POLLUTION PROBE
CLEAN AIR. CLEAN WATER.

To: Mercury CWS Development Committee

Re: Comments on the Monitoring Protocol in support of the Canada-wide Standard for Mercury Emissions from Coal-Fired Electric Power Generation Plants

From: Pollution Probe

Date: March 1, 2007

Pollution Probe believes that the Canada-wide Standard (CWS) for Mercury Emissions from Coal-Fired Electric Power Generation (EPG) Plants is an important standard, given that the coal-fired electricity sector was responsible for emitting an estimated 2,695 kilograms of mercury in 2003 — the largest single Canadian anthropogenic source. In general, we find the draft version of the Monitoring Protocol in support of the CWS (dated January 10, 2007) to be a satisfactory tool to provide guidance to jurisdictions on monitoring and reporting, to collect consistent, comparable and credible information for public reporting and to support future decisions on the effective management of mercury from the EPG sector.

In terms of monitoring and reporting, Pollution Probe is pleased to see the amount and type of information that will be collected and reported from each coal-fired EPG plant (e.g., the elements listed in sections 2.1 and 3.0). And we believe that the timing given for the jurisdictions to provide reports to the CCME, which will then be made publicly available (e.g., in 2008, 2009, 2010 and every two years thereafter until 2016) is adequate to keep stakeholders informed as to the achievement of the CWS.

In terms of future decisions on the effective management of mercury from the EPG sector, we encourage the Canadian government to view the current standard as an interim standard, to be reviewed and revised in approximately five years time, when further data are available. If the government is aiming to "aggressively pursue further reductions in the global pool of mercury" as stated in the Monitoring Protocol, Pollution Probe believes that Canada should be looking for a longer term target of at least a 90 per cent national capture of mercury from coal burned. Currently, technologies are available for certain types of coal that allow for

a 90 per cent capture and we believe that where these technologies are available, they should be implemented immediately.

Thank you for the opportunity to submit these comments.

Sincerely,

Dr. Quentin Chiotti
Director, Air Program and Senior Scientist
Pollution Probe