



CENTER FOR INTERNATIONAL ENVIRONMENTAL LAW

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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*

² *Our Mission*, CIEL, www.Ciel.org/about-us/our-mission/ (last visited May 30, 2017).

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 gain 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.³ 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.⁴ 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.⁵ 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

³ See, Stephen Vaughn, *NAFTA Draft Letter*, 30 March 2017 (addressed to joint session of congress), <https://home.kpmg.com/content/dam/kpmg/us/pdf/2017/03/tnf-draft-nafta-letter.pdf> [hereinafter *Draft*]; and see also, Robert Lighthizer, *Notification of Renegotiation*, 18 May 2017 (addressed to joint session of congress), <https://ustr.gov/sites/default/files/files/Press/Releases/NAFTA%20Notification.pdf> [hereinafter *Notification*].

⁴ *Green Group 2016 Transition Project* at 8, Green Groups. (2016, unpublished) [hereinafter *Green Group Project*]

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

⁶ *EU Trade Commissioner Malmström travels to Mexico to discuss ongoing trade negotiations*, European Commission (May 5, 2017). <http://trade.ec.europa.eu/doclib/press/index.cfm?id=1661>

⁷ Kyle Doherty, *From ‘The Oil Is Ours!’ To Liberalization: Resource Nationalism and The Mexican Energy Reform* 53 HOUSTON LAW REVIEW 245, 272 (2015).

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 7, at 259.

in NAFTA limits Canada from reducing exploitation and export of fossil fuels,¹⁰ as it requires Canada to “maintain its current share of energy exports to the United States,” irrespective of Canadian supply or potential shortages.¹¹ 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.¹² 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.¹³ 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.¹⁴ 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.¹⁵

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),¹⁶ TTIP,¹⁷ and TTP,¹⁸ 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

¹⁰ 350.org, et al., *Replacing NAFTA: Eight Essential Changes to an Environmentally Destructive Deal*, Sierra Club, <https://www.sierraclub.org/sites/www.sierraclub.org/files/uploads-wysiwig/NAFTA%20Enviro%20Redlines%20FINAL.pdf> (last visited May 5, 2017) [hereinafter *Replacing NAFTA*].

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.

¹⁴ *TPP Government Procurement Negotiations: Buy American Policy Banned, a Net Loss for the U.S.*, Public Citizen, https://www.citizen.org/sites/default/files/tpp-buy-american_2.pdf (last visited 6/6/17).

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.

¹⁷ *EU: Regulatory Cooperation, US: Regulatory Coherence, Transparency, and other Good Regulatory Practices* in Proposed Text of Transatlantic Trade and Investment Partnership, <https://ttip-leaks.org/ttip/regulatory-cooperation/> (last visited June 9, 2017).

¹⁸ *Transpacific Trade Partnership* at Ch. 16, (2016).

the bottom.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.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.²¹ Though absent from TTP, other language clearly indicates the intent for the states to be equally bound by the agreement.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.

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,”²³ however technical regulations and standards are often necessary components of public policy and “do not create unnecessary obstacles to international trade.”²⁴

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

¹⁹ *Preempting the Public Interest: How TTIP Will Limit US States' Public Health and Environmental Protections* 1, Center for International Environmental Law (CIEL) (2015) [hereinafter *Preempting the Public Interest*], <http://www.ciel.org/reports/preempting-the-public-interest-how-ttip-will-limit-us-states-public-health-and-environmental-protections-sep-2015/>.

²⁰ *Food Safety, Agriculture and Regulatory Cooperation in the Canada-EU Comprehensive Economic and Trade Agreement (CETA)* at 7-8, Council of Canadians (2016), <http://canadians.org/sites/default/files/publications/report-ceta-food-safety-english.pdf>

²¹ *Preempting the Public Interest* *supra* note 19, at 13.

²² *Id.*

²³ *Draft* *supra* note 3.

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).

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=\(@Symbol=%20wt/ds135/ab/r*%20not%20r w*\)&Language=ENGLISH&Context=FomerScriptedSearch&languageUIChanged=true#](https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S006.aspx?Query=(@Symbol=%20wt/ds135/ab/r*%20not%20r w*)&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

³¹ Francisco Nogales, *The NAFTA Environmental Framework, Chapter 11 Investment Provisions, and the Environment*, 8 ANN. INT’L & COMP. L. 97, 109 (2002).

