

ANNEX, Party's concerned comments on the draft findings and recommendations (communication ACCC/C/2013/98)

No	Para.	Text	Comment
1.	4	The Committee held a hearing to discuss the substance of the communication at its forty-eighth meeting (Geneva, 16-19 December 2014) with the participation of the communicant and the Party concerned.	Forty-eighth meeting took place on 24-27 March 2015.
2.	13	Public participation in the environmental impact assessment procedure is regulated by Order No. D1-370 of 15 July 2005 'Procedure for Public Information and Participation in the Environmental Impact Assessment Process of the Environmental Impact Assessment of the Proposed Economic Activity' (Public Participation Order)	Currently there are two more acts in force regulating public participation in the environmental impact assessment (EIA) procedure: 1. Order No. D1-845 of 16 October 2017 'Procedure for Screening for the Environmental Impact Assessment of the Proposed Economic Activity' 2. Order No. D1-885 of 31 October 2017 'Procedure for the Environmental Impact Assessment of the Proposed Economic Activity'
3.	82	The communicant alleges that the Party concerned harassed its representatives and other individuals in connection with the OHL, including by the State Security Department (SSD).	Does the word ' <i>including</i> ' in this context mean that other subjects except the State Security Department 'harassed' representative of the communicant and other individuals? If yes, please identify those subjects that we could comment on that.
4.	83-86	<i>Ms. Cimakauskienė</i> 83. The communicant submits that in 2012 the SSD made two telephone calls to the communicant's head, Ms. Cimakauskienė, 'of a harassing nature'. It claims that the SSD officer explained that he was interested in the OHL, questioned the communicant's actions and suggested that she 'come for a meeting without...bringing a toothbrush'. After a second call, Ms. Cimakauskienė contacted a journalist who interviewed her on a popular radio programme during which these incidents were discussed. The SSD did not contact her again.	We would like to explain why we did not comment on this kind of accusations when they first appeared in the comments provided by the Communicant (Communicant's comments, 9 October 2017): 1. Communicant provided subjective statements about alleged harassment and did not provide any supporting evidence; 2. At the time we got these first accusations of harassment we knew (and we know) beyond a shadow of doubt that the harassment from state institutions in the terms of Aarhus Convention in Lithuania of nowadays is just impossible. Lithuania is a democratic, rule of law country for which protection of human rights is one of the core

		<p><i>Ms. Želionienė</i></p> <p>84. The communicant claims that an SSD officer initiated a meeting in June 2014 with Ms. Želionienė, a landlord who had been closely cooperating with the communicant. Ms. Želionienė ‘got the impression that her phone calls could have been under surveillance as the facts touched upon in the meeting seemed to be well know[n] to the officer’, and the officer asked questions concerning Ms. Cimakauskienė’s activities.</p> <p><i>Dr. Valiokas</i></p> <p>85. The communicant claims that on 30 May 2014, its representative, Dr. Valiokas, and an expert, Mr. Sniečkus, were performing a biodiversity field survey at the OHL’s planned construction site, when they were asked questions by an environmental protection officer and “other persons who did not present themselves”.</p> <p>86. The Party concerned confirms that the SSD contacted Ms. Cimakauskienė. It claims it did so ‘to clarify the issues in the Rudamina community related to the electricity power line.’ It submits this was the only contact by the SSD regarding the OHL project, which acts in accordance with the principles set out in article 4 of the Law on Intelligence. It does not comment on the other alleged incidents.</p>	<p>values.</p> <p>Only after the request from the Compliance Committee to comment on the Communicant’s allegations regarding interaction from SSD side (Compliance Committee’s letter, 15 August 2017), the Ministry of Environment of the Republic of Lithuania contacted SSD and asked to provide related information. The reply of SSD, saying that there was one contact with Ms. Cimakauskiene (acting strictly according to national legislation) was provided to the Compliance Committee (Party’s concerned letter, 2 October 2017). The answer from SSD was short without additional reasoning and it is understandable taking into consideration the nature of SSD activities, secrecy requirements.</p> <p>Draft findings and recommendations gave a very strong signal for us that these kind of considerations from the Communicant side can have crucial consequences. Therefore, we contacted SSD ones again and asked to give more details, reasoning supporting SSD statement. On the basis of our request SSD initialized internal investigation which showed that none of the SSD officers had a contact with Ms. Želionienė, dr. R. Valiokas or Mr. E. Sniečkus. SSD officer who contacted Ms. R. Cimakauskienė, living in the same area, was Mr. R. Bigėlis. The latter stated that he knew R. Cimakauskienė in person. He had a task to supervise this project of a state importance, to gather information, and provide analysis. It was ones again confirm that Mr. Bigėlis had only one contact with Ms. Cimakauskienė, but the talk was of a friendly, not harassing nature. Differently from what was said by the Communicant and written in the draft findings and recommendations (‘&lt;...&gt; and suggested that she ‘come for a meeting without...bringing a toothbrush’), during the conversation Mr. Bigėlis jokily said ‘she does not have to bring a toothbrush yet’ (text of the conclusions of internal investigation on this issue is provided with these comments).</p> <p>All in all, we think that there is enough evidence to support the statement that SSD actions were not of a harassing nature and Party concerned is not in noncompliance with Article 3(8).</p>
5.	154 (g)	<p><b>Related finding:</b></p> <p>The telephoning to the communicant by the State Security Department “to clarify the issues in the Rudamina community related to the electricity power line” constituted harassment, penalization and persecution by the Party concerned in non-compliance with article 3(8) of the Convention.</p>	
6.	155(b )	<p><b>Related recommendation:</b></p> <p>The State Security Department receives clear instructions not to contact or surveil persons seeking to exercise their rights to participate or seek access to justice under the Convention.</p>	

