



Iniciativa para el Desarrollo Ambiental y Sustentable

JPAC'S CALL FOR COMMENTS ON DRAFT 2011-2012 CEC COOPERATIVE WORK PROGRAM

IDEAS COMMENTS ON PROJECT 8 "ENHANCING ENVIRONMENTAL LAW ENFORCEMENT"

1. Establishment of a trilateral wildlife enforcement working group (Task A-1-ii)

The 2011-2012 Work Program provides for the establishment of a trilateral wildlife enforcement working group. We do believe that the creation of a group committed to the improvement of wildlife enforcement is praiseworthy.

However, the Program makes no reference to the existing North American Wildlife Enforcement Group (NAWEG) and the way both groups would cooperate.

The NAWEG, which was created in 1994, is a network of senior wildlife enforcement officials from the three countries that works to stop illegal shipments of wildlife by strengthening the enforcement of laws and regulations, information exchange and training enforcement agents.

On the other hand, the Wildlife Enforcement Working Group, whose creation is proposed, is a coordinated ad hoc group of officials and key contacts operating to more effectively enforce regulations protecting priority wildlife species in North America.

From the project description and the CEC webpage, it appears that both groups have the same objective; nonetheless, it remains unclear how they would coordinate to achieve it. Therefore, we suggest that the project description shall include a reference to some coordination mechanism.

2. Adoption of environmentally-sound management practices in small and medium enterprises (SMEs) (Task B2)

Identifying an "urgent need to prepare developing countries for the surge in e-wastes"¹, in July 2009, the United Nations Environment Programme (UNEP) published a report entitled "Recycling-From e-waste to resources", which is aimed to promote the appropriate handling of e-waste.

¹ See UNEP Press Release dated February 22, 2010 available at <http://hqweb.unep.org/Documents.Multilingual/Default.asp?DocumentID=612&ArticleID=6471&lang=en&t=long>

TORRE PRESIDENTE

Andrés Bello No. 45 Piso 15.Col. Polanco Chapultepec. México D.F. 11560
Tel. +52 (55) 5998-4800 Fax. +52 (55) 5281-7271



Iniciativa para el Desarrollo Ambiental y Sustentable

Therefore, by promoting the adoption of environmentally-sound management practices in small and medium enterprises (SMEs), the CEC joins international efforts to address the issue of e-waste recycling and refurbishing.

However, the project description focuses only on improving management practices of SMEs (mainly by providing them with training courses).

It shall be stressed that the project makes no mention whatsoever of some sort of action directed at improving consumers' consciousness about the importance of reducing e-waste mismanagement.

We consider that the issue of e-waste cannot be resolved by focusing only on companies that recycle or refurbish e-waste. Therefore, we suggest that some action aimed to increase consumers' awareness about the urgent need to address the issue of e-waste and promote the adequate disposal of e-waste shall be included in the project.

Indeed, it should be noted that there is a lack of knowledge of consumers on the dangers of the improper disposal of e-waste and on how to properly discard them.

As a consequence, in order to address the issue of e-waste more effectively, we recommend that the project shall include some action aimed to guide consumers to adequately dispose of e-waste as we believe the latter to be a necessary complement to the promotion of the adoption of environmentally-sound management practices by SMEs.

TORRE PRESIDENTE

Andrés Bello No. 45 Piso 15.Col. Polanco Chapultepec. México D.F. 11560
Tel. +52 (55) 5998-4800 Fax. +52 (55) 5281-7271