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>.

by “grafting upon Mexican law... sanctity for private property rights” that form so much of the U.S. legal tradition.³⁷

Thus, fearing “legal retaliation for lost profits,” states may freeze or modify efforts to advance environmental protection.³⁸ Aware of the potential problems with the ISDS, the drafters of TPP included a carve out for tobacco control measures.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.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.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.’”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

³⁷ Doherty *supra* note 7, at 267.

³⁸ *Id.* See also, Gus Van Harten & Dayna Nadine Scott, *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) <http://dx.doi.org/10.2139/ssrn.2700238>.

³⁹ TPP Article 29.5.

⁴⁰ *Draft supra* note 3.

⁴¹ *The Trans-Pacific Partnership and the Environment: An Assessment of Commitments and Trade Agreement Enforcement* at 12, CIEL (2015), [hereinafter *TPP and Environment*] <http://www.ciel.org/wp-content/uploads/2015/11/TPP-Enforcement-Analysis-Nov2015.pdf>.

⁴² *Green Group Project 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.”⁴³

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.⁴⁴

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.⁴⁵ 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.

⁴³ *Id.*

⁴⁴ *Lowest Common Denominator: How the Proposed EU-US Trade Deal Threatens to Lower Standards of Protection From Toxic Pesticides*, CIEL (2015), http://www.ciel.org/wp-content/uploads/2015/06/LCD_TTIP_Jan2015.pdf

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 through 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.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.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 settlement 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;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.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.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

⁴⁹ John Knox and David Markell, *Evaluating Citizen Petition Procedures: Lessons from an Analysis of the NAFTA Environmental Commission*, 47 TEXAS INT'L L. J. 505, 529-37 (2012).

⁵⁰ *Id.*

⁵¹ *Id.* at 535.

⁵² Chris Wold, *Evaluating NAFTA And The Commission For Environmental Cooperation: Lessons For Integrating Trade And Environment In Free Trade Agreements*, 28 ST. LOUIS UNIVERSITY PUBLIC LAW REVIEW 201, 212 (2008).

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.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.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.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.’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.

Conclusion

⁵⁴ *Id.* at 2.

⁵⁵ *Id.* at 4-5.

⁵⁶ *Id.* at 5.

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,

A handwritten signature in black ink that reads "Melissa Blue Sky". The script is fluid and cursive, with the first name "Melissa" and last name "Blue Sky" clearly legible.

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 Jason Husby, Minneapolis MN
 Maureen Mccullough, Minneapolis MN
 Emily Moore, Minneapolis MN
 Kimberly Nieman, Minneapolis MN
 Alana Willroth, Saint Paul MN
 Dr Freitag, Stillwater MN
 Jessica Honza, Plymouth MN
 Carlos Cunha, Jefferson City MO
 Sharon Head, Desoto MO
 John Crotty, Manchester MO
 Larry Lambeth, Springfield MO
 Lopamudra Mohanty, St.Peters MO
 Lora Steiner, Kansas City MO
 Susan Leahy, Brentwood MO
 Harold Watson, Springfield MO
 Kenneth Robertson, Kansas City MO
 Valerie Apel, Ballwin MO
 Chas Martin, St. Louis MO
 Michael Olenjack, St. Louis MO
 Jon Kiesling, st louis MO
 Charles Phillips, Boonville, MO MO
 Lenora Roedner, Barnhart MO

