



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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Jeffrey Wennberg, Chair
U.S. Governmental Advisory Committee
VT Department of Environment Conservation
103 South Main St, Building 1 South
Waterbury, VT 05641-0401

Office of
International and
Tribal Affairs

Dear Mr. Wennberg:

On behalf of Commission for Environmental Cooperation (CEC) Council member, Administrator Scott Pruitt, I thank you for the Government Advisory Committee (GAC) letter of advice of April 4, 2017, reporting on our forty-eighth meeting held in Washington, D.C. on March 28-29, 2017. Our discussion at the meeting on how to strengthen the concepts and proposed results of cooperative trilateral project proposals under consideration for the CEC operational plan was very valuable. We appreciate the NAC's comprehensive advice on the twelve projects under consideration for the 2017-2018 Operational Plan.

GAC Recommendations

Project 1: Building community capacity to reduce marine litter in North American border watersheds

1. The committee believes that the project should look to and share strategies that are in place and under development at the national and sub-national levels in the three nations.
2. The committee is aware of active border programs with both Mexico and Canada and suggests that these programs might be partners in this effort.
3. Two suggestions for encouraging youth involvement are 1) awareness among children and young adults can be encouraged through partnerships with aquariums and museums, and 2) it might be possible to modify some of the excellent land-based waste management educational curricula to incorporate marine litter.
4. This is the kind of project that might be able to attract philanthropic support and thereby leverage the CEC resources with outside funds.
5. Given that final locations for these projects have not been decided, the committee believes that the project should favor the selection of at least one community where TEK would be an added opportunity. This is more often the case in EPA Region 10.

We agree it is important to capitalize and build upon strategies and exiting programs at the national, subnational, and international levels in the United States, Canada, and Mexico and shared borders. This project builds upon the U.S. Trash Free Waters practice that empowers communities to evaluate, modify, and expand practices to minimize and manage waste that finds its way into water ways and results in marine litter. It aims to learn and capitalize on related

efforts in Canada and Mexico, and develop and expand best practices trilaterally. We have advised our team to incorporate the education component through the existing network of aquariums and explore other opportunities on education and youth engagement as well. The project aims to engage communities, including local and tribal on both the Canada and Mexico borders, and further inland, selecting locations on a watershed-based approach. We also appreciate GAC's advice on potential appeal to philanthropic organizations and plan to reach out to relevant sources.

Project 2: Conserving shorebirds through community engagement at key sites in Canada, the United States and Mexico

1. The US Fish and Wildlife Service has data on this issue. Although the proposal listed the agency as the USA lead for developing the project, it was not listed among the entities that will have a significant involvement in the project. This appears to be a project that could attract outside financial support from private partners. The oil and gas industry might be interested in being affiliated with this effort.
2. The network of bird enthusiasts that exists throughout the continent suggests that public attention could be focused on shorebird conservation by creating social media groups that notify interested individuals whenever a notable event is taking place at nearby conservation areas.
3. TEK is thoughtfully included but the same advice as offered in project #1 above could also apply here.
4. Potential additional private financial partners include the Audubon Society and Ducks Unlimited.

GAC is correct that the US Fish and Wildlife Service is the U.S. lead expert on this project. This project is aiming identify and capitalize on drivers and incentives to engage key actors to create a sustainable approach to fund and implement bird and habitat conservation. Locations identified are important in bird migratory routes. Some of the actions contemplated include festivals that engage citizens, indigenous and local communities, businesses and outside financial sources to create visibility, awareness, and support for conservation of the habitats in a manner that contributes to the communities as a whole. We have shared GA's advice with the team to explore how to use social media, bird watching networks, and financial partners to achieve these objectives.