			<p>The situation when Lithuania is being compared to Belarus<sup>1</sup>, the country which puts its environmental activists into jail and applies all other means to restrict freedom of movement, freedom of speech, is just intolerable. We see these situations (Lithuanian case (communication ACCC/C/2013/98) and Belarus case (communication ACCC/C/2014/102) as totally different and incomparable.</p> <p>We ask the Compliance Committee to consider related text of the draft findings and recommendations ones again and conclude that the Party concerned was not in noncompliance with Article 3(8).</p>
7.	99	<p>Accordingly, the Committee finds that, by not correctly notifying the public concerned about the timeframes during which relevant documentation would be available and in which comments could be submitted, the Party concerned failed to comply with the requirements in article 6(2)(d)(ii) to adequately inform the public concerned about the envisaged procedure, including the opportunities for the public to participate.</p>	<p>As we understand, the conclusion made by the Compliance Committee is based on the evaluation of the notices in the newspapers where information about the timeframes was provided rather than the evaluation of legal framework in the present case.</p> <p>Could you please clarify, if the above mentioned conclusion of the Compliance Committee means that the Party concerned is responsible for the action/ inaction of private subjects/ entities?</p> <p>Does this conclusion also mean that the public concerned is dismissed from the duty to get acquainted with the related legal framework (was this aspect taken into consideration?)?</p>
8.	154(a)	<p><b>Related finding:</b> By not correctly notifying the public concerned about the timeframes during which relevant documentation would be available and in which comments could be submitted, the Party concerned failed to comply with the requirements in article 6(2)(d)(ii) to adequately inform the public concerned about the envisaged procedure, including the opportunities for the public to participate.</p>	<p>The national legislation on the EIA has been changed and entered into force from the 1 November 2017.</p> <p>Additional responsibilities for the competent authority were defined and more detailed information on the procedures for the public were introduced.</p> <p>During the scoping in accordance with the EIA Law, Article 8 (3): ‘The drafter of documents of environmental impact assessment shall submit a prepared programme to entities of environmental impact assessment for conclusions and inform, in accordance with the procedure established by the Minister of Environment, the public and the competent authority, which shall publish the information within three working days from the receipt thereof in accordance with the procedure established by the Minister of Environment.’</p>
9.	155(a) (i)	<p><b>Related recommendation:</b> The public is notified about all timeframes for opportunities for public participation, including the period during which relevant documentation will be available and in which comments can be submitted.</p>	

