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To: Manon Pepin
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Further Comments on Lessons Learned From Citizen Submissions to CEC

We responded on September 7, 2000 with a detailed analysis of the experience of our experience at the Department of the Planet Earth with a citizen submission to CEC. We wish to make some further remarks.

At the December 7-8, 2000 meeting of JPAC in Montreal, several participants including ourselves suggested that JPAC might want to investigate taking the citizen submission process somewhat further, on a case by case basis, towards negotiated solutions of the environmental problems presented by the citizen submissions.

- 1) It has been learned that virtually all of the citizen submissions have a very solid grounding in fact, are very worthy of consideration by CEC, and address real and legitimate problems.
- 2) Many of the environmental problems addressed by these citizen submissions could be partially or substantially resolved, should a case by case negotiation process be developed.
- 3) At the present time, the CEC process is a dead end process. Should a citizen submission be considered eligible under Article 15 to progress to the preparation of a "Factual Record" by the Secretariat, the end product is still a dead end and the issues at stake are still unresolved.
- 4) Discussion at the December meeting suggested that there might be ways, on a case by case basis, to take worthy citizen submissions and try to move towards a negotiation process with the governments that could partially or fully resolve some of the issues involved in the cases. In many of these cases, the three governments would likely find partial or full resolution of the environmental issues raised by the citizen submissions to be a favorable development.

Moving beyond the Factual Record towards actual resolution of worthy environmental problems is a wonderful idea, and we hope that JPAC will continue to pursue the issue on a case by case basis.

With best regards,

Erik Jansson, Exec. Dir.