Project 3: Tools for food loss and waste prevention, recovery, and recycling in North America

1. The list of other agencies and constituencies seems too limited. Please refer to the links listed in our last advice letter (2016-3).
2. One aspect of the food waste issue not discussed here is the development of technologies and methods to enhance the preservation of food, including post-cooking.
3. There are multiple experiments in various jurisdictions including Vermont, Mexico City, Ontario, Hennepin County MN, and many others providing incentives for curbside organic separation. These experiments could provide useful data for analysis.
4. The TEK section may be misdirected. Minimization of food waste has not been a subject

of tribal experience because tribes historically harvested only what was needed. The focus of TEK communities was prevention, not management.

5. The project may also want to examine current and potential future incentives for private industry to aggregate and convert organics to marketable commodities.

We appreciate GAC's advice on this project and have shared current and past advice with our team. While the current scope of the project aims to improve measurement of food loss and waste across the food supply chain, and develop approaches to translate food loss and waste prevention, recovery and recycling into associated environmental and socio-economic impacts (e.g. GHG reductions, landfill space conserved, meals recovered, etc.), the team is considering the advice and lists of potential partners as they detail the activities of the project. The list of localities piloting solutions to organics waste is particularly valuable, the team is also exploring the opportunity to engage TEK prevention experience in aspects of the project.

Project 4: Increasing impact of private sector supply chain efficiency through ISO 50001

1. Not all possible industries have been identified.
2. TEK might be involved in this project depending upon the specific industry selected for study and piloting.
3. Is ISO 50001 the most appropriate means to promote supply chain efficiency? The GAC is concerned that the smaller entities along the supply chain will find the rigor of the ISO certification process too challenging, and as a result decline to participate. The GAC suggests that including the option of pursuing less demanding certification approaches might produce similar benefits among a greater number of participating companies.

We appreciate GAC's advice and have shared it with the team. The team has informed us that this initiative enjoys support from the proposed industries and that these proposed industries plan to co-fund the project. We agree that TEK engagement will be dependent on the supply chain industries selected.

Project 5: Improving black carbon emissions inventory data for residential wood combustion

1. Youth engagement could be incorporated by reaching out to university students as data collectors.
2. The project description fails to indicate how the development of this information will provide a benefit and to whom. While the value of the information is easy to grasp, the specific end application would be useful to know. Assuming this question is answered the next logical suggestion is for the project sponsors to reach out to these groups or organizations and involve representatives in the inventory design.
3. "Residential" may be too narrow a focus. Wood burning takes place in a number of non-residential industries and activities, such as agriculture. Should the project also include these sources?
4. The committee also noted that the purpose of wood burning varies by region. Would it be useful to categorize the use of wood fuel by purpose or activity (heating, cooking, etc.)? Also, the committee recommends that the project acknowledge that in some communities

the use of wood is a matter of tradition and culture and not simply practical or economic.

We appreciate this input and have advised the project team to broaden the scope to look at other fuels used in local and indigenous communities (such as diesel) as well as the types of use (residential, cooking, recreational, etc.), and how the information will serve to inform national and North American emissions inventories and actions.

Project 6: Supporting science for continental conservation of the Monarch Butterfly

1. The continuing focus on the Monarch captures the public imagination but provides limited benefits toward addressing larger challenges. Redefining this project to provide meaningful scientific benefits for a wider number of threatened pollinators would seem worthwhile.
2. The project summary indicated a lack of TEK experience with the Monarch. The GAC suggests that if the scope of the project were to extend to pollinators generally the project team may find the TEK resources grow significantly.
3. The committee suggests a more active role of USDA may be helpful here.

We agree with the GAC that this project would add value through a comprehensive focus that also preserves key pollinators and have instructed the team to address other pollinators as well. The team has also approached USDA as a key stakeholder.

Project 7: Helping North American communities respond to extreme heat events (Phase-II) Scaling up syndromic surveillance systems

1. The US Public Health Service and their Canadian and Mexican counterparts should be added to the list of entities to be involved.
2. The GAC suggests that the project also invite the participation of FEMA as extreme heat events can be classified as disasters.

We appreciate GAC's advice to consider including the US Public Health service, their Canadian and Mexican counterparts, and FEMA. Our teams are considering their potential engagement in the context of the scope of the project.

