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To: [ECE-Survey-Aarhus](#)
Cc: [Ella Behlyarova](#); [Maryna Yanush](#); [Nohr Trine](#); [Vestlund Annette Linda](#); [Grønås Robert](#); [Tennfjord Øystein](#); [Ingunn Margrethe Limstrand](#); [gks](#)
Subject: SV: Comments on the updated EIT recommendations by Norway
Date: Monday, April 27, 2020 17:12:49
Attachments: [Draft updated EIT Rec tch 25Mar20KMD.pdf](#)

The draft updated Recommendations set high ambitions and contains elements important for digital transformation in the environmental field in order to further enhance protection of the environment and public access to information and participation for this purpose.

Norway has established and is seeking to further improve measures within the scope of the draft updated Recommendations as part of the digital transformation that we are aiming for. We have recently adopted a new digitalisation strategy for the environment sector for the period 2020-2024 (only in Norwegian), and a [Digital strategy for the public sector 2019-2025](#) was adopted last year. These strategies set aims and priorities for digital transformation of the public sector in general and the environmental sector in particular in the coming years. They have similar high ambitions and cover many of the elements contained in the draft of the updated Recommendations on electronic information tools, although in a more general manner.

The draft updated Recommendations contains elements that are important with regard to digital data and participatory rights; standardisation, use of open source, accommodating use of data, machine learning, block chain and artificial intelligence. They are framed in a way that supports the public's right to information and participation in decision-making in an accessible, inclusive and efficient way. The draft updated Recommendations therefore appear as updated and relevant.

We would however also like to point out that the high ambitions and in some parts quite detailed and prescriptive recommendations have resource implications. As they are recommendations that describe aims and measures to achieve them through establishment and further development without prescribing absolute time-limits, they also provide some flexibility for Parties to set their priorities and allocate resources for the establishment and further development of measures on the basis of the recommendations.

We are therefore in general supportive of the draft updated Recommendations, but have some comments to parts of the elements. With regard to Part III para 20 litra (g) on page 5, we believe it should be clarified that the main point is not that use and re-use of data should not be subject to licences, but that open data licensing should be used. With regard to Part IV Tools and Infrastructure, we believe that reference should be made to the [FAIR Data principles](#) for scientific data management and stewardship. The principles aim to ensure that data have a certain quality and to reduce technical and administrative barriers for access to and reuse of data. They also put emphasis on enhancing the ability of machines to automatically find and use the data, in addition to supporting its reuse by individuals.

We also have some more detailed text proposals to parts of the elements of the draft Recommendations that are inscribed in the attached version.

We reserve the right to provide additional input in the further consideration of the draft updated Recommendations in the upcoming meetings under the Convention.

Best regards,

Beate B. Ekeberg
National Focal Point for the Aarhus Convention



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Emne: Consultation on the update of the Recommendations on electronic information tools

Viktighet: Høy

To: National focal points of the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention), other interested UN Member States and stakeholders

Through decision VI/1 Meeting of the Parties to the Aarhus Convention at its sixth session (Budva, Montenegro, 11-14 September 2017) requested the Task Force on Access to Information to update the Recommendations on electronic information tools set out in decision II/3.

The current draft of the updated Recommendations on electronic information tools, prepared by the Chair with the assistance of the secretariat, is available at:

<http://www.unece.org/environmental-policy/conventions/public-participation/aarhus-convention/tfwg/task-force-on-access-to-information/consultations-on-the-recommendation-on-electronic-information-tools.html>

Parties, Signatories, other interested States and stakeholders are invited to provide their