June 12, 2017


Edward Gresser
Chair of the Trade Policy Staff Committee
Office of the United States Trade Representative

Submission in Response to the Request for Comments on Negotiating Objectives Regarding the Modernization of NAFTA (FR Doc. 2017-10603), “NAFTA Negotiations”.

Dear Edward Gresser,

The Center for International Environmental Law (CIEL) respectfully submits the following comments in response to the Request for Comments on Negotiating Objectives Regarding Modernization of the North American Free Trade Agreement with Canada and Mexico (Request) published by the U.S. Trade Representative (USTR) in the federal register at 82 Fed. Reg. 23699 (May 23, 2017).1 CIEL submits these comments both as an organization and on behalf of the more than 1,400 supporters listed at the end of this document.

Introduction

Since 1989, CIEL has used the power of law to protect the environment, promote human rights, and ensure a just and sustainable society. CIEL seeks a world where the law reflects the interconnection between humans and the environment, respects the limits of the planet, protects the dignity and equality of each person, and encourages all of earth’s inhabitants to live in balance with each other.2 For more than 25 years, CIEL has been active in the public debate regarding the social and environmental impacts of trade agreements, including the North American Free Trade Agreement and the North American Agreement on Environmental Cooperation. CIEL staff served for many years on the Trade and Environment Policy Advisory Committee. We engaged early and actively with the Commission on Environmental Cooperation (CEC) and filed multiple submissions on behalf of ourselves and other organizations under the North American Agreement on Environmental Cooperation’s Article 14/15 process, and have attempted to use the mechanisms available under other trade agreements, including the US-Peru Free Trade Agreement.

1 Request for Comments on Negotiating Objectives Regarding Modernization of the North American Free Trade
We have been deeply involved in civil society efforts to increase the transparency and accountability of trade and investment panels, in both State-to-State and Investor-State cases. Indeed, we litigated for more than a dozen years against the Office of the United States Trade Representative to bring greater transparency both to Investor State Dispute Settlement (ISDS) negotiations and to the ISDS process itself. More recently, we have prepared extensive and detailed analyses of industry and governmental proposals for the Transatlantic Trade and Investment Partnership (TTIP), and the proposed environment chapter of the failed Trans-Pacific Partnership (TPP).

CIEL’s experience to date indicates that trade policy, as currently conducted, results in trade agreements which consistently prioritize private economic again over the public’s interest in a clean and healthy environment, safe products, and an open, accountable democracy. The renegotiation of NAFTA should strive to correct this imbalance by reflecting this interconnection through the establishment of an FTA that upholds and strengthens environmental regulations, protects workers’ rights, and respects the rights of all people to exercise democratic control over public policies at all levels of government. This shift is necessary to avoid the detrimental effects NAFTA has inflicted upon people and the environment.

The following comment will discuss sections A, B, G, J, and M of the Request. In doing so the comment also references Stephen Vaughn’s exploratory draft to Congress, and Robert Lighthizer’s formal letter notifying Congress of negotiation. The comment focuses on the themes of a) reorienting the trade agreement to prioritize the safety, health, and well-being of the workers and the environment; b) a clear role for the public in environmental enforcement; c) the elimination of the Investor State Dispute Settlement Mechanism; and d) the transition from fossil fuels to renewable energy including the removal of the energy chapter. The overarching connection between these areas of concentration centers on the tendency of trade agreements to undermine the ability of governments to put people and the environment first.

As a starting point, prior to commencing negotiations in August, Parties should commit to transparency and public participation at all levels. A commitment to transparency before negotiations begin displays a willingness on behalf of governments to seek an agreement that prioritizes its citizens and the democratic process. Public participation in the development of trade positions ensures that negotiators consider how trade rules may affect the public interest, while transparency in negotiations provides an important safeguard against negotiators trading away safeguards and standards that protect the public interest. This means publishing draft versions of U.S. textual proposals for any section of a trade agreement for which the text has not yet been consolidated, soliciting public comment on the proposals, and responding to those comments prior to tabling the proposed language in negotiations. Before beginning negotiations in August, the United States should commit and agree with Mexico and Canada to commit to making proposed texts public both before and after each negotiating round. Such a move is not

5 Id.
without precedent, as Mexico and the EU recently reaffirmed their commitment to transparency as they continue negotiations for an EU-Mexico trade deal, and the EU published its latest “negotiating textual proposals” in May 2017.⁶

A. General and product-specific negotiating objectives for Canada and Mexico in the context of a NAFTA modernization.

This specific request lacks clarity, as it seems beyond our purview, and that of the USTR, to identify negotiating objectives for the Canadian and Mexican governments. That said, we interpret it as requesting objectives for the U.S. in negotiating with Canada and Mexico – though our suggestions do not change if the section is in fact soliciting negotiating objectives for Canada and Mexico. The renegotiation of NAFTA presents an opportunity to recommit to environmental protection in the face of rapid climate change. More than simply adopting or maintaining MEAs, a new NAFTA should seek to advance environmental protection beyond the current status quo. Doing so requires a reorientation of priorities towards environmental protection, and intergenerationally aware, sustainable trade practices.

A.1 Energy

Any discussion of modernization must necessarily include a progressive outlook on energy. As the average temperature of the world continues to increase, fossil fuels must be replaced by renewable energy. Action in this direction requires the elimination of the energy chapter, and in particular exclusion of the terms of Mexico’s energy reforms from the agreement, removal of the ‘proportionality clause,’ and an elimination of all fossil fuel subsidies by all three parties.

When implemented, NAFTA Chapter 6 protected ‘strategic activities’ relating to Mexico’s oil and hydrocarbon industries within the purview of the national government.⁷ Energy reform in Mexico has since privatized some of the industry, however Annexes 1 and 3 of Chapter 11 still exclude the industry from ISDS mechanisms as well as National Treatment principles—creating an open debate concerning dispute settlement and governing mechanisms for the industry.⁸ The resulting conflict of Chapters 6 and 11⁹ makes it clear that energy cannot have a place in a modernized NAFTA. Any inclusion of the Mexican energy reform would perpetuate the dominance of the oil industry in Mexico while severely damaging the potential of renewable energy to establish a share of the market. A true modernization of NAFTA must reflect progress in renewable energy and avoid preferential treatment for the fossil fuel industry in Mexico.

