

Dear Mr Chair,

Dear colleagues,

First of all, we would like to express our gratitude to the Committee for striving to assist the Republic of Belarus in fulfilling its international obligations under the Aarhus Convention. We would like to provide some preliminary reaction from our side.

In our country, interagency cooperation between state bodies has been intensified. Civil society is increasingly involved in the process of making environmental decisions, including the development of national environmental legislation. NGOs provide expert and practical support to government bodies.

We are pleased that the Committee has noted our efforts to advance the principles of the convention.

We also would like to take this opportunity to voice our comments, concerns and raise a number of questions.

In its report, the Committee refers to the documents of 2017 and states that Belarus has not provided updated legislation and other evidence of compliance with the provisions of the convention.

We would like to draw attention that the Republic of Belarus expressed its readiness to submit the documents necessary for making a well-grounded and balanced decision based on the information provided by both parties. At the same time, we did not receive a request from the Committee to provide additional information.

We will send these documents to the Committee, including through diplomatic channels. We note with regret that these issues could have been resolved earlier through direct communication with our state.

An action plan for the implementation of the Aarhus Convention was sent to the applicant in 2020. It says in favour of openness of our state to further cooperate with the Committee.

We suggest taking into account the information provided in the final report regarding the training and retraining of employees of the internal affairs bodies at the Academy of the Ministry of Internal Affairs and the Mogilev Institute of the Ministry of Internal Affairs. The program for improving their qualifications

for 2020-2021 includes activities aimed at capacity building in the field of fulfilling the obligations under the Aarhus Convention. This practice allows ensuring sustainability and participation of highly qualified experts in the dissemination of knowledge among target groups about the Aarhus Convention in comparison with one-time seminars.

At present, almost every officer in our country, whose activities are related to operational search sphere (criminal investigation), is familiar with the principles of the Convention.

We will provide information on the training of law enforcement officers additionally.

With regard to the detention of environmental activists, we would like to inform you the following

The Committee criticizes Belarus for prosecuting Ms Sukhy.

Ms Sukhyi's participation in an unauthorized political event “Women's Protest March” on August 29, 2020 has been proven. Its participants has not raise environmental issues. Previously, the Committee was provided with all the necessary information on this issue.

Moreover, we have shown respect for the eco-activist and the convention by not providing the Committee or publishing all the information that was in the public domain about the political activities of Ecohome during the August-September period. This information was removed from the Internet pages of Ms Sukhy immediately after her release. This information has been saved at the Ministry of Natural Resources.

The Committee's attempts to unreasonably extend the scope of the Convention beyond article 1, which is unacceptable from the point of view of international law, is deeply troubling.

Accordingly, the provisions of the convention cannot be applied when it comes to the implementation of political, civil, economic, cultural and other rights. The United Nations offers treaty and institutional mechanisms to protect such rights.

Please note that the implementation of the rights provided for by the Aarhus Convention must be carried out in strict accordance with the national legislation of any state. The politicization of environmental issues will only

cause negative effects on the convention implementation and may lead to the substitution of concepts when, hiding behind environmental issues, citizens receive carte blanche for violations of the law.

And the last but not least.

The Committee offers its expert support to the Party concerned. We welcome this initiative and we reiterate our invitation to the Committee to pay a visit to our country, which could take place after the seventh session of Meeting of the Parties.

We will continue a discussion on the implementation of Article 6 of the Convention into our legislation in the framework of the visit. Taking into account the current work of the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus on amending the Law on Environmental Protection, we believe that such discussion is relevant and expedient.

At the same time, we will discuss with the Committee the best practices for informing the public to ensure access to environmental information. Taking into account the active use of Internet resources in Belarus and the popularity of print media among the population, we consider them as effective tools for disseminating information. For example, almost 83 percent of the country's population uses the Internet. We will be glad if the Committee suggests us other effective ways of providing information.

In light of the tremendous work that is now being done to amend the legislation, and the lack of proposals from the public, which are aimed at implementing the recommendations of the Convention, we express our interest in an early trip of the Committee to our country in 2021.

We will provide and written comments to the draft report in a due course.

Thank you for your attention.