

Bill Eggertson

My comments are limited to the section on 'Promoting the North American Renewable Energy Market.' I realize that some points are technical details, but hope the overall input is viewed as constructive.

- 1) You use the term 'renewable energy' but almost all your activity concerns only green power. Suggest: change throughout to refer to 'Green Power' or 'Renewable Electricity' to avoid confusion with green fuels (ethanol) and green heat (space conditioning).
- 2) You mention the 2005 budget in Canada which included an expansion of WPPI and development of RPPI. In light of the hold / cancel of these mechanisms, you may wish to delete this reference.
- 3) Three-year funding of \$800,000 is low, since increased use of renewables provides a significant avoidance for environmental damage, as opposed to mitigation efforts which are common with your other activities.
- 4) Promoting trade in renewables as a 'green product' potentially could be ineffective without a clear definition of 'green.' Many jurisdictions within CEC refer to gas generation as green or clean (compared with coal), and green also includes nuclear in the context of GHG emissions. Continuing to use the term 'green' with no definition has limited value to informed consumers.
- 5) Task 2 will identify areas where development of renewables is possible and provide access to reliable information on potential sources of renewables. Canada has no benchmark analysis for offgrid renewables (except one report from Simon Fraser University that is extremely inaccurate, and a report for the North American Energy Working Group which is also incorrect); the US EIA has recognized its deficiency in tabulating off-grid and DG and green heat sources. This will be a major obstacle to complete tabulation of resources and potential sites.
- 6) Task 4 pairs information on resources with laws and policies. Again, the absence of resources will be an obstacle.
- 7) A missing element is some process to allow parties to encourage regulators (energy boards) to mandate consumption from renewables. In this way, targets are protected from political interference and policy changes.
- 8) All data should include reference to the GHG displacement from conventional baseload consumption.
- 9) Communication is emphasized but, with respect, I am not impressed with CEC's information dissemination. You mention work on developing papers and databases, yet documents are difficult to find on your web site. No partners in Canada (NRCan, NRC, INAC) have links to material developed by CEC.

Suggest: a separate and clearly-identified link off your main site, to emphasize your activity in renewables.

Other than that, my thanks that CEC is involved in this area.

Cliff Wallis

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The Friends of the Oldman River is generally supportive of the 2007-2009 operational plan. We would like to see even more emphasis on building capacity to protect biodiversity, especially in the interior plains (grasslands) of North America, and less emphasis on recycling. We support the continued work on a number of pollutant, renewable energy and biodiversity issues.

Wind energy is starting to develop into an issue given the scale of implementation, both on the environmental side and on the engineering/electrical grid side. This might provide a good focus for some discussions in the next 3 years. One particular area of concern is that, without a cap on greenhouse gas emissions, wind becomes just another industrial activity on the landscape with biodiversity protection being lost and no real reduction in GHG (ie. our use of energy continues to expand and wind becomes another environmentally destructive rather than environmentally protective activity, albeit in different ways than hydrocarbon based fuels).

We are not opposed to the work on recycling, we just feel that this is one area that already has better industry and government support. Biodiversity protection continues to lag in attention paid by governments even though we have some strong agreements in this area.

We realize CEC cannot do it all so wish you success in your program implementation whichever becomes your focus.

Dennis Baresco

This is just a reminder for next time you ask for public input. For the ENGO community (most of whom are painfully overworked), 30 days notice on this type of document is unacceptable and inexcusable.

Minimum of 90 days is appropriate (and entirely do-able, if desired, from any proponent's perspective). I would greatly appreciate it if you would pass this suggestion on to all who have a hand in determining deadlines.

Fernando Leija Torres

Dentro de mi perspectiva considero:

1.-Información en la toma de decisiones.

Se debe de considerar a los agentes de cambio (políticos en poder, líderes, maestros, ong, prensa, y estudiantes) que permita una repartición proporcional del conocimiento.

Con el objetivo de que el conocimiento no se aislé en un solo grupo de funcionarios, que la información tenga fluidez en el publico, lo que permite mas participación con bases mas firmes. Todos los proyectos se deben de medir en una forma anual, para autoevaluarse en su avance, y poder ver los avances de las metas establecidas.

11.-Desarrollo de capacidades.

De igual forma que el anterior, considerar a los grupo antes mencionados y medir los proyectos.

111.- Comercio y medio ambiente

Sobre el proyecto comercio y aplicación de la legislación ambiental. Considerar ese estrato de publico "agentes de cambio" que permita saber si se esta aplicando en forma correcta la ley, y es una forma que el conocimiento sea del dominio publico, que permita garantizar la aplicación de la ley.

Comentario adicional (26 de noviembre de 2006)

En el caso de directrices para la evaluación del riesgo de las sp. Exóticas invasoras y su ruta.

Considero que se debe de ampliar a un análisis mas profundo, para el caso de especies de plagas, y semillas consideradas como malas hierbas, que invadan nuestros campos y penetren en áreas naturales protegidas, y alteren el aparente equilibrio.

A) El flujo comercial va a aumentar el residuo (urbano, manejo especial, y residuos peligrosos y biológico infecciosos) que aun en un porcentaje muy alto no se lleva a cabo una adecuada disposición final, estos aumentos no se si se encuentre considerado este tema dentro de sus tres vertientes, porque van a contribuir a la contaminación de nuestros suelos, agua y aire.

B) En mi punto de vista considero que se debe de tomar en cuenta un proyecto de educación para considerar a los jóvenes y niños que sepan la verdad, que no se les digan mentiras, porque ellos deben de resolver los problemas para buscar el desarrollo sustentable, una proyecto con continuidad no los que se efectúan de acuerdo al estado de animo de personajes que se encuentran en el poder de la política ambiental.