Patrick Adcock, Excelsior Springs MO
 Martha Jaegers, Saint Louis MO
 Nikisha Ross, Jackson MS
 Lisa Buehler, Lakeside MT
 Jennifer Nitz, Missoula MT
 Kent Mollohan, Helena MT
 Norman Bishop, Bozeman MT
 Sarah Stewart, Gardiner MT
 Wayne Mortimer, Bozeman MT
 Carol Ostrow, Hillsboro NC
 Dane Bowen, Charlotte NC
 D Brown, Raleigh NC
 Linda Maynard, Apex NC
 Bonnell Walker, Elizabethtown NC
 Evelyn Coltman, Waynesville NC
 Gavin Dillard, Black Mountain NC
 Heide Catherina Coppotelli, Cedar Mountain NC
 Homer Edward Price, Sylva NC
 Jane Church, Chapel Hill NC
 Jude Misurelli, Brevard NC
 Kathy Wright, Aberdeen NC
 Doug Franklin, Hayesville NC
 Christi Dillon, Mooresville NC
 Ronald Clayton, Asheboro NC
 Wendy Stevens, Charlotte NC
 Martha Spencer, Brevard NC
 Nadine Duckworth, Township Of Taylorsville NC
 Lawrence East, Jacksonville NC
 Donald Rumph, Greenville NC
 Logan Paul, Durham NC
 Gene Fox, Wanchese NC
 Gary Rash, Salisbury NC
 Dawn Carr, Charlotte NC
 Katherine Connor Mckee, Shelby NC
 Jeff Bohan, Winston Salem NC
 Jennifer Brandon, Lexington NC
 Eileen Juric, Raleigh NC
 Devon Seltzer, Greensboro NC
 Andrea Snyder, hickory NC
 Edward Wolfsohn, Asheville NC
 Sam Todd, Charlotte NC
 Greg Gillis, Swansboro NC
 Akila Mosier, Richlands NC
 June Lovejoy, Fargo ND

Natalie Van Leekwijck, Hazard NE
 Donald Leisman, Concord NH
 Erline Towner, Milford NH
 Janice Banks, Center Barnstead NH
 Kellie Smith, Deering NH
 Kenneth Ruby, Salem NH
 Meg Kidd, Keene NH
 Marcel Liberge, Manchester NH
 Charles Arnold, Manchester NH
 Glen Benjamin, Portsmouth NH
 Judy Fairless, Warren NJ
 Harriet Grose, Morristown NJ
 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
 Helga Spector, Somerset NJ
 G Yuzawa, Wyckoff NJ
 Jeffrey Rattner, Lake Hopatcong NJ
 Jennie Sabato, Somers Point NJ
 John Ruhl, Flemington NJ
 Kim Sellon, New Providence NJ
 Lascinda Goetschius, Fair Lawn NJ
 George Bourlotos, Morris Plains NJ
 Nicole Scott-Harris, Bloomfield NJ
 Mr. Revesz, Cedar Grove NJ
 Carl Pflug, Keyport NJ
 Sharon Tozzi, Yardville NJ
 Terry Friedman, Montvale NJ
 Lorraine Brabham, Hoboken NJ
 Betty_Ann Duggan, Princeton NJ
 Dana Sklar, Cherry Hill NJ
 Janis Todd, West Windsor Township NJ
 Philip J. Hyun, Edison NJ
 Wendy Curtis, Upper Montclair NJ
 Linda Hardy, Matawan NJ
 Jan Johnston, Manahawkin NJ
 Jo Ann McGreevy, North Bergen NJ
 Sheeza Qurashi, Sicklerville NJ
 Dorothea 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
 Anna Engdahl, Usa NY
 Arlene Zuckerman, Rego Park NY
 A.L. Steiner, Cornwallville NY
 Beth O'Brien, Rochester NY
 Bobbie Flowers, New York NY
 Bernice Reinharth, East Meadow NY
 Christopher Lord, Brentwood NY
 Caroline Mislove, Brooklyn NY
 Susan Cox, New York NY
 Darrell Noel, New York NY
 Elaine Donovan, Hemlock NY
 Jen Valentine, Massapequa Park NY
 Fay Forman, New York NY
 Janet Forman, New York NY
 Glenda Lilling, Port Chester NY
 Iris Rochkind, East Elmhurst NY
 Jackie Stolfi, Massapequa Park NY
 Jill Nicholas, Penfield NY
 John Berman, Brooklyn NY
 Joyce Shiffrin, Brooklyn NY
 Kathy Haverkamp, Geneva NY
 Kristin Vanhorne, King Ferry NY
 Kate Skolnick, Brooklyn NY
 Kate Sherwood, Long Beach NY
 Kimberly Wiley, Rochester NY
 Cassandra Treppeda, Elmsford NY
 Larissa Matthews, Plainview NY
 Linda Martin, Rensselaer NY
 Elaine Livingston, Vestal NY
 Roberta Desalle, New York NY
 Marie Garescher, Tarrytown NY
 Margery Schiff, White Plains NY
 Mark Hollinrake, New York NY
 Marianne Devine, Brooklyn NY
 Mark Molloy, Brooklyn NY
 Michael F. Kolassa, Brooklyn NY
 Michele Paxson, East Meadow NY
 Mindye Fortgang, Merrick NY
 Mayelly Moreno, Brooklyn NY
 M Rangne, New York NY
 Michele Temple, Woodside NY
 Nancy Sheehan, Cobleskill NY
 Neil Freson, Henrietta NY
 Pamela Degeyter, Ghent NY
 Peter J. Keiser, Manlius NY

