

**SENT BY EMAIL AND REGULAR MAIL**

September 12, 2003

Attention: mpepin@ccemtl.org <mailto:mpepin@ccemtl.org>  
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 Wildlands League, a chapter of Canadian Parks and Wilderness Society, to express our concern about the integrity of the CEC citizen submission process with regard specifically to the Ontario Logging file.

The Wildlands League is a non-profit conservation organization working to protect wilderness in Ontario since 1968 and more recently, to ensure that forestry on public lands is sustainable.

Represented by the Sierra Legal Defence Fund, we have been involved in the Article 14 submission process regarding the impact of clearcut-logging on migratory birds and Canada's non-enforcement of the Migratory Birds Convention Act. We are concerned that the integrity of the submission process is being undermined by the CEC Council's actions to limit the citizen submission process and the Council's failure to respect the independence and judgment of the CEC Secretariat.

The Article 14 process is key to raising significant issues about the non-enforcement of environmental laws throughout North America and ensuring that governments are held accountable. To be effective, the process must be timely, open and equitable, and not subject to political manipulation by the Council. It should cover all issues of non-enforcement, whether narrow or broad in scope, and should not place undue demands on those making submissions (as in the Ontario logging case, where tens of thousands of dollars were spent by groups to compile the information requested).

We recognize that the Joint Public Advisory Committee is undertaking a review of the Article 14 submission process, and appreciate your strong and continued efforts to ensure that the process is fair, accountable and effective.

Yours truly,

Dr. Anne Bell  
Acting Executive Director