



The Honourable Catherine McKenna  
Federal Minister of Environment and Climate Change  
House of Commons  
Ottawa, ON K1A 0A6

July 11, 2017

Dear Minister McKenna:

**Re: Whittling Away the Health and Climate Benefits from a Canada-Wide Coal Plant Phase-Out?**

As a doctor-directed organization that is dedicated to improving human health by protecting the environment, we were thrilled last November when you announced that the Federal Government would close all coal-fired power plants across the country by 2030. At that point, CAPE, nine other health organizations, and four environmental organizations, had just released the Pembina report, **Out With the Coal, In With the New**, which estimated that a 2030 phase-out could produce **\$5 billion in health benefits**, while reducing greenhouse gases by **up to 325 Mt** over a 20 year period (2015 to 2035), beyond that expected under the existing regulations.

While we are pleased that the Federal Government is mandating an end date for coal-fired power plants, we fear that many of the health and climate benefits that could be realized with this policy, 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 least two thirds of the generation with renewable energies; and
- That equivalency agreements provide equivalent reductions in criteria air contaminants and mercury as well as greenhouse gases.

**Our donor/members agree.** Nearly 600 of them have signed and submitted individual petitions expressing their support for an ambitious coal phase-out that is implemented with the three principles identified above (see petitions enclosed).

**When we look at the emission rates being proposed for coal-to-gas conversion and new gas plants, we fear that the coal phase-out will be achieved largely with natural gas plants, and that many of the health and climate benefits promised with a coal phase-out will be lost.** Given the long half-life of methane (12 years on average according to the IPCC AR5), its powerful Global Warming Potential (GWP) (i.e. 86 times more powerful than CO<sub>2</sub> over 20 years according to the IPCC AR5), and the significant volume of fugitive emissions associated with natural gas extraction, it would be

irresponsible and wasteful to direct investments to natural gas. Instead, investments should be directed to energy conservation, energy efficiency, and renewable energy as much as possible. Where natural gas investments are needed as transitional technologies, the highest level of efficiency should be demanded to maximize the climate benefits while minimizing the public health costs.

In order to achieve the significant health and climate benefits that can be realized with this policy, we recommend that the ***Reduction of Carbon Dioxide Emissions from Coal-fired Generation of Electricity Regulations (SOR/2012-167)*** be amended to:

- Redefine the “useful life” for coal-fired generators as 40 years rather than 50 years of operation;
- Ensure that all coal-to-gas generators meet the 420 tCO<sub>2</sub>e/GWh emission rate immediately;
- Include a fixed end date and enforcement clause to ensure that all coal-to gas generators are phased-out within 15 years or by 2040 at the very latest; and
- Ensure that all new natural gas plants meet the emission standards of the most efficient combined cycle natural gas plants (i.e. 350 tCO<sub>2</sub>e/GWh).

<b>Table 1: Greenhouse Gas Emission Rates – Coal and Gas Plants (Tonnes/CO<sub>2</sub>e/GWh)(Pembina, 2016)</b>	
Average for coal-fired generators in Canada – 2014	1070
Coal Plant converted to Gas (Proposed Interim rate until 2045)	550
Coal Plant converted to gas (Proposed rate after 2045)	420
New Natural Gas Plant (Rate in Existing Regulations & Proposed)	420
New Natural Gas Plant (Rate proposed in 2011 Draft Regulations)	375
New Natural Gas Combined Cycle (US Clean Power Plan rate)	350

In addition, we would like to see agreements with the four provinces which:

- Include ambitious provincial commitments to renewable energy targets to ensure that non-emitting generation is prioritized for replacement generation; and
- Equivalency agreements that achieve reductions in mercury and criteria air contaminants, as well as greenhouse gases, that are equivalent to those identified in the Pembina analysis.

As a health organization, we feel strongly that the accelerated closure of Canada’s coal-fired power plants is central to the Canada’s climate action plan. **If implemented correctly, it 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. And, it can prevent climate-related morbidity and mortality by reducing greenhouse gases. It is time for bold action on coal-fired power plants in Canada.

Yours Truly,



Kim Perrotta MHSc  
Executive Director



Dr. Joe Vipond  
Board Member

- C.C. The Honourable Jane Philpott, Federal Minister of Health  
The Honourable Sarah Hoffman, Alberta Minister of Health  
The Honourable Shannon Phillips, Alberta Minister of Environment and Parks and Minister Responsible for the Climate Change Office  
The Honourable Scott Moe, Saskatchewan Minister of Environment  
The Honourable Jim Reiter, Saskatchewan Minister of Health  
The Honourable Serge Rousselle, New Brunswick Minister of 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