From my standpoint, I believe:

1.-Information for Decision-making.

Should consider the agents of change (politicians in power, leaders, teachers, NGOs, press and students) to enable a proportional distribution of knowledge, in order that knowledge is not isolated in a single group of officials and the information flows publicly, enabling more involvement on more solid ground. All projects should be measured on an annual basis in a self-assessment, to see the achievement of the established goals.

11.-Capacity Building.

Same as above, considering the aforesaid groups and measuring projects.

111.- Trade and Environment

On the Trade and Enforcement of Environmental Laws project. This should consider the public "agents of change" to determine whether laws are being properly enforced. This is a way to put knowledge in the public domain to ensure enforcement of the law.

Additional commentary (sent in on 26 Nov. 06)

On Guidelines for Risk Assessment of Invasive Alien Species and their Pathways.

I believe a more in-depth analysis should be pursued for pest species and weed seeds that invade our fields and penetrate protected nature areas, altering the apparent balance.

A) Trade flows will increase waste (urban, special-handling, hazardous and biological-infectious waste) that is still not properly disposed of to a very large extent. I don't know if these increases are considered within this topic in the three media, as they will contribute to soil, water and air pollution.

B) In my opinion, I think an education project should be considered so that children and youth know the truth and are not given lies, since they have to solve the problems in finding sustainable development in a project with continuity, not based on the whim of the persons in power involved in environmental policy.

Gabriela Vale

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El comentario que nos permitimos enviar por parte de la organización Uniendo Familias de Cd. Juárez. UF A.C., es muy simple, consideramos que es necesaria mucha mas difusión de la CCA a la población en general, dando a conocer los programas y actividades de las mismas.

Proponemos:

Programas de difusión dirigida a la población en general a través de campanas simples de cuidado del medio ambiente.

Programas de difusión con campanas especialmente dirigidas a jóvenes y niños, sobre todo el entendimiento de la diversidad de ecosistemas en que vivimos en América del Norte.

This comment, from the organization Uniendo Familias de Cd. Juarez UF A.C., is quite simple. We believe a much wider release from the CEC to the population in general is needed, to create an awareness of its programs and activities.

We propose:

Awareness programs aimed at the general population through simple environmental stewardship programs.

Awareness programs with campaigns especially aimed at children and youth, especially on the understanding of North America's diversity of ecosystems.

Lic. José Alfonso Ocampo Arjona

Dir. Gral. Buró Jurídico de Planeación

CRÍTICAS AL PLAN OPERATIVO 2007- 2009.

- El documento menciona las tareas a realizar de 2007- 2009, sin embargo no menciona los mecanismos y estrategias de cómo se realizarán.
- El documento establece tareas y estudios a realizar, pero no menciona quiénes realizarán esas tareas- estudios ni su metodología.
- El documento menciona el presupuesto destinado a cada proyecto para su estudio y realización, pero no menciona quienes estarán a cargo de ese presupuesto y cómo los van a utilizar.
- El documento arroja de forma general los proyectos, sin especificar dónde se van a realizar. Debería existir un apartado en la cual se mencionara las acciones que se están realizando o realizarán en cada uno de los tres países, así como quiénes están involucrados en la realización de la misma.
- Es muy reiterativa. Te repite los mismos datos de la introducción al momento de explicar los proyectos.
- El documento maneja términos técnicos. Si es para el público en general, aquellos que no estén involucrados dentro del mismo rubro o no tengan los mismos conocimientos técnicos sobre el tema, no entenderán de lo que se esta hablando. Si se pretende que el público y la sociedad esté concientizada y esté informada de las acciones de este Plan Operativo es necesario que el documento sea claro, entendible y de fácil consulta.
- El documento menciona que cuenta con sitio WEB para consulta de información; en el documento no se menciona ni se cita dicho sitio de Internet.
- Al ingresar a la página de la CCA después de buscarla en Google, la página de inicio despliega una información no organizada para su mejor consulta. Es demasiada información agrupada.
- No existen conclusiones en el documento.
- No existe bibliografía, ni teléfonos donde puedas comunicarte.

Más allá del documento presentado, hay algunas cosas que se deben y tienen que modificar, esto es, aterrizar en cada país los Acuerdos y Pactos que se hayan alcanzado; para implementar los mecanismos jurídicos necesarios para su aplicación. Al efecto de que no sea letra muerta ó filosóficos dado el caso.

Por citar un ejemplo, tenemos que el artículo 2 del Acuerdo de Cooperación ambiental señala que los países deben fomentar la aplicación de los Instrumentos Económicos; sin embargo, éste vocablo de fomentar debe ser modificado al de Aplicar, ya que el mismo es muy ambiguo, además se debe señalar los tipos de Instrumentos Económicos que se deben aplicar en cada país, ya que, por ejemplo en México en su Ley Ambiental prevee el establecimiento de Instrumentos Económicos y no menciona los mecanismos de su aplicación, en virtud de que los

remite a otras Leyes como las Tributarias y en dichas Leyes no contemplan los Estímulos y Apoyos de éstos Instrumentos.

También sería bueno establecer un período para la Instrumentación y Aplicación de los Instrumentos Económicos citados, para cada país, en pro y beneficio de acciones de preservación y protección de los recursos naturales.

Por otro lado, La Comisión de Cooperación Ambiental tiene en su poder cuantiosa información y documentación de temas ambientales, sin embargo, tal información y documentales no llegan a las Dependencias Gubernamentales correspondientes, por lo que el esfuerzo que se realiza no permea a nivel local, siendo que dicha información y documentación sería cualitativa y cuantitativamente importante para la toma de decisiones en cuestiones de índole ambiental. Así como también sería de utilidad para las empresas consultoras que trabajan en proyectos que necesariamente tienen una relación directa e indirecta con el medio ambiente; con lo anterior facilitaría el trabajo de todos los actores involucrados y ayudaría de manera fehaciente la preservación y protección de los recursos naturales, lo cual, no sucede actualmente, por lo que estamos ante una necesidad que la misma sociedad reclama y que ustedes tienen de manera sustantiva la solución, luego entonces, solicito envíen sino toda la información si parte de la información recabada hacia las Instancias Gubernamentales de los tres niveles de Gobierno y Cámaras de Consultoría.

