

April 16, 2008

The Honourable Minister John Gerretsen
Minister of the Environment
12th Floor, 135 St. Clair Avenue West
Toronto, ON M4V 1P5

Dear Minister Gerretsen:

Re: Improvements Needed in Provincial Air Quality Regulations

During its March 19th meeting, the Simcoe Muskoka District Health Unit Board of Health supported a resolution advocating for improvements to the provincial air quality regulations. This resolution is to support the recommendations made by Mr. Gary Carr, Halton Regional Chair, on the need for improvements in provincial air quality regulations. The recommendations were addressed to the Minister's office on October 1, 2007.
Air Quality – Air Quality Standards and Certificates of Approval:

WHEREAS exposure to high levels of sulphur can cause breathing problems, respiratory illness and cardiovascular symptoms;

AND WHEREAS people with asthma, chronic lung disease or heart disease are the most sensitive to sulphur;

AND WHEREAS in order to properly consider the potential impacts of an emission source, it is critical that existing background levels can be included in the assessment;

AND WHEREAS the existing Ministry of Environment Certificate of Approval process does not clearly identify a process by which background air levels and cumulative impacts can be addressed;

THEREFORE BE IT RESOLVED THAT the Simcoe Muskoka Board of Health encourages the Minister of the Environment to amend the air standard for sulphur dioxide in Ontario Regulation 419/05 Air Pollution – Local Air Quality (265 ug/m³) to be more protective of human health by aligning it more closely with the guideline recommended by the World Health Organization (20 ug/m³);

AND FURTHER THAT the Minister of the Environment include provisions in Ontario Regulation 419/05 for background levels of fine particulate matter, sulphur dioxide, nitrogen dioxide and carbon monoxide to be included in assessments of emission sources;

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AND FURTHER THAT the Ministry of the Environment and local planning departments develop a protocol to communicate planning applications that have potential public health impacts to medical officers of health.

AND FURTHER BE IT RESOLVED that a copy of this resolution be forwarded to the Minister of Energy and copied to local MPs, and MPPs and municipal offices, the Acting Chief Medical Officer of Health, the Association of Local Public Health Agencies, and to the boards of health throughout Ontario.

The World Health Organization guideline for sulphur reflects current health literature related to sulphur. It was updated on the basis of new epidemiological studies including a Canadian study which found an association between daily air levels of sulphur and daily mortality in 12 Canadian cities when the air levels in those cities was 5ug/m3. Exposure to high levels of sulphur can cause breathing problems, respiratory illness and cardiovascular symptoms. People with asthma, chronic lung disease or heart disease are the most sensitive to sulphur.

In order to properly consider the potential impacts of an emission source, it is critical that existing background levels can be included in the assessment. The existing Ministry of Environment Certificate of Approval process does not clearly identify a process by which background air levels and cumulative impacts can be addressed. There is not a protocol for Ministry of Environment and local planning department to communicate planning applications to the Medical Officer of Health that may have public health impacts. Consideration of available public health resources to provide a public health assessment will need to be included in the protocol development.

Sincerely,



Dennis Roughley,
Chair, Board of Health

CG:MW:pgc

- c. Dr. David Williams, Acting Chief Medical Officer of Health, Public Health Division,
Ministry of Health and Long-Term Care
Ms. Brenda Mitchell, Director of Environmental Health Branch (MOHLTC)
Ontario Boards of Health
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Local MPs & MPPs
Municipal offices in Simcoe Muskoka