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To: Compliance Committee
of the UN ECE Convention on Access to
Information, Public Participation in Decision-
Making and Access to Justice in
Environmental Matters

through the Secretary to the Aarhus
Convention United Nations Economic
Commission for Europe Environment and
Human Settlement Division Room 332, Palais
des Nations
CH-1211 Geneva 10, Switzerland

Cc: Ministry of Environmental Protection and
Natural Resources of Ukraine
[REDACTED]

Follow up on the case ACCC/C/2014/118 Ukraine

Acting upon a recently acquired status of a candidate for membership of the European Union, the Government of Ukraine has intensified its efforts in transposition of the environmental EU acquis. The Government and the Parliament are currently working on the draft laws related to industrial emissions, waste, habitat protection, mineral extraction, environmental monitoring, control and enforcement, as well as deregulation of businesses, boosting of the economy and easing out the post war reconstruction.

In all of this, the MENR seems to be forgetting about the MOP decision VII/8r concerning compliance by Ukraine with its obligations under the Convention. By this decision, the MOP endorsed the findings of the Compliance Committee that Ukraine has failed to comply with certain requirements of articles 4, 6 and 9 of the Convention as well as recommended Ukraine to take the necessary legislative, regulatory, administrative or other measures to ensure compliance with the relative provisions of the Convention.

As the first step in implementing the decision VII/8r the MOP requested Ukraine to submit a plan of action, including a time schedule, to the Committee by 1 July 2022 regarding the implementation of the above recommendations. However, according to our best knowledge no such plan of action has been drawn up so far. Nothing of its sort has been submitted to the Secretariat of the Convention prior or after the set deadline.

Meanwhile many of the draft laws and regulations that are being currently developed directly or indirectly relate to the issues raised in the Compliance Committee's findings and recommendations on the case ACCC/C/2014/118 Ukraine. Failing to address these issues now would mean not only falling behind in implementing the MOP decision, but also adopting pieces of legislation that would need to be revised to comply with the Aarhus Convention on the matters already addressed by the Compliance Committee.

Considering the above we kindly request the Secretary of the Aarhus Convention and the respective officials within the UN Economic Commission for Europe to address a letter to the Prime Minister of Ukraine urging the Government to develop the said plan of actions and coordinate activities contained therein with its wider euro-integrating efforts.

A handwritten signature in black ink, appearing to be 'Yelyzaveta Aleksyeyeva', written in a cursive style.

Yelyzaveta Aleksyeyeva,
November 2nd, 2022