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CRITIQUE OF THE 2007- 2009 OPERATIONAL PLAN.

- The document mentions the projects to be undertaken from 2007 to 2009; however, it does not mention the mechanisms and strategies that will be used to undertake them.
- The document establishes the tasks and studies to be carried out, but does not mention who will conduct them or their methodology.
- The document mentions the budget allocated to each project's study and performance, but does not say who will be responsible for the budget or how it will be used.
- The document lists the projects generally, without specifying where they will be done. There should be a section mentioning the actions being carried out or that will be carried out in each of the three countries, and who will be involved in the execution.
- It is very repetitive. It restates the same data from the introduction in the project explanations.
- The document uses technical terms. If it is for the general public, people not involved in the field or without technical knowledge in the area, won't understand what is being discussed. If the aim is to make the public aware and informed of the actions under the Operational Plan, the document should be clear, understandable and easy to read.
- The document mentions that there is a web site to find information, but the document does not say what the site is.
- After entering the CEC web site (following a search in Google), the home page displays information that is not organized for easy consultation. There is too much grouped information.

- The document contains no conclusions.
- There is no bibliography or contact telephone numbers.

Beyond the document, there are some things that should be modified, bringing the agreements reached home to each country, in order to implement the legal mechanisms needed for application, in order that it not be a dead letter or simply hypothetical. To cite an example, Article 2 of the North American Agreement on Environmental Cooperation states that the countries should promote the use of economic instruments. However, this term "promote" should be changed to "enforce," since the former is very vague.

It should also state what kinds of economic instruments should be used in each country, for example, Mexico's environmental law provides for the establishment of economic instruments, not mentioning the enforcement mechanisms thereof but referring to other laws, such as the tax laws that do not contemplate incentives or support for the economic instruments. It would also be good to set a timetable for the implementation and application of such economic instruments in each country, aimed at preservation actions and the protection of natural resources.

Furthermore, the Commission for Environmental Cooperation is holding vast stores of information and documentation on environmental issues, but these do not reach the corresponding government agencies. Therefore, its efforts do not reach the local level, where such information and documentation would be qualitatively and quantitatively important for environmental decisionmaking. It would also be of use to consulting firms working on projects directly and indirectly related to the environment, and would facilitate the work of all involved, clearly helping to preserve and protect natural resources.

This is not presently the case; society itself is calling out for it, and you are holding the solution. Thus, I request that you send part, if not all, of the information collected to the three levels of government and to consulting firms.

Juan Antonio Herrera

Sector Académico

Dalhousie University Por medio del presente y de manera respetuosa hago llegar los comentarios a la propuesta del Plan Operativo de la CCA a través de la presente.

- La propuesta del plan operativo de la CCA no parece tener a simple vista un programa integrado para la protección de la biodiversidad aun cuando esta propuesta contiene aspectos disgregados sobre especies invasoras; especies protegidas bajo la Convención sobre el Comercio Internacional de Especies Amenazadas de Fauna y Flora Silvestres (CITES); y el desarrollo de la capacidad interna para el manejo integral de los ecosistemas y la conservación de especies y espacios críticos. Esta propuesta carece de un programa sólido de protección a la biodiversidad en América del Norte que considere de una manera integral los problemas que afectan esta diversidad biológica. En consecuencia, se pierde la continuidad con programas anteriores que fueron establecidos por esta CCA como el Plan Estratégico para la Conservación de la Biodiversidad en América del Norte de 2003.
- Aspectos importantes dentro del rubro de biodiversidad han sido omitidos como la bioseguridad y los Organismos Genéticamente Modificados (OGM) los cuales pueden ser tratados desde un punto de vista científico para actualizar a la comunidad sobre el potencial y los riesgos de estos organismos sobre biodiversidad y el porcentaje de comercialización de los mismos en América del Norte.
- Un estudio sobre las áreas protegidas en los tres países y las contribuciones potenciales a la preservación de la biodiversidad contribuiría a los mejores aprovechamientos de estos recursos.

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This is to respectfully submit my comments on the proposed CEC Operational Plan.

- At first glance, the proposed CEC Operational Plan does not seem to have an integrated biodiversity protection program, even though the proposal contains piecemeal items on invasive species, protected species under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and local capacity-building for integrated ecosystem management and conservation of critical species and spaces. The proposal lacks a solid program to protect biodiversity in North America, considering an integrated approach to problems affecting biological diversity. As a result, continuity with earlier CEC programs, such as the 2003 Strategic Plan for North American Cooperation in the Conservation of Biodiversity, is lost.

- Important aspects regarding biodiversity have been omitted, such as biosafety and Genetically Modified Organisms (GMOs), which could be addressed from a scientific standpoint to keep the community up-to-date on the potential and risk of GMOs to biodiversity and their North American market share.
- A study on protected areas in the three countries and potential contributions to preserving biodiversity would help to improve the use of these resources.

Jule Asterisk

Director, Regional Environmental Action

Committee Slave Lake, Alberta I am writing in response to your request for input to the CEC's proposed operational policy.

From reading through your documentation, supplied to our committee by the Alberta Environment Network, it is evident that the CEC is performing valuable and far-reaching activities which will affect not only North America but the global environment for many years and centuries to come.