Any modernization of NAFTA should eliminate the proportionality clause, as countries modernize and shift to other forms of energy production. As it stands the proportionality clause

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⁸ Bradly Condon, Mexican energy reform and NAFTA Chapter 11: Articles 20 and 21 of the Hydrocarbons Law and access to investment arbitration, JOURNAL OF WORLD ENERGY LAW AND BUSINESS 1, 8 (2016).
⁹ Doherty supra note, at 259.
in NAFTA limits Canada from reducing exploitation and export of fossil fuels, as it requires Canada to “maintain its current share of energy exports to the United States,” irrespective of Canadian supply or potential shortages. Meaning, if Canada wants to reduce energy production, they cannot do so by reducing exports. They must maintain a proportionate amount of exports relative to the total supply, based on the prevailing proportion over the 36 months. Any energy reduction Canada undergoes must be via their own consumption. Such a provision clearly has as its objective the continued dominance of the fossil fuel industry; eliminating this provision simultaneously benefits efforts to implement renewable energy and will allow Canada, Mexico, and the United States to exert domestic control over their own energy policies.

Current restrictions on procurement policies limit the ability of governments to use ‘green purchasing’ requirements. Public procurement is often used as a tool to support local companies and public interest objectives such as renewable technologies or diversity. However, it can also violate the national treatment requirement of the GATT/WTO and as such is may be limited by FTAs. It is essential for governments to be able to use all available purchasing and policy instruments to better support renewable energy and green technology. Such objectives and decision making at all levels of government should not be constrained by provisions in a renegotiated NAFTA. The new NAFTA must instead require signatory governments to include a preference for goods and services with low environmental impacts in procurement decisions.

A.2 Regulatory Coherence

A modern NAFTA must recognize state sovereignty and abandon the recent FTA trend of establishing regulatory coherence. Included in the EU-Canada Comprehensive Economic and Trade Agreement (CETA), TTIP, and TTP, the practice requires a cohering of regulatory standards amongst parties to the FTA. With goals of establishing transnational standards and more efficient trade, regulatory coherence often results in lower health and environmental standards. Rather than raising the lowest regulatory standards to be in line with the most stringent, the most stringent standards often conform to the lower standards by requiring a ‘trade impact analysis.’ Such an analysis prefers “least trade restrictive” policies that creates a race to

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11 John Dillon & Gordon Laxer, Over a Barrel: Exiting from NAFTA’s Proportionality Clause, Parkland Institute (July 16, 2008), http://www.parklandinstitute.ca/over_a_barrel
12 NAFTA, Article 605: Other Export Measures.
13 Replacing NAFTA supra note 10, at 2.3.
15 Id.
16 Canada-E.U. Comprehensive & Economic Trade Agreement at Ch. 21, (2016); It should be noted that CETA calls only for voluntary cooperation, not mandatory cooperation.
18 Transpacific Trade Partnership at Ch. 16, (2016).
the bottom.\textsuperscript{19} For example, regulatory cooperation under NAFTA has already opened the door to greater corporate influence and less public participation in the area of chemicals policy-making and regulation. A Council of Canadians study found that an informal US-Canada regulatory cooperation initiative for pesticides established under NAFTA in 1996, the Technical Working Group on Pesticides, has been dominated by large companies with patented pesticides and their industry organization, CropLife. Farmers, NGOs and consumers are not represented, and the resulting harmonization has not risen to the most protective standards.\textsuperscript{20}

In addition, regulatory coherence often imposes a barrier to new regulation. While no explicit barriers to legislation exist, such provisions effectively require the Parties to agree on new regulation, thus increasing the politicization and corporate influence in the legislative process. Any resulting legislation may be watered down and ineffective. Moreover, the negotiations for TTIP included measures that preempted certain regulatory fields, thus diminishing state sovereignty.\textsuperscript{21} Though absent from TTP, other language clearly indicates the intent for the states to be equally bound by the agreement.\textsuperscript{22} Not only must NAFTA avoid measures tying state governments to models of regulatory coherence by national governments, but it must avoid implementing a framework of regulatory coherence altogether. This practice stifles regulatory progress and prioritizes the needs of corporations over those of citizens and the environment.

\textbf{B. Economic costs and benefits to U.S. producers and consumers of removal of any remaining tariffs and removal or reduction of non-tariff barriers on articles traded with Canada and Mexico.}

Though removing barriers to trade constitutes a primary objective of trade agreements, ensuring a responsible application of this process remains paramount. Non-tariff barriers to trade include duties, quotas, and other regulations passed nominally for public policy reasons, but practically act as protectionist measures. However, regulatory measures necessary to protect the health and safety of consumers as well as the environment, though potentially construed as Technical Barriers to Trade (TBTs), should not be mistaken for TBTs. The Draft calls for parties to “improve upon their WTO TBT commitments and eliminate any unjustified TBTs,”\textsuperscript{23} however technical regulations and standards are often necessary components of public policy and “do not create unnecessary obstacles to international trade.”\textsuperscript{24}

Practices potentially construed as non-tariff trade barriers, or TBTs operate as necessary elements of regulatory schema and should not characterized as trade barriers. As mentioned

\begin{footnotesize}  
\textsuperscript{21} Preempting the Public Interest supra note 19, at 13.
\textsuperscript{22} Id.
\textsuperscript{23} Draft supra note 3.
\textsuperscript{24} Erik Bartenhagen, The Intersection of Trade and the Environment: An Examination of the Impact of the TBT Agreement on Ecolabeling Programs, 17 VA. ENVTL. L.J. 51, 61 (1997).
\end{footnotesize}
above at supra section A.2, regulatory coherence results a race to the bottom through the convergence of regulations. This practice has no place in a modern trade agreement, and must be left out of the new NAFTA. The proposed public procurement requirements (allowing Parties to impose green purchasing requirements for governments. For more see supra section A.1) could be construed as barriers to trade, but are necessary components of a successful transition to green energy.

Additionally, NAFTA created a rise in cross-border carbon emitting vehicular traffic without providing an avenue to mitigate.25 A program requiring emissions reductions for all cross-border motor carriers, though inhibiting trade in some capacity, primarily functions as a supplement to renewable energy agendas and should be understood as such. Requiring all cross-border commercial vehicles to comply with the strictest available state and federal standards is necessary. Furthermore, as a result of offshoring to countries with lower emissions standards, NAFTA can result in ‘carbon leakage,’ or an increase in overall emissions.26 Allowing governments to penalize imported goods made with high climate emissions through enacting a carbon duty represents a supply side limitation on the use of fossil fuels in the production of goods.27 Removal or reduction of certain TBTs that benefit people and the environment, or limitations on new public should not be a goal of a NAFTA renegotiation.

