



“Eco-TIRAS”  
International  
Environmental  
Association of River  
Keepers

Asociația  
Internațională  
Ecologică  
a Păstrătorilor Rîului  
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Mr. Jeremy Wates  
Secretary of the Aarhus Convention

September 7, 2009

*Re: Aarhus Compliance Committee draft decision from July 2, 2009,  
on Communication Ref. ACCC/C/2008/30*

Dear Mr. Jeremy Wates,

Let me inform you that on the date of September 3, 2009 Eco-TIRAS organized the national seminar for NGOs on the issue of public awareness on the options provided by the Aarhus Convention via its Compliance Committee. Two international experts – Mr. Andriy Andrusievich (ECO-Forum and Environment & Society, Lviv, Ukraine) and Michael Zschiesche (UfU, Berlin) took part in it. The seminar was supported in frames of the project of the Rosa Luxemburg Foundation (Germany) in Moldova. The seminar was used also as the option to publicly discuss the Draft Findings of the CC on Moldovan case.

Please, find comments to improve the final decision:

1. Because in point 38 (b) of the Recommendations is noted the violation of the Art. 9-1 of the Convention it looks logic that this fact will be reflected also in the Main findings (points 34-37, for example, in p. 34).

Concerning the CC Recommendations draft:

We are agree with the recommendations proposed, but see the necessity to do some amendments to raise the effectiveness of the document:

2. It would be helpful to recommend additionally the establishment by Moldovan authorities the legally binding rule to publish the court decisions related to Aarhus in Internet and to publish statistical data on such cases.

3. It would be good to recommend to the Government of Moldova to take active and effective measures on active provision of information to the public by establishing of the registers of environmental information in Internet;
4. It looks as necessary to realize the measures which permit the Ministry of Environment of Moldova to supervise the application of the AC by other governmental bodies and have mechanisms of impact (like institutional measures to unite all natural resources management under MoE umbrella);
5. It would be important to propose to the Government of Moldova to develop and adopt on governmental level the Action Plan which will include reaction on all measures listed in in the CC Conclusions and Recommendations.
6. It looks as important measure to establish under the Government the inter-departmental coordination body for implementation of the Aarhus Convention.
7. In our view it will be helpful to recommend the Government of Moldova to adopt the Action Plan on implementation of the Aarhus Convention.

We have no other comments.

Thank you,

Sincerely yours,

A handwritten signature in black ink, appearing to be 'Ilya Trombitsky', with a stylized, cursive script.

Ilya Trombitsky  
Executive Director