

Economic Commission for Europe
United Nations

Compliance Committee under the
Convention on Access to Information,
Public Participation in Decision-Making
and Access to Justice in Environmental
Matters

19.07.21 v 3-2-281 206-440

Commentary on the letter of the NGO "Ecohome"
18 July 2021

The Ministry of Natural Resources and Environmental Protection of the Republic of Belarus declares the following regarding the statements of the NGO "Ecohome".

Interagency Working Group on coordination of preparation of the National Report on the implementation of the Aarhus Convention, as well as the final report on implementation of the decision VI/8c of the Meeting of the Parties of the Aarhus Convention by the Republic of Belarus (hereinafter - the Working Group), actively implemented its activities in 2020-2021 in a hybrid mode (personal and remote participation).

Unfortunately, the coronavirus infection (COVID-19) has affected all aspects of life, and the Working Group could not meet in person as often as we all would like. The organization of a joint meeting of the Working Group and the Public Coordination Environmental Council under the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus on 30 October 2020 was dictated by the principles of openness in the preparation of the National Report.

The refusal of the NGO "Ecohome" and its representatives to join the work of the Working Group cannot be seen as any evidence of the quality of the Working Group work. Otherwise, it is beyond common sense.

Sergey Magonov, as a member of the Working Group from the NGO "Ecohome", was twice invited to a joint meeting of the Working Group to coordinate the preparation of the National Report on the implementation of the Aarhus Convention and the Public Environmental Coordination Council under the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus, which took place on 30 October 2020 (letters were sent on 24 and 28 October 2020 from daspriroda@tut.by). NGO "Ecohome" was also invited to this meeting. If necessary, we are ready to provide supporting letters upon request of the Compliance Committee.

In addition, the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus invited the NGO "Ecohome" to participate

in the preparation of the final report on the implementation of Decision VI/8c, the National Report.

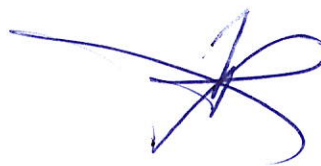
Also, we are convinced that the NGO "Ecohome" did not have any obstacles in organizing informal meetings on the basis of the Aarhus centers, but did not do it.

Regarding the study by the Ministry of Justice of the Republic of Belarus of the activities of the NGO "Ecohome", we draw your attention to the fact that in accordance with article 4 of the Law of the Republic of Belarus No. 3254-XII of 4 October 1994 "On Public Associations" public associations, unions are created and operate on the basis of the principles of **legality**, voluntariness, independence, **equality** and transparency. In accordance with Article 24 of the said law, control over the compliance of the activities of public associations with the Constitution of the Republic of Belarus, other legislative acts and their charters is carried out by the corresponding registration bodies. Thus, the Ministry of Justice of the Republic of Belarus operates within the framework of national legislation.

We are convinced that the NGO "Ecohome" carries out its activities in accordance with the Constitution of the Republic of Belarus, the Law of the Republic of Belarus of 4 October 1994 No. 3254-XII "On Public Associations", other legislative acts and on the basis of its charter.

We are also grateful to the NGO "Ecohome" for the resumption of cooperation and participation in June-July 2021 in three regional seminars "Relevant Issues of Public Involvement in Environmental Decision-Making in the Planning of Economic Activities" in the cities of Mogilev, Gomel and Grodno.

Sincerely,
First Deputy Minister
National coordinator



Baliaslau Pirshtuk