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 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
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 Ken Ward, Gloversville NY
 Thomas Giblin, Binghamton NY
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 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
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 Pleasantville NY
 Kathleen Jacobsen, Youngstown NY
 Virginia Soules, Brooklyn NY
 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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 Thomas Reynolds, Voorheesville NY
 John Hogan, Rome NY
 Alana Mayer, Brooklyn NY
 Gabriel Abate, Brentwood NY
 Louise Calabro, Bayside (Queens) NY
 Jacalyn Dinhofer, Manhattan New York NY
 Michael Gorr, Skaneateles NY
 Carol Jackson, New York NY
 John Markowitz, New York NY
 Pooya Mohseni, New York NY
 Elena Perez, Bronx NY
 Linda Rudman, New York NY
 Sara Schultz, Williamsville, NY 14221 NY
 Amanda Scuder, New York NY
 Philip Spadaro, Constantia NY
 Anthony Straka, Wappingers Falls NY
 Sarah Dolinar, Staten Island NY
 Dennis Turechek, Otego NY
 John Burke, Sea Cliff NY
 Elaine Chaback, Saugerties NY
 Lizabeth Rachele, Clifton Park NY
 Jesse Williams, Cincinnati OH
 Diane Hanas, Conneaut OH
 John Brewer, Marietta OH
 John Conway, Lakewood OH
 Michael Erskine, Whitehouse OH
 Geraldine Fogarty, Yellow Springs OH
 Kimberly Lowe, Gahanna OH
 Mary Zack, Worthington OH
 Sue Hanlin, Amherst OH
 Robin Craft, Plain City OH
 Suzana Megles, Lakewood OH
 Jeanne Schlatter, Coshocton OH
 Sandra Cobb, Moreland Hills OH
 William Stern, Euclid OH
 David Sickles, Eastlake OH
 Anita Bixenstine, Kent OH
 Aja Willowleaf, Cleveland OH
 Michael Ahern, Chesterland OH
 Anna Cruikshank, Springfield OH
 Mary Georgiton, Columbus OH
 Denise Ress, Ravenna OH
 Aloysius Wald, Columbus OH
 Michael Seager, Mentor OH
 Diana Yanko, Powell OH

