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December 1, 2014

Helen Ryan

Director General, Energy and Transportation Directorate,
Environmental Stewardship Branch, Department of the Environment
Gatineau, Quebec K1A 0H3

Dear Helen Ryan,

Re: Proposed regulatory changes to reduce emissions from on-road vehicles and fuels

The Ontario Public Health Association (OPHA) is pleased to provide comments, on behalf of our Environmental Health Expert Workgroup, to the Government of Canada reading its proposed regulatory changes related to on-road vehicles and fuels. These comments are in response to the regulatory proposals outlined in the Canada Gazette Part 1, Regulations Amending the On-Road Vehicle and Engine Emission Regulations and Other Regulations Made Under the Canadian Environmental Protection Act, 1999; and Canada Gazette Part 1, Regulations Amending the Sulphur in Gasoline Regulations.

Since 1949, the OPHA has been driven by a mission to provide leadership on issues affecting the public's health and strengthening the impact of people who are active in public and community health throughout Ontario. The members of our non-profit organization come from various sectors and disciplines but share a common passion for building healthy communities and improving the quality of life for all. They offer a wide range of expertise, access to provincial and community networks and insights from their innovative work

These proposed changes outlined in the Canadian Gazette provide the opportunity to reduce the health burden caused by emissions from air pollutants and greenhouse gases (GHGs) from vehicles, engines and fuels. Recent research into the burden of illness from air pollution in Toronto, for example, estimates that traffic is responsible for approximately 42% of premature deaths and 55% of hospitalizations arising from air pollution. These regulatory changes can also contribute to climate change mitigation and limiting its impacts by reducing GHG emissions from the transportation sector.

Outlined below are our comments related to the specific regulatory changes as well as some over-arching comments.

Regulation-Specific Comments:

1. *Regulations Amending the On-Road Vehicle and Engine Emission Regulations and Other Regulations Made Under the Canadian Environmental Protection Act, 1999*

OPHA supports the proposed Regulations Amending the On-Road Vehicle and Engine Emission Regulations and Other Regulations Made Under the Canadian Environmental Protection Act, 1999. The amendments will have a positive impact on health as they will reduce the allowable emissions from vehicles of several pollutants that impact air quality and health. The amendments include emission standards for nitrogen oxides, particulate matter and volatile organic compounds as well as other standards. The changes will bring Canada's regulations in line with US Tier 3 standards and are largely in sync with California's standards which are considered the leading practice in North America.

The amendments apply to small vehicles that range from passenger cars up to heavy pick-up trucks and delivery vans. However, the regulation being amended sets emission standards for all on-road vehicles up to and including the heaviest vehicles, such as heavy dump trucks, garbage trucks and highway tractors. Progressively improving this regulation to reduce heavy-duty vehicle emissions is particularly important as a disproportionate amount of transportation-related air pollution comes from heavy duty vehicles. Based on Government of Canada data, in 2009 heavy-duty vehicles accounted for only 1.5% of vehicles in Canada; however, they were responsible for almost 80% of PM2.5 emissions and over half of nitrogen oxide emissions from vehicles in Ontario. These disproportionate emissions in turn result in disproportionate health impacts from heavy duty trucks. Further tightening the regulation's emission standards for heavy-duty trucks would have great benefit, especially for people living in cities with high traffic congestion and living near heavily-used highways.

2. Regulations Amending the Sulphur in Gasoline Regulations

The OPHA supports the proposed Regulations Amending the Sulphur in Gasoline Regulations. The amendments will align Canada's sulphur in gasoline standards with those of US Tier 3 standards. Reducing sulphur in gasoline is necessary to enable more stringent emission standards for cars and light trucks as sulphur in gasoline prevents emission-control systems on vehicles from operating efficiently. As such, reducing sulphur in gasoline reduces emissions of pollutants that impact air quality and health. We support this approach to reducing vehicle emissions.

Over-Arching Comments:

- 1. The OPHA encourages the use of human health assessments and consideration in the development of the regulations.*

Some of the largest sources of air pollution within municipalities are transportation based. Transportation related issues are a growing challenge within urban communities. There is a wide range of research that strongly links transportation related air pollutants with various health outcomes including asthma exacerbation, and asthma onset in children, lung function, cardiovascular mortality, myocardial infarction onset, and atherosclerosis. Based on the research on human health risks, the OPHA strongly supports the use of human health risk assessments in the development of regulations that address air emissions related to the transportation sector. As identified in the proposed regulation amendments' Regulatory Impact Analysis Statement, a

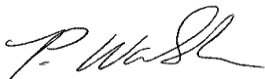
Unified Regional Air-Quality Modelling System was used to assess the impacts of emissions on air quality. While it is understandable to use a regional scale model for federal decision making, it is important to consider assessments that can capture variations within municipalities. As there is variability of emissions between different road networks with different traffic volumes and fleet composition, more detailed analysis at a higher resolution can provide more information on the impacts to human health. This approach can also support municipal, provincial, and federal efforts to address sustainable transportation strategies.

- 2. The OPHA encourages the development of a sustainable transportation strategy to help support active transportation and complement the regulations pertaining to emissions reduction.*

The Government of Canada's proposed changes to reduce emissions from on-road vehicles and fuels are positive steps forward to limit emissions of both air pollutants and GHGs – both significant concerns for public health. To complement this approach, a comprehensive, sustainable-transportation strategy is needed to provide alternatives to putting more cars and trucks on the road. The Government of Canada could lead and engage municipal and provincial/territorial governments in developing a sustainable-transportation strategy that includes support for public transit, discourages sprawl, and sets targets for reducing GHG and air pollution and would be of benefit to the health of Canadians over the long term. This step would bring together many elements of the Federal Sustainable Development Strategy and accelerate its implementation.

Thank you for the opportunity to provide comments on the proposed changes on Regulations Amending the On-Road Vehicle and Engine Emission Regulations and Other Regulations Made Under the Canadian Environmental Protection Act, 1999, and Regulations Amending the Sulphur in Gasoline Regulations. We welcome the opportunity to discuss these changes further. Please feel free to contact me at PWalsh@opha.on.ca or the Chair of the OPHA Environmental Health Workgroup, Helen Doyle at Helen.Doyle@york.ca if you have any questions or require clarification.

Yours sincerely,



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