

September 22, 2000

Ms. Regina Barba, Chair
Joint Public Advisory Committee
Commission for Environmental Cooperation
393 St. Jacques Ouest
Suite 200
Montréal, Québec H2Y1N9

Dear Ms. Barba:

Thank you for inviting me to submit comments on the mechanism for citizen submissions on enforcement matters under Articles 14 & 15 of the North American Agreement on Environmental Cooperation. Let me first say that the draft procedure for public review on input re Art. 14 & 15 seems sensible, more than adequate, and appears to be a workable process that will lead to unanimous adoption of the final recommendations forwarded by the Joint Public Advisory Committee to the Commission for Environmental Cooperation Council.

In regards to comments relating to the citizens submission process, I want to emphasize complication of the process. Under the original Articles 14 and 15 guidelines there were 11 steps. Last year the guidelines were revised and additional actions added to the process, making it more cumbersome. If a goal of the process is to make it easy for submissions to be considered by the Council, then no more changes to the current process are warranted. However, if the desire is for people to produce fewer submissions, then a lengthier, more complicated process will only serve to reduce the effectiveness of this tool for the residents of North America.

Thank you very much for your consideration. If there should be any further need to communicate with me, I can be reached at 512-239-3606 or by e-mail at sniemeye@tnrcc.state.tx.us.

Sincerely,

Stephen M. Niemeyer Acosta
Policy Analyst, Division of Border Affairs
Texas Natural Resource Conservation Commission (TNRCC)

cc: Diana Borja, Director, Division of Border Affairs
Dan Eden, Executive Assistant to Commissioner Marquez