments received on the Canada-United States Air Quality Agreement.



Thomas L. Baldini
U.S. Section Chair



Adèle M. Hurley
Canadian Section Chair



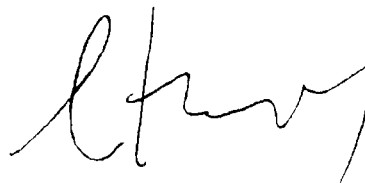
Susan Bayh
Commissioner



Dr. Pierre Béland
Commissioner



Alice Chamberlin
Commissioner



Francis Murphy
Commissioner

Minister of Foreign Affairs



Ministre des Affaires étrangères

Ottawa, Canada K1A 0G2

July 19, 1995

Mr. Philip Slyfield
Secretary, Canadian Section
International Joint Commission
100 Metcalfe Street
Ottawa, Ontario
K1P 5M1

Dear Mr. Slyfield,

The fifth year of entry into force of the United States-Canada Air Quality Agreement is approaching. Accordingly, the Parties to the Agreement, as required by Article X, have begun the five-year comprehensive review and assessment of the Agreement and its implementation.

Public input would be highly desirable for conducting a successful and comprehensive review. This would provide interested citizens on both sides of the border with the opportunity to express their views on the Agreement and its implementation.

As allowed for under Article IX, paragraph 2 of the Agreement, the Parties believe that it is appropriate to refer the issue of public input, for the five-year review, to the International Joint Commission. Specifically, we request that the International Joint Commission organize a public meeting this fall to solicit input for the review.

The Parties intend that the five-year review will be published as a chapter of the 1996 Progress Report of the Air Quality Agreement. The deadline for developing the first draft, which will include public comment, is December 20, 1995.

A similar letter on behalf of the Government of the United States is also being sent to the Secretary of the U.S. Section of the International Joint Commission.

The Parties appreciate the efforts of the International Joint Commission.

I look forward to your response.

Yours sincerely,

André Ouellet



United States Department of State

*Bureau of Oceans and International
Environmental and Scientific Affairs*

Washington, D.C. 20520

July 5, 1995

Mr. David Larouche, Secretary
U.S. Section
International Joint Commission
1250 23rd Street, N.W.
Suite# 100
Washington, D.C. 20440

Dear Mr. Larouche:

The fifth year of entry into force of the United States-Canada Air Quality Agreement is approaching. Accordingly, the Parties to the Agreement, as required by Article X, have begun the five-year review and assessment of the Agreement and its implementation.

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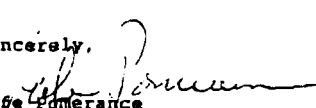
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A similar letter on behalf of the Government of Canada is also being sent to the Secretary of the Canadian section of the International Joint Commission.

The Parties highly appreciate the efforts of the International Joint Commission.

