

December 19, 2006

Honourable Rona Ambrose
Minister of the Environment

Mr. John Moffet
A/Director General, Systems and Priorities, Environment Canada
John.Moffet@ec.gc.ca

Dear Minister Ambrose, Mr. Moffet;

Re: "Notice of intent to develop and implement regulations and other measures to reduce air emissions published in the Canada Gazette, Part I, October 21, 2006, p. 3351"

Please accept our comments, which we are addressing to Mr. Moffet and to the Minister of the Environment.

We are writing to express our full support and endorse the Pembina Institute's *Comments on Environment Canada's Notice of intent to develop and implement regulations and other measures to reduce air emissions, published in the Canada Gazette Part I, October 21, 2006* (by Matthew Bramley and Mark Winfield, dated December 18, 2006
http://www.pembina.org/pdf/publications/Notice_intent2_%20comments.pdf).

Manitoba Wildlands is a non-profit environmental organization based in Winnipeg, Manitoba. We work to fulfill provincial public policy to establish protected areas that are representative of our lands and waters and we provide information about public processes that affect Manitoba lands and waters, decisions for use of crown (public) lands, technical information about lands decisions and processes. As members of Climate Action Network Canada, and in our ongoing public policy audit activity in Manitoba we are increasingly aware that public expectations and concerns regarding emissions reduction include expectation that clear regulatory action will be taken soon. Reducing emissions in Canada will need to require more than 'programs'.

We support the Pembina Institute's submission in its entirety; however we also wish to call attention to and re-emphasize here some of the key points of their submission. In particular, we echo the Pembina Institute's regarding the need for the *Notice of Intent* to reference Canada's international legal obligations regarding greenhouse gases (GHGs) and criteria air contaminants (CACs) under treaties such as the Kyoto Protocol, the UN Framework Convention on Climate Change, the Canada-US Air Quality Agreement and its Ozone Annex.

We also support Pembina's call to make Canadian standards stronger than those of other countries, for the *Notice* to set clear targets or standards for GHGs, CACs or equipment that causes their release, such as vehicles and appliances, and for regulations to come into force in 2008. We also agree with the Pembina Institute's assessment that the *Notice*,

fails to address several important sources of emissions. For instance, it is silent on GHG emissions from agriculture, industry outside the so-called "key industrial sources", waste management and forestry (depletion of forest carbon stocks). It also appears to ignore GHG emissions from medium and heavy trucks, despite the fact that emissions from freight trucks rose by 60% in Canada between 1990 and 2004.

The time has also come for emissions from the construction and operation of hydro systems in Canada to be quantified and posted publicly. It is unacceptable that this information is considered private when we look at the national inventory for Manitoba Hydro emissions information. We urge you to make sure that all electrical utilities, their transmission and infrastructure systems are included in future regulations and transparent inventory data.

National emissions inventory tools are essential, but we would also suggest strongly that without a national inventory of our carbon stocks, and requirements under various federal programs and regulations to include loss of carbon in reporting - climate change will continue to put much of what Canadians hold dear - at risk. So our final recommendation is that your government move rapidly to carbon inventory information to be posted publicly and then applied in any assessment regarding emissions. Under CEPA reporting can also then include effect on inventories of carbon stocks and requirements to *replace* any carbon lost. Then and only then we will be able to approach a no net loss of carbon and no net gain in emissions society. Today we need to first protect our carbon stocks and reduce our emissions to pre 1990 levels.

We very much appreciate the opportunity to provide our comments and we trust that our endorsement of the Pembina Institute's submission will add to its weight in your consideration of all comments on the *Notice of Intent*.

Yours truly,



Gaile Whelan Enns
Director, Manitoba Wildlands