Congratulations on your accomplishments to date and best of luck in all of your future endeavors. We have a couple of suggestions to make in accordance with your request for input, as follows; Communicate the existence of the CEC to municipal governments. Municipal government is where the 'rubber hits the road' and I know for a fact that at least the ones in our area are completely aware of the CEC and the 'best practices' encouraged by your committee on a national and international scale.

Please consider planning a brochure for municipalities introducing them the data bases specifically relating to the; Sound Management of Chemicals, Promotion of Renewable Energy and Green Procurement.

Our group felt that if our elected municipal representatives had this sort of information available to them in an official database, they would not resist quite so strenuously these concepts when they are suggested to them by their constituents.

Please consider including the woodland caribou of Alberta in Project 3:

Building local capacity for integrated ecosystem management and to conserve critical species and spaces. The woodland caribou are in danger of extirpation in Alberta, mainly due to industrial development (Forestry and Oilfield) in their habitat. Now we have the beginning of what looks like a new Pine Beetle onslaught in Alberta. The woodland caribou will definitely be extirpated is the Alberta Government in concert with industry accomplishes its plan for Pine Beetle control. Thank you for your consideration and for all of your work.

Dr. Kenneth R. Hinga

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Comments on CEC Operational Plan

We wish to provide comments on Trade and Environment Project 5, Guidelines for Risk Assessment of Invasive Alien Species and their Pathways Task 2 is to "Develop a Distributed Information System".

This project team should be aware of a major invasive species project which has been undertaken for North America. Multiple U.S. and Canadian agencies have joined with a non-profit agricultural research organization, CAB International, to create an extensive data resource on invasive species, focusing initially on North America. CAB International has extensive experience in creation and maintenance of encyclopedic information digests (called compendia) as internationally used data resources. This particular compendia is a \$3M project promoted by the US Invasive Species Council.

At present, the membership of the consortium is the Canadian Food Inspection Agency, the Canadian Forest Service, Monsanto Company, USDA, Animal and Plant Health Inspection Service, the USDA Agricultural Research Service, the USDA Foreign Agricultural Research Service, the USDA Forest Service, the USDA Invasive Species Coordination Program, and the USDOC National Oceanic and Atmospheric Administration. A number of agencies in Mexico have expressed their intent to join the project.

At the least, it would be advisable for the CEC project to link with the Compendia project and be cognizant of the resource it represents. By joining the Compendia, the CEC could help shape the data resource itself.

The team can contact Ms. Hilda Diaz-Soltero, the USDA Senior Invasive Species Coordinator (202-354-1880 hdiazsoltero@fs.fed.us) for further information.

- Task 1 is to "Test and Evaluate the CED risk Analysis Guidelines
- Task 3. Establish an ad hoc task group
- Task 4 conduct Risk Assessment
- Task 5 Finalize the North American risk assessment (Voluntary) guidelines
- Task 6 Develop a management plan

We suggest that it would be advisable to have the CEC project team solicit the review and participation of USDA personnel from the Animal and Plant Health Inspection Service (APHIS) in all these projects if they are not already involved). APHIS is responsible for protecting and promoting U.S. agricultural health, administering the Animal Welfare Act, carrying out wildlife damage management activities.

Its offices of Plant Protection and Quarantine, Veterinary Services, Wildlife Services, and International Services have the daily function of dealing with invasive species. APHIS has regulatory authority that are used to control import of potentially invasive species, control of invasive species, and considerable expertise in risk assessment for invasive.

Dr. Martín Villa Ibarra

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Los comentarios a la propuesta del plan operativo 2007 2009 son los siguientes:

En México en esta transición proponer la alineación de las políticas ambientales sectoriales con esta propuesta.

En México existe el financiamiento de la investigación a través de los fondos de CONACYT y los gobiernos de los estado y CONACYT y las Secretarías de estado; se podría proponer que las convocatorias para estos fondos consideraran esta propuesta para fortalecer el financiamiento de los programas ambientales en el caso de la contaminación del aire, generalmente se apoya a proyectos para grandes ciudades; tenemos evidencia de que ciudades de menos de 500,000 habitantes (caso de ciudad obregón, sonora), presentan serios problemas de contaminación del aire y de enfermedades alérgicas y de las vías respiratorias superiores que se relacionan con la contaminación atmosférica; la propuesta es que se tome en cuenta este tipo de proyectos para su apoyo.

Apoyar las políticas ambientales que promueven procesos limpios y ambientalmente saludables como los certificados de calidad ambiental para industrias e instituciones.

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Comments on the proposal for the 2007-2009 Operational Plan are as follows:

In Mexico, during this transition, align sectoral environmental policies with this proposal.

In Mexico, research is funded through Conacyt and state government funds, and Conacyt and cabinet departments. I would propose that y funding requests consider this proposal to strengthen the funding of environmental programs.

In the case of air pollution, support is generally given to projects for big cities. We have evidence that cities with less than 500,000 inhabitants (such as Ciudad Obregón, Sonora) have serious air pollution, [causing] allergies and upper respiratory problems relating to air pollution. I propose that these kinds of projects be considered for support.

Support environmental policies promoting clean and environmentally healthy processes, such as environmental quality certificates for businesses and institutions.

Patricia Silva Alcantara

Presidenta de Ecodiversa A.C.

Quien es el personal operativo de México, en donde se encuentra, quienes son? Quienes crearan el documento, como se llaman

Ya se tiene documentados los proyectos, por que se le designo ese presupuesto ya se conocen en que área geográfica se encuentran, en que criterios se baso la selección, pues en México ya hay proyectos de prioridad como por ejemplo la problemática de contaminación de la cuenca Lerma Chapala.

