

STATEMENT APPENDIX

Summary of Comments Submitted by Conference Participants on Draft Statement and Actions Taken to Address Them

**Comments submitted by Conference Participants on Draft 1 –
Draft Statement Circulated on March 10, 2005**

Statement Section	Comment	Action Taken to Address Comment
Proposed Additional New Statement	<p>A new statement was proposed as follows.</p> <p><i>There is still significant need for improving the institutional capacity of developing countries to carry out and enforce air quality policy.</i></p>	<p>This new statement has been added as Statement 10 based on support for the statement in breakout group 3, the panel presentations, and discussion comments from delegates from Brazil, Mexico, and Chile.</p>
Supporting Statements	<p>Suggestion to label these as background discussion points or presentation statements. Include disclaimer that not all participants may agree with specific presentation statements.</p>	<p>The supporting statements have been renamed presentation statements. A footnote has been added to indicate that not all conference delegates may agree with all of the presentation statements.</p>
List of participants	<p>Need to identify international organizations under a separate category rather than listing them by the country where their offices are located (i.e. CEC and WHO)</p>	<p>The specific office locations have been removed in the list of participants for CEC and WHO European Centre for Environment and Health. CEC is now listed as Commission for Environmental Co-operation of North America.</p>
Statement 1	<p>Suggestion that air quality should be addressed within the context of health issues that are unrelated to air quality e.g. AIDS, malaria etc.</p>	<p>This revision has been made as it was mentioned several times in the panel presentations.</p>

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Statement 2	Suggestion to mention iterative process of setting short-term air quality goals within a long term plan.	This addition has been made as it is consistent with the notion of continuous improvement that was identified several times throughout the meeting.
Statement 2	Comments that stopping rules may need to be developed.	It was mentioned in the policy panel that several stopping rules already exist, cost-benefit analysis being one of them.
Statement 2	Comment on the need to specify who should provide additional resources for air quality management in cases where lack of capacity is a barrier.	This was revised to provide example of joint funding for capacity building projects by Asian Development Bank and US EPA.
Statement 3	Suggestion to specify principle in relation to “within-nation” Air quality management.	The principle is now prefaced with “<i>To achieve national level air quality targets</i>”

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Statement 3	Suggestion that all levels of government should be involved in risk management and this does not necessarily depend on the airshed.	The phrase (depending on the airshed) was deleted.
Statement 3	Suggestion to separate need for greater capacity and greater intergovernmental, intersectoral multistakeholder co-operation into two separate sentences.	These two ideas are separate and are now in two sentences.
Statement 4	Suggestion to add introductory statement recognizing that air quality issues are global.	This idea was supported by speakers in the transboundary session. The following sentence has been inserted at the beginning of the text supporting the statement. “Air quality policymakers have recognized that global air quality management requires a hemispheric approach focusing on achieving air quality improvements in common airshed”.
Statement 4	Suggestion to specify aspects of international standardization “across entire continuum of RM activities”	The sentence has been revised as follows: <i>An international strategy for standardization must consider all aspects of air quality risk management including a process to seek commitments, setting of standards, enforcement of controls, and monitoring of benefits and costs.</i>

Statement Section	Comment	Action Taken to Address Comment
Statement 5	Proposed alternate wording to second and third sentence... “ultimately however, continued reduction of air pollution levels will depend on a massive paradigm shift that will likely need to include a new approach to technology and the organization of society. While the possibility exists that such a shift could be forced on the global community by climate change and other factors, we should now be searching for innovative approaches”	See below
Statement 5	Proposed rewording: Policy tools and strategies exist to reduce high levels of air pollution and health impacts. Demonstrations of success can be found in the state of California, Mexico and Asia. Nevertheless, the problems, particularly in developing countries, are sufficiently formidable that continuing efforts are needed to identify and demonstrate innovative approaches while at the same time solidifying the application of sound decision principles and best practice.	This proposed rewording for the draft final is most consistent with plenary discussion on the initial wording of this principle. Several comments were made to the effect that “we have the tools but not the capacities”. Delegates will have an opportunity to make revisions before the Statement is finalized.
Statement 5	Proposed rewording to second sentence... But at some point a new approach <i>based on</i> technology, and the organization of society will be needed because of air quality, climate change and other <i>new emerging</i> factors.	See above