Sincerely,


Rafe Pommerance
Deputy Assistant Secretary
for Environment and
Development

Annex 2

THE FOLLOWING SUBMITTED WRITTEN COMMENTS ON THE CANADA/U.S. AIR QUALITY AGREEMENT 1995 REVIEW

1. Julia Langer	World Wildlife Fund	Nov. 9
2. Jim Bruce	Canadian Climate Program Board	Nov. 10
3. William B. Grant	Virgina Chapter, Sierra Club	Nov. 11
4. Bill MacClarence	State of Alaska	Nov. 14
5. Joseph R. Williams	State of Washington, Dept. of Ecology	Nov. 16
6. Brian R. Shmaefsky	Kirkwood College, Kingwood, TX	Nov. 17
7. Scott K. Lytle	State of Alaska	Nov. 20
8. Thomas D. Shepard	Great Lakes Castings Corp., Ludington, MI	Nov. 20
9. Jim Greaves	State of Alaska	Nov. 21
10. Ian D. Brindle	Brock Univ., Chemistry Dept., St. Catherines	Nov. 21
11. Tsuneaki Maeda	DKK Corporation, Tokyo, Japan	Nov. 26
12. Nadim Missaghian ¹	New Brunswick, Dept. of Environment	Nov. 28
13. Martha Kostuch ¹	Prairie Acid Rain Coalition	Nov. 28
14. Nancy Ragle ¹	American Lung Assoc. of Michigan	Nov. 28
15. Andrew Hamilton ¹	Commission for Environmental Cooperation	Nov. 28
16. Peter Victor	Ontario Ministry of Environment and Energy	Nov. 28
17. Elaine Kennedy	Public Advisory Committee, St. Lawrence RAP	Nov. 28
18. R. Ross Reid	The Lung Association, Ontario Prov. Office	Nov. 29
19. Jane Abraham	The Lung Assoc., Bruce, Dufferin & Grey Co.	Dec. 1
20. Shin'ichi Okamoto	Tokyo University of Information Services	Dec. 4
21. Mary Ginnebaugh ¹	Downriver Citizens for a Safe Environment, MI	Dec. 4
22. Graham F. Kenyon	Cominco, Trail, B.C.	Dec. 4
23. Rick Coronado ¹	Citizens Environment Alliance of SW Ontario, Windsor and District Labor/Environment Project	Dec. 4
24. R.G. Gossen	Canadian Chlorine Coordinating Committee	Dec. 4
25. S. Kleinau	Bruce Peninsula Environment Group, Ontario	Dec. 4
26. Stewart W. Towle	Littleton CO	Dec. 4
27. Ms. Marcia Post	Phoenix, New York	Dec. 4
28. Gordon Lloyd	The Canadian Chemical Producers Association	Dec. 5
29. Karen Kendrick-Hands ¹	Michigan Environmental Council and East Mich. Environmental Action Council	Dec. 5
30. Ken Whiting	Canadian Cement Council	Dec. 5
31. Michael Perley	Toronto, Ontario	Dec. 5
32. Rob Dunlop	Richmond, B.C.	Dec. 5
33. Gordon Dalzell	Saint John Citizens for Clean Air	Dec. 5

¹ Presentation also recorded in Transcript of Hearings

34. Ann Gertler	Ontario Public Advisory Committee	Dec. 5
35. Tony McQuail	Ecological Farmers Association of Ontario	Dec. 5
36. Paul Muldoon ¹	The Canadian Environmental Law Association	Dec. 5
37. Erich Linse Jr.	Dunnigan, CA	Dec. 5
38. Morton L. Mullins	Chemical Manufacturers Association	Dec. 5
39. Sandra S. Lawn	Prescott, Ontario	Dec. 6
40. J. Barrie Mills	Greater Vancouver Regional District	Dec. 6
41. K.S. Patel	Lecturer, Raipur, India	Dec. 11
42. Michael D. Zagata	State of New York, Dept. of Env. Conservation	Dec. 7
43. Mark Van Putten	National Wildlife Federation	Dec. 7
44. Bruce S. Cathcart	Ozone Transport Commission	Dec. 8
45. Robert J. Redhead	Laidlaw, Inc., Burlington, Ontario	Dec. 4
46. Jim Elliott	Regina, Saskatchewan	Dec. 5
47. James D. Bodnar	Redwood, California	Dec. 1
48. Myriam Medina-Vera	Durham, North Carolina	Dec. 1

PRESENTATIONS BY THE FOLLOWING ARE RECORDED IN THE TRANSCRIPTS OF THE PUBLIC HEARINGS

1. Bruce Walker	STOP (Citizens Environmental Group), Montreal
2. Brian Stocks	Lung Association of Essex County, Ontario
3. Leona Leveque	Sandwich Clean Air Committee
4. Mark Richardson	American Lung Association of Michigan
5. Kenneth Maybee	Canadian Lung Association
6. Brian Panell	Pollution Probe
7. John Jackson	Great Lakes United
8. Paul McDonald	City Of Ottawa, Ontario

¹ Presentation also recorded in Transcript of Hearings