

Dear Chairman, dear members of Compliance Committee,

Thank you very much for providing the Draft supplementary report of the Compliance Committee - Compliance by Belarus with its obligations under the Convention and thanks for the opportunity to submit our comments.

We are very grateful for the opportunity to continue communication to the Compliance Committee despite the liquidation of Ecohome as a legal entity.

We fully agree with the Committee's findings and proposed Draft decision.

We would like to mark a few of our comments:

1) Concerning para. 34 - "As a result of the Supreme Court's decision, on 31 August 2021 Ecohome ceased to exist» - we would like to suggest adding a clarification to this conclusion "Ecohome ceased to exist *as a legal entity*".

2) Concerning para. 54 - it would be more effective to start with suspension (not to wait till February 2022).

Because, it is important to note that till now, Belarus has not been able to show significant progress in implementation of Decisions and Recommendations of previous Meetings of the Parties to the Aarhus Convention. Despite statements about its adherence to the principles of the Convention, Belarus has remained in non-compliance for a long period of time.

This is also confirmed by the findings of the Report of the Compliance Committee - Compliance by Belarus with its obligations under the Convention¹.

Belarus had enough time to take decisive and meaningful steps to implement the Recommendations of the Meeting of the Parties, and take action to prevent the persecution of activists and NGOs, however, unfortunately, it was not done

Due to the systematic nature, the frequency of non-compliance with the obligations under the Convention, as well as the serious degree of violations, namely the continuing and aggravating facts of persecution of activists and NGOs exercising the rights under the Convention, we consider it is necessary already to apply to Belarus in accordance with paragraph 37 g of Decision I / 7 - temporarily suspension of special rights and privileges provided for in the Convention.

Sincerely yours,
Marina Dubina

ex-executive director
NGO Ecohome

08.10.2021

¹https://unece.org/sites/default/files/2021-08/VI.8c_Belarus_report_to_MOP7_advance_unedited.pdf