

IV

Maquiladora Attitudes

THE MAQUILADORA SITUATION

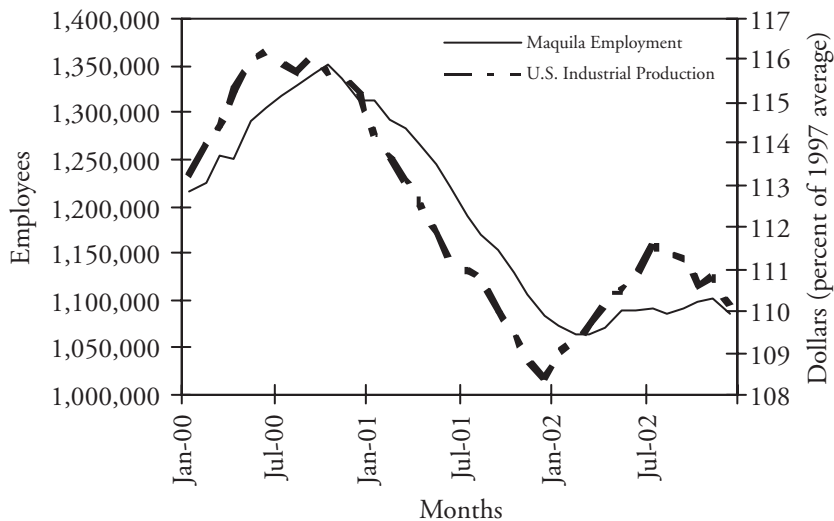
A few days before Christmas 2001, workers lined up outside the entrance to the Mabamex toy factory in Tijuana, which manufactures toys for Mattel. The workers were there to receive their Christmas bonus, which consisted partly of toys. Many of the workers also received layoff notices (Enriquez 2003). While conditions in maquilas are often dangerous and unpleasant by U.S. standards, the jobs are attractive to Mexican workers who migrate in large numbers from the interior to the border to find work. As the Mabamex story illustrates, these jobs are becoming harder to find as layoffs become more common. Indeed, the maquila industry has been in a sharp recession since October 2000. That month, employment peaked at 1.3 million workers. By December 2002, workers numbered only 1.1 million, a decline of 19.5% (Erickson Forthcoming).

Both cyclical and structural factors have contributed to the decline in maquila employment and production since 2000; the U.S. economy has also played a role. Maquilas sell most of their production to the United States and the U.S. corporations own a large majority of the plants, so the close link between U.S. industrial production and maquila employment is not surprising (Figure 1). Mexican maquilas are also facing increasing global competition, especially from China, Central America, and the Caribbean (GAO 2003). The real depreciation of the peso relative to the dollar is also a problem. Representatives of the maquila industry complain of uncertainty about taxes. At the same time, the special status of the

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maquila industry has been phased out as part of the North American Free Trade Agreement (NAFTA). The decline of the maquila industry has been felt on the U.S. side as well. Border tariffs were down 10% in 2001 (GAO 2003).

Figure 1. U.S. Industrial Production v. Maquila Employment



Sources: Federal Reserve Board of Governors; INEGI

The maquila industry is likely to be a major player in any emissions trading program developed on the border, so conditions in the maquila industry will be important in determining the success of emissions trading. The current adverse conditions, one might think, would limit interest in establishing an emissions trading program. To test this, a survey of maquilas was conducted in Ciudad Juárez, Matamoros, and Reynosa. Two basic findings were made: There is considerable confusion about emissions trading, and despite the downturn in the maquila industry, there is interest in finding out more about it. This chapter summarizes the survey results.