			<p>Para 69 of the Order No. D1-885 describes the requirements on the content of information that should be published for the public during the scoping and sets the requirements on timeframes:</p> <p>69. The information made available to the public must include: &lt;...&gt;</p> <p><b>69.5. the deadline for submission of proposals, which must be at least 10 working days from the date of publication of the information, counting from the day following the publication;</b>“</p> <p>After the EIA report is drafted in accordance with the Law on EIA 10 (3, 8, 9):</p> <p>„3. The drafter of documents of environmental impact assessment shall, <b>not later than 20 working days before granting to the public the access to a report, inform the public</b> about the granting to the public the access to the report in accordance with the procedure established by the Minister of Environment.</p> <p>&lt;...&gt;</p> <p>8. The drafter of documents of environmental impact assessment shall submit to the competent authority a report revised and/or supplemented in accordance with conclusions of entities of environmental impact assessment, conclusions of the entities of environmental impact assessment on the report and the environmental impact of the proposed economic activity and an evaluation of proposals of the public concerned.</p> <p><b>9. The competent authority shall, within three working days from the receipt of a report, publish to the public a notice on the report and access</b> thereto in accordance with the procedure established by the Minister of Environment. <b>The public concerned shall have the right to submit to the competent authority, within ten working days from the publication of the notice,</b> written proposals on the environmental impact assessment of the proposed economic activity and the report.”</p> <p>Para 75, 77, 83 and 84 of the Order No. D1-885 describe the requirements on the content of information that should be published</p>
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<sup>1</sup> Compliance Committee supports its reasoning by citing findings on communication ACCC/C/2014/102 (Belarus).

			<p>for the public after the EIA report is drafted and sets the requirements on timeframes:</p> <p>‘75. The drafter of the EIA documents <b>not later than 20 working days prior to the public presentation of the report, informs the public</b> about the opportunities to access the report and submit proposals, participate in the public presentation of the report and publishes information specified in para 77 of the Order by the following means:</p> <p>&lt;...&gt;</p> <p>77. The information made available to the public regarding public presentation of the report shall contain:</p> <p>&lt;...&gt;</p> <p>77.5. by when (<b>at least 20 working days must be allowed to get acquainted with the report and submit proposals</b> before the final public presentation referred to in para 77.6) to submit proposals to the drafter of the EIA documents (provide copies of the proposals to the EIA entities and the Agency for information in accordance with their competence).</p> <p>&lt;...&gt;</p> <p>83. Upon receiving from the drafter of the EIA documents the report, evaluation of the proposals of the concerned public and the conclusions of the EIA entities, <b>the Agency shall no later than within 3 working days from the date of the receipt publish on its website the notice</b> specified in para 84 of the Order <b>and the opportunity to get acquainted with the report and submit proposals to the Agency not later than within 10 working days.</b></p> <p>84. The notice shall contain the following information:</p> <p>84.3. <b>by when to submit proposals to the Agency</b>, which will be discussed with members of the public concerned before the Agency makes a decision on the environmental impact of the proposed economic activity (<b>deadline for submission of the proposals is 10</b></p>
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			<b>working days from the day following the publication of the notice on the Agency's website.</b> Proposals received after this deadline will not be considered).
10.	105	<...> The Committee considers that the 2010 Agreement accordingly fixed the general location, at least, of the OHL's border crossing point.	Firstly and most importantly it should <b>be highlighted</b> that so called "2010 Agreement" is <b>just the Minutes of the event</b> which took part on 30 April 2010. In no sense this meeting can be treated as resulting in any agreement between participants of the event. The conclusions of this meeting were not legally binding. Moreover, we see from the text of the Minutes, that participants of the meeting did not have unanimous opinion on the border crossing point's issue. T. Varneckas (Head of planning division of UAB 'Sweco Lietuva', Lithuanian side) 'believes that it is rather difficult to determine, with the high degree of precision, the site of the border crossing point without having done the EIA first, hence he suggested identifying only a stretch of the border which should be examined and evaluated so as to identify the best border crossing point.' Katarzyna Twardowska, Deputy Director of EIA Department, GDOS (Polish side), 'believes that it is very important for the Polish side to identify a specific border crossing point because the evaluations are ongoing'. After related discussions the intension to plan the border crossing point on the certain site was expressed, not an agreement to fix it: 'When drawing up EIA and SEA documents as well as the special plan on the border crossing site, UAB „Sweco Lietuva“ <b>will attempt</b> to plan the border crossing point on the site indicated on the said plan <...>'. Therefore, we do not agree with the Compliance Committee's conclusion that '2010 Agreement' fixed the general location or even fixed border crossing point of the OHL's.
11.	108	<...> Agreement demonstrates that the 2010 Agreement foreclosed other options in practice.	It should be repeated that so called '2010 Agreement' was not legally binding. This aspect was briefly mentioned by the Compliance Committee itself: '<...> regardless of whether or not it amounted to a treaty under the Vienna Convention on the Law of Treaties <...> (para. 109). The fact that this '2010 Agreement' was a meeting of the representatives of the competent authorities of
12.	109	Based on the above, regardless of whether or not it amounted to a treaty under the Vienna Convention on the Law of Treaties, the 2010 Agreement was related to the decision-making concerning the OHL and in practice foreclosed options for the border crossing point prior to the public having an opportunity to participate thereon.	
13.	111	The Committee finds that, by fixing the location of the border crossing point through an interstate agreement without regard to the pending public participation procedures, the Party concerned precluded the possibility for the public to participate when all options on the crossing point were open and thus failed to comply with article 6(4) of the Convention.	
14.	154 (b)	<b>Related finding:</b> By fixing the location of the border crossing point through an interstate agreement without regard to the pending public participation procedures, the Party concerned precluded the possibility for the public to participate when all options on the crossing point were open and thus failed to comply with article 6(4) of the Convention.	
15.	155(a)	<b>Related recommendation:</b>	