En el desarrollo de capacidades y toman de decisiones están analizando las consecuencias finales como es la contaminación ambiental, y los recursos naturales que purifican estas consecuencias los toman poco en cuenta pues considero que deberían tomarlos como prioridades como el manejo integral de ecosistemas y la conservación de especies y espacios críticos, pues ellos son los encargados de producir servicios ambientales. (Ejemplo hay especies vegetales que absorben metales pesados)

Al obtener su atlas de monitoreos de contaminantes cuales serán las condiciones previstas para darles soluciones, ya tienen los remediaciones de acuerdo a los procesos industriales. Muchas veces las empresas requieren que se les ayude con ciencia y tecnología aplicada que innové en el reciclaje dentro de sus procesos de usos de materias primas.

Lo de laboratorio forense para vida silvestre debería incluir un hospital de vida silvestre, y un centro de recuperación de su salud y un centro de reintroducción a su hábitat natural en mejores condiciones.

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Who are the operational personnel in Mexico? Where are they and who are they? Who will create the document? What are their names?

Have the projects already been documented? Why were they so budgeted? Is the geographical area already known? On what basis were they selected? In Mexico, there are already priority projects such as the pollution problem in the Lerma Chapala basin.

Capacity building and decision-making analyze final consequences, such as environmental pollution. The natural resources that purify these consequences are overlooked, and I think they should be regarded as priorities, such as integrated ecosystem management and conservation of critical species and spaces, as they are responsible for producing environmental services. (For example, there are plant species that absorb heavy metals.)

Once the pollutant-tracking atlas is in place, what conditions are foreseen to provide solutions, since remediation is also available based on the industrial processes used? Companies often require help with the recycling science and applied technology I created, in their processes

using raw materials. The forensic wildlife laboratory should include a wildlife hospital and health center, and a center for reintroduction [of wildlife] into their natural habitat in better conditions.

Rafael Friedmann

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He aquí un par de breves comentarios sobre el plan de trabajo que han delineado.

Me centre solamente en el sector de las energías alternativas, dada mi larga trayectoria profesional en estas. El plan no contempla apoyar ni promover el uso eficiente de la energía--tanto a nivel suministro como del lado del consumidor.

En contraste, se contempla apoyar solamente a las energías renovables. Creo que esta es una omisión importante y que por alguna razón que no entiendo, la CCA todavía no incluye entre sus iniciativas. El uso eficiente de la energía no solo reduce emisiones contaminantes, si no que aprovecha mejor los recursos--tanto físicos como monetarios, mejorando no solo la economía y competitividad del país, si no que también a nivel del usuario final y su economía familiar, y ayuda a la generación de empleos.

El uso eficiente de la energía (aun sin tomar en cuenta todos los costos que se pudieran aducir a las externalidades) es muchísimo más barato que buscar nuevas fuentes de suministro y/o ampliación de las actuales. En California, la política oficial del Estado provee abatir ~ 60% del crecimiento esperado en el decenio 2002-2012 con los programas públicos de promoción del uso eficiente de la energía entre los usuarios.

Tan solo entre el 2006 al 2008 se han destinado más de 2.1 mil millones de dólares en California para programas de promoción del ahorro de la energía por los clientes de las 3 principales compañías eléctricas (PG&E, SCE, Sempra). Me extraña de sobremanera que la CCA no vislumbre un programa para promover aprendizaje y adopción de tecnologías y prácticas para la utilización eficiente de la energía (y recursos en general--agua por ejemplo) entre los 3 países. Hay importantes lecciones a nivel Estatal/Provincia tanto en los EEUU como Canadá, y a nivel nacional en México. El incluso promover el establecimiento de programas que cubran las poblaciones de los 3 países, podría acelerar la producción de tecnologías más eficientes. Por favor, reconsideren esta omisión por parte de la CCA.

Con respecto a la propuesta de promoción de renovables, aplaudo el que la tengan ya que creo que en especial para México, esta fuente presenta muchas opciones para resolver las necesidades futuras del país. Desde los 1970's que en México se ha trabajado en el aprovechamiento de fuentes renovables-- tanto solares, como eólicas y geotérmicas. Hay mucha gente capaz, tanto a nivel académico como incluso pequeños empresarios (durante Salinas por ejemplo se instalaron más de 30 mil sistemas fotovoltaicos en pequeñas localidades sin acceso a la red eléctrica nacional).

Hay un poco de infraestructura remanente a nivel gobierno (CONAE y SEMARNAP) que también ha buscado promover la adopción de estas tecnologías. Claro--las necesidades y oportunidades

que se presentan en México en su mayoría son diferentes a las que se dan en los EEUU y Canadá (hay mas concordancia entre las comunidades marginadas/indígenas en los 2 países del norte con el México rural; y mas concordancia entre los sectores urbanos de los 3 países).

Creo que la propuesta de trabajo de la CCA en renovables seria mas efectiva si buscase promover el aprendizaje de varios trabajos que ya se están llevando a cabo en cada país, vincular estos, y buscar reforzar y apoyar la evolución de los mercados de equipos y servicios renovables. La propuesta actual parecía ser poco conducente a lograr los grandes objetivos nombrados en el futuro cercano (definitivamente no para el 2009). Falta definir objetivos a corto plazo que vayan moviendo a los tres países hacia los objetivos mencionados.

Finalmente--creo que los montos destinados a la evaluación de los logros de todos los programas propuestos para estos 3 años no son suficientes (~1%). Tampoco hay claridad de que indicadores serán usados para la evaluación. En mi trabajo actual, destinamos ~ 8% de los fondos para la evaluación de los programas para la promoción del uso eficiente de la energía en California. Dada la variedad de las iniciativas que se llevaran a cabo, sospecho que si piensan usar los resultados de la evaluación para mejorar las iniciativas tanto durante su ejecución como las que apoyaran en el 2010- 2012, es importante que se destinen mas fondos a la evaluación de las mismas--al menos 5% y de preferencia, un 10%.

