



Centre québécois du droit de l'environnement  
Quebec Environmental Law Centre

By e-mail: [morozco@cec.org](mailto:morozco@cec.org)

Montreal, 8 December 2005

Ms. Marcela Orozco  
Commission for Environmental Cooperation  
393, rue St-Jacques Ouest, bureau 200  
Montreal (Québec)  
H2Y 1N9

Re: JPAC strategic plan

Dear Ms. Orozco:

The following are our brief comments on the 2006–10 strategic plan of the CEC's Joint Public Advisory Committee.

QELC is a nonprofit organization founded in 1989 with a mission to promote environmentally responsible legal instruments and practices. QELC is involved in various government consultations dealing with legislative and regulatory reform. As well, for the last few years it has been working internationally under contract to the Canadian International Development Agency (CIDA). Finally, QELC responds to environmental law-related inquiries from the public.

On page 3 of the document, it is stated that JPAC wants to ensure that economic development is sustainable. Far be it from us to wage a semantic battle, but in our understanding of the term "sustainable development," economic development cannot be sustainable when considered in isolation. Sustainable development can only take place as an amalgam of economic, social, and environmental considerations. We feel it is important to make this distinction in the document and to avoid misconstruing this well-established principle.

QELC is pleased to emphasize its agreement with the principles set out on page 4 – namely, transparency, awareness raising, and participation.

JPAC seeks to enhance its efforts to raise the awareness of less-represented groups, such as aboriginal peoples, businesspeople, and low-income communities (page 5). QELC would like to understand better how JPAC came to consider this an important activity.

For the QELC, the goal of using groups as relays in the communication process is promising. Moreover, concerning the part emerging from the Mexico discussions, JPAC's experience with sustainable development in Mexico is highly innovative and forward-looking. Our organization could consider participating and making its contacts available to JPAC.

Regarding JPAC's contribution to activities related to environment/trade links, QELC maintains that internalization of environmental costs is a fundamental factor to be considered in these links. On this point, we can make a significant contribution.

We trust that these brief comments are helpful.

Sincerely,

Maitre Marc Turgeon  
Project Manager