



“Eco-TIRAS”
International
Environmental
Association of River
Keepers

Asociația Internațională
Ecologică
a Păstrătorilor Rîului
”Eco-TIRAS”

Str. Teatrului 11A, Chișinău, 2012,

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Chisinau, Moldova

Dear European Commission,

Hereby on behalf of 50 NGOs-members of our transboundary Dniester River basin association of environmental NGOs of Moldova and Ukraine let me thank you for the opportunity to comment the current situation with implementation of environmental component of the EU/Moldova Action Plan from the very beginning. It is a good precedent of involvement of civil society organizations from neighbouring countries which should be replied in future.

All the best,

Ilya Trombitsky

**Comments of registered in 2000 in Moldova environmental NGO
“Eco-TIRAS” International Environmental Association of River Keepers
on implementation by Moldova of EU/Moldova Action Plan
(2.6 Chapter, especially points 69-71, related to the Environment)**

Environment

(69) Take steps to ensure that conditions for good environmental governance are set and start implementing them

– Strengthen administrative structures and procedures to ensure strategic planning of environmental issues, including financing strategies, and co-ordination between relevant actors

Comment: in fact, despite of the name of the MoE “Ministry of Ecology and Natural Resources” almost all natural resources (water, forests and soil) are managing and controlling by other independent from the MoE governmental agencies in a not sustainable way. Coordination of these agencies is weak and does not provide the harmonized approach. It does not permit MoE to manage natural resources efficiently and in a sustainable way. Moreover, three years ago the MoE staff is significantly cut up to 25 people. Until the institutional structure for natural resources management will be improved no hopes on any progress in this field.

– Establish procedures regarding access to environmental information and public participation, including implementation of the Aarhus Convention, particularly by establishing structures and procedures for ensuring an acceptable level of service to those wishing to have access to information.

Despite Moldova was the first country which ratified the Aarhus Convention and among the first which accepted the Almaty (2005) Amendment to the AC, there is no evident political will or progress in harmonization of national legislation with the AC in fields of access to environmental information and public participation. During 2003 – 2008 there were no any steps or even intentions in this direction initiated by national government or other players. There are no still data registers available to public and no intention to create them.

- Prepare regular reports on the state-of-the-environment

There are prepared and published on the year-to-year basis the national reports but their quality is weak. Its drafts are not available for public discussions.

- Strengthen structures and procedures necessary to carry out environmental impact assessments, including in relation to transboundary issues; complete relevant legislation.

There are almost no applied procedures of EIA, and at the same time – great violations by national government of own legislation on EIA, including starting of constructions without finalized EIA (2007 case of rail way construction in Ramsar site “Lower Prut Lakes”). SEA is also not applied.

- Further improve communication strategies on the benefits of environmental policy and environmental education, support civil society actors and local authorities

The public access to law making is established only on parliamentary level, when government and ministries have no any workable rules and procedures of such consultations on drafts. All such nature activities are rather voluntary exceptions than practices, despite MoE in general is one of most open for public among different ministries. Relationships of local authorities with NGOs totally depend of the attitude of concrete **Local Public Authorities towards NGOs.**

(70) Take active action for prevention of deterioration of the environment, protection of human health, and achievement of rational use of natural resources, in line with the commitments of the Johannesburg Summit

- Continue with the adoption of legislation for key environmental sectors (water quality, waste management, air quality, industrial pollution), including the adoption of the legislation on wild flora and ecological networks.

Legislation for different sectors is not harmonized and the complex views are not reflected in land planning despite some efforts in this direction are done (Law on Ecological Network, Water Policy Strategy etc.).

- Enhance administrative capacities, including for the issuing of permits as well as for enforcement and inspection

no comment

- Develop sector-specific programmes and plans (water, waste, air, industrial pollution), notably by completing the plan on liquid waste and the plan on persistent organic pollutants.

no comment

(71) Enhance co-operation on environmental issues

- Implement provisions under the Kyoto Protocol and the UN Framework Convention on Climate Change
- Participate actively in the Danube – Black Sea Task Force to implement a transboundary approach to water management; ensure active participation in the Eastern European, Caucasus and Central Asia component of the EU Water Initiative

Moldova somehow participates in Danube cooperation but mostly on international policy level without national implementation. No any outcomes of such cooperation on the ground and moreover – some evident steps back like destruction of Lower Prut Ramsar site by realization of the railway construction project in natural protected territory without any EIA and SEA. Before – in the beginning of 2000th the same is done by construction of oil extraction facilities in core area of this protected area.

Moldova in general enough active participates in the EUWI by starting National Water Policy Dialogue, but the lack of attention to the issue on the highest country level does not permit to have efficient outcomes from such dialogue. Again – independence of state water agency from the MoE prevents any real progress in this direction.

- Identify possibilities with neighbouring countries for enhanced regional co-operation in particular as regards trans-boundary issues

Some progress is achieved on transboundary waters cooperation with Ukraine with support of UNECE and OSCE, even new modern Dniester River basin agreement is drafted, but government is not too insistent on modernization of water cooperation legal framework. Some progress is achieved in this sphere in involvement of Transdnister in water cooperation. Separation of water management with MoE does not help in transboundary water cooperation.

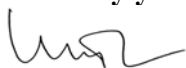
Cooperation with Romania faces difficulties related to the lack of basic interstate treaty which does not permit elaboration of Prut River basin agreement – the issue which is binding also for Romania in accordance with WFD.

- Possible participation in selected European Environment Agency activities
- Strengthen administrative capacities for the implementation of regional and international agreements

Some activities are done by Moldova in these spheres.

We believe that presented comments will help in inforcement of the Action Plan in nearest future. From NGO side we are happy to further monitor the process as well as to do input to drafting of necessary national legislation of Moldova.

Sincerely yours,



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