

29 February, 2012
N 20/12

Ms. Fiona Marshall
Environmental Affairs Officer
Aarhus Convention Secretariat

Dear Ms. Marshall

I am writing to you on behalf of the “Ecodar” NGO regarding the process of implementation of decision IV/9a of the Meeting of the Parties on compliance by Armenia with its obligations under the Aarhus Convention as well as towards upcoming meeting of the Compliance Committee on 27-31 March, 2012.

As you are aware from the letter submitted by the Transparency International Anti-corruption Center the Ministry of Nature Protection submitted a draft law on the Environment Impact Assessment (Expertise) in November 2011. Our NGO participated at the Parliamentary Hearings organized on the issue and expresses its concern on the draft and presented a survey on inconsistencies with international obligations and acting national legislation to the Standing Committee on Nature Protection at the Parliament. The voting on the draft was postponed at that time.

Nevertheless on 6 of February, 2012 the draft without any preliminary hearings was proved by the Parliament. The draft incorporated some minor amendments only and still is not in compliance with international requirements. The NGO applied to the President of the Republic of Armenia do not sign the draft but call for discussion with participation of all stakeholders.

We would like to introduce the above-mentioned issues as well as our amendments to the draft law to the Compliance Committee during upcoming meeting. Our approach and suggestions were presented at the first meeting of the Intergovernmental Working Group on the Aarhus Convention took place on 14th of February, 2012 by Mr. Artur Grigoryan, the lawyer of our organization who is a member of the Committee.

We will request the Compliance Committee to analyze the mentioned legal amendments and issue an opinion on the conformity of the Armenian EIA legislation with the requirements of the Aarhus Convention and recommendations of Compliance Committee endorsed by the decision IV/9a of the 4th Meeting of the Parties on Compliance by Armenia with its obligations under the Convention.

Could you please advise whether the Committee` meeting is open for the NGO. If yes, we would kindly request you to provide Mr. Artur Grigoryan with the Invitation and ask for your advice whether we can apply for financial support to the Convention. At the same time I am glad to inform that the OSCE Office in Yerevan expressed its readiness to share travel costs in case of Mr. Grigoryan`s participation.

Looking forward to hear from you soon.

Thank you very much

With best regards,
Hrayr Savzyan

President of “Ecodar” NGO

CC: Ella Behlyarova Secretary to the Convention