	(ii)	Any international agreement concerning the specific activity that is agreed by the Party concerned prior to the completion of the public participation procedure under article 6, must not preclude all options being open during the public participation procedure.	<p>Lithuania and Poland, LitPolLink, AB ‘Lietuvos energija’, AB ‘Sweco Lietuva’ during which different issues related to the project were discussed and not binding intensions were declared, can not be ignored.</p> <p>Secondly, if we talk about the nature of this meeting, the political weight of the representatives present at the meeting, we see that even politically this meeting can not be treated as an agreement of the parties, because these were not represented by the high level representatives. Moreover, the Minutes of this meeting <u>were not signed by interested parties so we can treat the wording of the meeting Minutes as agreed text or even an agreement.</u></p> <p>As we explained while commenting on the 2002 Plan, ‘the 2002 Plan set a preliminary route, subsequently made specific in the county and municipal master plans.’ (para. 104 of the draft Findings and Recommendations). Also during the 2010 Meeting the border crossing point which would be a priority at least for one interested party was named and <b>only</b> intension to plan this crossing border point for the Project was expressed.</p>
16.	115	The Committee considers that even if it were still legally possible for the decision-makers to have opted for the underground alternative, the title of the 2009 Decree, the above public notice and brochure all sent a strong message to the public concerned that the choice of overhead technology had already been selected. The Committee accordingly finds that, by failing to ensure that all options with respect to the choice of technology for the power line were not just legally open but also could clearly be seen to be open by the public concerned, the Party concerned failed to comply with article 6(4) of the Convention.	<p>At this point we do not agree with Compliance Committee’s conclusion that the legal possibility to change 2009 Decree is of the importance.</p> <p>As it was said in our very first response to the communication (dated 26-11-2014), the main objective of the 2009 Decree was to grant public limited company Lietuvos energija a permission to carry out the functions of the planning organiser. ‘The adoption of that order did not prevent discussions on the alternatives of Project implementation. In accordance with the interpretation of the Aarhus Convention Compliance Committee, ‘early’ public participation, when all options are open for discussion, does not prevent competent authorities from taking a position or determining a preliminary opinion as to the proposed activity. However, it is said in addition that competent authorities must still be in the information gathering</p>
17.	154(c)	<p>Related finding:</p> <p>By failing to ensure that all options with respect to the choice of technology for the power line were not just legally open but also</p>	

<sup>2</sup> Aarhus Convention Implementation Guide, p. 144.