G. Relevant barriers to trade in services between the United States and Canada and Mexico that should be addressed in the negotiations

Modernizing NAFTA must reflect the increasing mobility of capital and consequences this has on peoples and communities everywhere. Given that the comparative advantage in trade rests to some extent in lower regulations and health and safety standards for workers, workers must have increased mobility to seek the best possible working environment. As such, we oppose any border walls in North America and defend the human and labor rights of people who migrate, as well as their right not to be forced to migrate by poverty and insecurity.28 The parties to NAFTA must make shared commitments to the rights of migrant workers and indigenous people and enforceable mechanisms to protect them, including the right to form trade unions.29 Any new North American Agreement should “promote trade union democracy, freedom of association, and transnational collective bargaining in cases where an employer operates in two or more countries thus increasing the political power of the concerned groups.”30

J. Relevant investment issues that should be addressed in the negotiations

25 Replacing NAFTA supra note 10.
26 Id.
27 See, European Communities – Measures Affecting Asbestos and Asbestos-Containing Products, WT/DS135/AB/R at ¶192.b (2001) (Stating that the Panel can, when determining the likeness of a product, take into account health and safety concerns, as well as differences in production.), https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S006.aspx?Query=(@Symbol=%20wt/ds135/ab/r*%20not%20w*)&Language=ENGLISH&Context=FomerScriptedSearch&languageUIChanged=true#
28 Political Declaration of the Encounter of Social Organizations of Canada, United States and Mexico, Participants of the Encounter (May 29, 2017), http://www.alainet.org/en/articulo/185853
29 Id.
30 Id.
Any modernization of NAFTA must eliminate the ISDS mechanism and respect the right of people to exercise democratic control over public policies in each country. The ISDS mechanism in Chapter 11 serves to extend protection to states investments in one of the participating countries. “Under these provisions, investments and investors are protected from certain types of ‘measures’ taken by governments. The definition of ‘measures’ is broad - it includes all laws adopted by national, state or provincial legislatures; regulations that implement these laws; local or municipal laws and bylaws; and policies that affect government interaction with businesses - which means that investors are protected from nearly all forms of government action.”\(^{31}\) This provision effectively limits the ability of governments to enact needed public policy laws, due to the ability of corporations to challenge these through the ISDS mechanism.\(^{32}\) Corporations can claim that the new legislation is trade restrictive through alleging violations of the most favored nation and national treatment principles. When governments enact ‘measures’ for public policy purposes corporations can allege that the domestic ‘measures’ violate these principles.

Through the ISDS corporations have achieved a roll-back of environmental protections and demonstrated the potential for ISDS to restrict a Party’s authority to regulate on behalf of citizen welfare. “They have extracted more than $370 million from governments in these cases, while pending NAFTA claims total more than $35 billion.”\(^{33}\) The mechanism as it exists creates a favorable platform for corporations to raise disputes against FTA signatories. The cases are heard not by judges but by arbitrators typically with corporate backgrounds. The potential for ISDS to undercut sovereignty and to influence decision-making within a nation’s public policy-making process is not merely hypothetical, this chilling effect has occurred as a result of previous ISDS decisions.\(^{34}\)

The Metalclad Corporation case remains the most illustrative of these decisions. The dispute arose from the Mexican government’s refusal to intervene in a dispute between Metalclad and a municipal government over the construction and operation of a landfill. Following certain investment promises to construct the landfill, a municipal government refused to issue the permit that Metalclad needed fearing environmental and health impacts of the site. In addition to awarding the company US$16,685,000 in damages, the Tribunal created a chilling effect on future legislation by interpreting “expropriation” to include land-use regulations “which have the effect of depriving the owner in whole or in significant part, of the use or reasonably-to-be-expected economic benefit of property.”\(^{35}\) “The Tribunal held in its award that the actions of the Mexican national and municipal authorities entailed a breach by Mexico of its obligation to afford Metalclad’s investment treatment in accordance with international law, including fair and equitable treatment, under NAFTA Article 1105.”\(^{36}\) In addition to these policy implications, the arbitral tribunal demonstrated why domestic courts are preferable in adjudicating these disputes.


\(^{32}\) Id. at 112.

\(^{33}\) *Replacing NAFTA* supra note 10.

\(^{34}\) Nogales supra note 31.

\(^{35}\) Id.

\(^{36}\) Metalclad Corporation v. United Mexican States, (ICSID Case No. ARB(AF)/97/1), [https://academic.oup.com/icsidreview/article/16/1/165/629580/Metalclad-Corporation-v-United-Mexican-States](https://academic.oup.com/icsidreview/article/16/1/165/629580/Metalclad-Corporation-v-United-Mexican-States).
by “grafting upon Mexican law… sanctity for private property rights” that form so much of the U.S. legal tradition.\textsuperscript{37}

Thus, fearing “legal retaliation for lost profits,” states may freeze or modify efforts to advance environmental protection.\textsuperscript{38} Aware of the potential problems with the ISDS, the drafters of TPP included a carve out for tobacco control measures.\textsuperscript{39} This alone indicates that many states recognize the dangers posed by ISDS to state regulatory frameworks. Broad corporate rights, including ISDS, must be eliminated from NAFTA to safeguard our right to democratically determine our own public interest protections. International investors should be required to seek recourse in domestic courts, just as domestic investors must.

M. Relevant environmental issues that should be addressed in the negotiations

Consistent with the Draft letter, a goal of the renegotiated NAFTA should be to effectively enforce existing environmental laws and undertake implementation of applicable multilateral agreements.\textsuperscript{40} Without an independent oversight body with sufficient autonomy to enforce environmental commitments and evaluate the environmental effects of NAFTA, however, there is no guarantee that the commitments made will translate into environmental protection. Negotiations should also seek legally binding and enforceable environmental obligations within the body of the agreement.

