



DET KONGELIGE  
MILJØVERNDEPARTEMENT

*Royal Ministry of the Environment*

Aarhus Convention Secretariat  
United Nations Economic Commission for Europe  
Palais des Nations, Av. de la Paix 10  
CH-1211 Geneva  
Switzerland

Your ref

Our ref  
200500235

Date

08 OKT 2010

**Proposal by the Aarhus Secretariat on elements for the 2012 –  
2014 Workplan under the Aarhus Convention – Norwegian  
comments**

Norway would like to thank the Aarhus Convention Secretariat for its proposal on elements for the 2012-2014 workplan under the Aarhus Convention, and for the opportunity to submit comments. We apologise for the late submission.

**General remarks**

In the Secretariat proposal it is at an early stage concluded, without much discussion, that some areas of work may be mature enough to be downscaled from an intergovernmental level to a subregional/country level. The idea behind the proposal is to reach authorities concerned and key stakeholders more effectively.

Norway agrees that in certain areas, the work under the Convention might be ready to be discussed with the goal of finding new and more effective ways of working. Still Norway sees a clear need for a more comprehensive and in-depth evaluation to be carried out, in order to be able to consider this issue in a holistic and enlightened manner. Especially is this the case in relation to the work of the different Task Forces (TF).

Further Norway finds it difficult to get a proper understanding of the new concept of an “assistance mechanism”, which is being introduced in the Secretariat proposal.

Important questions that needs to be answered in this relation is i.a;

- how the “assistance mechanism” relate to the other bodies of the Convention i.a. the Secretariat, the Bureau and the different Task Forces,

---

Postal address  
PO Box 8013 Dep  
0030 Oslo

Office address  
Myntgt. 2  
postmottak@md.dep.no  
www.miljo.no

Telephone  
+47 22 24 90 90  
Vat no.  
972 417 882

Department for Climate Change  
and Pollution Control  
Telefax  
+47 22 24 95 60

Our officer  
Vibeke Ursin-Smith  
+47 22 24 57 62



- how the new “mechanism” would operate,
- who would be the “members” of the “mechanism”, and
- how the new “mechanism” would be financed.

In general it is important that the financial implications of the Secretariats different proposals for new activities are properly analysed and estimated. This is needed in order to get a picture of the consequences of what is being introduced and discussed.

Lastly Norway would like to point out that the Strategic Plan, in addition to Implementation, also covers the areas of Expansion and Development. It is of great important that the work program reflects this, and that important issues such as the inclusion of product information in the scope of the Convention is not being left out.

### **Specific remarks**

#### Compliance and reporting mechanisms

No new elements are proposed for these activities, but it is suggested to strengthen the link between the outcome of the two processes and other activities. In this area as in others, good cooperation and synergies between different processes is important. Norway thus supports the proposal of enhancing the link between the different activities under the Convention.

In relation to the proposal of involving the members of the Compliance Committee (CC) in relevant training and advisory services, Norway finds this to be positive, as long as the core functions of the CC are given priority.

#### Assistance mechanism

As mentioned above, Norway finds it hard to state a clear opinion in relation to this topic until the “assistance mechanism” has been described in a more detailed manner. Still we do see that there could be a need for a more holistic approach to the work being done in relation to giving country-specific advice. Still this does not mean that most of the work under the Convention should be downscaled from an intergovernmental level to subregional/country level. Norway agrees with the view put forward by the European Eco Forum (note distributed at WGP 12) in relation to this; *“if the Task Forces function well, they can lead to initiatives to make governments go beyond its original intentions, find solutions for problems because there are international pressure to do so, clarify weather problems are systematic across Parties or incidental, and compare interpretations of the Convention”*. It is important that this aspect of the work under the Convention, also in the future, is being nourished and secured.

#### Access to Justice

Norway supports the work that has been done by the Task Force on Access to Justice. Ensuring access to justice is both very important and very challenging. On this issue Norway thus sees the need for both general work in the form of i.a. analytic studies and for more targeted national capacity building activities.

Electronic information tools

Norway could consider downscaling the activities in this specific area to a regional/country level, as this seem appropriate as a follow up by the work that has been done by the Task Force.

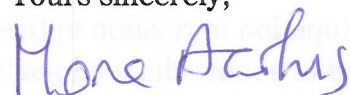
Promotion of the application of the principle of the Convention in international forums

Norway could also in this area be open to consider possible new ways of taking the work under the Convention further, including a review of the structure and role of the existing Task Force. Also in relation to this Norway sees the need for a more comprehensive evaluation of the issue in order to take a firm stand.

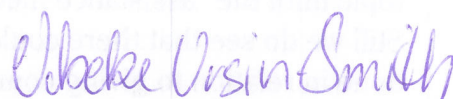
Miscellaneous

Norway supports the Secretariats proposals in relation to increase the efforts for more synergies and cost efficiency between the Convention and the PRTR Protocol. Norway also supports the continued effort to promote the Convention, i.a. through the Community Strategy. Norway sees the elements envisaged in paragraph 26 as an integrated part of the Community Strategy. The number and shape of the bodies under the Convention needs to be further discussed at a later stage and on the basis of a more comprehensive evaluation of the existing bodies. Still Norway could already today support the proposal of giving a meeting of the Working Group the shape of a session/round table, if the parties find a need for this.

Yours sincerely,



Mona Aarhus  
Deputy Director General



Vibeke Ursin-Smith  
Senior Adviser