

Finland associates itself to the earlier views and comments provided by the European Union on this matter, especially *EU views on the future of the "Environment for Europe" process* (18 July 2007) and Council conclusions *Preparations for the Environment for Europe Sixth Ministerial Conference* (16 July 2007, 11906/07).

Pan-European issues

At the pan-European level we still need a forum to identify major challenges of environmental protection in our region and to reflect these issues in our decision-making. The political level is where we can open a dialogue between different sectors and stakeholders in order to increase the commitment to environmental goals.

Some questions:

- From our point of view one new emerging issue is climate change and energy policies, including transfer of technology, know-how and experiences in this region. Would EfE be able to provide an effective and flexible platform for this?
- EfE's role with regard to synergies with global environmental processes would deserve discussion
- Development of appropriate processes to tackle issues that are relevant for the Pan-European level

Sub-regional issues

Sub-regionalization should be a more integral part of the process also with regard to the preparatory stages. The EfE process in its full composition is not a flexible forum for developing and promoting sub-regional approaches. Innovative and efficient tools are needed to achieve this aim. It has been noted within the EfE process, that progress in the eastern part of the EfE region takes much longer than was the case with the CEE countries, partly due to the lack of strong drivers. How could EfE process promote strong drivers?

- Strengthened environmental governance, MEAs, environmental monitoring and assessment (including integration of monitoring in decision-making processes) and promoting transboundary cooperation.
- take the stock of enlargement of the EU, including the possibilities to share and learn from the experiences of the new EU Member States with regard to the EU legislation
- integration of environmental issues in the other sectors and especially in the National Development Plans. Here a coordinated messages and efforts by the donors would be of great importance.

Coordination

Policy frameworks like the Environment for Europe also provide a ground for projects and increase the coordination regarding different activities – the policy coordination should also focus to increase project efficiency. Pan-European level is also important to avoid fragmentation, which subregionalization could easily lead to if left without the full regional level. EfE provides a platform for the international financial institutions and donors to actively seek opportunities for enhancing coordination.

Benefits of the EfE process

- It brings together not only ministers, it has also proven to be an attractive framework for a number of different actors and stakeholders dealing with environmental issues from the whole region. Especially it has given the NGO's a chance of large-scale participation in environmental cooperation and they have been empowered in the political level
- It takes stock of developments in the state of the environment and also within other processes in the region
- It makes it possible to identify major challenges and urgent needs and set targets

We have witnessed that the process has been able to redirect its focus of attention according to the political changes which have taken place. After the enlargement of the EU the focus was shifted towards

the EECCA and SEE countries. Despite all the criticism, it **has** achieved results: transboundary issues - especially waters, EBRD-PPC, EPRs, stronger focus on implementation (and ratification) of the MEAs, environment and security, PEBLDS.

Ministerial Conferences

In Belgrade the plenary sessions served for full stocktaking of the political issues in a wide range of themes. The side-events provided signals of upcoming issues and were well attended by the participants. These experiences should be taken into account in further preparations.

Preparation process for the Ministerial Meetings has proved to be heavy and resource consuming. On the other hand it has definitely increased commitment thanks to its open-ended format. However, the issues, which have been brought for decision for such a wide participation have been in some cases too detailed. This is partly due to the flow of documents which have been prepared for the Ministerial Meetings.

In future, more attention to the purpose and outputs of the Ministerial Meetings should be given at the first stages of the preparatory processes. One possibility for focusing the discussions could be to concentrate on few targets with high effect on the environment in the region. The MEAs have been very important tool and in many cases have significant effect in the region (e.g. LRTAP). These issues could be addressed in a strong and concrete way.

Stakeholders

The process should more intensively focus on the needs and commitments from the EECCA region, and on the other hand the process should also reflect the intensity of the drivers of the region. The process should be more flexible (needs — willingness to cooperate). The future work would benefit a lot, if the national and local level work would be more effectively involved in the process. This needs national dialogues with and within the countries, inviting all relevant ministries in the work. There is a wide experience on the work with national actors in the OECD EAP Task Force, as well as in the Secretariats of the ECE conventions. More coordinated efforts by the donors would be of great importance to contribute to sectoral integration and increase the efficiency.

There are some important stakeholders and tools, whose experience would bring added value and this experience should be more effectively integrated in the process:

- **Secretariats of the multilateral environmental agreements and OECD EAP Task Force** have accumulated wide experience of the problems and obstacles in implementation and of the region
- **Central and Eastern European countries as EU Member States** have gone through profound environmental reform. This experience could help EECCA countries in their reform, and **Regional Environmental Centers** have a special role in transfer of expertise.
- **National dialogues with the countries** could improve the commitment from the country level and contribute also to the sectoral integration. It is clear that the environmental authorities in the EECCA countries need outside back up in their efforts.
- **public-private partnerships** – there are examples of success, but also of difficulties

At the same time, strong involvement of the non-governmental organizations should also in the future be an integral part of the process. International financing institutions are involved, and especially EBRD has been integrated in the process. More coordinated messages and efforts by the donors would be of great importance to contribute to sectoral integration and increase the efficiency. There are also other than European financing institutions active in the EECCA countries and coordination with them and between the donors should be also increased.

Secretariat arrangements

With regard to organizational issues and secretariat arrangements we refer to the EU documents mentioned above.