M.1 Regulatory Issues

The problems presented by the ISDS were discussed above, however, these problems appear to have been contemplated by recent FTAs. Parties to the TPP ‘carved out’ Tobacco companies of the ISDS process because of the undue influence the Tobacco Industry could have on regulations.\textsuperscript{41} If ISDS remains in the renegotiated NAFTA, a new carve out must create an exemption for environmental and other public interest policies from all the deal’s rules including those on ISDS and regulatory coherence, without exceptions. Signatory governments should maintain the ability to preclude ISDS suits by stipulating ad hoc a certain measure is in the public interest. Each government should simply be able to declare regulations to be matters of public policy when challenged through ISDS or the dispute settlement chapter. These exemptions “should not be limited by any qualifiers, such as ‘necessity,’ ‘primarily aimed at’ or ‘arbitrary.’”\textsuperscript{42}

This carve out must also include ensuring these policies are protected from any regulatory coherence models, lest they are required to conform to lower standards. Any law or regulation at

\footnotesize{
\textsuperscript{37} Doherty \textit{supra} note 7, at 267.
\textsuperscript{38} \textit{Id.} See also, Gus Van Harten & Dayna Nadine Scott, \textit{Investment Treaties and the Internal Vetting of Regulatory Proposals: A Case Study from Canada,} Osgoode Legal Studies Research Paper No. 26/2016 (December 7, 2015) \texttt{http://dx.doi.org/10.2139/ssrn.2700238}.
\textsuperscript{39} TPP Article 29.5.
\textsuperscript{40} Draft \textit{supra} note 3.
\textsuperscript{42} Green Group Project \textit{supra} note 4, at 8.
}
any level of government, that a party says is for the environment or public health, must not be changed or weakened through negotiations, or subsequent regulatory cooperation measures agreed upon by the parties. This could be achieved by stating:

“Notwithstanding any other provisions of the Agreement, a contracting party shall not be prevented from taking prudential measures with respect to environmental protection, resource management and conservation, and related health protection matters.”  

M.2 Chemicals

The mandate should not include authority to negotiate provisions that are applicable to the regulation of chemicals. Instead, chemicals should be entirely excluded from the purview of a modernized NAFTA. The reduction of non-tariff barriers to trade in this field leads to an inevitable race to the bottom. In particular, the elimination of regulatory differences in pesticides regulation will lead to a lower level of protection and a higher level of exposure to harmful substances.  

The proposals by the chemical industry for a renegotiated NAFTA would expose Americans to toxic substances, weaken the government’s ability to ensure food safety, and poison the environment. For example, the industry advocates for the protection of cross-border data flows, which could prevent Americans from receiving information about the risks of chemicals and the potential harm to human health. Trade constraints on regulatory authority for chemicals also inhibit innovation by protecting entrenched companies and their higher-risk products. In contrast, regulations that encourage companies to find healthier substitutes leads to new products and increasing market demand for those products.

The elimination of hazard-based regulation would ignore our scientific understanding of carcinogenic and other high-risk substances which cannot be adequately controlled or which are unsafe at any level. Instead, a move towards requiring risk assessments for every substance would entail higher regulatory expenses for the government and be based on a series of assumptions about risk that are unsupported by facts or evidence.

The regulation of chemicals in trade agreements also constrains the authority of local and state governments to protect their citizens, which have been at the forefront of innovations in chemicals regulations.

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43 Id.  
45 Joint Statement by the American Chemistry Council (ACC), the Chemistry Industry Association of Canada (CIAC), and Mexican Chemical Industry National Association (ANIQ) on NAFTA, American Chemistry Council (March 1, 2017), https://www.americanchemistry.com/Media/PressReleasesTranscripts/ACC-news-releases/Joint-Statement-by-ACC-CIAC-and-ANIQ-on-NAFTA.html
M.3 Enforcement though an Independent Dispute Settlement Mechanism

Renegotiating NAFTA presents an opportunity to establish an effective and independent enforcement mechanism. NAFTA has suffered from a “decrease in independent oversight and loss of institutional autonomy that has undermined environmental enforcement.”46 A modernized NAFTA should not condition enforcement on proving that a violation affects trade or investment between the parties, as required in some existing US FTAs. A new NAFTA should establish that disputes over alleged violations of environmental provisions may be brought to an independent dispute settlement body by a citizen of any Party, a Party, or the CEC. “Panelists in such disputes, or in disputes over measures justified on environmental grounds, shall be full-time environmental lawyers, environmental advocates, environmental academics, or environmental regulators. Provisions should be included to allow for early dismissal of claims that are manifestly without legal merit. The decisions of the dispute settlement body regarding violations of environmental provisions must be transparent, not dependent on approval of the Parties, and subject to the same sanctions available for violations of commercial provisions.”47

The process by which citizens submit complaints to the CEC also requires changing in both form and scope. The renegotiation of NAFTA should include provisions that if the CEC or environmental ministry of any Party receives a petition from a citizen to identify a potential violation of any of the provisions in the new Environment Chapter by another Party, the CEC or ministry must investigate the potential violation. Instead of requiring Party approval, once the CEC or Environmental Ministry has made a determination of a claim as meritorious an investigation and subsequent publication of findings by the respective ministry, or CEC is required. When an investigation leads to a conclusion that a violation is reasonably likely, the burden then falls to the CEC or respective ministry of the environment to bring the claim to the independent dispute settlement mechanism.48 The independent dispute settlement mechanism will have the requisite jurisdiction to issue a legally binding resolution, and see that the resolution is implemented.

M.4 Strengthening the CEC

Moreover, the modernization of NAFTA requires an update to the CEC. As international environmental governance remains fragmented under a multitude of treaties and implementing bodies, the strengthening of the CEC to establish a coherent set of legal norms in North America would not only decrease risk of engaging with ambiguous environmental regulations for investors, but would firmly establish rule of law allowing citizens and states to ensure better protection of the environment.

To accomplish this, the renegotiation of NAFTA should establish the CEC as an independent body to monitor the environmental impacts of NAFTA, receive and evaluate petitions by citizens of any Party concerning such impacts, and propose measures to mitigate them. The current SEM process is not independent, must often work through a narrow scope, and lacks the ability to

45 TPP and Environment supra note 41, at 8.
47 Green Group Project supra note 4, at 7.
48 Id. at 5.
make recommendations.\textsuperscript{49} Eliminating this process and allowing the CEC or the ministry of the environment to accept and review claims by private citizens overcomes many procedural shortcomings. Such a move would increase the independence of the citizen petition process by eliminating much of the power Parties currently have in reducing the scope, or denying investigative approval.\textsuperscript{50} Where the CEC finds a likely violation of such provisions, it is necessary that the body can bring a claim directly to an independent dispute resolution body. The work of the CEC must not depend on approval of the Parties.

