

In general I think public consultation needs to be an active process, not a passive one (which yours is). These need has been understood through some 20 years or more of my experience in many countries. using the CECInfo access to the UN Infoterra got the information to me. Your proposed process does not include such wide means of distribution or access. Also the approach to consultations seems to be rather formal and might even appear to need a lawyer involved. This should not be.

I commented on the final item of the last text page of you draft. My comment was that it is necessary to have an "active" or even "proactive" information program to be effective public consultation. A very good handbook on community consultation is available from the EUROPEAN FOUNDATION for the Improvement of Living and Working Conditions as a free Adobe acrobat document. If you are interested I will send it. I know that Environment Canada has published a number of guidelines in public involvement which should be available, and I have also published a paper on this many years ago. A group of your status should refer to these. All emphasize the need to bring the public into the process, not just put information on your web site and hope people find it. There are millions of web sites out there now. When was the last time you checked my site at [www.geoniger.com](http://www.geoniger.com). I do not expect you to have heard of this. The only way that I heard of your web site was that someone posted it to the United Nations Infoterra newsnet site which I monitor. Are the public who do not have internet of any value to you? How many of the Mexican public are on the net? You need to develop some more proactive means of getting the issues you want commented on out to the public.

My other annotation that I sent related to page two of your document "How JPAC receives and transmits issues from the public. First, as discussed above, this assumes that the public know who CEC and JPAC are, know of the issues, and know the mechanisms to send comments. As a long-term environmentalist who is involved in such things globally, including having written some of the environmental processes for Canada and Mexico under the agreement, I am surprised how little I know of what you are up to. If this was a public consultation program I was conducting under CEAA, it would not be accepted. But then, my major concern under this item is the very formal and almost legalistic manner in which it is laid out. I may be wrong, but I get the impression that I would need to conduct a scientific research program, hire a lawyer and prepare a thesis before I submit my formally written comments. Or else they will be discarded as unimportant or invalid. Again, how many of the public does this rule out or scare off.

I hope that this provides a more formal version of my reply. It was a lot more work than just attaching the annotations to your acrobat file and returning them.

Thank you for reading my ramblings and I do hope they are constructive.

Yours truly,

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