Project 8: Marine Protected areas as tools for promoting ocean health

1. TEK is well integrated into this project design.
2. The committee sees the potential for collaborative partnerships to possibly include the creation of an on-going organization or association of MPA managers and key stakeholders beyond the completion of the project itself. This should be further developed in the project proposal. One additional collaborative partner that was suggested by a committee member was Woods Hole Oceanographic Institute.

We appreciate GAC's advice to create a self-supporting organization or association of MPA managers and key stakeholders to help propel this project past the two years of CEC

involvement. This project proposal presents a continuation of a current project. Project sustainability beyond this second phase of CEC funding is a key priority for us.

Project 9: Implementation of North American action plans to boost the sustainable, legal and traceable production and trade of CITES Appendix II priority sharks, turtles, tarantulas and timber

1. The project description is weak and appears to be written prematurely. Development of a well-defined project can only be done once the specific action plan to be implemented is selected. The committee believes this is a worthy project but recommends a thorough reworking of the project proposal once the species and action plan are selected.

We agree with the GAC that the scope, contents, and impact of this project will depend on the specific action plans. These plans are now complete and address actions for production, conservation, and sustainable trade of 56 CITES Appendix II species. The project team is currently determining which action plan to focus on and adjusting the project design accordingly.

Project 10: North American TEK atlas/inventory and case studies on best practices in integrating TEK in decision-making in the three countries

1. While the committee sees significant value in this project, TEK is not a discrete body of knowledge that can be cataloged. The project needs to acknowledge that many tribes will not participate, and that in many cases TEK is a tradition and often one that is not shared outside the tribe.
2. The committee believes the case study component is good and could, by example, expand the appreciation among tribes for the value of viewing TEK as a resource as well as a tradition.
3. The project description should acknowledge that this effort is a first step; an opportunity to provide leadership in hope that over time more will follow.
4. Given the different legal status of Mexican tribes, will this effort engage with them differently than U.S. and Canadian tribes?
5. While the template encourages a discussion of the involvement of youth, tribal culture requires that the focus should be on engagement with elders.
6. The project description is unclear regarding whether the inventory and case studies are limited to federally recognized tribes. The GAC recommends the opportunity for participation be extended to all tribes, whether or not they are federally recognized.

We appreciate the GAC's questions and advice on this project. Our trilateral Roster of Experts on TEK is leading and collaborating with our team to design this project proposal and address topics like the ones identified by GAC as challenges and opportunities.

Project 11: Reducing Emissions from goods movement via maritime transportation in North America (Phase III)

1. This is clearly a special purpose project with a defined goal. Once Mexico complies with MARPOL Annex VI and ECA the project is completed.

We are expanding the scope of this project proposal to focus on sharing and advancing consistent/harmonized vessel and port greening practices in North America, including MARPOL Annex VI and ECA implementation in Mexico. The project facilitates Mexico's ascension to MARPOL Annex VI and submission of an Emissions Control Area designation application to the International Maritime Organization. The project also facilitates sharing best practices in green ports among North American stakeholders to reduce pollution and impacts to the environment and human health.

Project 12: Quantifying methane and black carbon from flaring in the oil and gas industry

1. The committee sees two applications for the outputs of this research. First, an opportunity to generate interest in the development of cost effective technologies to reduce the waste of this energy resource, and second, an opportunity to quantify the environmental and health impacts from the emissions.
2. The committee believes that the industry has developed estimates of these metrics already, but may not have conducted the actual direct measurement proposed here.
3. The GAC sees a role that universities could play in this research and suggests that once the data has been collected and analyzed the CEC could facilitate partnerships between industry and universities to develop means of cost effectively capturing and marketing currently flared gas.

We appreciate GAC's advice on potential approaches to achieve successful research and driving technology development and resource recovery in this sector.

Thank you for all your time and efforts in providing this valuable advice and insight into the CEC projects. We look forward to continue to working with you as we advance the important integration of trade and environmental issues in North America.

Sincerely,



Jane Nishida
Acting Assistant Administrator
U.S. Alternative Representative