

## Carla Sbert

Nature Canada  
Ottawa, Canada

It was a pleasure to participate on behalf of Nature Canada in the CEC JPAC and Council Sessions on August 16 and 17, 2010 and I thank you for supporting my attendance. As you know, the main focus of my participation was to encourage the CEC to focus its efforts over the next 5 years on restoring the health of North America's native grasslands one of our most imperiled ecosystems. The statement I delivered to the Council on August 17, best summarizes our comments on the proposed 2010-2015 Strategic Plan of the CEC. I am enclosing it and a related article for your reference.

However, given that there was no opportunity for public comment after the Tuesday morning session, I will take this opportunity to make two brief comments on other topics addressed in the proposed Strategic Plan, as follows:

1. Nature Canada has twice participated as a submitter under Article 14 of the NAAEC. The first submission (Ontario Logging II) filed in October 2004, led to the publication in February 2007 of a Factual Record that has proven very helpful in working to address the failure to effectively enforce Canada's Migratory Bird Convention Act alleged in the submission. The process took less than two and a half years. In October 2006, Nature Canada (and several other organizations) filed another submission, this time regarding effective enforcement of the Species at Risk Act in Canada. The Secretariat diligently took less than a year to recommend to the Council the preparation of a factual record. However, a few days from today, that recommendation will have been awaiting a Council vote for three years. Needless to say this is unacceptable. The citizen submission process is a fundamental component of the CEC and the NAAEC. As evidenced by the two letters attached, corrective action is required to restore the credibility of the citizen submission process.
2. Nature Canada welcomes the return of a granting mechanism to support local groups in their efforts to improve the environment and conserve ecosystems in North America through the North American Partnership for Environmental Community Action (NAPECA). The previous North American Fund for Environmental Cooperation was a very important link for the CEC to action on the ground. We encourage the CEC to ensure the new NAPECA adopts the high standards of transparency and independent and objective decision-making that made NAFEC such a success.

We look forward to the final 2010-2015 Strategic Plan for the CEC and to collaborate as may be appropriate in its implementation. Thank you in advance for your consideration of these comments.