

Ministry of the Environment, Conservation and Parks
Policy and Program Division
Program Management Branch
40 St Clair Avenue West, Floor 4
Toronto ON
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Attention: Gerald Gillespie, Senior Policy Advisor

RE: EBR POSTING 013-3867 Redesigning Ontario's Drive Clean Motor Vehicle Emission Testing Program

Thank you for the opportunity to respond to the proposed redesign of Ontario's Drive Clean Program. The Clean Air Partnership is a charitable organization that works with Ontario municipalities to advance their livability and competitiveness through actions that:

- reduce energy costs, air pollution and greenhouse gas emissions;
- increase our resilience to extreme weather impacts; and
- advance Ontario's low carbon economy.

CAP was established when the City of Toronto, the Province of Ontario and the Government of Canada came together to address the health impacts of air pollution in June 2000. CAP now serves as the secretariat for 28 Ontario Clean Air Council member municipalities as well as another 58 Ontario municipal members participating in the Federation of Canadian Municipalities' Partners for Climate Protection program. Membership in these networks accounts for over 90% of Ontario's population.

Please see below for recommendations from Clean Air Partnership related to the proposed changes re EBR Posting 013-3867.

1. Winding down the light duty vehicle emissions testing requirements

The Clean Air Partnership does support an update to the light duty vehicle fleet testing requirements and recognizes that testing all light duty vehicles is not the most efficient way of identifying the small percentage of vehicles that are disproportionately negatively impacting air quality within Ontario. As such, we agree that new opportunities to identify those vehicles are warranted. Monitoring and enforcement can play a role in protecting public health from vehicle emissions, but without information on the monitoring and enforcement plan we should require diesel vehicles above 7 – 10 years range to undertake mandatory emission testing every two years. This may not be feasible due to the space requirements of Drive Clean testing facilities to maintain space and diagnostics without sufficient vehicles to pay for the testing. However, if there is a mechanism to use the heavy duty testing facilities for the older diesel vehicles, this could reduce health risks from diesel emissions. Diesel exhaust is classified by the International Agency for Research on Cancer as a Group 1 carcinogen. There is sufficient evidence that diesel exhaust causes lung cancer, and preliminary evidence of a positive association with bladder cancer in humans.

2. Redesigning the heavy-duty vehicle emissions testing program

Clean Air Partnership supports a stronger focus on heavy-duty diesel vehicles. Large trucks are significant emitters of particulate matter (with ultra-fine PM being a significant health concern). Identifying and replacing older, more polluting, heavy duty trucks will accelerate the transition of our older truck fleet (which have longer vehicle life expectancies) to newer less polluting vehicles. As such, we support the below efforts and goals:

- Mandatory test of a vehicle's on-board diagnostic (OBD) computer-based emissions controls, alongside the current smoke meter opacity test
- Reviewing the appropriate vehicle test age and test frequency
- Reviewing the test standard for visible emissions opacity
- Increased enforcement of existing anti-tampering restrictions with regards to emission control systems that are in current regulations
- Providing incentives to industry who consistently demonstrate cleaner fleets
- Review ways to reduce costs to taxpayers.

Relating to the last bullet, the goal is to ensure efficient and effective processes are in place to identify those vehicles disproportionately contributing to air pollution and negative health impacts. Older diesel trucks emit a large portion of harmful pollutants contributing to a majority of the on road vehicle emissions in the form of PM_{2.5} (80% in Ontario) and NO_x (over half in Ontario) (Toronto Public Health, 2007, 2014). The costs to our public health care system as a result of air pollution need to be taken into account. Each year in the Greater Toronto and Hamilton Area, traffic-related emissions result in approximately 1,000 premature deaths & 4,000 hospitalizations (Improving Health by Design in the Greater Toronto-Hamilton Area, 2014).

Many jurisdictions in the United States have put in place diesel truck turnover programs, where incentives are used to drive the replacement of older, polluting vehicles and accelerate the transition to less polluting heavy-duty vehicles over time (Burian et al., 2014). Some programs also established connections with financial institutions in order to establish low interest loans and financing for participating truck drivers.

Policies related to the use of lower emission trucks close to vulnerable populations are also worthy of consideration. Goods movement analysis identifies opportunities to reduce vulnerable population's exposure to air pollutants. It would be particularly important for the Ministry to work with municipalities and health units in jurisdictions most affected by transportation emissions to identify and explore possible interventions to reduce Ontarian's exposure to air pollution. The Greater Toronto and Hamilton area is particularly vulnerable due to the large population exposed to road emissions. Evans et al (2011) found that 24% of Toronto and 13% of Ontario residents were within 100 metres and 56% of Toronto and 32% of Ontario residents are within 250 metres of a major road.

3. Strengthening the on-road enforcement of emissions standards for both light and heavy-duty vehicles

Clean Air Partnership strongly supports improvements on monitoring and enforcement as a

mechanism to identify those vehicles that are disproportionately polluting. Significant improvement can be made, including:

- Strengthening on-road enforcement of both light and heavy duty vehicles on Ontario's highways to ensure domestic and out-of-province vehicles are within specified pollution limits
- Strengthening anti-tampering restrictions with regard to emission control systems

In relation to the above points, it important to work with municipalities, health units, academic partners, NGOs and other key stakeholders to harness the existing expertise that can help Ontario achieve our pollution reduction goals.

There has also been significant monitoring improvements that can support enforcement opportunities. These include:

- Mobile labs car/van chase measurements
- Testing heavy-duty vehicles at weigh in stations
- The drive-by system tested by Ministry of Environment, Conservation and Parks
- Drive by photo radar
- Truck based on OBD, data now accessible through wireless, continuous upload of data

Monitoring and enforcement would be further supported by more widespread engagement of Ontario citizens to serve as notifiers of visible air pollution coming from specific vehicles on the road. This can be advanced through greater awareness and promotion of phone-in and online reporting of vehicles that Ontarians have noticed excessive visible air pollution from. At present, there is little awareness of the mechanisms available to Ontarians to report sightings of these vehicles. Significant opportunities exist to increase this opportunity as an enforcement mechanism.

Thank you for the opportunity to respond to the changes to the Drive Clean program. Please let me know if you have any questions. Clean Air Partnership would be happy to help play a convening role between the Ministry, municipalities, public health units and other key stakeholders should the Ministry be interested.

Sincerely,

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