The CEC should also monitor Parties’ compliance with environmental provisions, report on best practices for compliance, and receive and evaluate petitions by citizens concerning such compliance. The current process ends with publication of a factual record, leaving unknown the efficacy of the SEM process;\textsuperscript{51} therefore empowering the CEC to monitor compliance with the environment chapter both prior to and after a dispute will improve overall environmental protection. The creation of best practices through regulatory oversight again both allows investors to more efficiently comply while monitoring the effectiveness of the environmental regulatory framework of NAFTA. The immense scale of trade liberalization detrimentally affects the environment; part of the expanded presence of the CEC should include monitoring, evaluating, and mitigating this impact.\textsuperscript{52} The failures of the current environmental framework under NAFTA indicate the necessity of self-reflection to ensure compliance with the objectives of the FTA.

M.5 Specific Environmental Objectives

Further, the renegotiation must require robust and binding protections for the environment in an Environment Chapter and other relevant chapters of NAFTA. Necessary for the success of an environmental framework are the following goals:

The new NAFTA must create, implement and enforce laws that prohibit trade in illegally harvested plants and wildlife. Such action must prohibit the harvesting, taking, or trading of any wild flora or fauna, in part or in whole. To this end NAFTA needs to require rigorous enforcement measures, as well as the mandatory implementation of relevant MEAs, such as CITES. This practice must include full supply chain transparency, with data traceability to determine origin and legality.\textsuperscript{53}

The renegotiation of NAFTA must prohibit harmful fisheries subsidies that contribute to increased fishing capacity, IUU fishing, or promote overfishing. Furthering this goal requires ecosystem-based fisheries management that meets international best practices. These methods include but are not limited to monitoring landed and discarded catch, enforceable limits on catch

\textsuperscript{50} Id.
\textsuperscript{51} Id. at 535.
\textsuperscript{53} Green Group Project supra note 4, at 3.
(including discards), prohibiting overfishing, and requiring the conservation of special marine species including sharks, sea turtles, seabirds, and marine mammals.\textsuperscript{54}

NAFTA must require that Parties do not derogate from national or international environmental laws. Imperative to this end is the necessity of language assuring Parties “adopt, maintain, and implement” the laws, regulations, and all other measures necessary to fulfill their obligations under key environmental agreements, including the United Nations Framework Convention on Climate Change.\textsuperscript{55} Such commitments must extend to the binding resolutions issued by the Independent Dispute Settlement Mechanism.

The new agreement must require Parties to address climate change, including a binding requirement to implement policies to ensure compliance with the Paris agreement. The new FTA must promote efforts to keep the warming of global average temperature below 1.5°C by (1) prohibiting fossil fuel subsidies and (2) ensuring protections for countries to address climate change. This requires countries to adopt, maintain, and implement greenhouse gas emission standards, a carbon cap and/or tax and any related border tax adjustments, renewable energy programs, and energy efficiency standards or labels.\textsuperscript{56}

Further, as part of larger efforts to combat climate change the FTA must end the practice of fossil fuel subsidies. For the reasons stated in supra Section A.1, NAFTA should avoid any special provisions favoring non-renewable energy. Fossil fuel subsidies perpetuate the global domination of hydrocarbons, and suppress the growth of green energy.

Countries must also adopt strict regulations reducing pollution from lead and other toxins. Adhering to the relevant multilateral treaties regarding toxins and chemicals regulation remains a necessity for the both the prevention of climate change as well as a prioritization of human health and safety.

The implementation of these more specific goals provide substance to the reorientation of NAFTA towards a sustainable, democratic, citizen focused trade agreement. The ability to enforce these regulations via an independent dispute settlement mechanism remains imperative for such a trade agreement to materialize. Though technically restrictive of trade, the above policies would greatly benefit an environmental protection framework included in NAFTA. To further this point, a ‘climate impact assessment’ must replace the ‘least trade restrictive analysis.’\textsuperscript{57} This could allow for the increasing of environmental regulations, many of which further the above list of goals, without enacting new legislation. A ‘climate impact assessment’ prioritizes a continued reorientation of NAFTA toward a focus on human and environmental elements.

\textbf{Conclusion}

\textsuperscript{54} Id. at 2.
\textsuperscript{55} Id. at 4-5.
\textsuperscript{56} Id. at 5.
\textsuperscript{57} Replacing NAFTA supra note 10, at 2.
The attempt to modernize the NAFTA must go beyond a mere reconfiguring of its parts; it requires not only a reorientation of the objectives but also the enhancement and recognition of each parties’ commitments and responsibilities to the ultimate benefit of their citizens. To this end, the process of modernization must stem from a clear commitment to transparency; the new NAFTA must uphold and strengthen environmental regulations with the goal of improved environmental protection, greater enforcement provisions, and meaningful recourse for environmental harm. Further, it must protect workers’ rights, and respect the rights of all people to exercise democratic control over public policies at all levels of government.

Sincerely,

Melissa Blue Sky
Senior Attorney
Center for International Environmental Law
The following individuals support CI\El’s submission to USTR and call for a new North American Agreement that prioritizes people and planet over narrow corporate interests.