METHODOLOGY USED IN THE SURVEY

The survey was conducted in the summer of 2002 and consisted of 27 questions—21 objective questions and six subjective, open-ended questions. The questions were designed to elicit information about respondents' knowledge of emissions trading, willingness to participate in emissions trading programs, as well as information about the institutional framework in which emissions trading will take place, such as the prevalence of environmental committees. It is unusual to include so many open-ended questions in a questionnaire of this type; however, it was thought that open-ended questions were necessary to elicit the information desired. A total of 200 maquilas were surveyed. Ciudad Juárez, having the most maquilas among the three Mexican border cities surveyed, was allocated a sample size of 80 maquilas. Reynosa and Matamoros were each allocated a sample of 60 maquilas. Local contacts from each city were used to administer the survey, including Lic. Patricia Vázquez Zarate of the Instituto Tecnológico de Matamoros, Ing. Esperanza Rosales Gutiérrez of the Instituto Tecnológico de Reynosa, and Ing. Cesar Nuñez of the Departamento de Ecología del Estado (Chihuahua) in Ciudad Juárez. Each of these individuals consulted with at least one of the authors and supervised the students who conducted the survey.

In Reynosa and Matamoros, surveys were sent to all maquiladoras. After a few weeks, students followed up by making calls to individual plants. This process was continued until all 60 surveys were collected. In Ciudad Juárez, all maquiladoras registered with the state's environmental agency were contacted. The same procedure of follow-up calls was performed until the 80 surveys were collected. The individual students were handed a random list of maquiladoras to contact, thus attempting to eliminate any bias in terms of which were contacted by phone. The instrument itself was written in Spanish. A copy of the instrument is included as an appendix to this chapter.

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RESPONSES TO INDIVIDUAL QUESTIONS ON THE SURVEY

This section presents several tables that review various aspects of the survey according to the distribution of the responses. Basic characteristics of the respondents and the firms are presented in Table 1. Ciudad Juárez accounted for 40% of the responses and Reynosa and Matamoros for 30% each. Environmental manager was the most common position of the individuals who responded to the survey. Human resources was the second most common occupation indicated, followed by engineer and manager. The majority of these individuals have been with the firm 10 years or less. The sample included firms of all sizes ranging from less than 250 employees to more than 1,500. These firms are relatively lean with few managers; most firms report that 85% of workers are directly involved in production. Most of the maquilas in the survey sell their output primarily to U.S. customers.

Table 1. Basic Information on Respondents and Firms

Question	Missing Observations	Results (%)	
Cities where survey was conducted	None	Ciudad Juárez	40.00
		Reynosa	30.00
		Matamoros	30.00
Respondent	27	Manager	8.09
		Environmental Manager	39.88
		Engineer	13.87
		Other ¹	38.15
		Human Resources	23.07
Tenure with the firm	None	Less than 5 years	31.50
		6 to 10 years	28.00
		11 to 15 years	23.50
		16 years or more	17.00

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Table 1. continued

Question	Missing Observations	Results (%)	
Number of employees	None	250 or less	17.50
		251 to 500	26.00
		501 to 750	14.50
		751 to 1,000	20.00
		1,001 to 1,500	12.00
		1,501 or more	10.00
Percentage of employees that are production workers	None	Less than 71%	13.00
		71% to 80%	13.00
		81% to 85%	11.50
		86% to 90%	32.50
		91% to 95%	24.50
		96% or more	5.50
Percentage of output sold in the U.S.	None	Less than 50%	13.00
		51% to 99%	46.00
		All	41.00
Percentage of output sold in Mexico	None	Less than 50%	90.50
		51% to 99%	6.00
		All	3.50
Percentage of firms selling more than 10% of output to other parts of the world ²	None	Europe	13.50
		Asia	6.00
		Other	1.50

¹ The largest category within "Other" was Human Resources, which accounted for 23.07%; other categories mentioned were security, maintenance, purchases, sales, etc.

² Note that this category does not need to add up to 100%

Source: Authors

In Table 2, the results for the perceptions of environmental laws are presented. These results will be highlighted later when cross-tabulated with the position of the respondent in the firm. Nearly 60% of respondents think Mexican environmental laws and U.S. laws are very similar. Also worth noting is the fact that most think Mexican laws are more restrictive than U.S. laws (16.58% versus 13.07%).

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Nearly 90% think Mexican environmental laws are adequate. It is also clear that most respondents think Mexican state and local environmental laws are similar or less restrictive than the federal laws.

