

Marko Keiner,  
Director,  
Environment Division,  
The United Nations Economic Commission  
for Europe,

Dear Mr. Keiner,

In response to your letter dated 29 September this year, transmitting for comments the draft supplementary report of the Aarhus Convention Compliance Committee with regard to Belarus, I would like to report the following.

The Belarusian side has started to study the draft report.

A preliminary analysis showed that the Committee had not sufficiently examined the circumstances of the case related to the liquidation of the Public Association "Ecohome".

We drew attention to the Committee's desire to conclude its consideration of this issue in the shortest possible time, to approve hasty conclusions, which are built mainly on the opinion of Public Association "Ecohome", and to recommend to the meeting of the Parties unreasonable and excessive measures against Belarus. At the same time, the Committee also did not exhaust the existing possibilities for resolving this issue, which were provided in the established procedure for consideration of compliance (paragraph 36 of Annex to decision I/7).

We are convinced that the deadline for the preparation of the response, which was suggested by the Committee on the previous occasion and which was significantly shorter than the standard deadline, was insufficient for Belarus to prepare all the necessary, comprehensive information.

Based on practice, we cannot consider the weekly period provided by the Committee this time, especially in the light of the exceptional attitude of the Committee to this issue, as reasonable and sufficient.

In this regard, in order to thoroughly analyse the draft supplementary report and prepare detailed comments, we would like to ask the Committee to extend its proposed initial deadline for the response.

I would like to assure you that Belarus will make all efforts to send comments on the draft supplementary report of the Committee as soon as possible, but no later than the standard reasonable time limits established in its working methods (*modus operandi*, paragraph 199).

We have learned from your letter that the Committee intends to submit this preliminary report to the forthcoming meeting of the Parties, in violation of the compliance procedure (paragraph 35 of Annex to decision I/7) and the working methods of the Committee (paragraph 221).

This approach undermines the credibility of the Committee, discredits the mechanism for monitoring compliance with the Convention, and can negatively affect its viability.

In conclusion, I would like to note that Belarus is well aware of the impartial status and functions of the Secretariat. That is why we look forward to the careful attitude of the Secretariat to the observance of the fundamental principles of their work by the subsidiary bodies of the meeting of the Parties, prompting them at the right time on the appropriate procedural steps.

Please submit this letter to the attention of the Compliance Committee.

Best regards,

Minister

Andrei Khudyk