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Dear Mr Bärlund,

Thank you very much for sending us an offer to contribute to the EfE reform process and give an opportunity to transmit our comments on the questionnaire enclosed.

First of all, let me stress that the European Commission has supported the EfE process since the very beginning and appreciates its achievements. However, the geo-political situation in the region has changed fundamentally. The countries covered by EfE are in a different situation today; the countries of Central Europe are EU Member States, the countries of south-east Europe are candidates or potential candidates to the EU and many of the countries of ex-Soviet Union have close bilateral relations with the EU in the context of the EU's Neighbourhood Policy and the EU's Strategic Partnership with Russia. The EfE process has fulfilled its original role and now, as indicated in the Belgrade Ministerial Declaration, it is time for major reform.

Concerning the elements of the reform we have the following remarks:

a) The format, focus and priorities of the process and Ministerial Conferences.

The EfE activities should be tailor-made with a focus on the Central Asia sub-region. Other EECCA and South-Eastern Europe countries are covered by special mechanisms of cooperation with the European Union which are working effectively, also in the field of environment. Thus, there is a risk of duplication of activities in these countries. To ensure

coherence with the bilateral work of the EU, it would be useful for the EfE to concentrate on the CA countries.

Concerning other EECCA countries, implementation of existing environmental multilateral conventions is the top priority. Work in these areas should be undertaken in synergies with EU activities, optimising use of resources.

The purpose and shape of Ministerial Conferences should be thoroughly rethought with a view to achieve effectiveness and cost-efficiency. Focus should be on practical action rather than grand declarations.

b) Evaluating the performance and impact of the process.

An added value of the EfE process could be seen in enhancing effects of existing initiatives, for instance by contributing to improvement of the water sector in EECCA countries through meeting the objectives of the EU Water Initiative.

c) Attracting the broader interest and more active engagement of all stakeholders, in particular the private sector and d) Expanding the use of partnership as vehicles for improving implementation.

The role that the EECCA RECs should play in the EfE implementation should be considered. There may be a place for giving the RECs more responsibilities in this regard.

More coordinated participation of private donors should be sought. Developing closer cooperation with commercial banks could benefit in more environmental projects being financed in the context of EfE process. Developing relations with venture capitals interested in sustainability issues could be a useful way to involve more private sector into EfE process, too.

e) Leveraging external contributions of expertise, manpower and resources

The countries that want to participate in the EfE process and benefit from its programmes should be aware that their active contribution will be indispensable. This applies especially to the countries with fast growing economies like Russia or Kazakhstan. They have to take responsibility for environment together with the rest of Europe on an equal footing.

f) Assessing ways and means to promote more effectively the UNECE region-wide dimension of environmental cooperation.

See answer to point b)

g) The full cost of the process and the effective allocation of available resources.

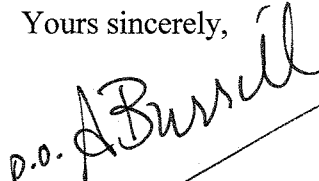
See last paragraph of answer to point a) and answer to point e).

h) Future secretariat arrangements.

Future arrangements for evaluation and monitoring of the process have to provide for closer cooperation with all stakeholders including international organisations (sharing information, exchange of opinions, consultations). It will allow avoiding overlapping activities, coordination of use of expertise and identifying areas of activities.

I hope you will find the above-mentioned points as a useful indication on the European Commission position towards the EfE reform. I will be happy to discuss more detailed solutions that will certainly emerge after this consultations and further work done by UNECE CEP in this respect.

Yours sincerely,

p.o.   
Claude ROUAM