



**Alberta Wilderness Association**  
*"Defending wild Alberta through awareness and action"*

September 22, 2000

Joint Public Advisory Committee  
Commission for Environmental Cooperation  
393 St. Jacques West, Suite 200  
Montreal, Quebec H2T 1N2  
Sent to: Manon Pepin: [mpepin@ccemt1.org](mailto:mpepin@ccemt1.org)

**RE: Draft JPAC Public Review of Articles 14 and 15**

Dear Members of JPAC:

Here are the Alberta Wilderness Association's thoughts on Article 14/15 Submissions:

- A. **There must be accountability.** To this end, factual records must be made public and should clearly state conclusions and recommendations. All secretariat recommendations regarding the preparation of the factual record should also be made public as soon as the recommendation is made. There must be specific timelines that guarantee a response to submission within a reasonable time period.
- B. **There must be timeliness.** We do not feel there is any need for a 30 day waiting period for notification to submitters and the public after the CEC secretariat's recommendation on preparing the record has been provided to Council. There must be specific timelines that guarantee a response to submission within a reasonable time period.
- C. **Specific and Chronic Lack of Enforcement.** There must be avenues for ENGOs and the public to make submissions on specific failures to enforce as well as chronic/general failures to enforce. In fact, the latter probably deserve the most serious attention and scrutiny.

We are opposed to the idea that only Article 14 & 15 issues referred to JPAC by Council can be reviewed by JPAC.

In summary, we feel that Article 14 and 15 submissions can be powerful tools to achieve better enforcement of environmental laws. For ENGOs and the public, this is one of the most important components of the North American Agreement on Environmental Cooperation. It must not continue to be used by Council in a way that undermines public process and effective environmental law enforcement. .

Thank you for listening to our concerns.

Yours sincerely,

Cliff Wallis  
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