Table 2. Environmental Laws

Question	Missing Observations	Results (%)	
In general, how would you compare Mexican environmental laws to U.S. laws?	1	Similar	58.29
		Less restrictive	13.07
		More restrictive	16.58
		Not comparable	2.01
		Don't know	10.05
		Easy to interpret	22.11
With regard to the environment, Mexican laws are...	1	Somewhat easy to interpret	48.24
		Somewhat confusing	27.64
		Very confusing	2.01
		Very appropriate	14.00
What is your opinion of the Mexican environmental laws and their enforcement?	None	Somewhat appropriate	30.00
		Appropriate	44.00
		Somewhat inadequate	4.00
		Very inadequate	0.00
		No opinion	8.00
		Similar	64.32
How do you compare the environmental requirements of state and local governments to that of the federal government?	1	Less restrictive	15.58
		More restrictive	9.55
		Not comparable	3.52
		Don't know	6.03
		There are no state regulations	1.01

Source: Authors

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Table 3 deals with how the firm manages environmental issues. More than half the firms stated they do not have an environmental manager, yet this alone does not mean the firm does not have an individual who is responsible for environmental issues. Proof of this is that only 16.5% of the firms state they do not have such a position. Furthermore, nearly 80% of the firms have between one and five individuals connected to environmental issues. There is no question that they view governmental issues as a major obstacle to operating in an environmentally responsible way (72.3%). Interestingly, nearly 8% blame environmental problems on the private sector, pointing to their operating in an environmentally irresponsible manner. Slightly more than a quarter of the firms (25.76%) comply with ISO 14000 standards. Perhaps more telling is the fact that less than 3% of the respondents indicate not knowing what ISO 14000 is.

Table 3. The Firm and the Environment

Question	Missing Observations	Results (%)	
Does the firm have an Environmental Manager/Engineer?	3	Yes	45.69
		No	54.31
How long has this position existed?	none	5 years or less	68.50
		6 to 10 years	26.50
		11 years or more	5.00
How many employees are in the environmental office?	none	None	16.50
		2 or less	38.50
		3 to 5	40.00
		6 or more	5.00
What do you view as the largest obstacle to your firm operating in the most environmentally sensitive manner? ¹	16	Bureaucracy/Lack of coordination of the government	25.54
		Government inefficiency	26.63
		Lack of interest of private industry	7.61
		Other	17.39
		Don't know	2.72

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Table 3. continued

Question	Missing Observations	Results (%)	
Is your firm under the administration of ISO 14000?	2	Yes	25.76
		No	67.68
		Don't know, but I know what it means	4.04
		Don't know, but I don't know what it means	2.53
Is ISO 14001 applied in your company?	12	Yes	26.60
		No	62.77
		Don't know	6.38
		Other	4.79
Based on the environmental laws established by the Mexican government in 1993, which pollutants are relevant for your company? ²	7	PM ₁₀	45.00
		Ozone	15.00
		Carbon Monoxide	55.50
		VOCs	40.00
		NO _x	18.00
		Sulfur Dioxide	13.00
		Carbon Dioxide	57.50
		None	9.50
Are the terms "environment" or "industrial security" included in firm literature?	2	Yes	72.73
		No	27.27
Has your firm been involved in community activities that have an environmental impact?	6	Yes	17.53
		No	82.47

¹ An open-ended question

² Note that the responses do not need to add up to 100%

Source: Authors

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Table 4 presents information about respondents' understanding of emissions trading. An interesting result is that less than one in five have ever heard of emissions trading (15.23%). Because this was anticipated, a brief description of the practice was presented before proceeding with the subsequent questions. Clearly, a steering committee of some sort would be welcome to establish the guidelines needed to begin transboundary trading. Respondents were asked about whom they felt should be included on the steering committee. A larger number (13.64%) thought the committee should be drawn exclusively from government officials, in contrast to the smaller number (5.11%) that wanted the government excluded from the committee. In addition, nearly a quarter would expect all interested parties to attend, including nongovernmental organizations (NGOs). The majority (44.32%) wanted the committee to be drawn only from government and private industry. Finally, the majority of respondents were undecided about whether their firm would participate in emissions trading. While not presented in the table, nearly all expressed cost considerations in determining participation. Only slightly more than 7% would be willing to participate without qualification.

