

**Prime Minister of Ukraine  
Mr. D.A. Shmyhalyu  
Minister of Digital  
Transformation  
Mr. Fedorov M.A.  
Minister of Energy  
Mr. Galushchenko H.V.  
To the Minister of Environmental  
Protection and  
natural resources of Ukraine  
Mr. Strilets R.O.**

*Regarding the necessity of mandatory preservation of the publication  
and access to the list of open eco data from  
CMU Resolution 835 of October 21, 2015,  
taking into account the conditions of martial law*

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.

We emphasize the mandatory preservation of relevant lists of open data, taking into account their high public interest and significance for the civil safety of the population. Since access to this 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 Protection of atmospheric air, as well as the Aarhus Convention, the availability of these data in the next edition of Resolution of the Cabinet of Ministers of Ukraine No. 835 of October 21, 2015, given the conditions of martial law, is an obligation of Ukraine according to the norms of international and Ukrainian law.

Given the above, we emphasize the mandatory preservation of public access to the following sets of open data in the Resolution of the CMU On Approving the Regulations on Data Sets to be Published in the Form of Open Data:

**1. Ministry of Internal Affairs**

- Operational data on the quality of atmospheric air in populated areas according to the data of the observation network of hydrometeorological organizations
- Data of the Ukrainian Hydrometeorological Center for public use
- Materials of hydrometeorological observations, information base of hydrometeorological data, and data on the state of the natural environment
- Operational information about man-made, natural, and other emergencies on the territory of Ukraine

- State water cadastre under the section "Surface waters" in the part of conducting constant hydrometric, hydrochemical observations of quantitative and qualitative characteristics of surface waters
- Data on background concentrations of pollutants in atmospheric air in populated areas according to data from the observation network of hydrometeorological organizations

## **2. Ministry of Economy**

- Data of the soil monitoring system on agricultural lands

## **3. Ministry of Energy**

- Environmental and radiation conditions in the area of nuclear power plants
- Data on the implementation of the National Plan for the Reduction of Emissions from Large Combustion Plants by operators of large combustion plants
- Reporting data of operators of large incineration plants on the implementation of the National Plan to reduce emissions from large incineration plants

## **4. Ministry of Environment**

- Generalized data of regional registers of waste generation, processing and disposal facilities
- State cadastre of territories and objects of the nature reserve fund
- Data from the state environmental monitoring system
- Data on issued licenses for conducting economic activities for the management of hazardous waste and licensees
- Data on issued licenses for conducting economic activities for the production of particularly dangerous chemical substances and licensees
- Unified register for environmental impact assessment
- List of objects that are the biggest polluters of the natural environment in terms of discharge of pollutants into water bodies
- List of conclusions on cross-border transportation of waste
- List of notifications on cross-border transportation of hazardous waste
- List of permits for carrying out works on the lands of the water fund within the coastal protection strips along the seas, sea bays and estuaries, in internal sea waters, estuaries and the territorial sea
- List of permits for emissions of pollutants into atmospheric air by stationary sources of objects of groups 1, 2, 3 with an indication of the number and period of validity
- List of waste declarations submitted by business entities
- List of economic entities whose emission indicators (specific emissions) of polluting substances into atmospheric air have been approved by the Ministry of Environment
- List of objects that are the biggest polluters of the environment in Ukraine in terms of emissions into the atmospheric air

## **5. NCREKP**

- Register of subjects of natural monopolies in the field of energy
- Register of subjects of natural monopolies in the fields of heat supply, centralized water supply and drainage, household waste disposal

## **6. DPS**

- Information on the payment of environmental tax by subjects of natural monopolies and economic entities that are rent payers for the use of subsoil

## **7. State Geological Survey**

- List of special permits for the use of subsoils (including for the use of oil and gas-bearing subsoils)
- Interactive map of subsoil areas for which special subsoil use permits have been granted
- Data on the receipt of applications for granting, extending, reissuing and canceling special permits for the use of subsoil, making changes to them and issuing their duplicates
- Data on subsoil areas, in respect of which the issue of selling a special permit for the use of subsoil without holding an auction is being decided
- Data on subsoil areas, in respect of which the issue of selling a special permit for the use of subsoil at the auction is being decided
- Essential conditions of agreements on the use of the area (including the work program and special conditions of subsoil use, which provide for requirements for the efficiency of work; the procedure for extracting minerals; types )

## **8. State Water Agency**

- State monitoring data of surface water bodies, including coastal waters
- List of permits for special water use

## **9. State Forestry Agency**

- Register of permit documents that give the right to carry out business activities related to wood harvesting

## **10. State co-inspection**

- Annual plan for the implementation of state supervision (control) measures
- Report on the implementation of the annual plan for the implementation of state supervision (control) measures
- Information on the results of state supervision (control) in the field of environmental protection

## **11. Ukrainian Hydrometeorological Center**

- Results of radiation control
- Daily and monthly data on the regime and resources of surface water on the rivers and reservoirs of Ukraine
- Daily and monthly monitoring of air pollution

## **12. Local state administrations**

- List of permits for emissions of pollutants into atmospheric air by stationary sources of objects of groups 2 and 3 with an indication of the number and period of validity (for regional state administrations)

### **13. Local self-government bodies**

- Data on green areas to be removed, by the issued reports of the survey of green areas

Ukraine aspired to become one of the three world leaders in terms of the level of development of the field of open data to build a transparent and accountable state for citizens who use services based on open data because a strong and active civil society is a guarantee of the protection of rights, freedoms and state integrity, which today actively shows Ukraine and its people in conditions of military aggression by Russia.

And 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 requirements of wartime and is critical, in particular, for the possibility of restoring the liberated territories and for maintaining a safe life in the larger territory of the country.

Please send the answer exclusively to [savednipro@gmail.com](mailto:savednipro@gmail.com)

Best regards,  
representatives of public organizations and  
expert community according to the list:

<b>Name of the organization</b>	<b>Signatory</b>
NGO SaveDnipro	Iryna Chernysh
NGO "Ecoaction"	Natalia Gozak
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