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I have a couple of brief comments on the defined workplan.

I focus only on the alternative energy sector, given my long profession career in the area.

The plan does not contemplate the support or promotion of efficient energy use, at the supply level or by consumers. In contrast, it contemplates support only for renewable energies. I think this is an important omission, and for some reason I do not understand the CEC still does not include it in its initiatives. The efficient use of energy not only reduces pollutant releases, but also makes better use of resources, both physical and monetary, not only improving the country's economy and competitiveness but also the end user and his household economy, helping to create jobs.

Efficient energy use (even without considering all costs attributable to external factors) is much cheaper than looking for new supply sources or extending current ones. In California, official state policy provides for abating ~60% of expected growth in public spending for the 2002-2012 period with public programs to promote the efficient use of energy among users. From 2006 to 2008 alone, more than 2.1 billion dollars have been set aside in California for energy savings promotion programs with customers of the three leading electric companies (PG&E, SCE, Sempra).

I'm especially surprised that the CEC does not foresee a program to promote the learning and adoption of technologies and practices for the efficient use of energy (and resources in general- water, for example) among the three countries. There are important state- and province-level

lessons in the United States and Canada, and nationally in Mexico. The promotion of the establishment of programs covering the populations of the three countries could accelerate the production of more efficient technologies. Please reconsider this omission by the CEC.

As regards the proposal to promote renewables, I applaud its inclusion and think that, especially for Mexico, this source presents several options to solve the country's future needs. Mexico has been working since the 1970's to use renewable sources-including solar, wind and geothermal. There are many capable people in academia and even small business (for example, during the Salinas administration, more than 30,000 photovoltaic systems were installed in small towns without access to the national grid).

There is little remaining government infrastructure (CONAE and SEMARNAP) also seeking to adopt these technologies. Of course, Mexico's needs and opportunities are mostly different from those seen in the United States and Canada (there are more similarities between the marginalized/indigenous communities in the two northern countries with rural Mexico, and more similarities between the three countries' urban sectors).

I think the CEC's proposal for work on renewable energies would be more effective if it sought to promote learning from the various projects already underway in each country, linking them and endeavoring to reinforce and support the market evolution of renewable equipment and services. The current proposal seems not to aim for the major objectives spelled out for the near future (definitely not by 2009). Short-term objectives need to be defined to move the three countries toward those objectives.

Lastly, I think the funds allocated to assess the achievements of all programs proposed for these three years are insufficient (~1%). Also, it is unclear what indicators will be used in the assessment. In my current work, we allocate ~8% of funds to evaluate programs to promote efficient energy use in California. Given the variety of initiatives to be carried out, I suspect that if you plan on using the results of the assessment to improve the initiatives during their execution and to support them in 2010-2012, it is important to allocate more funds to evaluate them-at least 5% and preferably 10%.

Rafael Huacuz Elías

Doctorante del programa en estudios urbanos y ambientales

El Colegio de México

Considero que el documento que sobre el Plan Operativo de la CCA 2007-2009 tendría que tener una difusión más amplia en sectores gubernamentales y académicos (en donde por cierto la información es escasa), sobre todo los documentos impresos ya que leer casi 200 hojas en archivo electrónico (pdf) es complicado.

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I think that the CEC Operational Plan 2007-2009 should have a wider release among governmental and academic sectors (where information is already scarce), especially the printed documents. Reading almost 200 pages of an electronic (pdf) file is complicated.

Roland Blassnig

Environmental Dimensions News Report

Editor

What happens after you receive the written submissions for your annual plan? Do you consider changing the plan depending on comments and has this happened in the past?

Rubén Alejandro Marroquín Flores

Candidato a Doctorado en Ciencias con especialidad en Manejo de Recursos Naturales
Facultad de Ciencias Forestales UANL
Linares, N. L. México

Desde mi punto de vista personal, me parece una lista de proyectos interesantes y prioritarios. Solo uno toca aspectos de legislación ambiental y para mi país México creo es un problema muy grande, hacia su interior sus leyes ambientales están muy atrasadas, por otro lado el no cumplir con el protocolo de Kyoto por parte de los Estados Unidos de América considero es otra limitante al desarrollo de las iniciativas para la conservación de los servicios y la biodiversidad de los ecosistemas.

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In my personal view, it seems to be a list of interesting and high-priority projects. It only refers to environmental law issues, and for my country, Mexico, I think it is a very big problem in that its environmental laws are far behind. Also, I think the United States' noncompliance with the Kyoto protocol is another limitation on the development of conservation initiatives for services and ecosystem biodiversity.

JPAC Meeting in Cancun: 7-8 Nov 2006

Public Comments

- There is an enormous amount of work to be done in North America. The CEC should prioritize its activities and concentrate on areas that others cannot address.
- Since Kyoto was not ratified by the three countries, we recommend a carbon sequestering mechanism be included in the workplan.
- University [educational] structures should be used to talk about sustainable development. Efforts should be coordinated among the three countries' leading universities, working from the ground up to teach basic principles and promote their applications.
- Draft agreements between universities and local institutions, generating reports while building capacities. The program should be grounded at the local level, effectively applying elements of local capacities.
- Promote new educational models and innovations leading to social benefits. Propose sustainable development projects for specific regions.
- The program should include timelines and data goals.
- Water is an ever more important topic. It should be regarded as a financial resource.
- Use complementary approaches [in dealing with freshwater]. Urge North America to create assessment or watershed units and to continue planning and action.
- Promotion of renewable energy alternatives. Most energy [sources, i.e., fuels] are consumed by mobile sources. We should consider measures to make vehicles more efficient. Analyze transportation issues and the use of biofuels.
- We urge the CEC not to abandon the substantial work on biodiversity, particularly that on marine and terrestrial protected areas. Concerning the map of Mexican watersheds: urge the use of this as a succinct unit. With assessment of watershed units: triage those that are not at risk and pick the ones where the CEC can make a difference. Move towards planning and action.

