



REPRESENTING TOUR OPERATORS
AND BUS COMPANIES

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Danie Dube
Acting Chief
Chemicals Evaluation Branch
Department of the Environment
Hull, Quebec
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&

Arthur Sheffield
Team Leader Regulatory & Economic Analysis Branch
Department of the Environment
Hull, Quebec
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August 28, 2000

Dear Ms. Dube and Mr. Sheffield,

Motor Coach Canada has grave concerns regarding Environment Canada's proposal to include particulate matter of less than 10 microns (PM-10) in the list of toxic substances under the Canadian Environmental Protection Act. Our concerns are based on information that was gathered and reported to you in a letter dated August 8, 2000 from the Canadian Trucking Association. The CTA contention that it is premature to list PM-10 as "toxic" is based on the scientific findings of the Health Effects Institute, the Scientific Advisory Board of the US Environmental Protection Agency and GlobalTox Corporation. The scientific findings provide ample evidence that there is a level of uncertainty over the potential health effects associated with PM-10 and that it would be wrong for Environment Canada to proceed to list PM-10 as "toxic".

Motor Coach Canada is in agreement with and supports the position taken by CTA regarding PM-10 and we urge you to accept the CTA's recommendations that PM-10 be treated as a "controlled substance" under the Canadian Environmental Protection Act.

Sincerely,



Brian Crow

c.c. David H. Bradley

