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Via E Mail (mpepin@ccemtl.org)

November 12, 2001

Manon Pepin
JPAC Liaison Officer
Commission for Environmental Cooperation
393, rue St-Jacques Ouest
Bureau 200
Montréal (Québec)
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Dear Ms. Pepin:

The Canadian Trucking Alliance (CTA) is pleased to provide comment on the CEC's proposed program plan and budget for 2002-2004. Specifically, we provide the following comments with regard to the *Trinational Air Quality Improvement Initiative: North American Trade and Transportation Corridors.*

CTA does not refute the positive health benefits that would accrue from reducing emissions from ALL modes of freight transportation – truck, rail, air and marine. CTA has been a strong supporter of strict regulation of emissions from transportation fuel and engines in all modes.

We reiterate the findings of the discussion paper prepared by ICF Consulting which suggested that given the prescribed regulation of truck diesel and engine emissions, a shift of freight from truck to rail – where no similar regulation exists – would contribute to increased emissions in trade corridors. It is important that these findings be considered when developing CEC programs and projects.

Trinational Protocol to Reduce Diesel Emissions at Congested Border Crossings

1. Since the railways have been aggressively marketing their services in the trade corridors, particularly since the tragic events of September 11th, it is imperative that the impacts of all modes operating in the major North American trade corridors be examined.

2. The proposed program plan argues that the primary reason diesel fuel is used by the trucking industry is that it is cheap. The price of diesel fuel has virtually doubled over the past couple of years and represents the second largest component of trucking costs after labour. Over the past year, a historic phenomenon occurred. Diesel fuel prices have at times been higher than the price of unleaded gasoline. The reason that diesel is used is that it produces more power per unit of energy – and is thus more efficient than gasoline fuelled engines. Unlike the railway industry in Canada, which uses cheaper unregulated diesel, the trucking industry must pay for cleaner fuel and air.

3. The proposed program is based in part on the assumption that today's trucks are built to travel great distances and that older equipment is worse for the environment. The proposed strategy of profiling "high-risk" polluters (older equipment) is supported by the trucking industry. However, the strategy of targeting older polluting equipment *at the border* will not produce the results expected by CEC. For starters, adding these types of inspections at the border will only serve to exacerbate congestion problems at the border. Secondly, most trucks engaged in cross border traffic are newer. Older

equipment tends to be engaged in local traffic – city pick-up and delivery, aggregate/dump shipments, farming, excavating, etc. An Environment Canada report of October 2001 is supportive. Almost 50% of long haul trucks are less than 4 years old. In comparison, only 20 % of local/vocational vehicles are less than 4 years old, and 56% are older than 10 years. The agricultural sector has the oldest trucks with an estimated 90% older than 10 years old.

Workshop on Heavy-Duty I/M Programs

CTA supports the harmonization of on road emissions' testing programs. The identification of smoking trucks is not difficult, and CTA believes strong enforcement action against such vehicles should be a government priority. However, annual testing programs have been demonstrated to be an inefficient use of government and industry resources. For example, the new generation of trucks (those less than five years old) are passing Ontario's Drive Clean program 98% of the time. (Over 100,000 trucks have been tested).

In 2001 the US National Academy of Sciences issued a report calling into question the productivity of I/M programs. The report found that on the basis of evaluations by states and by independent researchers, I/M programs provide much lower benefits than estimated by the models.

A small, malfunctioning fraction of the fleet contributes a substantial portion of overall vehicle emissions. Thus, the largest potential reductions in emissions from I/M programs are associated with a small number of high-emitting vehicles. Studies show that between 10% and 27% of the vehicles that fail an I/M test never pass the test.

Future air-quality improving programs are likely to place greater emphasis on controlling NOx and PM emissions. Although diesel engines are a minor source of CO and HC, they are larger contributors to mobile-source NOx and PM emissions. Although emissions reductions are central to any evaluation of I/M programs, costs are inextricably linked to emissions reductions, making cost-effectiveness a critical evaluation criterion.

Based on these findings the Council made the following recommendations regarding the delivery and alteration of I/M programs. Five key recommendations are presented below:

1. Due to outdated models, EPA and states should expect lower emissions-reduction benefits from I/M program as currently configured.

2. I/M programs should focus primarily on identification, diagnosis, and repair of the highest-emitting vehicles along with verification of those repairs.

3. EPA and states ensure that some programs undergo comprehensive, long-term evaluations using multiple data sources and analytic techniques.

4. I/M programs should clearly state which pollutants they are seeking to reduce. Different types of repair actions and different mechanic training programs are needed for I/M programs that focus on reducing NOx and PM emissions.

5. I/M programs can be improved by identifying ways to make them more cost-effective, more readily understood and by easing the testing burden for vehicle owners. There is already growing evidence that reducing the frequency of testing vehicles with a low probability of failure, including exemption of recent model year vehicles from regular testing is very cost effective.

In a post September 11th world the CEC should focus study efforts on how to facilitate trucks through the border or how to consolidate more product on less trucks --- this will limit population exposure to vehicle emissions. The trucking industry has supported and accepted the higher cost of running cleaner engines; however, no matter how clean an engine is it will still emit a certain level of combustible byproduct. Consequently, the more productive vehicles can become, the less they will emit. This fact has been proven countless times and was raised in a recent Environment Canada study which declared congestion relief and more productive truck configurations to be the key to reducing emissions from trucks.

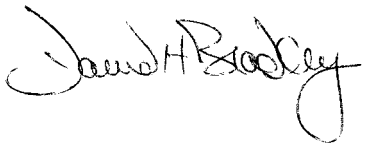
If the CEC remains steadfast in its desire to conduct an I/M conference why not focus its attention on the neglected subject of railway emissions? The CEC's own paper entitled *North American Trade and Transportation Corridors* highlighted the negative impact of unregulated locomotive engines and fuels on NAFTA corridors. Canadian locomotives continue to use unregulated fuel and engines. Canadian locomotives remain exempt from EPA engine regulations that apply to US railways. This unregulated equipment operates across the US-Canada border.

Recently both Transport Canada and Environment Canada reported on the Canadian railway industry's weak environmental record. In 2001 a report revealed that Eastern Canadian railway operations primarily use furnace oil to fuel their locomotives. This fuel has a sulphur content of over 2000-ppm. As CEC is aware, the higher the content of sulphur in diesel fuel the more particulate matter is created. Another report released this year found that the locomotives purchased by Canadian fleets in the 1980s and 1990's were worse environmental performers than equipment manufactured in the 1960's. Locomotives have an operational life of 40 years.

CTA recommends that in light of this evidence that the CEC explore the development of an I/M program for locomotives engaged in border commerce. Environment Canada has developed a new technology, DOES2, that will allow government officials to field-test locomotives for emission output. To date no Canadian locomotive has even been laboratory or field tested for its actual emission output. Does it not make sense for CEC to focus its I/M attention on an unregulated industry as opposed to an industry subject to both engine and fuel regulations and on road emission testing?

CTA remains committed to working with governments in helping reduce emissions from the trucking sector. CTA believes that the spirit of section 3.1.3 of the proposed program and budget plan was developed with that same intent. CTA remains hopeful that CEC will accept the association's suggestions in a positive and supportive light. I would also suggest that a meeting between CTA and CEC staff responsible for transportation emissions take place.

Sincerely,



David Bradley
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DHB/km

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