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Angela Ferrari, Anchorage AK
Ken Maurice, Anchorage AK
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Tim Baxter, Mobile AL
Melissa Milano, Tuscaloosa AL
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Robert Miles, Huntsville AL
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Anne Dugaw, Costa Mesa CA
Alena Jorgensen, Temple City CA
Anje' Waters, Grass Valley CA
Anne Veraldi, SF CA
Stacie Charlebois, Sebastopol CA
John Martinez, Lomita CA
Arlene Baker, Berkeley CA
Bill Herman, Oceanside CA
Rachel Rose, Auberry CA
Wayne Steffes, Redding CA
Camille Gilbert, Santa Barbara CA
Diane Berliner, Los Angeles CA
Carol Patton, Kensington CA
Caryn Cowin, South Pasadena CA
Sharon Budde, Concord CA
Christian Heinold, Oakland CA
Chad Johnson, Long Beach CA
Carol Rowland, Creston CA
Cathy Crum, Agoura CA
Joseph Dadgari, Los Angeles CA
Marc Silverman, LA CA
Dianne Miller, San Diego CA
Deborah Santone, Pleasant Hill CA
Donna Carr, Encinitas CA
Donna Sharee, San Francisco CA
Duane Welsch, Claremont CA
Ed Loosli, Walnut Creek CA
Eh Estes, Mountain View CA
Beatriz Pallanes, Santa Ana CA
Frances Goff, Pasadena CA
Dale Freeman, Auburn CA
Gina Gatto, Castro Valley CA
Gregg Johnson, San Jose CA
Genevieve Riber, San Diego CA
Jennifer Kelly, Palo Alto CA
Les Roberts, Fresno CA
Bernadette Webster, Whitethorn CA
Maryann Haller, Escondido CA
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Jeffrey Hurwitz, San Francisco CA
James Dawson, Davis CA
John Oda, San Francisco CA
Janet G Heinele, Santa Monica CA
J Angell, Rescue CA
J. Mednis, Del-Mar CA
Joe Buhowsky, San Ramon CA
John Wiesner, Castro Valley CA
Joe Weis, Reedley CA
Jean Mont-Eton, San Francisco CA
Jennifer Federico, Oakland CA
Jennifer Muir, La Canada CA
Jeri Pollock, altadena CA
Jessica Fielden, Oakland CA
Joyce Jeckell, Sunnyvale CA
Jamie L, Alameda CA
Jeremy Spencer, Pacifica CA
Jude Lotz, Burbank CA
Faith Strailey, Quincy CA
Kate Ague, Menlo Park CA
Joseph Melvin, Redding CA
Kelly Brannigan, Oceanside CA
John Pasqua, Escondido CA
Pamela Check, Chico CA
Karla Devine, Manhattan Beach CA
Diana Kliche, Long Beach CA
Katherine Wright, Aliso Viejo CA
Karen Kirschling, Sf CA
Lacey Hicks, Union City CA
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Joyce Heyn, Poway CA
Michael Essex, El Dorado Hills CA
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Mary Meehan, La CA
Melvin Taylor, Sacramento CA
Rebecca Koo, San Diego CA
Mark Gotvald, Pleasant Hill CA
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Maryellen Redish, Palm Hill CA
Michele Reed, Templeton CA
Merilie Robertson, Canoga Park CA
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Michele Coakley, Rancho Cordova CA
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Dr. Prisca Gloor, Los Angeles CA
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Querido Galdo, Oakland CA
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Marcina Motter, Encinitas CA
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Ted Fishman, San Jose CA
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Tim Brellow, Guerneville CA
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Victoria Miller, Encino CA
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Shereen Mcdade, Los Angeles CA
Kermit Cuff, Mountain View CA
Inez Hileman, Orinda CA
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Brian Girard, Ventura CA
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Zvika Greensfield, San Rafael CA
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Kae Bender, Lancaster CA
Kurt Cruger, Long Beach CA
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Scarlet Sobranie, Los Angeles CA
Kenneth Wilcox, Sacramento CA
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Anita Coolidge, Cardiff CA
Casey Harris, Davis CA
Codruta Onaga, Glendale CA
Damian James, Oakland CA
Leon Hunter, Downey CA
Janet Flanagan, Platina CA
Donna Esposito, carlotta CA
Jessica Likens, Buena park CA
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Miranda Leiva, Sherman Oaks CA
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Sherrill Furell, Davis CA
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Suzanne Sparks, Laguna Woods CA
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Twyla Meyer, Pomona CA
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Marilyn Price, Mill Valley CA
Casee Maxfield, Los Angeles CA
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Malcolm Moore, Portola CA
Mary etta Moose, san francisco CA
Deborah Mulvaney, San Francisco CA
Oak Norton, Redlands CA
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Maria Peteinaraki, heraklion city creta CA
Emil Reisman, Encino CA
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Luranne Drager, San Francisco CA
Joseph Pluta, Bakersfield CA
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Steve Ochoa, Huntington Park CA
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Jason Thomas, Shasta Lake CA
Kathleen Bungarz, Walnut Creek CA
Laura Herndon, Burbank CA
Zara B, Nevada City CA
Andi Shotwell, Wheat Ridge CO
Kathleen Doyle, Golden CO
Curtis Kline, Conifer CO