		could clearly be seen to be open by the public concerned, the Party concerned failed to comply with article 6(4) of the Convention.	and processing stage and must be open to persuasion by members of the public to change their position or opinion. <sup>2</sup> With regard to this practice, during Project implementation possibilities for making alternative proposals were provided to the public. These proposals were analysed and reasoned answers were provided, and were taken into account when preparing the EIA documents.’
18.	155(a) (iii)	<b>Related recommendation:</b> The range of options open at each stage of decision-making are adequately reflected in the information provided to the public at each stage;	
19.	131	Based on the above, the Committee finds that, by establishing a system whereby comments submitted by the public during the EIA procedure are to be in the first instance submitted to an entity not required to be independent from the developer, and not to the competent public authority itself, the Party concerned is in noncompliance with article 6(7) of the Convention.	The national legislation on the EIA has been changed and entered into force from the 1 November 2017. Additional responsibilities for the competent authority were defined and more detailed information on the procedures for the public were introduced. Environmental Protection Agency (hereinafter – Agency) is the competent authority for EIA in Lithuania. Para 64 of the No. D1-885 sets that:
20.	154(d) )	<b>Related finding:</b> By establishing a system whereby comments submitted by the public during the EIA procedure are to be in the first instance submitted to an entity not required to be independent from the developer, and not to the competent public authority itself, the Party concerned is in noncompliance with article 6(7) of the Convention.	‘During the EIA process, <b>the concerned public has the right to submit any proposals, comments, information, analysis, opinion on the proposed economic activity and its EIA (hereinafter - proposals) to the drafter of EIA documents, EIA entities and the Agency</b> in accordance with the procedure established in this Chapter.’ In our view, such legislation put competent authority in the parallel position as drafter of EIA documents, EIA entities and enshrines a right for the public to provide its comment to independent, impartial state body (Agency).
21.	155(a) (iv)	<b>Related recommendation:</b> A clear requirement is established that comments submitted by the public are sent to the competent public authority itself.	
22.	132	Item 33 of the Public Participation Order as currently in force requires the drafter (in the present case, the consultant) to prepare a reasoned evaluation of proposals and provide written answers to the members of the public who submitted them. However, the obligation in article 6(8) that the Party concerned shall ensure that in the decision due account is taken of the outcome of the public participation necessarily requires that the public’s comments be considered by the competent public authority.	Public Participation Order is still currently in force but is applied only for the EIA procedures initiated before Order No. D1-885 came into force. According to para 70 of Order D1-885, <b>‘When submitting proposals regarding the scoping program to the drafter of EIA documents, the public concerned shall provide the copies of the proposals to the Agency so that the Agency has information on all proposals submitted before approving the program.’</b>

		Accordingly, the Committee makes clear that it is incompatible with the Convention that the developer's consultant prepared the responses to the comments received and the reasoned evaluation of the comments for the competent public authority. Moreover, it is not in compliance with the Convention that the competent public authority, responsible for taking the decision, was provided only with the summary of the comments submitted by the public.	Regardless of to whom the public has submitted proposals, to the drafter of documents or to the competent authority, the competent authority is responsible for evaluation if and how these proposals were evaluated and taken into account. During the scoping in accordance with the Law on Environmental Impact Assessment of the Proposed Economic Activity Article 8 (9): <b>'9. Upon examining and evaluating a programme and an evaluation of proposals of the public concerned</b> accompanying it and based on conclusions of entities of environmental impact assessment, <b>the competent authority shall, within ten working days from the receipt of the programme, approve the programme</b> or submit reasoned requests to the drafter of documents of environmental impact assessment to supplement or revise the programme. Information about the approved programme shall be published by the competent authority in accordance with the procedure established by the Minister of Environment.'
23.	154(e)	<b>Related finding:</b> By not ensuring that the competent public authority is required to take due account of the outcomes of the public participation, the Party concerned fails to comply with article 6(8) of the Convention	<b>programme</b> or submit reasoned requests to the drafter of documents of environmental impact assessment to supplement or revise the programme. Information about the approved programme shall be published by the competent authority in accordance with the procedure established by the Minister of Environment.'
24.	155(v) )	<b>Related recommendation:</b> The obligation to take due account of the comments, information, analysis or opinions submitted by the public during the EIA procedure is placed on the competent public authority.	After the EIA report is drafted in accordance with the Law on Environmental Impact Assessment of the Proposed Economic Activity Article 10 (8, 9): <b>'8. The drafter of documents of environmental impact assessment shall submit to the competent authority a report revised</b> and/or supplemented in accordance with conclusions of entities of environmental impact assessment, conclusions of the entities of environmental impact assessment on the report and the environmental impact of the proposed economic activity <b>and an evaluation of proposals of the public concerned.</b> <b>9. The competent authority shall,</b> within three working days from the receipt of a report, <b>publish to the public a notice on the report and access thereto</b> in accordance with the procedure established by the Minister of Environment. <b>The public concerned shall have the right to submit to the competent authority, within ten working days from the publication of the notice, written proposals on the environmental impact assessment of the proposed economic activity and the report.'</b>

