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Page 1 of 4

Reform of the Environment for Europe (EfE) process

Your letter of January 15th, 2008

Dear Mr. Bärlund,

Following your request please find below German comments on the EfE reform. Please allow some preliminary remarks:

The last two EfE ministerial conferences clearly showed one obvious deficiency that strongly influences both the preparation and the outcome of the process: There is neither a permanent body dealing with the issues likely to be in the focus of the conferences nor is there a permanent exchange and/or an in depth work regarding the outcome or the ministerial declarations. Follow-up work is done - if at all - in a very scattered and dispersed way.

Germany therefore believes that the process can be largely improved by making the process more permanently. This would require a tighter connection to a permanent committee.

In my opinion there is only one international body available for the EfE process, namely the UNECE. Proposals to put it to other organizations like the Council of Europe miss the fact that the ECE is the only body with a pan European coverage that deals with broad environmental issues. This being said I would advocate entrusting the ECE Secretariat with the function to act as Secretariat for the EfE Process.

To improve the work and to make it more permanently and more noticeable I believe in a much stronger role of the CEP. Whereas the CEP was always very active whenever an EfE conference had to be prepared there was almost no activity within the CEP between the conferences. Giving a new role to UNECE would require making EfE a permanent agenda item



Page 2 of 4

for the CEP to allow the discussion of developments in the region in a timely manner and to give input in the process. Thus it was a good decision to have a mid-term review between ministerial conferences but this may not be enough to keep the momentum over time.

The preparation of the ministerial meetings was clumsy and not very efficient. There were three groups dealing with the preparatory work, groups that basically consisted of the same persons (CEP, WGSO and Execom). Whereas the Execom is necessary to prepare the practical decisions when it gets closer to the venue of the conference the duplication of work in the CEP and the WGSO is inefficient and costly. I therefore propose to give up the WGSO in the future and use the CEP instead. This would of course require a change of the terms of reference of this committee.

This said some German comments on the elements listed in the annex of your letter:

a) **Format, focus and priorities**

The format of the EfE Process should be a ministerial meeting at intervals as needed to keep the process up to date and proceeding.

Germany takes the view that the EfE process has always been needs driven. Its purpose was and is the development of a concise environmental policy throughout the pan-European region. It was always readjusted according to the changes in the political landscape. The Belgrade conference showed that the geographical focus has changed to the Caucasus and Central Asia.

However, the process should not be limited to a region and sub-regions but kept open to accommodate all issues of importance to the pan-European region.

Germany believes that it would not be wise to start discussions on a limitation of the process in a general form as it has to be kept open for cross cutting issues as needed.

However, it could make the process more attractive to also allow for sub regional activities and maybe also high level conferences for sub regions if needed and supported by the sub regions.

b) **Performance and impact**

The performance and impact of the process may be different depending from which side you look at it. Germany is convinced that it is needed for the EECCA countries as sole occasion to have a high level exchange on needs and environmental performance in the region. Ministerial conferences were always a showcase to present the valuable work done within the ECE (EPRs, Monitoring etc.) additionally it has its value as a body to



Page 3 of 4

assess compliance with the ECE's environmental conventions. Germany suggests that the implementation of existing conventions should be the priority with regard to convention work. There is no need or priority to negotiate new conventions unless there are requests from sub regions to deal with matters that require sub regional conventions. In such cases there should be an individual decision on the involvement of UNECE as other bodies like UNEP may be more appropriate.

There is no doubt that the impact of the EfE process has been diminishing in the last decade, basically as result of political developments like expansion of the EU etc. With the new focus on the EECCA countries a more permanent work seems to be necessary, conferences alone cannot do the job necessary to arrive at the necessary improvements. To this end Germany believes that permanent work within the ECE CEP will be necessary and helpful (see above). As progress is being achieved at a different pace in the sub regions more attention should be given to sub regional work. This may lead to the need of high level meetings for the sub regions to bundle political commitment for programmes and facilitate trans boundary dialogue. However a streamlined Pan-European EfE ministerial conference should provide the overall framework.

c) Improving interest and engagement of stakeholders

Interest and engagement of stakeholders generally follows the issues. It would therefore depend on whether it will be possible to bring forward interesting issues that are interesting not only for environmental NGOs but also issues that will interest possible investments. This will be basically dependent on the development of programmes and governance. Thus, governance and the role of environment within this broader issue play a crucial role.

d) Use of partnerships

As above c).

e) Leveraging contributions of expertise, manpower and resources

A more permanent structure for the EfE process may also help to leveraging contributions in promoting a greater attention to the process. On the other hand there should be more visibility of activities and progress within the states the EfE process is focussing on. Without substantial efforts in these states increasing interest and contributions from other states are unlikely.



Page 4 of 4

f) Promote environmental cooperation

The most important environmental cooperation will have to take place on a sub regional scale (water in Central Asia, Mountain Cooperation in the Caucasus etc.). See above b. More sub regional cooperation would also facilitate providing funding for respective projects. However the influence of the EfE process to initiate sub regional cooperation seems to be rather limited and should be improved.

g) Cost of the process, allocation of resources

Over all the process – apart from the work of the secretariat – will not be more costly than at present, provided there are no special meetings and the follow up of the process will be done in back to back meetings of the ECE CEP.

The working programmes and corresponding budgets should be project based.

h) Future secretariat arrangements

The secretariat functions should be at the UNECE secretariat (see above).

For the Ministry

Szelinski