Thomas Kuspiel, Denver CO
Lanelle Lovelace, Crestone CO
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Gladys Murphy, Highlands Ranch CO
Heidi Wood, Greeley CO
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Joy Om, Boulder CO
John Eckler, Lakewood CO
Klaus Steinbrecher, Castle Rock CO
Katherine Robertson, Fort Collins CO
Lawrence Crowley, Louisville CO
Maureen Oliver Borchuez, Lakewood CO
Rachel Scarlata, Divide CO
Laura Waterworth, Aurora CO
Dea Smith, Loveland CO
Carla Behrens, Longmont CO
Tiffany Snyder, Boulder CO
Wolfgang Glaeser, Craig CO
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Martha W D Bushnell, Louisville CO
Rakesh Chandranatha, Golden CO
Lawrence Baird, Aurora CO
James Senger Jr., Bayfield CO
David Schroeder, New Castle CO
Suzie Awad, COLORADO SPRINGS CO
Julia Bottom, Longmont CO
Edward Hall, Glenwood Springs CO
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Cynthia Small, Golden CO
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Ellen Wasfi, Dover DE
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Jack Ray, Newark DE
Andrea Chisari, Titusville FL
Brenda James, Vero Beach FL
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Bob Senko, Cape Coral FL
Chey Richmond, Pensacola FL
Lasha Wells, Saint Petersburg FL
Sandra Boylston, Sanford FL
Joyce Schwartz, Altamonte Springs FL
Donald Shaw, St. Petersburg FL
Harold Henry, Miami FL
Donna Selquist, Port St Lucie FL
Esther Garvet, Miami FL
Emily Sagovac, Wellington FL
Geri Collecchia, Pembroke Pines FL
James Stalls, Niceville FL
Jim Brunton, Tampa FL
Andrea Chisari, Titusville FL
Jennifer Scott, Fort Myers FL
James Robertson, Largo FL
Karen Matulina, St Augustine FL
Kristo K, Stuart FL
Carol Ohlendorf, Bradenton FL
Lawrence Logue, Pensacola FL
Lynn Forsht, Homestead FL
Felicity Hohenshelt, Jacksonville FL
Lisa Mazzola, Tampa FL
Lonnie Albrecht, Lake Panasoffkee FL
Sylvia R., Lauderhill FL
Mari Mennel-Bell, Fort Lauderdale FL
Martha Burton, Lakewood Ranch FL
Michael Sunfire, Lakeland FL
Mark Aziz, Sarasota FL
Mary Walls, Jacksonville FL
Patricia Mcdonald, Winter Park FL
Doug Landau, St Petersburg FL
Robert Wolf, Naples FL
Patricia Deluca, Nokomis FL
Ryan Persad, Fort Myers FL
Barry Eshkol Adelman, Vero Beach FL
Theresa H Deery, St Pete Beach FL
Judy Moran, Panama City FL
Timothy Lippert, Tampa FL
Virginia Utt, Melbourne FL
Barbara Schwartz, Ocala FL
Dave Karrmann, Jacksonville FL
Sandra Perez, Miami FL
Donna Pope, Tampa FL
Cheryl Watters, Palm Coast FL
Whitney Watters, St. Augustine FL
Patti Martin, Spring Hill FL
Mark Grzegorzewski, Saint Petersburg FL
Marilynn Smith, Brooksville FL
Karyn Graham, Tampa FL
Cliff Rimler, Gainesville FL
Curt Valmy, davie FL
Margaret Handley, Orlando FL
Claudia Reed, Bocaelia FL
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Mark Caso, clearwater FL
George Craciun, Thonotosassa FL
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Laurie Habel, Jacksonville FL
Maureen Kowsky, Largo FL
Irene Lloyd, Jacksonville FL
Ellen Matis, West Palm Beach FL
Gillian Miller, Miami FL
Robert Oberdorf, Plantation FL
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Pat Wynn, Miami FL
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Joe Perugini, Tarpon Springs FL
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Hezikiah Johnson III, Albany GA
John Wiener, Atlanta GA
Mark Koritz, Dunwoody GA
Marco Pardi, Lawrenceville GA
Eleanor Smithwick, Atlanta GA
Joni K Lamb, Richmond Hill GA
Norman Hoffman, Marietta GA
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Carolyn Turner, Tucker GA
Kim Crawford, Hampton GA
William Lucas, Kaunakakai HI
Jonathan Boyne, Honolulu HI
Lesley Patton, Kapaa HI
Nalei Kahakalau, Honoka’A HI
Jacqui Skill, Lahaina HI
Noenoe Barney-Campbell, Honolulu HI
Robert Nerger, Naalehu HI
Virginia Bennett, Honolulu HI
John Nix, Kihei HI
Mel Cup Choy, Kaneohe HI
Ronald Russell, Kihei HI
Yolanda Clay, Kailua-Kona HI
Debra Nix, Kihei HI
John Tovar, Cedar Falls IA
Barb Rogers, Ames IA
Inga Jaeger, Iowa City IA
Jody Gibson, Des Moines IA
Kathy Colton, Marion IA
Merle Dockendorff, Fairfield IA
Patricia Copenhaver, Iowa Falls IA
Bill Giese, Cedar Rapids IA
Dan Coburn, West Branch IA
Holly Kukkonen, Iowa City IA
Cheryl Kallenbach, Winchester ID
Jane Beattie, Ketchum ID
Robin Lorentzen, Caldwell ID
C. Lima, Orofino ID
Elizabeth Bryant, Meridian ID
Craig Hanson, Priest River ID
Thomas Rogers, Eagle, Idaho ID
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Barbara Sullivan, Arlington Heights IL
Beverly Conroy, Oak Park IL
David Brodnax, Oak Park IL
Carol Devoss, St. Charles IL
Lynn Morris, Chicago IL
Cindy Risvold, Naperville IL
Ann Davidson, Chicago IL
Caroline Mead, Glenview IL
Dawn Albanese, Elk Grove Village IL
Ellen Domke, Chicago IL
Julia Wade, Arlington Heights IL
Nick Scarim, Batavia IL
Jan Zanoni, Glenview IL
Jerry Golden, Clinton IL
Jim Forbes, Evanston IL
Karen Peterson, Northbrook IL
Lynne Rooney-Katsma, Oswego IL
Lindsey Pfanstiel, Red Bud IL
Lisa Klepek, Glen Ellyn IL
Linda Townill, Plainfield IL
Marian Scena, Chicago IL
Marc Conrad, Chicago IL
Kate Harder, Glen Ellyn IL
Pat Rose, Skokie IL
Ryan Burgess, Glen Ellyn IL
Carole Pooler, Chicago IL
A.G. Hansen, Crestwood IL
Wyman Whipple, Dahinda IL
Sophia Mcaskill, Palatine IL
Jennifer Cunningham, Aurora IL
Rohana Wolf, Evanston IL
Sonja Chan, Kankakee IL
Christine Austin, Marion IL
Karen Van Tuyle, Roodhouse IL
Zygmunt Czykietka, Chicago IL
Rita Kain, Earlville IL
Colleen Cleary, Ottawa IL
Stephan Donovan, Chicago IL
Gary Grice, Chicago IL
Mark Grotzke, Tinley Park IL
Cat Marron, Glendale Heights IL
Pat Korallus, Lisle IL
Rev Charles H Hensel, Northbrook IL
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Matt Geer, Willow Springs IL
Donna Barrett, Buffalo Grove IL
Michele Laporte, Lombard IL
N H, Schaumburg IL
Russell Ziegler, downers grove IL
Christine Etapa, Chicago IL
David Gross, Pinckneyville IL
Diane Vandiver, Bolingbrook IL
Barbara Hannah, La Grange Park IL
Jeffery Biss, Elgin IL
Olga Abella, Robinson IL
Laura Anderson, Chicago IL
John Kavalunas, Lakewood IL
Robert Merz, Highland Park IL