CROSS-TAB ANALYSIS

These results presented in the previous section are themselves interesting, but it is also interesting to see if the position of the respondent, the geographical region, or some other factor influenced the survey responses.

Table 5 presents the impact respondents' positions in the firm had on the answers to questions related to environmental laws. The results seem to indicate that environmental officers are more likely to think there are no differences in U.S. and Mexican environmental laws. This is an interesting finding since these respondents are charged with coordinating environmental policy.

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Table 4. The Firm and Emissions Trading

Question	Missing Observations	Results (%)	
Have you heard of emissions trading?	3	Yes	15.23
		No	84.77
Do you think, from your experience, that a technical commission is needed to set up the emissions trading market? ¹	14	Yes	91.4
		No	6.45
		Undecided (or unclear answer)	2.15
From where should the members of this committee come? ¹	24	Only the government	13.64
		Government and private industry	44.32
		All parties (including NGOs)	24.43
		Exclude the government	5.11
		Miscellaneous	10.8
		Don't know	1.7
Under what circumstances would your firm be willing to participate? ¹	15	Will	7.03
		Will not	4.32
		Maybe	67.57
		Management must decide	9.19
		Miscellaneous	3.78
		Don't know	8.11

¹ An open-ended question

Source: Authors

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Table 5. Response to Questions Depending on Respondent's Position in the Firm (Percent)

How do Mexican environmental laws compare to the U.S. laws?						
Position	Similar	Less Restrictive	More Restrictive	Not Compatible	Don't Know	
Manager	50.00	0.00	7.14	0.00	42.66	
Environmental Officer	76.61	5.80	13.04	1.45	2.90	
Engineer	50.00	29.17	20.63	0.00	0.00	
Other	47.69	12.31	16.92	4.62	18.48	
Mexican environmental laws are:						
Position	Easy to Interpret	Somewhat Easy	Somewhat Confusing	Confusing		
Manager	7.14	35.71	57.41	0.00		
Environmental Officer	36.23	55.07	5.80	2.90		
Engineer	2083.00	56.33	20.83	0.00		
Other	4.62	43.08	49.23	3.08		
Mexican environmental laws are:						
Position	Very Appropriate	Somewhat Appropriate	Appropriate	Somewhat Inadequate	Inadequate	Don't Know
Manager	0.00	35.71	21.43	0.00	0.00	42.86
Environmental Officer	18.84	17.39	59.42	1.45	0.00	2.90
Engineer	8.33	25.00	58.33	8.33	0.00	0.00
Other	7.58	36.36	39.39	6.06	0.00	10.61

Source: Authors

Those that usually deal directly with environmental laws—environmental officers and engineers—are most likely to view the laws as easily understood. Environmental officers and engineers are not as quick to praise the Mexican environmental laws as managers are, since at least a small number of them indicate that the laws are somewhat inadequate.

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As is clear in Table 6, neither occupation nor city of residence seemed to affect who is viewed as an obstacle. Regardless, government is blamed while the private sector is viewed as relatively innocent. There is one difference: Managers are less likely to blame government inefficiency but more likely to profess ignorance of the exact cause. The respondents who had the largest concerns about the willingness of the private sector to cooperate in reducing pollution were in Ciudad Juárez. This is interesting. Of the cities surveyed, Ciudad Juárez has the most developed environmental movement. This movement may have generated awareness among the private sector, thereby drawing attention to the need for greater cooperation.

