



Sage Centre

October 4, 2006

Right Honourable Stephen Harper
Prime Minister
House of Commons
Ottawa, Ontario
K1A 0H3

CELA Publication #548EN

Re: The Environment as a Priority – A Real Opportunity to Put Canada on Track

Dear Prime Minister,

The undersigned welcome your commitment to “take actions that make a difference” on the environment. As we believe you are aware, now is the time for urgent action to protect the environment and human health; delay is not an option. We also expect you share our concern that rhetoric and good intentions will not address our major environmental challenges – only action will. We therefore urge your government to launch action that is immediate, clear and quantified with timelines for implementation. We are encouraged to hear that your government is considering the continued regulation of carbon dioxide and the regulation of emissions from the automotive sector to California levels.

Presented below is a set of recommendations outlining our key expectations for your soon-to-be released environment plan. All of these recommendations have been presented to members of your team in the past by our organizations individually. Individual signatory organizations have also elaborated additional, more detailed expectations for the plan that have been communicated to the government.

Greenhouse Gas Pollution

- Make an unequivocal recommitment to the Kyoto Protocol. It is not in the interest of Canadians to abandon our international commitments.
- Put forward clear, measurable short-term and long-term targets for reductions in Canada’s greenhouse gas emissions, which set our economy clearly on a path towards 80% below 1990 levels by 2050.
- Place a requirement on industry, including large final emitters, manufacturers of appliances and equipment and others, to reduce greenhouse gases through regulations that set aggressive binding emission targets and performance standards applying, at the latest, to the period beginning in 2008. For the automotive sector, greenhouse gases should be regulated in a manner at least as stringent as California’s regulation. We urge you to ensure that the regulation takes effect in 2010 when the existing Memorandum of Understanding with the auto sector ends, or by 2009 if the auto sector fails to fully implement the terms of the MOU during its implementation.
- Commit to publish drafts of greenhouse gas regulations under the Canadian Environmental Protection Act (CEPA) within three months.



Air Quality

The federal government should take the following steps under existing law through the Canadian Environmental Protection Act to clean Canada's air:

- Set clear and federally enforceable national and regional targets and timelines for the reduction of emissions that cause smog, including sulphur and nitrogen oxides, particulate matter and volatile organic compounds. On air pollutants that cause smog, the federal government can regulate ambient levels in line with the Canada-wide standard of 65 parts per billion over an eight-hour period.
- Implement a federal action plan to achieve these regional and national targets for these substances, including reductions in emissions from key sources, such as coal-fired power plants, transportation, and industrial facilities, with detailed monitoring and reporting of the results.
- Implement a national mercury emission reduction strategy for Canada, reducing the use and release of this extremely toxic air pollutant.
- Establish mandatory Canadian vehicle and engine fuel efficiency standards compatible with California's Clean Car Bill – Canadians will save money at the pump and reduce smog.

Nature

- Make an unprecedented investment in completing the systems of protected areas on land and sea in order to properly protect and conserve Canada's ecological integrity, biodiversity and natural heritage with particular attention to areas most at risk from climate change, starting now with protection of sites in the Mackenzie Valley and habitat protection for migratory birds and species at risk.
- Work to restore healthy populations of Canada's 'at risk' flora and fauna by developing and implementing effective recovery strategies through the Species at Risk Act. These strategies must identify critical habitat and outline steps to protect it.

Toxic Substances

- Make a commitment to strengthen CEPA to ensure that Canadians and their environment are properly protected from the harmful effects of toxic substances. Specifically, mandatory timelines must be in place at each stage of regulation, from assessment to regulatory actions, to ensure accountability in the law. As emerging legislation in the European Union requires, a greater onus should be placed on industry to provide information about their substances before they enter the market, rather than the current burden that is placed on government, which must determine whether products are dangerous before putting in place precautionary measures. Consumer products, which current laws do not effectively regulate for environmental effects, should be explicitly brought under CEPA's authority. And the Act should be amended to include specific protections for vulnerable ecosystems such as the Great Lakes and the Arctic.



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Fiscal Reform

- Announce a timely shift of the federal government's estimated \$1.4 billion/yr in subsidies to the oil and gas sector towards environmental protection, energy efficiency, and low-impact renewable energies.

An environment plan that meets these expectations will produce tangible reductions in pollution and improve the health of Canadians, and of the environment, in the near and long term. We look forward to working with you to implement a bold action plan enabling Canadians to benefit from a cleaner environment, climate protection and recognition for meeting our international obligations.

cc. Hon. Rona Ambrose, Minister of the Environment
Hon. Gary Lunn, Minister of Natural Resources
Hon. James Flaherty, Minister of Finance
Hon. Lawrence Cannon, Minister of Transport
Hon. Maxime Bernier, Ministry of Industry

(SEE COMPLETE LIST OF SIGNATORIES BELOW)

SIGNATORIES:

Allergy & Environmental Illness Group of Charlottetown, P.E.I
Bathurst Sustainable Development
BC Sustainable Energy Association
Blue Mountain Watershed Trust Foundation
Campaign for Pesticide Reduction, New Brunswick
Canada Association for Renewable Energy
Canadian Environmental Law Association
Canadian Institute for Environmental Law and Policy
Canadian Parks and Wilderness Society
Community Health Opposition to Known Emissions Dangers (CHOKED)
Citizen's Environmental Alliance
Citizen's Network on Waste Management
Citizen's Stewardship Coalition (Port Alberni)
Coalition for a Green Economy
Conservation Council of New Brunswick
Corporation Saint-Laurent / Jour de la Terre Québec
David Suzuki Foundation
Ecology Action Centre
Environment North
Environmental Defence
Environmental Health Association of Nova Scotia
Équiterre
Faith & the Common Good
Falls Brook Centre
Forest Ethics
Friends of Fundy Footpaths
Friends of the Earth
Georgia Strait Alliance
Global Exchange
Great Lakes United
Greenpeace Canada
GSX Concerned Citizens Coalition
Inter-Church Uranium Committee Educational Co-operative (ICUCEC)
Manitoba Wildlands
Nature Canada
Nature Saskatchewan
Ontario Sustainable Energy Association
Pembina Institute
Pollution Probe
Sage Centre
Saint John Citizens Coalition For Clean Air
Saltspringers for Safe Food
Saskatchewan Environmental Society
Saskatchewan Light Pollution Abatement Committee
Saskatchewan Network for Safe Alternatives to Pesticides
Sierra Club of Canada
Sierra Legal Defence Fund
SOS Eau Water Sankan Inc
Stop the Hogs Coalition, SK
Tantramar Environmental Alliance
Toxics Watch Society
Vancouver Humane Society
Windfall Ecology Centre
World Federalist Movement-Canada
World Wildlife Fund
Yukon Conservation Society