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Candie Glisson, West Lafayette IN
Fredric Salstrom, St. Mary Of The Woods IN
Sally Small, Indianapolis IN
Steve Babb, Indianapolis IN
Karen d Felts, Noblesville IN
Ed Benner, Goschen IN
William Fife, Indianapolis IN
Alfred Staab, Wichita KS
Daviann Mcclurg, Larned KS
Stephen Keener, Lenexa KS
Margaret Sweeton, Wichita KS
Sharon Parker, Topeka KS
Betsy Ruhe, Louisville KY
Donna Blue, Lexington KY
David Crawford, Louisville KY
Jennifer Edelen, Louisville KY
Mafalda Castro, Porto KY
Emma Anderson, Lawrenceburg KY
Rolf Friis, Louisville KY
Julia Sharp, Olive Hill KY
Cynthia Blackledge, Morehead KY
Richard Ralston, Louisville KY
Peggy White, Owensboro KY
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Brieaux Poche, Ponchatoula LA
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Matthew Genaze, Cambridge MA
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Annica Ackah Sey, Silver Spring MD
Fatima Baker, Cambridge MD
Christopher Ecker, Rockville MD
Ryan Bradley, Greenbelt MD
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Heidi Johnson, Wheaton MD
David Hurley, Bel Air MD
Kendra Holt, Wheaton MD
Kevin Kriescher, Baltimore MD
Molly Hauck, Kensington MD
Lisa Hopkins, Annapolis MD
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Susan Welsford, Muskegon MI
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John Viacrucis, Moorhead MN
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Erline Towner, Milford NH
Janice Banks, Center Barnstead NH
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Meg Kidd, Keene NH
Marcel Liberge, Manchester NH
Charles Arnold, Manchester NH
Glen Benjamin, Portsmouth NH
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Alison Miller, West Windsor NJ
Cori Bishop, Egg Harbor City NJ
Chris Scholl, Neptune NJ
Christine Koehler, Vineland NJ
Matthew Franck, Highland Park NJ
Denise Kobylarz, Pequannock NJ
Linda Mckillip, Erial NJ
Sue Velez, Delran NJ
Andrew Mumford, Red Bank NJ
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G Yuzawa, Wyckoff NJ
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Jennie Sabato, Somers Point NJ
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Kim Sellon, New Providence NJ
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George Bourlotos, Morris Plains NJ
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Sheeza Qurashi, Sicklerville NJ
Dorothy Jackson, Princeton Junction NJ
Debra Miller, Belvidere NJ
Ken Lavacca, Bloomfield NJ
Leslie Jenkins, West Orange NJ
Holly Mcdonald, Trenton NJ
Paul Netusil, Old Tappan NJ
Eugene Pumphrey, Barnegat Light NJ
Ashley Rosen, Westfield NJ
Millicent Sims, Montclair NJ
Dina Willner, Mahwah NJ
I. Engle, Village Of Tularosa NM
Crystal Wolf, Santa Fe NM
Dawn Foster, Placitas NM
Elisabeth Price, Albuquerque NM
Bob M, Hobbs NM
Tami Linder, Rio Rancho NM
Leslie Wilbur, Las Cruces NM
Robert Gilman, Albuquerque NM
Randy Diner, Abq NM
Michael Ripberger, Los Lunas NM
Susan Selbin, Albuquerque NM
B. Thomas Diener, Albuquerque NM
Stephanie Vorse, Carlsbad NM
Josephine Scherer, Albuquerque NM
A.T. Cole, Silver City NM
Mary Bissell, Rio Rancho NM
Amy Dingman, Albuquerque NM
Dawn Chambers, Silver City NM
Erika Wanenmacher, Santa Fe NM
Merry Harsh, Silver City NM
Scott Ary, Reno NV
Derek Gendvil, Las Vegas NV
Georgina Wright, North Las Vegas NV
Jason Steadmon, Boulder City NV
Jerry Curow, Searchlight NV
Ken Gibb, Zephyr Cove NV
Mary Frank, Las Vegas NV
Pat Brunson, Las Vegas NV
John Dalla, Las Vegas NV
Stephen Babb, Henderson NV
Lorraine Gardner, Fernley NV
Rebecca May-Doyle, Reno NV
Bonnie Helmer, Las Vegas NV
Steve Kossack, Las Vegas NV
Tony Segura, Las Vegas NV
John & Shirley Valney, Reno NV
Amanda Smock, Brooklyn NY
Arlene Forward, Huntington NY
Alix Keast, New York NY
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A.L. Steiner, Cornwallville NY
Beth O'Brien, Rochester NY
Bobbie Flowers, New York NY
Bernice Reinharth, East Meadow NY
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Elaine Donovan, Hemlock NY
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Mark Molloy, Brooklyn NY
Michael F. Kolassa, Brooklyn NY
Michele Paxson, East Meadow NY
Mindye Fortgang, Merrick NY
Mayelly Moreno, Brooklyn NY
M Range, New York NY
Michele Temple, Woodside NY
Nancy Sheehan, Cobleskill NY
Neil Freson, Henrietta NY
Pamela Degeyter, Ghent NY
Peter J. Keiser, Manlius NY
Candice Lowery, Mount Vernon NY
Paul McCarthy, Scotia NY
Nicholas Prychodko, Bridgehampton NY
Sharon Longyear, Yorktown Heights NY
Sharon Shelby, Le Roy NY
Sandy J., New York NY
Susan Lofurno, Webster NY
Anastasia Hanifan, Hicksville NY
Kelley Scanlon, Syracuse NY
Thomas Connor, Wallkill NY
Wendy Fast, Dansville NY
Lora Schwartzberg, South Salem NY
Patricia Beetle, Castleton NY
Janet Moser, Baldwin NY
Ken Ward, Gloversville NY
Thomas Giblin, Binghamton NY
Jill Simon, NyC NY
Stephanie Christoff, White Plains NY
Matthew Lipschik, B'klyn. NY
Leslie Cassidy, New York NY
Karlene Gunter, Rochester NY
Bridgette Hartung, Liverpool NY
Albert Horcher, Rockville Centre NY
Charles Kennedy, New York NY
Douglas Kinney, Otego NY
Peter Kivic, Fort Covington NY
Linda Lemke, Grahamsville NY
Laura Matturro, Smithtown NY
Zoe Strassfield, Water Mill NY
Roxanne Warren, New York NY
Andrew & Kathleen Wittenborn, Pleasantville NY
Kathleen Jacobsen, Youngstown NY
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Sarah Hamilton, Canastota NY
Mary Jo O'Connor, Sound Beach NY
Javier Cordero, Briarwood NY
Erma Lewis, Brooklyn NY
Carol Kite, Chittenango NY
Lauren Hayman, Brooklyn NY
Patti Shealy, Beacon NY
Saveria Garcia-Macri, Elmont NY
Tracy Marotta, Brooklyn NY
Will Morel, Brooklyn NY
Mary Smith, Rochester NY
Gail Padalino, West Sand Lake NY
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Laura Hanks, Milwaukie OR
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Phoebe Oaks, Portland OR
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Terrie Williams, Vidor TX
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Kris Strate, Fairview UT
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Adina Parsley, Stanwood WA
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