**Table 6. Response to Questions Depending
on Respondent's Position in the Firm and
Geographical Region (Percent)**

How do you compare the environmental requirements of state and local governments to that of the federal government?						
Position/City	Similar	Less Restrictive	More Restrictive	Not Compatible	Don't Know	There are No State Laws
Manager	50.00	14.29	0.00	7.14	28.57	0.00
Environmental Officer	72.48	15.94	7.25	1.45	2.90	0.00
Engineer	66.67	16.67	12.50	4.17	0.00	0.00
Other	60.00	16.92	13.85	0.00	9.23	0.00
Ciudad Juárez	66.25	15.00	10.00	1.25	7.50	0.00
Reynosa	55.93	20.34	8.47	8.47	3.39	3.39
Matamoros	70.00	11.67	10.00	1.67	6.67	0.00

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Table 6. continued

What do you view as the largest obstacle to your firm operating in the most environmental sensitive manner?						
Position/City	Bureaucracy	Lack of Government Coordination	Government Inefficiency	Lack of Interest by the Private Sector	Other	Don't Know
Manager	25.00	25.00	8.33	8.33	16.67	16.67
Environmental Officer	23.08	21.54	33.85	6.15	12.31	3.08
Engineer	37.50	16.67	33.33	4.17	8.33	0.00
Other	18.03	22.95	21.31	13.11	22.95	1.64
Ciudad Juárez	26.39	18.06	16.67	15.28	16.67	6.94
Reynosa	30.77	17.31	23.08	1.92	26.92	0.00
Matamoros	20.00	25.00	41.67	3.93	10.00	0.00

Source: Authors

In Table 7, answers to questions pertaining to emissions trading are reviewed, and several items are worth noting. First, managers are generally not willing to allow other interested parties (beyond the government and private firms) to participate in the steering committee. Second, environmental officers in particular want government representation on the committee. Another interesting finding is that no managers are willing to state unequivocally that they will participate in emissions trading.

Finally, an evaluation of the pollutants by number of employees was analyzed and presented in Table 8. Respondents were asked to identify the most important environmental issue facing their firm. Interestingly, the response varied depending on the number of employees (Table 8). Most small firms identified carbon monoxide (CO) or carbon dioxide (CO₂) as their major environmental concern, while most large firms identified particulate matter 10 microns or less in diameter (PM₁₀). This finding is significant for the design of a border emissions trading program. First, as explained in Chapter III, the most common nonattainment pollutant on the border is PM₁₀. Therefore, the gains from an emissions trading program aimed at PM₁₀ may be significant. Second, all else being equal,

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organization of an emissions trading program among a few large firms would be easier than among many small firms. Thus, the results support the conclusion that there is a potential gain from the organization of a PM₁₀ emissions reduction trading program.

**Table 7. More Response to Questions Depending
on Respondent's Position in the Firm and
Geographical Region (Percent)**

From where should the members of this committee come?						
Position/City	Government	Government and Private Sector	All Parties	Exclude Government	Miscellaneous	Don't Know
Manager	38.46	53.85	0.00	7.69	0.00	0.00
Environmental Officer	13.24	47.06	33.82	0.00	4.41	1.47
Engineer	9.52	19.05	33.33	4.78	33.34	0.00
Other	9.43	62.26	13.21	7.59	5.66	1.89
Ciudad Juárez	17.50	55.00	23.75	0.00	2.50	1.25
Reynosa	12.82	7.69	28.21	20.51	28.21	2.56
Matamoros	8.77	54.39	22.81	1.75	10.52	1.75
Under what circumstances would your firm be willing to participate?						
Position/City	Will	Will not	Maybe	Management Must Decide	Miscellaneous	Don't Know
Manager	0.00	7.14	71.43	7.14	7.14	7.41
Environmental Officer	5.88	0.00	79.41	10.29	2.94	1.47
Engineer	19.05	0.00	71.43	9.52	0.00	0.00
Ciudad Juárez	0.00	0.00	72.50	13.75	8.75	5.00
Reynosa	17.02	17.02	34.04	6.51	0.00	23.40
Matamoros	8.62	0.00	87.93	3.45	0.00	0.00

Source: Authors

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Table 8. Number of Firms Stating Particular Pollutant is an Issue, According to the Number of Employees (Percent of Firms of that Size that State Pollutant as a Concern)

