



**Comments of the Council of Great Lakes Industries
On the Interim Report of the Interagency Ocean Policy Task Force,
dated 10 September 2009
The White House Council on Environmental Quality**

The Council of Great Lakes Industries (CGLI), representing the common interests of more than two dozen U.S. and Canadian industrial organizations and associations that have investments in the Great Lakes Basin, is pleased to have the opportunity to submit the following comments, supplemental to those we filed on 23 July 2009.

Throughout the Interim Report the Ocean Policy Task Force has correctly recognized business and industry as important stakeholders. Economic issues are also considered in many of the parts of the document. However, in the Principles section beginning on page 14, economic impact is considered only in principle 3, section a; principle #4; and in principle #9, section h. Economic issues should be universally included as these principles are more fully developed. In the Great Lakes Region much of the business and industrial activity is located in the Region because of proximity to the lakes. Industry, government and environmental organizations have developed strong working relationships in the Region to support both the environment and the economy. Economic interests should appropriately be added to the National policy statement.

Comments on Implementation Strategies

1. Importantly, ecosystem-based management, one of the nine priority objectives, is currently supported In the Great Lakes Region by extensive actions and plans already developed and deployed in the Great Lakes. The Ocean Policy Task Force should recognize this existing substantial base of work and acknowledge how it will support future ecosystem-based efforts within the Great Lakes.

2. The Interim Report's principal #1.b. states (pp14ff) that "decision-making will also be guided by a precautionary approach as reflected in the Rio Declaration of 1992" and quotes the Rio Declaration: "...lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation". The term "precautionary approach," earlier in the paragraph, is not a defined U.S. policy that includes specific terms of reference establishing bounds for when and how to take or evaluate actions. Consequently, the term should be removed from the document.

For the record: CGLI does not object to the application of precaution in policy making decisions. However in doing so, we believe it necessary to identify and utilize the following key elements:

- reasonable evidence that " threat of serious or irreversible damage to health or the environment " is credible as determined by objective risk assessment;
- targeted risk reduction methods;
- application of measures that are proportionate to risk;

- decisions reached through balanced, scientific and transparent peer review;
- involvement of all relevant stakeholders;
- measures that include societal and cost/benefit assessment; and,
- a process for determining that measures taken are achieving identified goals.

These elements are essential in the exercise of precaution and not encompassed by merely citing a portion of Principle 15 from the Rio Declaration on Environment and Development.

3. Principle #9 (p 16) states that decisions will be guided by the “best science available”. The CGLI supports the use of science in all decision making.

Comments on Framework for Policy Coordination

As the Task Force develops its framework it is again important to build on the existing structures within the Great Lakes. More than 1500 stakeholders in the Great Lakes Region worked together within the Great Lakes Regional Collaboration. That intensive one-year effort produced the Great Lakes Restoration Strategy (December 2005) and subsequent Restoration Initiative. There are numerous other examples of successful multi-stakeholder collaborative efforts in the Great Lakes. The Ocean Policy Task Force can build from the important work already begun in the Region.

As a result of the experience in the Great Lakes Basin, CGLI particularly supports two recommendations under Areas of Special Emphasis:

2. Regional Ecosystem Protection and Restoration: Establish and implement an integrated ecosystem protection and restoration strategy that is science-based and aligns conservation and restoration goals at the Federal, State, tribal, local, and regional levels.

5. Ocean Coastal, and Great Lakes Observations and Infrastructure: Strengthen and integrate Federal and non-Federal ocean observing systems, sensors, and data collection platforms into a national system and integrate that system into international observation efforts.

Indeed, we believe that the Region already has a good start on pursuing these recommendations.

Respectfully submitted, George H. Kuper, President,
Council of Great Lakes Industries
16 October 2009