

Gatineau, Québec  
K1A 0H3

December 1, 2008

Mr. Nelson Sabogal  
Senior Programme Officer  
Secretariat of the Basel Convention

RE: Canada's comments on the developments and obstacles related to the Strategic Plan for the Implementation of the Basel Convention

Dear Mr. Sabogal:

This is further Decision IX/3 of the ninth meeting of the Conference of the Parties requesting comments on the current Strategic Plan for the implementation of the Basel Convention. This Decision is very important and timely to pause and review what the Basel Convention is doing, what it is doing well, what occurred that was not planned, what did not occur as planned and what it can improve upon. The review should provide information for Parties to the Convention to be well positioned to tackle current and emerging challenges related to the management of wastes and its impacts on human health and the environment. This is a first step in helping Parties assess the overall effectiveness of the Convention, as we are required to do under Article 15.7.

In addition of knowing how the Strategic Plan has been implemented, we believe that the starting point of this process must be to review the objectives of Basel's current Strategic Plan and consider whether these objectives have been met. The analysis to conduct this assessment should include a review of existing data and trends regarding transboundary movements, number of Parties having transposed their obligations into national legislation, the trend of the results of the indicators described in the Strategic Plan (to see whether the indicators have been met), etc. The review should be based on facts and be simple, pertinent and performed in a timely fashion. To do so, we suggest that the review of the Strategic Plan be all-encompassing and include related initiatives, such as the recommendation on cooperation and coordination among the Basel, Rotterdam and Stockholm Conventions, results of the compliance committee activities and the Review of the Basel Convention Regional and Coordinating Centres (BCRCs).

As a first step and as requested, below are our comments, in no particular order, on the challenges with the implementation of the current Strategic Plan:

- The Strategic Plan assisted Parties to the Basel Convention in several areas: several projects were implemented and delivered and resulted in various guidelines, workshops, awareness raising, sharing of information, etc;
- There is a need for reporting on the Strategic Plan based on results (have its objectives been met? have the strategic plan indicators been met? etc);
- The current Strategic Plan is flexible but it would appear that it may have been too broad in its scope; we may wish to compare the Plan with those of other multilateral environmental agreements to see if there are other approaches that might be of assistance;
- The Strategic Plan aims at projects which, based on Basel's limited funds, would seem to have been too ambitious to result in a realistic funding mechanism/level;

- The roles of those involved must be clarified (Basel's Secretariat, BCRCs, host country, etc);
- There is a need for strengthening the mechanism for regions and BCRCs to gather and disseminate information within and between Regions (i.e. strengthening work/learn from each others);
- There is a need to find out why fewer activities were undertaken for some fields of the Strategic Plan;
- Are some of the priority waste streams still posing a growing threat to human health and the environment? Is the characterization of such wastes and end-of life materials clear?
- Has the Plan improved the environmentally sound management capacity of countries? We must also take into consideration a review of Parties' capacity to manage and control waste in the context of today's reality;
- Are enforcement levels appropriate? Have they improved? What about sham exports?
- Is the Plan clearly linked to Basel COP decisions and Convention commitments and responding to Basel's current issues, such as e-waste and ship dismantling?
- How to better integrate cooperation and coordination with the Rotterdam and Stockholm Conventions, the 3R concept and ensure the efficient use of natural resources on a global scale while ensuring the protection of human health and the environment.

I hope these comments will assist in informing the review of the Strategic Plan for implementing the Basel Convention.

Sincerely,

Carolyn Blain  
Competent Authority of Canada under the Basel Convention  
Director, Waste Reduction and Management Division  
Environment Canada