Matt Roberson, Dublin OH
 Toby Ann Reese, Valley City OH
 Erin Znidar, Mentor OH
 Katie and Bill Dresbach, Sheffield Lake OH
 April Eversole, Hanoverton OH
 Laura Colston, Terrace Park OH
 Maureen Absten, Columbus OH
 Malika Arsalane, Hamilton OH
 Daniel Demetzky, North Ridgeville OH
 Loretta Kerns, Cortland OH
 Reed Oliver, Cincinnati OH
 Diane Roller, Howard OH
 Vicki Williams, Dublin OH
 Gary Cook, Cincinnati OH
 Dan Benson, Huron OH
 Lana Henson, Oklahoma City OK
 Lola Reed, Moore OK
 Lydia Garvey, Clinton OK
 Ed Parks, Lawton OK
 Alison Murray, Kitchener ON
 Gilles Dubois, Alexandria ON
 Aaron Dukes, Hood River OR
 Debra Rehn, Portland OR
 Celeste M Howard, Hillsboro OR
 David S. Nichols, Portland OR
 Glenn Koehrsen, Mulino OR
 Grace Neff, Albany OR
 Cynthia Enlow, Albany OR
 Amy Roberts, Albany OR
 Lida Stevenson, Corvallis OR
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 Mike Laporte, Portland OR
 Diana Saxon, Salem OR
 Michael Halloran, Salem OR
 Steve Sheehy, Klamath Falls OR
 Siocha Oconnor, Eugene OR
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 Steve Campbell, Florence OR
 Sandi Cornez, Portland OR
 Dean Sigler, Aloha OR
 Allan Widmeyer, Ashland OR
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Laura Hanks, Milwaukie OR
Linda Simington, Aurora OR
Phoebe Oaks, Portland OR
Leslie Burpo, Eugene OR
Elizabeth Waldron, Corvallis OR
Roy Adsit, Portland OR
Sabrina Carey, Talent OR
Jeriene Walberg, Bend OR
Lois White, Grants Pass OR
BC Shelby, Portland OR
Allison Alberts, Green Lane PA
J.T. Smith, Sellersville PA
Ann Marie Sardineer, Trafford PA
Anne Pinkerton, Phoenixville PA
W. Andrew Stover, Chambersburg PA
Barbara Ellmaker, Chester Springs PA
Cynthia Bauer, Pittsburgh PA
Gerritt Baker-Smith, East Stroudsburg PA
Andrew Fisher, Huntingdon Valley PA
Frank Fredenburg, Albrightsville PA
Leslie Sharlock, Slippery Rock PA
Henry Berkowitz, Sabinsville PA
Susan Porter, Lords Valley PA
Jennifer Zielinski, New Providence PA
Julio Aviles, Jenkintown PA
Jm Lavassaur, Ardmore PA
Jason Crawford, Lancaster PA
Kirk Ramble, York PA
Kay Reinfried, Lititz PA
Kathie E Takush, Reading PA
Marilynn Harper, Media PA
Dan Lara, Philadelphia PA
Michael Lombardi, Levittown PA
Nezka Pfeifer, Scranton PA
Paul Nasuti, Philadelphia PA
Marjorie Faust, New Ringgold PA
Patricia Parker, Lewisburg PA
George Erceg, Natrona Heights PA
K Danowski, Pittsburgh PA
Sharon Newman, West Chester PA
William Haegele, Philadelphia PA
Thomas Nelson, Lansdowne PA
Donna Bookheimer, Douglassville PA
Diane Kokowski, Pittsburgh PA
Gabriele Markert, Abbottstown PA
Sandra Gerhart, Reading PA

Lorraine Heagy, Lititz PA
Susan Babbitt, Philadelphia PA
John Comella, Philadelphia PA
Susan Curry, Elizabethtown PA
Edmund Skowronski, Stroudsburg PA
Daniel Lara, Philadelphia PA
Donna Janusko, Bethlehem PA
Sa Re, paoli PA
Kristin Mccrossin, Downingtown PA
Mark Levin, Plymouth Meeting PA
Elizabeth Seltzer, Brookhaven PA
Henry Bates, Philadelphia PA
Sherry Beck, Lancaster PA
Rosemary Caolo, Scranton PA
Robert Fenstermaker, Moscow PA
Rosemarie Kozdron, Rockton PA
Gina Lobiondo, Havertown PA
Jennifer Lorenz, Collegeville PA
William Montgomery, Pottstown PA
Stephanie Mory, Clarks Summit PA
Rita Pesini, North Wales Montgomery County PA
Keith Portka, Cheswick PA
Mary Puffenberger, Elizabethtown PA
Daniel Salmen, Pittsburgh PA
John Scahill, Pittsburgh PA
Susan Tucker, Warren PA
Sabrina Wojnaroski, Pittsburgh PA
Eric Aberle, Upper Darby PA
Cheryl Pace, Philadelphia PA
Juliann Pinto, Philadelphia PA
Felicia Lewis, PHILADELPHIA PA
Emilia Novo, Quetzal PR
Barry Lebeau, West Warwick RI
Sandra Dutcher, Hope Valley RI
James Burge, Foster RI
Michael Langlais, Providence RI
Rebecca Connors, N Kingstown RI
Ellen Goodman, Riverside RI
Dana Rockwell, Coventry RI
Marilyn Kagan, Providence RI
Jeffrey Gomes, East Providence RI
Matt Loper, Tiverton RI
Kathy Bradley, Lugoff SC
Sheila Low-Beer, Charleston SC
Stacey Govito, Beaufort SC