COMMENTARY RECEIVED AFTER THE DEADLINE (30/11/06):

Dr. Andrzej Zeromski

Universidad de Guadalajara, México

Programa de trabajo cooperativo 2007:

Información para la toma de decisiones:

Proyecto 4. Cartografía de aspectos ambientales de América del Norte

1. El Proyecto núm. 4 es central dentro de la prioridad "Información para la toma de decisiones" de la CCA para el período 2007-2010. Incluso se puede decir que los otros cinco proyectos del grupo están subordinados temáticamente al proyecto del Atlas. De acuerdo con el avance de los trabajos sobre el Atlas se podrá pensar en la colaboración entre los proyectos restantes con el Proyecto núm. 4, con el fin de lograr su enriquecimiento mutuo. Dicha colaboración podría ser aprovechada, para el desarrollo y renovación de la metodología del Atlas.
2. Desde el principio sería recomendable también pensar el Atlas en una versión impresa. Las técnicas digitales siempre estarán reservadas a un grupo de usuarios específicos. El Atlas constituirá un excelente medio para la propagación y difusión de la necesidad de la paulatina integración del continente.
3. Sobre el Atlas hay que hablar con certezas. No se debería anticipar las posibles dificultades en relación con el proyecto. Debido a ello quitaría del texto las palabras "sin obstáculos" (primer párrafo, que trata sobre la descripción del proyecto, en la pág. 9).
4. Creo que el Proyecto núm. 4 es clave para el desempeño de la CCA durante el período 2007-2010, ello en virtud también de que involucra directamente a los servicios cartográficos gubernamentales de los tres países, lo que asegura el buen desempeño y el desarrollo exitoso de este gran proyecto.
5. Resulta de suma importancia propiciar la colaboración de los países de América del Norte en torno a la colaboración en la elaboración del Atlas y de su posterior uso. La problemática del Atlas se encontrará vinculada directamente con el desarrollo sustentable de las Partes, es decir, se perfila como una herramienta orientadora para el desarrollo económico social y ambiental a largo plazo.
6. De ahí surge su complejidad, que debe verse reflejada en una metodología innovadora. Las metodologías clásicas de los Atlas son bien conocidas; no obstante, el Atlas Ambiental de América del Norte ha de ser diferente. Lo que se pretende es lograr una información actualizada para la toma de decisiones sobre la construcción del presente desde la perspectiva del futuro sustentable del continente. El diseño de una metodología cartográfica para tal fin debe enfrentarse con este reto. El Atlas debe ofrecer las oportunidades del continente en materia de sustentabilidad, a la vez de presentar las debilidades, así como fortalezas y riesgos al respecto.
7. Por lo expuesto anteriormente, se sugiere conformar un grupo académico de carácter consultivo, integrado por especialistas en cartografía ambiental y temática del desarrollo sustentable; cuyos miembros podrían ser representantes de algunas universidades de los tres países.

La presencia del grupo académico en los trabajos sobre el Atlas podría -en un momento dado- facilitar igualmente la difusión de una nueva conciencia ambiental ciudadana, al interior de diversos niveles de la educación formal de los países del continente.

2007 Cooperative Work Program:
Information for Decision-Making:

Project 4. Mapping North American Environmental Issues [Translation from the original Spanish]

1. Project No. 4 is a key aspect under the CEC's "Information for Decision-Making" priority for the 2007-2010 period. In fact, the other five projects in the group are thematically subordinated to the Atlas project. Following the Atlas work, collaboration on the remaining projects may be geared toward Project No. 4, for mutual enrichment. This collaboration could be used to develop and renew the Atlas methodology.
2. From the outset, it would also be advisable to think about a print version of the Atlas. Digital techniques will always be reserved to a specific user group. The Atlas will constitute an excellent way to release and publicize the need for the gradual integration of the continent. When speaking of the Atlas, certainties should be discussed. We should not anticipate the possible difficulties relating to the project. Thus, the word "seamlessly" should be deleted from the text (first paragraph of the project description, at page 8).
3. I believe that Project No. 4 is key to CEC performance for the 2007-2010 period, since it also directly involves the governmental mapping services of the three countries, thereby ensuring the proper performance and successful execution of this important project.
4. It is especially important to further the North American countries' collaboration on the Atlas and the use thereof. The problems addressed by the Atlas will be directly linked to the Parties' sustainable development, i.e. it may be used to guide their long-term economic, social and environmental development.
5. This is where its complexity arises, which should be reflected in an innovative methodology. Classical Atlas methodologies are well known, however the North American Environmental Atlas should be different. It should provide up-to-date information for decision-making, building on the present to attain a sustainable future for the continent. A mapping methodology to this end should be designed to face this challenge. The Atlas should offer sustainability opportunities on the continent, while presenting the respective strengths, weaknesses and risks.
6. Based on the above, I suggest that an advisory academic group be formed, composed of specialists in environmental mapping and sustainable development. The members could be representatives from universities in the three countries. The academic group's involvement in work on the Atlas also might facilitate a new public environmental awareness at the different levels of formal education among the continent's countries.