			<p>Para 41-43 of the No. D1-885 sets that:</p> <p>‘41. The <b>drafter of the EIA documents submits to the Agency a revised and/or amended report</b> based on the conclusions of the EIA entities, the conclusions of the EIA entities on the report and the environmental impact of the proposed economic activity (when an EIA entity does not submit their conclusions within the set deadlines - the information from the EIA entity on the fact and date of receipt of the report) <b>and evaluation of the proposals of the concerned public. The Agency</b> shall, in accordance with the procedure laid down in Chapter V of the Order, <b>publish on its website a notice to the public on the received report and the opportunities for further access to the report and to submit proposals to the Agency.</b> When publishing the notice to the public about the received report, upon noticing printing, discrepancies of factual data or other technical errors in the conclusions of the EIA entities, the Agency may request the EIA entities to correct (amend) their conclusions.</p> <p>42. <b>After the deadline for submission of the proposals, the Agency shall examine the report,</b> the conclusions of the EIA entities, <b>the proposals received from the concerned public, the evaluation of the proposals of the concerned public, if necessary, as specified in para 43 of the Order organises a meeting</b> during the opening hours of the Agency, prepares the protocol of the meeting, and no later than within 25 working days from the date of receipt of the report, based on the conclusions of the EIA entities and the information received during the EIA process, makes a decision on the impact of the proposed economic activity on the environment (Annex 4), or requests in writing that the drafter of the EIA documents supplements or amends the report in accordance with the reasoned requirements and / or the attached protocol &lt;.&gt;.</p> <p>43. <b>When</b> the conclusions of the EIA entities contradict each other and (or) the conclusion does not comply with the requirements established in para 5 of Article 10 of the Law on Environmental Impact Assessment of the Proposed Economic Activity and / or <b>proposals from the public concerned have been received, the</b></p>
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			<b>Agency, after the deadline of 10 working days for the submission of proposals, organizes a meeting to discuss the conclusions of the EIA entities and / or the proposals of the public. &lt;...&gt;</b>
25.	138	<...> The Committee has, however, received no information to indicate that the minutes of the meeting on 17 December 2010 were made available to the public at the same time and in the same places as the OHL decision itself, or that the minutes show that due account was taken of the outcome of public participation. Moreover, the Committee has not been provided with a copy of the minutes of the meeting on 17 December. Thus, the Party concerned has not demonstrated to the Committee that the competent public authority provided evidence to the public, along with the decision, that due account was taken of the outcome of public participation.	Regarding the sentence of this paragraph: <i>‘Moreover, the Committee has not been provided with a copy of the minutes of the meeting on 17 December’</i> we would like to note that in our response to communication (26-11-2014 letter No. (16-1)-D8-8740) we named, listed number of events, legislation, supporting documents. The most important, in our view, were translated into English and provided to the Compliance Committee. Moreover, later in the proceeding we received letters from the Compliance Committee enclosing additional questions, asking additional translations of related documents, however request to provide translation of the Minutes of the 17 December 2010 meeting was not provided. We want to assure that the Party concerned had no intention of not submitting indicated document and provides it together with these comments.
26.	154(f)	<b>Related finding:</b> By failing to demonstrate to the Committee that the competent public authority provided evidence to the public, either in or along with the decision, that due account was taken of the outcome of public participation, the Party concerned failed to comply with article 6(9) of the Convention	
27.	155(vi) )	<b>Related recommendation:</b> When publishing the decision, the competent public authority provides evidence to the public, either in or along with the decision, of how due account was taken of the outcome of the public participation.	
28.	139	In the light of the above, the Committee finds that, by failing to demonstrate to the Committee that the competent public authority provided evidence to the public, either in or along with the decision, that due account was taken of the outcome of public participation, the Party concerned failed to comply with article 6(9) of the Convention.	Do we understand correctly that in the present case Committee found Party concerned in non-compliance not because of the deficiencies of the legal framework or practice applied but because the Party concerned <i>‘failed to demonstrate’</i> compliance <u>during the proceeding (ACCC/C/2013/98)?</u>