Statement Section	Comment	Action Taken to Address Comment
Statement 6	Suggestion to broaden evaluation of initial actions to evaluation of all actions	Agree. This change has been made.
Statement 6	Suggestion that <i>“not a lot was said on taking a precautionary approach. What I did hear several times (Martin Williams, Michal Krzyzanowski, and myself) was a need to move away from a single target level as soon as possible and then work on continuous improvement towards the lower one. Both levels could move with time as more information on effects and costs becomes available. A precautionary approach implies targeting the lower level and then relaxing the target level based on increased knowledge. I thought I had detected a change from a precautionary approach at this meeting”</i> .	<p>The following principle for decision making under uncertainty was presented by Group 2 as follows:</p> <p>Consider taking actions even in the presence of uncertainty (precautionary approach)</p> <p>Since the term “precautionary” was not used by other groups, the proposed wording suggested by one of the delegates in the next line will be inserted into the draft final statement. The notion of continuous improvement is conveyed in Statement 2.</p>
Statement 6	Suggestion to reword principle as follows “Uncertainties in the science should not stop attempts to improve air quality”.	This proposed revision has been inserted. Delegates will have an opportunity to comment on the revision before the Statement is finalized. Any differences in opinion on this point will be noted.

Statement Section	Comment	Action Taken to Address Comment
Statement 7	Suggestion to clarify reference to compliance in a non-regulatory context.	<p>Agree that this was confusing, the word compliance has been deleted and the sentence revised as follows:</p> <p><i>In a non-regulatory environment, economic incentives and disincentives are important tools for promoting actions to achieve reduction targets and for building support for energy efficiency and technological innovation.</i></p>
Statement 7	Suggestion to mention that all possible approaches should be considered in the context of life cycle analysis.	<p>The following sentence has been added - Energy choices should be made on a life cycle basis.</p>
Statement 7	<p>Suggestion to insert the word “successes: as follows:</p> <p>There is a need for an international database of case studies of policy <i>successes</i> and interventions</p>	<p>It was also mentioned in the Group 3 report that it is important to learn from both policy successes and failures. The sentence has been revised as follows:</p> <p><i>There is a need for an international database of policy interventions including documentation of policy successes and failures.</i></p>
Statement 9	Commenting supporting statement regarding emission inventories and air monitoring networks.	<p>This principle has been retained as there were no comments from the planning committee or delegates suggesting the need to revise or remove it.</p>

Statement Section	Comment	Action Taken to Address Comment
Statement 9	<p>Suggestion to insert the word expanded as follows:</p> <p>Emissions inventories and monitoring networks need to be maintained and <i>expanded</i> as a basis for evaluating air quality on an ongoing basis.</p>	<p>Agree, this was mentioned especially in the context of developing regions. Sentence has been revised as suggested.</p>

**Comments Submitted by Conference Participants on Draft 2 –
Draft Statement Circulated on April 4, 2005**

Comment	Action Taken to Address Comment
<p>Statement 1. Air quality management policies and strategies should seek to maximize net benefits to society, while maintaining fairness and equity.</p> <p>First, policies and strategies don't seek anything. "Should be set" would be proper. Second, there are often tradeoffs between efficiency and equity. You can't necessarily do both. I would say "to maximize net benefits consistent with maintaining a reasonable degree of fairness" But this has a bias to efficiency. Third, equity and fairness are the same thing, I would say.</p>	<p>Agree. These changes have been made.</p>
<p>Statement 2. As it reads now the suggestion is that when the costs exceed the benefits, further reduction isn't necessary anymore. Could we change this to "...until further reductions are not considered as justifiable and efficient for cost-benefit reasons and societal support."</p>	<p>Addressing social factors in this statement as suggested is reasonable given i) Group 2 statement - cost- benefit analyses have to be interpreted in a broader context, considering social, cultural and political factors and ii) the example Jane Barton presented from the Georgia Basin -Puget Sound transboundary region where public concern about future health effects and environmental deterioration in the face of population and economic growth is a main driver for continued a.q. management, even though regulatory limits are generally met. Also there was much discussion in Group 3 on the notion of global air quality standards and the several members pointed out that global standards would need to be interpreted by individual countries because public acceptance of risk and the definition of clean air will vary. The Statement was revised as suggested and The Georgia Basin-Puget Sound example was referred to in the text below the statement to describe the influence of social factors on air quality management.</p>
<p>Statement 2. Change "where air quality standards are grossly exceeded" to "where air quality is still poor"</p>	<p>Agree. This change has been made.</p>
<p>Statement 4. The incorrectly, attributes the LRTAP convention to WHO</p>	<p>This correction has been made.</p>
<p>Statement 5. The revised wording of Statement 5 looks rather uncomfortable, mentioning as it does only California, Mexico and Asia. If it's any consolation, I would have been uncomfortable with the original one mentioning Rome too. The point being made I think is mainly that despite all these improvements-and there are many examples from around the world on all continents-there is still much to do. If you have to mention geographical areas, then could you include Europe too please?</p>	<p>The Statement has been revised as follows: Demonstrations of success can be found in various regions of the world.</p>