Ruth Roberts-Shepherd, Summerville SC
John Schenck, hilton head SC
Sharon Wojno, Mount Pleasant SC
Phyl Morello, White Pine TN
Kevin Vaught, Antioch TN
Michele Villeneuve, Kingsport TN
Veronica Bourassa, Evensville TN
Susan Schuchard, Nolensville TN
Carole Caprio, Carthage TN
James Thoman, Hermitage TN
Debi Darnell, Grimsley TN
Bobbie Hensley, Greeneville TN
Dianne Doochin, Nashville TN
robert cobb, Knoxville TN
Chelsey Dyer, Nashville TN
Anita Faulkner, Carrollton TX
Brant Kotch, Houston TX
Brian Pike, Cypress TX
Julie Bush, Corpus Christi TX
Randy Lopez, League City TX
Christopher Tuch, New Braunfels TX
Claudia Richner, Kerrville TX
Christopher Dowling, Marfa TX
Crystal Mitchell, Bertram TX
Daniel Rebson, West University Place TX
Sharon Frank, Lewisville TX
Greg Allbee, North Richland Hills TX
Pamela Evans, Kemp TX
Greg Sells, Austin TX
Deb Hahn, Dallas TX
Andrea Nutley, Pearland TX
H. Guh, Dallas TX
Carrie Watson, Huntsville TX
Sandra Burson, Humble TX
Janie Martinez, Cypress TX
Katheryn Jeffery, Dallas TX
Kathryn Burns, Austin TX
Joyce Dixon, Dallas TX
Kristina Lamons, Houston TX
Lisa Stone, Houston TX
Lisa Hughes, Galveston TX
Leana Bosley, Wylie TX
Guadalupe Yanez, El Paso TX
Dallas Windham, Dallas TX
Lindsey Caudill, Austin TX
Brenda Hammond, Fayetteville TX

Mark Blandford, Amarillo TX
Odilia Leal-Mcbride, Austin TX
Pamela Miller, Tolar TX
Pam Thomas-Hill, Houston TX
Carolyn Riddle, Austin TX
Sylvia Duncan, Plano TX
Marc Lionetti, Austin TX
Vicki Lawson, Waxahachie TX
Terrie Williams, Vidor TX
Martha Eberle, Dripping Springs TX
Juan Hernandez, El Paso TX
Phillip J Crabill, Little Elm TX
Evelyn Parker, Rhome TX
Joan Estes, Canyon TX
Penny Hammack, North Richland Hills TX
Blake O'Quinn, Mount Pleasant TX
Catherine Johnson, Duncanville TX
Bradley Green, Duncanville TX
Bert Foxwell, Pflugerville TX
Robert Bonazzi, San Antonio TX
Linda Fielder, Carrollton TX
Mary Ramirez, Corpus Christi TX
Becky Holdford, Garland TX
Libby Logan, Lewisville TX
Jennifer Prevost, san antonio TX
Bob Hurley, Saginaw TX
Stanley Barreto, Lubbock TX
Jean Cameron, College Station TX
Tonya Carlisle, Caddo Mills TX
Anna Loera, Kingwood TX
Rick Pearson, Lampasas TX
Leslie Smith, San Marcos TX
Marlyn Lilly, Cleburne TX
Jennifer Lake, Taylorsville UT
Juanita Hull, Riverdale UT
Myrna Fisher, Salt Lake City UT
Bev Doman, Salt Lake City UT
Karen Johnson, Salt Lake City UT
Kris Strate, Fairview UT
Leslie Calambro, Henrico VA
Elaine Becker, Roanoke VA
Kristin Gallanosa, Danville VA
William Guthrie, Arlington VA
Virginia Broadbeck, Orange VA
Gina Paige, Glen Allen VA
Karen Bryant, Fairfax VA

