



ГРОМАДСЬКА ОРГАНІЗАЦІЯ SAVEDNIPRO
ГО «ЗБЕРЕЖИ ДНІПРО»

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№03/03/23/295
03.03.2023р.
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**To members of committee hearings
"How to spread the basic tools of e-democracy to all territorial communities"**

To the members of the Committee on Digital Transformation

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*Regarding maintaining access to ecological
open data, taking into account the conditions of martial law*

Dear members of the committee hearings!

Referring to the Decree of the Cabinet of Ministers of Ukraine of February 24, 2022 No. 181-r on the issue of introducing and ensuring the implementation of measures of the legal regime of martial law in Ukraine, many authorities at various levels have closed access to the majority of open data from Resolution of the CMU 835 of October 21, 2015. and do not submit them to the Open Data Portal.

Considering that access to environmental information is protected by the Aarhus Convention on Access to Information, Public Participation in the Decision-Making Process and Access to Justice on Environmental Matters, Article 34 of the Constitution of Ukraine, and the Resolution of the Cabinet of Ministers of Ukraine On Some Issues of State Monitoring in the field of atmospheric protection

air, open access to this data is the duty of Ukraine following the norms of international and Ukrainian law, including in the next edition of Resolution of the Cabinet of Ministers of Ukraine No. 835 dated October 21, 2015.

Taking into account the mentioned high public interest in environmental information and its significance for the civil safety of the population, we emphasize the mandatory preservation of lists of ecological open data and the mandatory preservation of public access to all sets of ecological open data in Resolution of the CMU No. 835 On Approval of the Regulations on Data Sets, which are subject to publication in the form of open data.

Today, when Ukraine won the right to apply for membership in the EU, we have no right to postpone the course taken for the European model's openness of activity and transparency. Expanding the list of open environmental data is aimed at improving and streamlining decisions, bringing Ukrainian legislation into line with European Union law, and fulfilling Ukraine's obligations under the Association Agreement in the area of providing access to environmental information.

Open environmental data does not contradict the wartime requirements and is critical, in particular, for restoring the liberated territories and maintaining a safe life in the larger territory of the country.

Best regards,
representatives of public formations according to the list:

Name of the organization	Signatory
NGO SaveDnipro	Iryna Chernysh
NGO Ecoaction	Olga Polunina
NGO "Danube-Carpathian Program"	Bohdan Prots
NGO PODIL ENVIRONMENTAL ASSOCIATION	Oleksandr Ocyshen
NGO "Razom We Stand"	Svitlana Romanko

Waste Ukraine Analytics	Andriy Hnap
National Ecological Center of Ukraine	Ruslan Gavrilyuk
NGO "Ecogvalt"	Verdesh Maxim
NGO "Technologies of Progress"	Maxim Nefyodov

NGO "Ukrainian Nature Conservation Group (UNCG)"	Oleksiy Vasyliuk
NGO "Ecopark Osokorky"	
NGO "Anti-corruption Center"	Antonina Volkotrub
GO "ANTS"	Ostap Yednak
NGO DiXi Group	Olena Pavlenko
NGO "Ecology-Law-People"	Olena Kravchenko