



NATIONAL OFFICE
880 Wellington Street, Suite 506
Ottawa ON K1R 6K7
tel 613.569.7226
fax 613.569.7098
info@cpaws.org
www.cpaws.org
Reg. Charly #10686 5272 RR0001

September 16, 2003

Mr. Gustazo Alanis-Orteja
Joint Public Advisory Committee
North American Commission for Environmental Cooperation
393, rue St-Jacques Ouest, Bureau 200
Montréal, Québec H2Y 1N9

Attention: mpepin@ccemtl.org

Re: JPAC Review of Citizen Submission Process

I am writing on behalf of the Canadian Parks and Wilderness Society (CPAWS) to express our support for a strong, effective Article 14 process. CPAWS is Canada's grassroots voice for wilderness with eleven chapters across Canada, and 20,000 members and supporters.

CPAWS wishes to thank the Joint Public Advisory Committee (JPAC) for its continued support of the environmental goals of the North American Agreement on Environmental Cooperation (NAAEC) and in particular its strong support of the citizen submission process. We wish to voice our support for JPAC's efforts to improve the Article 14 process.

CPAWS has participated in the Article 14 submission process in the Ontario logging file. We view the Article 14 process as an important mechanism to raise significant issues relating to the non-enforcement of North American environmental laws. Unfortunately, the utility of this process may be undermined by overly narrow investigations or interference with the Secretariat's expertise by the Council.

CPAWS recommends that it again be made clear that the Article 14 process should be authorized to examine both narrow and broad issues of non-enforcement and that the Secretariat's decisions on the scope of investigations and the sufficiency of information be respected. If the process continues to be undermined, citizens and groups will no longer see the process as a useful accountability mechanism. If the scope of investigations is too narrow, citizen groups will view the process as ineffective in addressing critical issues of non-enforcement. If too much information is demanded of groups simply to ask for an investigation, it will no longer be an accessible process for groups such as CPAWS.

Thank you for taking CPAWS' views into consideration.

Sincerely,

Stephen Hazell
Executive Director

Chapters: Nova Scotia • Montréal • Ottawa Valley/Vallée de l'Outaouais • Wildlands League • Manitoba • Saskatchewan • Calgary/Banff • Edmonton • British Columbia • Yukon • NWT

KEEPING CANADA WILD FOR MORE THAN 40 YEARS