



March 29, 2004

Krista Nakrieko
Canadian Council of Ministers of the Environment
360-123 Main St
Winnipeg MB R3C 1A3

Re: 2003 Review of the Canada-wide Standards (CWS) for Dioxins and Furans from Coastal Pulp and Paper Boilers Burning Salt-Laden Wood

Dear Ms. Nakrieko:

On behalf of the Coastal Pulp and Paper Boilers Multi-stakeholder Advisory Group (P&P-MAG), I am pleased to forward the following recommendation to the Canada-wide Standards (CWS) Development Committee (DC) for Dioxins and Furans regarding the 2003 Review of the CWS for Dioxins and Furans from Coastal Pulp and Paper Boilers Burning Salt-Laden Wood.

The DC directed the P&P-MAG to scan for significant new information in relation to the numerical targets in the current CWS as the starting point of the review. A consideration of whether to change the standards was to have proceeded if there was significant new information. The P&P-MAG concluded that there was no new significant information to warrant a review of the current standard at this time. This view took into account the recent work undertaken by the Pulp and Paper Research Institute of Canada (Paprican) to research technical options on pollution prevention opportunities for coastal pulp and paper power boilers and included new dioxins and furans emission testing results for eight coastal pulp and paper mills. The data available to date show a range in emission test run results; however, on average, all but one are below current CWS limits.

In addition, Pierce Lefebvre conducted a study on alternative log movements. The objectives of this study were to provide a common understanding of how logs are transported, sorted and stored in coastal waters, to assess the associated costs of different modes of transportation, and to identify opportunities for avoiding contact with salt water.

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Also considered was the required evaluation of all Canada-wide Standards for Dioxins and Furans in 2006 to “*consider new scientific, technical and economic information and provide an assessment of the need to develop the next set of CWS targets and timelines to continue progress toward virtual elimination*”. This was noted and identified as a timely opportunity to reconsider the current standard for coastal mills with new information and additional test data that should be available at that time.

Taking the above noted studies and data into consideration, the P&P-MAG recommends to the DC that:

- No change is required in the current Canada-wide Standard for Dioxins and Furans from Coastal Pulp and Paper Boilers.

In addition, it is suggested that the focus for the coastal mill sector be on implementation of the current standards by jurisdictions, in accordance with Annex 1 (Reporting Framework), noting the requirements for a report on interim progress in achieving the CWS in 2004, and the evaluation of CWS for Dioxins and Furans in 2006.

The P&P-MAG members agreed that it could continue to be forum for advice to the CWS Development Committee as may be required in future.

The above is respectfully submitted on behalf of the P&P-MAG.

Sincerely,

Sohee Ahn
Chair, Coastal Pulp and Paper Boiler Multistakeholder Advisory Group

cc: Members of the Coastal Pulp and Paper Boiler Multistakeholder Advisory Group