29.	144-152	Paragraphs concerning possible breach of Article 3(8)	See comments provided in the lines 4-6 (above).
30.	155(a)(vii)	The time period within which the public must be notified of the decision is calculated from the date the decision is taken, not the date it is received by the developer.	This aspect was not analysed by the Committee in the paragraphs above. Please specify what are factual and/ or legal basis for this conclusion/ recommendation.

**DETALŪS METADUOMENYS**

<b>Dokumento sudarytojas (-ai)</b>	Lietuvos Respublikos aplinkos ministerija, A. Jakšto g. 4, 01105 Vilnius
<b>Dokumento pavadinimas (antraštė)</b>	REGARDING DRAFT FINDINGS AND RECOMMENDATIONS (COMMUNICATION ACCC/C/2013/98)
<b>Dokumento registracijos data ir numeris</b>	2020-10-20 Nr. (63)-D8(E)-5881
<b>Dokumento specifikacijos identifikavimo žymuo</b>	ADOC-V1.0, GEDOC
<b>Parašo paskirtis</b>	Pasirašymas
<b>Parašą sukūrusio asmens vardas, pavardė ir pareigos</b>	ARMINAS MOCKEVIČIUS, Ministerijos kancleris
<b>Parašo sukūrimo data ir laikas</b>	2020-10-20 15:32:40
<b>Parašo formatas</b>	Parašas, pažymėtas laiko žyma
<b>Laiko žymoje nurodytas laikas</b>	2020-10-20 15:33:08
<b>Informacija apie sertifikavimo paslaugų teikėją</b>	ADIC CA-B
<b>Sertifikato galiojimo laikas</b>	2019-04-25 - 2022-04-24
<b>Parašo paskirtis</b>	Registravimas
<b>Parašą sukūrusio asmens vardas, pavardė ir pareigos</b>	Lina Krasauskienė, Vedėja
<b>Parašo sukūrimo data ir laikas</b>	2020-10-20 15:46:34
<b>Parašo formatas</b>	Trumpalaikis skaitmeninis parašas, kuriame taip pat saugoma sertifikato informacija
<b>Laiko žymoje nurodytas laikas</b>	
<b>Informacija apie sertifikavimo paslaugų teikėją</b>	RCSC IssuingCA
<b>Sertifikato galiojimo laikas</b>	2020-01-09 - 2021-01-08
<b>Pagrindinio dokumento priedų skaičius</b>	1
<b>Pagrindinio dokumento pridedamų dokumentų skaičius</b>	0
<b>Programinės įrangos, kuria naudojantis sudarytas elektroninis dokumentas, pavadinimas</b>	Elektroninė dokumentų valdymo sistema VDVIS, versija v. 3.04.02
<b>El. dokumento įvykius aprašantys metaduomenys</b>	
<b>Informacija apie elektroninio dokumento ir elektroninio (-ių) parašo (-ų) tikrinimą (tikrinimo data)</b>	El. dokumentas atitinka specifikacijos keliamus reikalavimus. Visi dokumente esantys elektroniniai parašai galioja. Tikrinimo data: 2020-10-20 15:51:56
<b>Elektroninio dokumento nuorašo atspausdinimo data ir ją atspausdinęs darbuotojas</b>	2020-10-20 atspausdino Eglė Paužuolienė
<b>Paieškos nuoroda</b>	