



November 20, 2017

Lubna I. Hussain
Ministry of the Environment and Climate Change
Environmental Sciences and Standards Division
40 St. Clair Avenue West, Floor 7
Toronto, Ontario
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SENT VIA EMAIL:
Lubna.hussain@ontario.ca

Re: Regulatory amendments related to air emissions of sulphur dioxide and other items

Dear Ms. Hussain:

The Federation of Northern Ontario Municipalities (FONOM) appreciates the opportunity to comment on [EBR #013-0903](#), the regulatory updates related to air emissions of sulfur dioxide (SO₂). We share the government's objective to limit exposure to substances that can cause adverse impacts on both human health and the environment. We appreciate the government's commitment to a constructive dialogue with various stakeholders aimed at achieving this objective and securing positive outcomes for our citizens. We also commend efforts to safeguard the Sudbury basin airshed by Vale and Glencore, who have demonstrated ongoing commitment to the continuation of this work, in our common interest.

FONOM is the unified voice of Northeastern Ontario, representing and advocating on behalf of 110 municipalities. Our mission is to improve the economic and social quality of life for all Northerners and to ensure the future of our youth.

We fully support the notion that the airshed in Northern Ontario is unique, especially given that relative to Southern Ontario there are few industrial emitters in a very large geography. Therefore, we believe a different approach should be applied to the North.

FONOM

The Federation of Northern Ontario Municipalities

The compliance mechanisms used in Sudbury by the two largest industrial companies, Vale and Glencore, have led the way to significant SO₂ reductions and exemplary public disclosure practices, as noted in the Ontario Environmental Commissioner's latest report, *Good Choices, Bad Choices: Environmental Rights and Environmental Protection in Ontario*. Specifically, she notes:

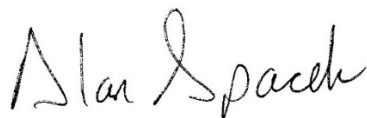
In Sudbury, two companies operating the majority of large polluting facilities jointly maintain, and publicly disclose the results of, 18 fixed SO₂ monitoring stations. They are also required to predict where the highest pollutant concentrations will occur and to send a mobile monitor to those locations. For this purpose, they maintain a sophisticated weather office, and jointly sponsor a third party to monitor and report the pollution. Real time SO₂ data is accessible on two public websites. Facilities curtail production when necessary to avoid exceeding ambient air pollutant limits in the community. The MOECC should require Sarnia's industrial facilities to undertake similar measures.

On a measured basis, according to the network of monitors across the Sudbury Basin, readings are below 40 ppb more than 95% of the time. This positive performance is expected to improve even more when both companies complete their current emissions reduction projects.

Currently, Glencore is mid-way through a Process Gas Project, projected to cost \$300 million, which will reduce SO₂ emissions. Similarly, Vale's Clean AER (Atmospheric Emissions Reduction) Project – an investment of more than \$1 billion – is now more than 80% complete and will reduce current SO₂ emissions by 85%. These important sustainability initiatives will have a significant and positive impact on the airshed in Northern Ontario, and lead us to support an alternative approach for the North.

We trust that you will consider the above guidance by the ECO when formulating updates to the SO₂ standard. Thank you for the opportunity to provide our input on the regulatory amendments to SO₂.

Sincerely,



Alan Spacek
President