

November 18, 1999

Commission for Environmental Cooperation  
393, rue St-Jacques Ouest, Bureau 200  
Montréal, Québec  
Canada H2Y 1N9

Dear CEC:

The Center for International Environmental Law (CIEL), on behalf of the Submitting Parties, presents this Submission pursuant to Article 14 of the North American Agreement on Environmental Cooperation (NAAEC) and Council Resolution 99-06. This Submission presents evidence that the United States Government is "failing to effectively enforce" Section 703 of the Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§703-712, which prohibits the killing and taking of migratory birds.

The evidence presented clearly shows that the United States is failing to enforce the MBTA against loggers and logging companies. In fact, the United States has an unwritten policy that no enforcement or investigative action shall be taken in incidents involving logging operations. The Submitting Parties therefore respectfully request that the Commission prepare and publish a factual record documenting the allegations contained in this Submission.

Please direct all communication to:

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Thank you for your attention to this matter.

Best regards,

Chris Wold  
David Downes

# Submission to the Commission on Environmental Cooperation Pursuant to Article 14 of the North American Agreement on Environmental Cooperation

*submitted by*

Alliance for the Wild Rockies  
Center for International Environmental Law  
Centro de Derecho Ambiental del Noreste de Mexico  
Centro Mexicano de Derecho Ambiental  
Friends of the Earth  
Instituto de Derecho Ambiental  
Pacific Environment and Resources Center  
Sierra Club of Canada  
West Coast Environmental Law Association

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*prepared by*

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## The Submitting Parties

This submission is made by the following organizations from Canada, Mexico, and the United States.

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