

## Position Paper: Environment and climate change

**Prepared for:** Platform 3 meeting on connectivity, energy efficiency, environment and climate change

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### Introduction

The state of the environment in the EaP countries is continuously deteriorating, manifested in the pollution of waters, soil and air, biodiversity loss, depletion of natural resources and climate change consequences, combined with the low priority of environmental agenda for the governments and absence of adequate environmental institutions.

Hydro energy is an increasingly popular alternative and renewable source of energy in the EaP countries, however, its excessive development causes rapid decrease of water resources in rivers and has a negative impact on drinking water supply and on aquatic ecosystems of the rivers in entire regions.

Climate change affects the whole EaP region. Whereas sustainable environment is integral to human rights, such as the rights to life, proper nutrition, health and water, the conceptual solutions for mitigation and adaptation to climate change are urgently needed in order to guarantee human rights.

### Arguments

In the context of this Platform, it is of paramount importance to acknowledge that the environment is an overarching factor, which should be taken into account in all areas, including transport and energy, as well as within the investments into various economic sectors.

The integration of environmental policy into sectoral economic and natural resources management policies is the main challenge for the EaP countries and therefore the main risk for investments, because according to the EU directives, any infrastructure projects can be approved only if they are not damaging the environment.

At the same time, even in Georgia, Moldova and Ukraine, countries with AA/DCFTA in place where the EU directives on Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA) were already transposed, which is a great achievement in itself, the implementation process has just started.

Therefore, we call for environmental responsibility of international financial institutions (IFIs) to impose the EIA and SEA procedures according to the EU requirements within all funded projects in the region, even if the national legislation or practice in some EaP countries does not require such a step.

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On the approach to environmental governance in the EaP countries, the proposed discussion paper for the EaP Platform 3 and the Work Programme are usefully focusing on main environmental sectors such as waste, water, air etc. It is important to go into details and focus on the most problematic environmental sectors, especially when discussing investments. Without comprehensive understanding of the environmental governance, including checking the future investments against its sustainability, i.e. “environmentally enabling environment”, we are running the risk of investing resources with little success.

When discussing environmental sectors like air, water, waste, etc., the discussion should always aim at one level up, reflecting good environmental governance requirements. When investing, the IFIs should take into consideration the following: presence of sound(er) environmental policy; ongoing modernisation of environmental institutions (unlike, for example, in case of Georgia and Moldova, where the Ministries of Environment were eliminated from the structure of government); good communication with the stakeholders; support from the stakeholders built on an adequate dialogue and capacity building, as well as transparency and accountability of the government.

There is no doubt that water, waste and air are the most costly environmental sectors in terms of reforming and achieving good quality standards. The reforms in these sectors depend on rebuilt environmental monitoring system. It might not be so attractive for investments but the funds in this area are badly needed, especially for the purchase of equipment. To establish an adequate environmental monitoring system in the EaP countries, comparable to those in the EU, is of utmost importance in order to provide reliable data for informed decision-making.

**On water:** wastewater treatment is a priority since untreated wastewater constitutes up to 34 per cent of wastewater discharge

**On waste management:** separate collection, reuse and recycling versus incineration – the latter, only the Best Available Technologies (BATs) should be introduced in the region. Even if it might seem profitable, no outdated technologies, which could bring about yet another environmental hazard with residues of toxins such as dioxins and furans, should be passed on to the EaP region.

**On air:** the currently dominating system of heat and power plants requires decades to reduce pollution caused by burning coal. Approach based on innovative technologies in the energy sector should be followed and funded, such as large biogas and wood pellets plants or solar energy plants.

### **Conclusions**

- It is necessary to closely observe the dangerous trends of reforming environmental institutions in some EaP countries where ministries of environment are downsized or even shut down (Georgia and Moldova).
- It is necessary to implement the Luxembourg Declaration aiming at better environmental governance with more transparency, participation, accountability, effectiveness and better functioning institutions; to continue efforts to implement the Luxembourg Declaration Action Plan. To include where possible the environmental and climate change objectives into the overall conditionality approach.

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- The “more for more” principle of the EU support with regard to the EaP countries should primarily apply to environmental compliance (EIA and SEA procedures).
- It is necessary to incentivise other renewable energy solutions and support hydro-energy projects only in case the environmental impact assessment was carried out and the local communities and wider public support the project. One of the urgent cases is the intention of Ukraine to build a range of hydropower plants on Dniester River. Dniester already suffers from water deficiency caused by the Novodnistrovsk Hydropower Plant in Ukraine, harming the water supply of 4 million people in Moldova and Ukraine.
- It is necessary to promote meaningful reforestation actions in the whole EaP region by increasing the share of forested lands by a minimum of additional 5 per cent of forest coverage as of 2017 in each of the EaP countries by 2030. It is crucial to put an end to illegal logging aimed at illegal timber exports, which is currently a major cause of deforestation in the EaP region.

### **More Information**

*The Eastern Partnership Civil Society Forum (EaP CSF) is a unique multi-layered regional civil society platform aimed at promoting European integration, facilitating reforms and democratic transformations in the six Eastern Partnership countries - Armenia, Azerbaijan, Belarus, Georgia, Moldova and Ukraine. Serving as the civil society and people-to-people dimension of the Eastern Partnership, the EaP CSF strives to strengthen civil society in the region, boost pluralism in public discourse and policy making by promoting participatory democracy and fundamental freedoms.*

*For more information, please visit the EaP CSF website at [www.eap-csf.eu](http://www.eap-csf.eu)*