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Thank you for the opportunity to comment on the Strategic Plan of the Commission for Environmental Cooperation 2010-2015. Defenders of Wildlife, a U.S.-based non-governmental organization, is dedicated to the conservation of wildlife and its habitat. Defenders strongly agrees with the importance of public participation in improving the effectiveness and programs of the Commission. Accordingly, Defenders offers the following comments for consideration.

1. Reducing black carbon emissions represents a great opportunity to link climate change with specific actions that will benefit both public health and the environment, and have beneficial social and economic consequences at the local, regional and national level. Black carbon emission reductions could have important positive impacts in mitigating climate change while improving air quality.
2. There is a need to strengthen actions presented and described in the Plan. For example priorities and actions in the Climate Change section, should not be presented as a “could” but as a “should.”
3. Goals, results and indicators to facilitate implementation and follow up of the Plan should be included. For example, see our suggestions on the development of a table for indicators and results in the climate change priority.
4. It is necessary to communicate and disseminate the plans, actions and results achieved. Scientific studies and action plans are a basic instrument for a successful Plan and its implementation, but without enough public communication, and diverse messages to a diverse public, the Plan will not be as effective.
5. Defenders support the current language in the strategic plan to enable community based adaptations that could enhance resilience to impacts from climate change that affect both physical and social environments. However, we recommend more attention be placed on shared climate change adaptation activities. There is a tremendous need and opportunity for collaborative climate change adaptation activities and information sharing between the United States, Canada, and Mexico. In particular, we recommend the inclusion of ecosystem-based adaptation strategies to protect natural resources and communities from the impacts of climate change.

In addition, the following text should be replaced by the suggested language underlined:

1. Strategic Objective #4, Strengthening Regional Environmental and Wildlife Law Enforcement, priority “Healthy Communities and Ecosystems”: The Objective has to be accompanied by a massive campaign of public awareness in order to be

successful. If the public is not educated on the seriousness of imperiled species, enforcement will not be a success by itself.

2. 4.2 Climate Change – Low carbon economy. Strategic Objective #1: the improvement of comparability of greenhouse gas emissions data should be also measured by indicators building upon previous emission comparisons developed by the CEC. Also, there is a need for an integrated approach on climate change and local air pollution.
3. Bullet number 3 – Black carbon data: diesel from industry and vehicles should be included in the gathering and analysis of black carbon data.
4. Page 9, first bullet: The following text should be inserted before “sufficient capacity, infrastructure, and systems for supporting methodologies; and”: “data availability, data collection, technical assistance, training, measurements and analytical infrastructure, with emphasis to Mexico and strengthen its capacities”.
5. Page 9, addition of a third bullet to complete the initiative to address in climate change and enable a low-carbon economy: “increased capacities to communicate data and information to different audiences, including the public, by appropriate means”.
6. Strategic Objective #2: “could” needs to be replaced by “should” to strengthen the activities carried by the Parties.
7. Strategic Objective #2, second paragraph: “establishes an on-line information sharing platform focused on science, technologies, and policies”. We support this initiative but it is important to determine in the Plan who will manage the platform to have clear responsibility for developing the strategies. In the same sentence, we suggest the following text: “establishes an on-line information sharing platform focused on science, technologies, policies, best practices, training, technical assistance and finance opportunities”.
8. Page 10: The last paragraph should read as follows: “in support of both strategic objectives, the Parties should collectively undertake value-added focused projects that deliver GHG reductions and ancillary benefits to North America (including improved public health related to indoor pollution).”
9. Page 10: First box, first sentence, should read as follows : “In the short-term, for example, these projects will include but not be limited to: [...] – clean/low emissions vehicles road and non-road [...] – other initiatives related to black carbon such as wood burning, agricultural burning, brick kilns, waste burning, diesel trucks and buses, forest fires”.

Defenders is an organization that has worked for a number of years in issues of climate change, we hope that these comments will be useful to develop an integrated final Plan. This is an ideal moment to elaborate such a Plan in view of the need for the countries to join efforts to address climate change.