

October 24, 2001

Honorable James M. Jeffords, Chairman
Committee on Environment and Public Works
United States Senate
410 Dirksen Senate Office Building
Washington, DC 20510-6175

Dear Mr. Chairman:

We are writing to express our view that carbon dioxide (CO₂) should not be considered in legislation designed to reduce emissions of sulfur dioxide (SO₂), nitrogen oxides (NO_x), and mercury.

As you know, CO₂ is not a pollutant subject to regulation under the Clean Air Act. We believe that reductions of conventional pollutants such as SO₂, NO_x and mercury can and should be accomplished through established Clean Air Act programs for the protection of domestic public health and welfare. The regulation of global greenhouse gas emissions such as CO₂ has no legitimate place in the Clean Air Act.

To achieve any meaningful global environmental effect, worldwide cooperation is required to reduce CO₂ or other greenhouse gas emissions. Emissions of greenhouse gases are quickly distributed throughout the global atmosphere, and have very long atmospheric residence times. Reducing CO₂ emissions in the U.S. alone would not have any beneficial effects. Any long-term efforts to stabilize or otherwise affect atmospheric concentrations of greenhouse gases requires that all countries be part of an effort to limit or reduce CO₂ emissions, including developing countries.

Over the past thirty years, the Clean Air Act has resulted in significant reductions in harmful air pollutants without impeding economic growth. This experience has shown that it is possible to fuel a growing economy while reducing emissions of air pollutants such as sulfur dioxide. However, unlike conventional pollutants, there are no off-the-shelf technologies available to reduce CO₂ emissions. At this time, the only means available to reduce CO₂ emissions are to reduce overall energy use, or to dramatically reduce consumption of domestic

coal. While more efficient energy use is feasible and desirable, improvements in energy efficiency should be pursued on their merits.

Including CO₂ along with conventional emissions would greatly increase the cost of proposed emission reductions, and would have an adverse impact on the welfare of low- and fixed-income families. The Energy Information Administration (EIA) finds that power suppliers would need to make significant expenditures to comply with stricter standards for SO₂ and NO_x, but the impact on electricity prices would be moderate. On the other hand, a CO₂ reduction in line with the requirements of the Kyoto Protocol would increase average retail electricity prices by as much as 43 percent in 2010.

It is vital to the health of the U.S. economy that the diversity of fuel use be maintained. Currently, most electricity is generated with coal, followed by nuclear, natural gas, and hydro. We believe that it is essential to maintain the role played by these fuels, while making efforts to improve energy efficiency and raise the share generated by renewable energy supplies.

Reasonable reductions of SO₂, NO_x and mercury emissions should be possible while maintaining fuel diversity. We are concerned, however, that the burden of proposals for removal of CO₂ would fall heavily on coal, thereby making the economy more dependent on other fuels, particularly natural gas. The natural gas distribution system is currently inadequate and natural gas has shown considerable price volatility in recent years.

The public and labor can benefit from reducing emissions of SO₂, NO_x, and mercury, with reasonable standards and timetables. Along with cleaner air, we expect to see job creation in the production, installation and maintenance of equipment to reduce emissions.

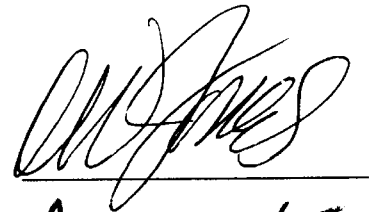
We believe that more thought and planning are needed to work out an equitable plan for greenhouse gas emission reductions, consistent with economic growth and maintaining jobs. Such a plan should include funding for the development of new technology, and should be predicated on a truly global agreement for the reduction of greenhouse gases.

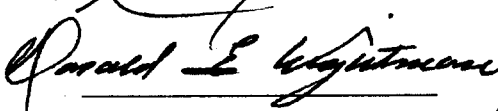
For these reasons, we believe that the inclusion of CO₂ within Clean Air Act legislation will burden the process and will slow down the introduction of beneficial new clean air requirements.

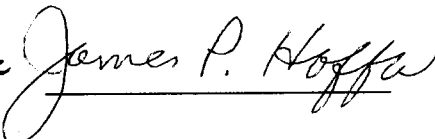
Sincerely,

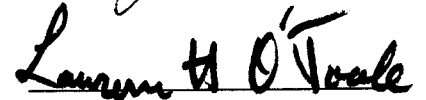














Signatures

Michael Sacco, President
Seafarers International Union of North America (SIU)

Cecil E. Roberts, President
United Mine Workers of America (UMWA)

Charles W. Jones, International President
International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers and
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James P. Hoffa, President
International Brotherhood of Teamsters (IBT)

Lawrence H. O'Toole, President
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