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November 15, 2010

Mr. Ibrahim Shaffi
Programme Officer: Technical
Secretariat of the Basel Convention (SBC)
International Environment House
11-13 chemin des Anémones
Building D
1219 Châtelaine (Geneva),
Switzerland

RE: Draft strategic framework 2012-2021 for the implementation of the Basel Convention

Dear Mr. Shaffi,

Thank you for the opportunity to provide comments on the most recent document pertaining to the New Strategic Framework. I trust that Canada's comments will be useful in finalizing a draft for broader review by Parties in advance of the Conference of parties in October 2011. We have reviewed carefully the document in relation to approved objectives and goals agreed at the last Open-Ended Working Group meeting and offer the following comments.

1. We do not believe that the *means of implementation* should be included in the NSF document as such. Here is why: (a) the *means* are of little value because it is very difficult to effectively link the agreed objectives and the suggested means of implementation; (b) some *means* are high level and have broader scope than the objectives themselves; (c) others are at the level of actions to be undertaken to achieve the objectives and would fit well under the Programme of Work; (d) some are almost a duplication of the objectives; (d) the result of this inconsistency is confusion for the reader and a distraction away from the goals and objectives of the NSF.
2. That being said, we believe that some means of implementation were valuable and should be kept and placed into a programme of work (PoW). Please refer to attachment 1 which presents Canada's comments on each of them.
3. Pertaining to the indicators, we are of the view that linking them to the objectives is an appropriate way to proceed and allows for a rapid assessment of their applicability and relevance. We found that most indicators are appropriate and have prepared a comparison table (see attachment 2) of the goals and objectives linked to the indicators with a few comments for your consideration.

4. We would like to propose that the Basel Secretariat circulate in the next draft, the New Strategic Framework in a slightly modified format to show how the Programme of Work links to the NSF. We have found such an example with the UNEP Work Programme (see attached document in Canada's e-mail). This would be a clear and simple way to present the goals, objectives and indicators agreed upon and also to link the existing Programme of Work enabling a quick assessment where we may have gaps to achieve our Framework objectives in the future. Should the Secretariat agreed to this, Canada could volunteer to prepare one or two examples of what a new format may look like with our existing information.
5. Finally, when reviewing the means of implementation we found some useful references to the need for overall evaluation of the Convention and reporting of progress against the NSF. However, we did not find that these activities fit well with any of the agreed upon objectives. Accordingly, we propose that a brief section on Reporting and Evaluation be added to the text of the NSF – either before the indicators section or at the very end of the Framework document – this would permit the sanctioning of such activities in support of all goals of the NSF.

As a final point, we would like to have an indication on how Parties' comments will be integrated in the next draft document and if a conference call of the Open-Ended Coordination Group (OECG) for the NSF will be held to discuss their integration and next steps. The OEWG7 decision mandated the OECG to hold a face-to face meeting prior COP10. A Conference call would be an appropriate opportunity to seek the views of the OECG members in this regard and discuss next steps.

We trust these comments will assist you in finalizing the New Strategic Framework document. Should you have any questions, please do not hesitate to contact me.

Best regards,



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Manager, Waste Policy Section
Waste Reduction and Management Division
Environment Canada

c.c. Ms. Johanne Forest, First Secretary, Permanent Mission of Canada
Mr. Tim Gardiner, Competent Authority, Canada