



To: David Argue
Senior Policy Advisor
Ministry of the Environment
Air Policy and Climate Change Branch
135 St. Clair Avenue West, 4th Floor
Toronto, ON M4V 1P5

Re: Proposed Regulation under the Environmental Protection Act that will ensure coal is not used to generate electricity at the Atikokan, Lambton, Nanticoke and Thunder Bay coal generating facilities after December 31, 2014 (EBR Registry Number: 010-0945)

From: Pollution Probe

Date: August 10, 2007

Please accept this submission as Pollution Probe's formal comments on the proposed notice cited above.

Pollution Probe supports the government of Ontario's proposal for a legally binding regulation to close the Atikokan, Lambton, Nanticoke and Thunder Bay coal-fired facilities by December 31, 2014.

However, we also strongly support the accelerated closure of these facilities before the December 31, 2014 deadline where the possibility to do so exists. The Ontario Power Authority has estimated that a significant portion of electricity generation from Ontario's coal-fired utilities could be phased out before the proposed closure date.

In addition, we recommend the government of Ontario pursue legally binding requirements for interim annual reductions in the coal use at these facilities. There is an historical precedence for the adoption of interim targets, which is an approach that was effectively adopted by the government of Ontario for SO₂ emissions.

Establishing interim targets and a staged phase out plan will also assist the government of Ontario in achieving the commitments that have been made to a *Canada-wide Standard for Mercury Emissions from Coal-fired Electric Power*

Generation Plants, which is a 60 per cent capture rate of mercury by 2010, and the Kyoto Protocol, which has a commitment date of 2012.

We respectfully submit these comments and welcome the opportunity to further discuss the specific details of interim targets and a phase out plan for this proposed regulation.

Sincerely,



Dr. Quentin Chiotti
Climate Change Programme Director
and Senior Scientist



Krista Friesen
Senior Project Manager