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

Re: JPAC Review of Citizen Submission Process

Dear Members of the Joint Public Advisory Committee:

I am writing on behalf of the 9000 member Northwest Ecosystem Alliance. NWEA works to conserve and restore the wild lands and biodiversity of the Pacific Northwest of the U.S. and British Columbia.

NWEA staff has extensive expertise in forest ecology and restoration, forest policy and practices, endangered species law and conservation and forest products trade and subsidies. We have recently published a report called *Greening the Trade in Trees: Solutions to the U.S./Canada Softwood Lumber Dispute*.

NWEA has been involved in the Article 14 submission process in the BC Logging file. We view the Article 14 process as a potentially important mechanism to raise significant and widespread awareness of the flouting of North American environmental laws. Unfortunately, the utility of this process may be undermined by overly narrow investigations or political interference with the Secretariat's expertise and inquiries.

Article 14 and the CEC in general is in danger of becoming a sham, when despite overwhelming evidence supporting a full scale investigation, the scope of the investigation is limited by overt political pressure from the very economic interests and/or their governments that the CEC are meant to oversee. The cumulative effect is the erosion of the public trust and the fulfillment of the predictions that social values will fall prey to free trade.

We recommend that it again be made clear that the process can 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 will be respected.

If the scope of investigations is too narrow, citizens will view the process as ineffective in addressing critical issues of non-enforcement. If the process continues to be undermined, citizens will no longer see the process as an important accountability mechanism and will justifiably cease to participate. We support your efforts to improve the process and look forward to further communications and cooperation.

Sincerely,

Joe Scott  
International Campaigns Director