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<p>A general reference to worldwide improvements in the 'headline' text and references to geographic areas including Europe in the body of the text would be fine. You could mention the CAFE programme there perhaps, by saying something along the lines of 'the CAFE programme will set out a strategic vision for air quality management in the European Union' or words to that effect.</p>	
<p>Statement 5. I also one example of European (Irish) action to cut pollution - with demonstrated health benefits as follows "The ban to distribute bituminous coal in the city of Dublin, Ireland, resulted in a sharp decrease of pollution and death rates in the city.</p>	<p>This example has been inserted in Statement 5.</p>
<p>Statement 5. Clean Development Mechanism should be in caps and singular.</p>	<p>This change has been made.</p>
<p>Statement 6. As it reads there is a bias to improving air quality. To correct this, I would add: "Neither should worst case scenarios be used to justify further air quality improvements."</p>	<p>Principle 6 has been revised as follows: In locations where air quality is poor and local/urban/regional studies to characterize emission sources and impacts are in their infancy, lack of scientific information should not delay the implementation of strategies to improve air quality.</p> <p>In the management of pollutants for which there is no threshold for health effects, the lack of location specific information to characterize ambient air quality, emissions sources and health risks should not be considered an excuse for inaction. Control measures should be undertaken with the objective of achieving a basic level of air quality, taking into consideration realistic emission reduction scenarios and cost-effectiveness ratios. Uncertainties in the estimates of future ambient air quality levels and quantification of health benefits and economic costs should be characterized as fully as possible to assist the decision process.</p>
<p>Statement 6: delete the phrase "since the benefits...long run" We don't know this is true. I don't even know for sure what the phrase means. I would also add language to support what I added the suggestion above about worst case scenarios</p>	<p>The phrase has been deleted and Statement modified as indicated above.</p>
<p>Statement 6: change "attempts" to improve air quality to "efforts" to improve air quality</p>	<p>Agree. This change has been made.</p>
<p>Statement 7. The quote about prime time on the next page is taken out of context. After "incentive approaches," add "applied to transportation emissions."</p>	<p>This change has been made.</p>

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The quote below this one is not a sentence.	
Statement 7. "polluter pays" is out of place here. That is an equity principle. I think you mean to say "emission fees."	This change has been made.
Statement 8. How do we know that "action days" are an effective means of calling attention to the issue? Did someone introduce evidence for this? If not, we could waffle and say they are a "promising means."	The Statement has been revised as follows: Air pollution action days during air pollution episodes appear to be a promising means of calling public attention to the air pollution issue.
Statement 9: This sentence makes it sound like the publicly available data should be in the form of air quality indices, rather than the actual data. This is a big mistake. Please change so it reads that the monitored data should be made publicly available. For policy, the indexes are pretty useless because they aggregate over different pollutants.	The Statement has been revised as follows: Emissions inventories and monitoring networks need to be maintained and expanded as a basis for evaluating air quality on an ongoing basis. Emissions and monitoring data should be made publicly available.
Statement 10 comes across as pretty negative. I would rewrite to say: While improvements in institutional capacity in developing countries are undeniable, further improvements are needed in the institutional capacity to carry out and enforce air quality policy.	Agree. This revision has been made.