Releasing Authority:

Kenneth H. Maybee,
President and CEO
Point of Contact:
Eddie Oldfield
New Brunswick Lung Association

Firstly, let me say that the Operational Plan is clear and follows important tracks of concern to each country. The CEC's programs addressing North American Pollutants Monitoring, Air Quality Management, and Reporting Initiatives are of particular interest to our organization. Furthermore, initiatives proposed on Harnessing Market Forces, Encouraging Green Purchasing, and promoting the North American Renewable Energy Market are an important foundation to creating a sustainable and green economy in North America, while reducing air pollutants (as defined by CEPA) and greenhouse gas emissions.

The New Brunswick Lung Association is a health charity based in New Brunswick, Canada, that works collaboratively with partners in the US and Canada, including industry, 3 orders of government, NGOs and academia - to address respiratory health issues and environmental determinants of health.

Our organization, and sister organizations across Canada and the US, work actively to address Asthma, Chronic Obstructive Pulmonary Diseases, and Lung Cancer and other respiratory diseases - underlying chronic conditions that may be exacerbated by air pollution and a changing climate. We have already developed a web-based mapping (GIS) application capable of accessing environmental and health information in geospatial format, available in the Canadian Geospatial Data Infrastructure (www.gishealthportal.ca/nbla/). We host an International Center for Air Quality and Health to conduct research, education, and advocacy to decision-makers for policies that can best address environmental determinants of health (e.g. transboundary air pollution).

Furthermore, our President and CEO, Kenneth Maybee, was a delegate in the negotiations of the Canada-US Air Quality Agreement - Ozone Annex and spoke at the CEC's 10-year review of the North American Agreement on Environmental Cooperation on the importance of public education on environmental health issues that span the three countries. At that conference, we made a recommendation to the CEC to work with NGOs in North America to hold a workshop/summit focussed on public education, behavior change, policymaking, and information sharing regarding environmental issues that are part of your core mandate.

The workshop/summit could include discussion by participants from the three countries on public education strategies to stimulate market forces in favor of renewable energy, chemical-free produce, and other goods and services. Recommendations / Suggestions:

a) After reviewing the Operational Plan, we noticed that the goal of reducing greenhouse gas emissions to mitigate climate change was not overtly mentioned - even though many of your

programs will have this impact. We believe it is important for the CEC to insert as a goal or objective of the 2007-2009 Operational Plan the reduction of greenhouse gas emissions and the monitoring of GHGs in North America, as part of helping the three countries to deal with climate change. For starters, this could be included as a co-benefit in delivering the CEC programs on renewable energy and green purchasing.

b) We are particularly fond of the proposed EcoKit, and would like to help in the dissemination and transfer of information to industry, government, and NGO stakeholders. We recommend that the CEC hold a two-day multi-stakeholder summit, perhaps combined with a JPAC meeting, to develop / adopt an international strategy for public education. We envisage a strategy that involves:

1. The EcoKit that serves as the focus for the public education strategy
2. A guide for holding regional workshops to engage multiple NGO, academic, industry, and government stakeholders
3. Clear measurement and evaluation criteria (e.g. public perceptions of barriers / opportunities, level of engagement, economic indicators)
4. A reporting process (combining results into an official publication)
5. Sufficient funds to cover costs of holding 8-9 Regional Workshops. These workshops could be aimed toward increasing public awareness and engagement OR be a training workshop around the EcoKit. This would increase public education and awareness of goods and services that meet specific environmental criteria, and help to increase purchasing parity and trade of these goods and services between Mexico, the US, and Canada.

c) We are fully supportive of the CEC's proposed initiative to build and use the North American Environmental Atlas. This could be one of the most significant developments in the CEC framework for addressing air quality and other environmental issues. The technology used in this program would improve evidence-based decision-making, information-sharing, and public education. It is however important to provide adequate training and education to environmental/health professionals, policy makers, industry, and government authorities, in order for the Atlas to be most effective. To support the CEC's Atlas initiative, we would be willing to provide advanced web-based GIS expertise and services, through a meeting or teleconference with CEC staff.

For example, in developing MetaData and the Atlas (map layers) the CEC should consider developing an online 'catalogue' for end-users to search for and access geospatial data sets / resources. Secondly, the CEC should consider developing web-sensor networks and web-processing services to amalgamate and process environmental data / indicators collected through air quality monitoring stations, satellite observation, etc. Thirdly, the CEC should consider utilizing web-map services including ours, to add value (and new map layers) to the Atlas. The Lung Association can demonstrate methods for integrating geospatial data, including air pollution, climate / meteorology, sea level rise, population census data, health information, community infrastructure, and more, into web-based maps. We could demonstrate the ability

of web-based GIS (using interoperable standards defined by the Open Geospatial Consortium) to assist with decision-making.

For example, in March 2007 we are supporting a Pandemic Preparedness Exercise involving partners in the State of Maine and the Province of New Brunswick. The Exercise is coordinated by the Department of Public Safety - and they have an agreement with us to use our mapping capabilities for any environmental or health hazard that would require emergency management. If you have an

interest in sending a representative as an observer for the exercise you would be most welcome. The Lung Association continues to work on web-based GIS improvements. This would fit in the CEC's program area of developing Thematic Applications on Priority Areas, and using geospatial information within the Atlas (repository of environmental and ecosystem data).

Congratulations on an excellent plan. We can not overemphasize the importance of the CEC developing a 2-day summit focussed on public education and behavior change, as part of strengthening market forces in favor of renewable energy, green purchasing, and zero or lowemissions goods and services. We further recommend that a special committee be formed to scope out the summit details, and subsequent regional workshops.

A catalogue of existing public education programs/services should also be developed. In short, improving air quality and reducing greenhouse gas emissions is the responsibility of every citizen, small, medium and large industry, three orders of government etc. Each country represented under NAFTA know only too well the spiraling costs to the health care system through increased mortality, morbidity, and damage to ecosystems from air pollution and climate change. We look forward to its implementation and continuing efforts to reduce air pollution and greenhouse gases.