Pollutant	Number of Employees					
	250 or less	251-500	501-750	751-1,000	1,001-1,500	1,501 or more
PM ₁₀	42.88	26.92	34.48	52.50	58.33	80.00
Ozone	8.57	17.31	10.34	25.00	16.67	5.00
Carbon Monoxide	42.86	57.69	58.62	72.50	54.17	35.00
VOCs	40.00	36.54	27.59	47.50	45.83	45.00
NO _x	20.00	13.46	24.14	20.00	20.83	10.00
Sulur Dioxide	20.00	7.69	17.24	10.00	20.83	5.00
Carbon Dioxide	48.57	61.54	65.52	72.50	45.83	35.00
None	11.43	17.31	6.90	2.50	4.17	10.00

Source: Authors

Appendix B

Survey Instrument

Encuesta sobre la Viabilidad Fronteriza del Comercio de los Permisos de Emisiones

Participante: Gerente de la Planta, Gerente Ambiental, Ingeniero
Otro (Especifique)

- 1) ¿Cuántos años tiene trabajando esta planta?
- 2) ¿Cuántos empleados trabajan en esta planta?
- 3) ¿Cuántos empleados de la planta son trabajadores del área de producción?
- 4) Aproximadamente, ¿qué porcentaje del producto de la planta se distribuye en los siguientes mercados?
Estados Unidos
México
Europa
Asia
Otro
- 5) ¿La planta tiene un Gerente Ambiental/Ingeniero? Sí No
(pasa la pregunta 6 si el participante es Gerente Ambiental/
Ingeniero)
- 6) ¿Qué tiempo tiene desde que se estableció este puesto en la planta?
- 7) ¿Cuántos empleados tiene la oficina ambiental?

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8) En general, ¿cómo podrías describir las Leyes Ambientales Mexicanas en relación con las Leyes de los Estados Unidos?

Similares a

Menos estrictas que

Más estrictas que

No son comparables

No sé

9) Las Leyes Mexicanas relacionadas con el Ambiente son:

Muy fáciles de interpretar

Más o menos fáciles para interpretar

Un poco confusas

Extremadamente confusas

10) ¿Cuál de las siguientes respuestas reflejan de mejor manera, tu opinión sobre las Leyes Mexicanas del Medio Ambiente, así como su aplicación?

Muy apropiadas

Más o menos apropiadas

Apropiadas

Algo inadecuadas

Muy inadecuadas

No tengo opinión

11) ¿Cómo comparas los requerimientos ambientales del municipio del Estado con los requerimientos de la federación?

Similares

Menos estricto

Más estricto

No tienen comparación alguna

No sé

Aquí no existen requerimientos ambientales del Estado.

12) ¿Cuál es el obstáculo principal que encuentras desde el punto de vista legal en cada nivel institucional para el mejor funcionamiento de tu empresa en términos ambientales?

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13) ¿Tu compañía está bajo la dirección del sistema de administración ambiental ISO 14000? (si la respuesta es No [b-d] pasa a la pregunta 15).

Sí

No

No sé, pero sí lo que es el ISO 14000

No sé, y no sé lo que es el ISO 14000

14) ¿El ISO 14001 (Medio Ambiente) es aplicado en tu compañía?

Sí

No

No sé

15) En 1993 el Gobierno Mexicano estableció las Leyes que regulan la Contaminación del Aire (Normas Oficiales Mexicanas-NOMs). En general, ¿cuál de estos contaminantes son relevantes para tu compañía?

Partículas Suspendibles (PM₁₀)

Ozono (O₃)

Monóxido de Carbono (CO)

Componentes Orgánicos Volátiles (VOCs)

Óxidos de Nitrógeno (NO_x)

Bióxido de Azufre (SO₂)

Bióxido de Carbono (CO₂)

Ninguno

(Si la respuesta es h, pasa a la pregunta 17)

16) Indica el orden de importancia de los contaminantes para tu compañía (1-el más importante, 7-el menos importante, N/A si no es aplicable a).

Partículas Suspendibles (PM₁₀)

Ozono (O₃)

Monóxido de Carbono (CO)

Componentes Orgánicos Volátiles (VOCs)

Óxidos de Nitrógeno (NO_x)

Bióxido de Azufre (SO₂)

Bióxido de Carbono (CO₂)

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17) ¿Los términos “ambiental” o “seguridad pública” son mencionados en cualquier parte o forma, en los medios de comunicación y folletos comerciales de la empresa?