Ken Staiger, Roanoke VA
Louise Mann, South Chesterfield VA
Susan McCarthy, Winchester VA
Niranjali Amerasinghe, Arlington VA
Dorothy Johnson, Centreville VA
Pamela Jiranek, Earlsville VA
Steven Kranowski, Blacksburg VA
Justine Tilley, Williamsburg VA
Steven Vogel, Falls Church VA
Tara Wheeler, Oakton VA
Lynda West, Falls Church VA
Patricia Rowell, Alexandria VA
Peggy Bellan, Norfolk VA
Joseph Leedy, Virginia Beach VA
Ken Barter, Haymarket VA
Pat Cameron, Williamsburg VA
Becky Daiss, Arlington VA
Michael Jackson, Deltaville VA
Robert Poignant, Lynchburg VA
Diane Rohn, Mc Lean VA
Jim Salazar, Springfield VA
Lori Williams, Roanoke VA
Clara Z., Cubjac VA
Michelle Kaufman, Rutland VT
Phyllis Erwin, Guilford VT
Anne Jameson, Marshfield VT
Donald Morrison, West Windsor VT
Michael Masley, Seattle WA
Baker Smith, Burien WA
Brian Balin, Seattle WA
Barbara Bonfield, Tacoma WA
Brenda Michaels, Issaquah WA
Candace Laporte, Silverdale WA
Cathy Scott, Seattle WA
Sammy Low, Stanwood WA
Adina Parsley, Stanwood WA
Robert Gabriel, Olympia WA
George Fairfax, Oak Harbor WA
Felicity Devlin, Tacoma WA
Martha Koester, Seattle WA
Ardeth L. Weed, Edmonds WA
Glen Anderson, Lacey WA
Howard Clark, Olalla WA
Jennifer Pittman, Issaquah WA
Robert Brown, Fircrest WA
Lorraine Hartmann, Seattle WA

Karen Hedwig Backman, Federal Way WA
Meryle A. Korn, Bellingham WA
Nancy Hines, Seattle WA
Paula Shafransky, Sedro Woolley WA
Sandra Rodgers, Amboy WA
Ronlyn Schwartz, Langley WA
Margaret Hashmi, Bellingham WA
Steve V., Port Angeles WA
Mr. Shelley Dahlgren, Phd, Issaquah WA
Susan Kilgore, Lummi Island WA
Stephen Bailey, Deming WA
Sue Stoeckel, Everett WA
Michael Hill, Elbe WA
T J Thompson, Gig Harbor WA
Trina Cooper, Seattle WA
Thom Peters, Snohomish WA
James Mulcare, Clarkston WA
Paul Mathew, Bothell WA
David Arntson, Bothell WA
Amanda Dickinson, Yakima WA
Brandie Deal, Bothell WA
April Atwood, Seattle WA
Howard Pellett, Anacortes WA
Linda Wasserman, Tacoma WA
Kathleen Wheeler, Deer Park WA
Taggart Howland, Vancouver WA
Patricia Ranstrom, Vashon WA
Raeann Scott, Lynden WA
Vonda Vandaveer, Bellevue WA
Gary Bennett, Bellingham WA
Travis Miller, Seattle WA
Dean Webb, Seattle WA
Jack Stansfield, Stanwood WA
G H, Orting WA
Laurie Chinn, Vancouver WA
Angela Jensen, Spokane WA
Kathy Kestell, Spokane WA
Ted Pratt, Olympia WA
S. P. Almskaar, Everson WA
Christian Bookter, Goldendale WA
Lanie Cox, Spokane WA
David Daniels-Lee, Ocean Shores WA
Don Glickman, Anacortes WA
Jacqueline Jacoby, Gig Harbor WA
Theodore King, Seattle WA
Liza Martin, Bellevue WA

Priscilla Martinez, Bothell WA
William Persky, Olympia WA
Susan Seniuk, Seattle WA
Sandra Smith, Seattle WA
Debbie Thorn, Kirkland WA
Maxine Clark, Bremerton WA
Gerri Friedberg, M.A., Egg Harbor WI
Robin Pasholk, Neenah WI
Cynthia Betts, Kenosha WI
Linda Austin-Buss, Camp Douglas WI
Cam Roberts, Lacrosse WI
Corey E. Olsen, Delafield WI
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Dave Searles, Brodhead WI
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Jackie Tryggeseth, Prairie Du Sac WI
Kristof Haavik, Menomonee Falls WI
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Michael Iltis, Madison WI
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Richard Heinlein, Trevor WI
Mary Jones-Giampalo, New Lisbon WI
Roger Schmidt, Madison WI
Susan Michetti, Mt Horeb WI
Theodore Wuerslin, Waukesha WI
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Sandra Klueger, Lomira WI
Kathy Krause, Mukwonago WI
Nigel Lim, SS WI
Randy Nilsson, Mercer WI
Ina Pillar, Oregon WI
Lynette Strangstad, Mineral Point WI
Heather Westphal, Shiocton WI

Jo Garrett, Madison WI
Lee Mitchell, Charleston WV
Peter Abbrecht, Shepherdstown WV
Friend Zentura, Casper WY