



CAPE
Canadian Association
of Physicians
for the Environment

Association Canadienne
des Médecins
pour l'Environnement
ACME



CPHA ACSP
CANADIAN PUBLIC HEALTH ASSOCIATION
ASSOCIATION CANADIENNE DE SANTÉ PUBLIQUE

B R E A T H E
the lung association



Idac-acta
Learning Disabilities Association of Canada
Association canadienne des troubles d'apprentissage



Paola Mellow, Director
Electricity and Combustion Division
Energy and Transportation Directorate
Environment and Climate Change Canada
351 Saint-Joseph Boulevard, 11th Floor
Gatineau, Quebec

January 12, 2017

Dear Ms. Mellow:

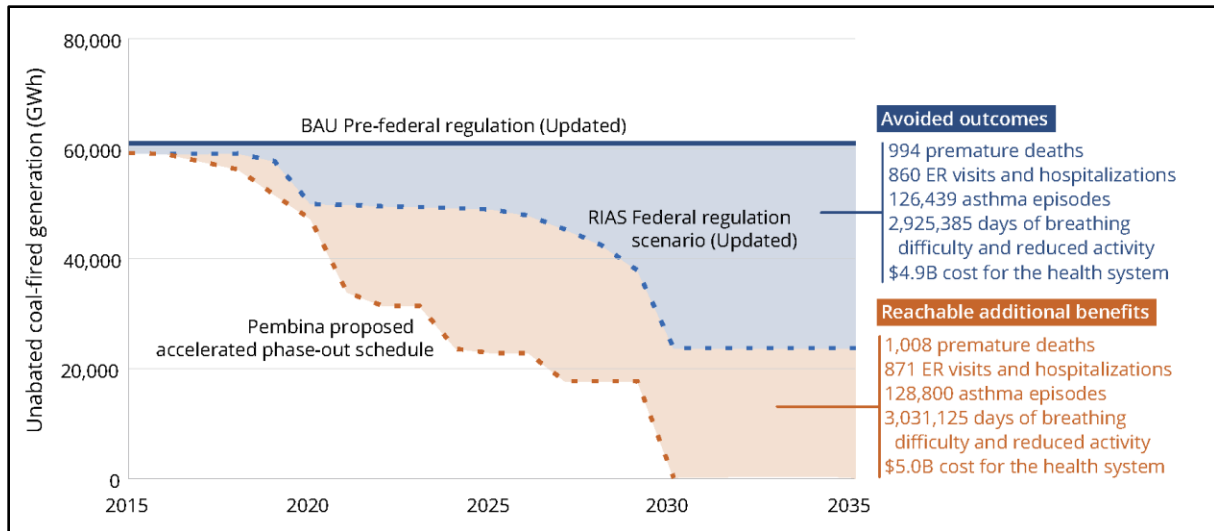
Re: Health Collaborative Comments on the Notice of Intent to develop Greenhouse Gas regulations for Electricity Generation in Canada

This submission is being made on behalf of eight health organizations that represent health care professionals, public health professionals, and public health advocates from across the country. We are united in the view that climate change is one of the greatest public health challenges of this century. We also share the view that the accelerated phase-out of Canada's coal-fired power plants can produce significant and immediate health benefits for Canadians, while also helping us to meet climate commitments made under the 2015 Paris Agreement.

In the new Pembina Institute report, that was endorsed by each of our organizations, ***Out with the Coal, In with the New***, it was demonstrated that a 2030 Canada-wide phase-out of coal-fired power plants could produce \$5 billion in air pollution-related health benefits while also reducing emissions of greenhouse gases (GHG) by 30 megatonnes (MT) if:

- all coal-fired generators are shut down after 40 years of operation or by 2030 whichever comes first;
- two thirds of coal generation capacity is replaced with non-emitting renewable energies; and
- one third of coal generation capacity is replaced with the lowest emitting natural gas technology.

While we are pleased that the Federal Government is moving to phase-out coal-fired power plants



across Canada, we fear that many of the health and climate benefits that could be realized with that action, will be lost if the regulatory approach does not ensure:

- a phased approach that begins immediately and provides reductions equal to those that can be realized with the Pembina assumptions;
- the replacement of at two thirds of that capacity with renewable energies;
- that equivalency agreements provide equivalent reductions in criteria air contaminants and mercury as well as greenhouse gases.

We are disappointed, for example, to see that the Federal Government anticipates that its proposed regulations would only reduce GHG by 5 MT outside of Alberta or 15 MT with Alberta, when the Pembina plan estimates that GHG could be cut by 30 MT. We assume that the reductions predicted by the Pembina report for criteria air contaminants and mercury would also be cut by a proportional amount, which suggests that the health benefits would also be greatly reduced.

As health organizations, we feel strongly that the accelerated closure of Canada’s coal-fired power plants is central to Canada’s Climate Action Plan. If implemented correctly, the coal phase-out can be a triple win for health. It can prevent 1000 premature deaths and 900 hospital visits by improving air quality in Canada. It can protect the mental capacity of our children by reducing mercury levels in our ecosystem. It can prevent climate-related deaths and disease by reducing GHG.

Submitted by:

- Kim Perrotta, Executive Director, **Canadian Association of Physicians for the Environment (CAPE)**
- Ian Culbert, Executive Director, **Canadian Public Health Association (CPHA)**
- Debra Lynkowski, President and Chief Executive Officer, **The Canadian Lung Association**
- Vanessa Foran, President and CEO, **The Asthma Society of Canada**
- Claudette Laroque, Executive Director, **Learning Disabilities Association of Canada (LDAC)**
- Doris Grinspun, CEO, **Registered Nurses Association of Canada (RNAO)**

Lindsay, McLaren, President, **Alberta Public Health Association** (APHA)

Wanda Martin, Interim President, **Saskatchewan Public Health Association** (SPHA)

Brian Condran, President, **Public Health Association of Nova Scotia** (PHANS)

Cody Sharpe, Policy Coordinator, **Upstream**

C.C. The Honourable Catherine McKenna, Federal Minister of the Environment & Climate Change

The Honourable Jane Philpott, Federal Minister of Health

The Honourable Sarah Hoffman, Alberta Minister of Health

The Honourable Shannon Phillips, Alberta Minister of the Environment

The Honourable Scott Moe, Saskatchewan Minister of the Environment

The Honourable Jim Reiter, Saskatchewan Minister of Health

The Honourable Brian Kenny, New Brunswick Minister of the Environment and Local Government

The Honourable Victor Boudreau, New Brunswick Minister of Health

The Honourable Margaret Miller, Nova Scotia Minister of the Environment

The Honourable Leo Glavine, Nova Scotia Minister of Health and Wellness and Seniors