Sí

No

18) ¿Tu compañía ha estado envuelta en alguna actividad comunitaria que tuviera problemas relacionados con el medio ambiente? Si la respuesta es “Sí”, explica por favor:

Sí

No

19) ¿Cuando es comparada con las plantas similares en los Estados Unidos, pudieras decir que la tecnología usada es:

Antigua

Parecida

No comparable

No sé

Si la respuesta es b o c, pasa a la pregunta 21.

20) ¿Cuál es la principal explicación de tu respuesta a la pregunta número 19?

Edad de la planta

La tecnología fue desarrollada en esta planta

Es difícil adoptar la tecnología en los Estados Unidos, por el exceso de regulaciones.

El costo para implementar la tecnología en los Estados Unidos es muy alto (excluyendo los costos de regulación)

Los costos de implementación de esta tecnología en México son muy altos (excluyendo los costos de regulación)

21) ¿Consideras que el TLCAN (NAFTA) ha tenido un impacto sobre los costos ambientales de la producción?

Sí. Explica por favor:

No

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22) ¿Habías oído hablar de la comercialización de las emisiones?

Sí. Explica por favor:

No

Nota: La comercialización de las emisiones, es una política ambiental de los Estados Unidos orientada al control de la contaminación ambiental a través del ejercicio de las fuerzas del libre mercado. Actualmente, en los Estados Unidos se ha desarrollado ya la comercialización de permisos para el Bióxido de Azufre (SO_2) en el Intercambio Mercantil de Chicago. La comercialización de permisos es normalmente usada para controlar las emisiones de Bióxido de Azufre de las plantas generadoras de electricidad de carbón de los Estados Unidos. A través de un programa piloto de Comercialización de la Reducción de las Emisiones (PERT) se está llevando a cabo entre compañías de Canadá y los Estados Unidos. Bajo el mecanismo de la comercialización de los permisos, los esfuerzos han sido encaminados para incluir los Óxidos de Nitrógeno (NO_x) y las Partículas Suspensibles (PM). Además, hay la intención de establecer un programa similar en la frontera entre México y los Estados Unidos. Dentro de los esfuerzos en México por la administración de la calidad del aire, el Gobierno Mexicano ha establecido bajo la supervisión general del INE (Instituto Nacional de Ecología) un plan de acción e implementación colectiva para el mejoramiento de la calidad del aire. En este nuevo escenario, el INE y la Secretaría de Medio Ambiente y Recursos Naturales (SEMARNAT) están interesados en examinar las posibilidades de un mecanismo de comercialización de los permisos de emisiones, en el que participan las plantas y compañías a lo largo de la frontera entre los Estados Unidos y México. Las compañías Americanas o Mexicanas obtendrán créditos de reducción de emisiones (ERC) los cuales pueden ser usados como moneda de intercambio para emisiones actuales. Los ERCs son creados cuando una fuente reduce sus emisiones a un nivel por debajo del de las emisiones actuales o del nivel requerido por las leyes estatales y federales. Los ERCs pueden ser usados también por las compañías Mexicanas o Americanas como moneda de intercambio para permisos de emisiones para sus respectivas agencias de protección ambiental. Los

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beneficios por usar los ERCs pueden potencialmente ser una ventaja positiva para los costos actuales de la reducción de la contaminación.

23) ¿Qué aspectos sobre el TLCAN (NAFTA), consideras que pudieran ser útiles como apoyo al proyecto de la comercialización de las emisiones?

24) De acuerdo a tu experiencia técnica, profesional y administrativa, ¿consideras que debe existir un Comité, Consejo u Organismo Binacional que supervise, sancione o certifique, las transacciones del proyecto de la comercialización de las emisiones?

25) En este Organismo, Consejo o Comité Certificador, ¿quiénes lo deberían de integrar para su mejor funcionamiento?

26) ¿Bajo qué circunstancias pudiera tu planta estar dispuesta a participar en este proyecto de la Comercialización de las Emisiones?

27) De acuerdo a lo antes expuesto sobre las emisiones, ¿cuáles serían tus dudas sobre el proyecto?