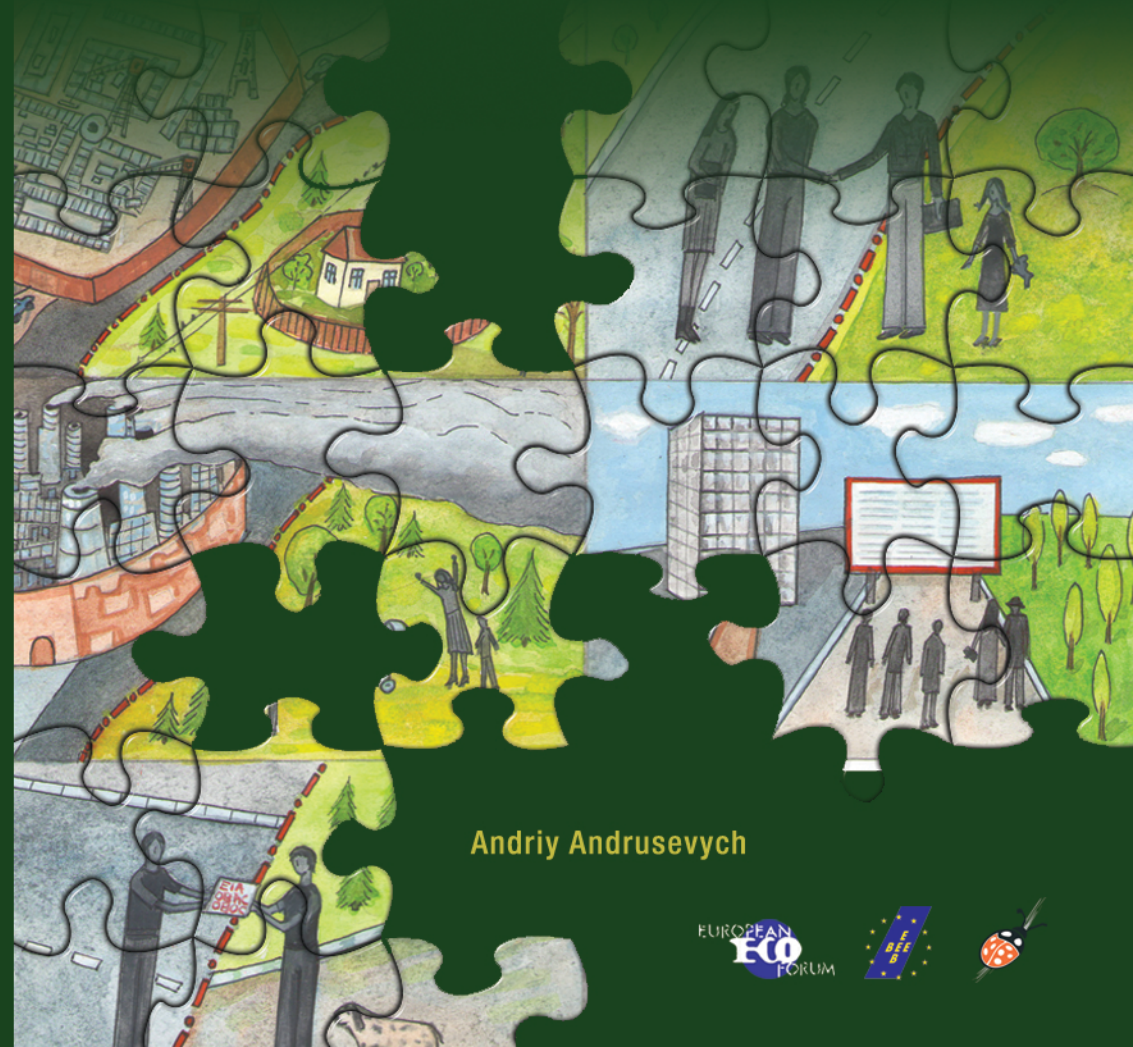


THE ESPOO CONVENTION: TRANSBOUNDARY ENVIRONMENTAL IMPACT ASSESSMENT

PRACTICAL GUIDE FOR CITIZENS AND NGOS



Andriy Andrushevych



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European Environmental Bureau (EEB) stands for sustainable development, environmental justice, global equity, transparency, participatory democracy and shared but differentiated responsibilities. It promotes the principles of prevention, precaution and the polluter pays. The EEB is the environmental voice of its members and European citizens.

The European ECO Forum is ad hoc Coalition of more than 200 environmental citizens' organisations (ECOs) and other NGOs acting in the UN-ECE region and primarily focusing on the "Environment for Europe" (EfE) Ministerial process and implementation of its decisions.

Public Participation Campaign (PPC) of the European ECO Forum focuses on improving and implementation of the Aarhus Convention throughout the pan-European region and is coordinated by European Environmental Bureau.

Resource & Analysis Center "Society and Environment" (RACSE) is a think-tank non-profit organization based in Lviv, Ukraine. It focuses on environmental policy research, capacity building and implementation of innovative initiatives in Ukraine and regionally (Eastern Europe, Caucasus and Central Asia).

This publication has been prepared by Andriy Andrusevych who is a European ECO Forum expert on legal issues and compliance mechanisms for the Aarhus and Espoo Conventions as well as legal focal point Eastern Europe, Caucasus and Central Asia. He is Governing Board Member of Resource & Analysis Center "Society and Environment".

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INTRODUCTION

This guide provides citizens and non-governmental organizations (NGOs) with clear and simple advice on how better exercise their rights to know and participate in environment-related decisions. This guide focuses on one important issue: what opportunities the public has to express its concerns about a decision which affects their environment but is taken in a foreign country. In Europe these opportunities are provided by the Espoo Convention and are available to citizens of 43 states.

We all share one environment which does not recognize borders. The public has the right to be informed and to express its comments about decisions to authorize an industrial project which can affect their environment, even when the decision is taken by a foreign country. This guide explains in detail how to use these rights in practice.

This guide is about both lessons to be and already learnt. European ECO Forum members have long experience in application of the Espoo Convention and using available mechanisms to challenge its violations. We have also participated in the development of the Protocol on Strategic Environmental Assessment, which came into force in July 2010. Yet, there are lessons we will learn about using the Espoo Convention. We hope this guide will foster application of the Espoo Convention by helping the public to understand how to use it.

The first key to protection of your rights is to know about them. Rephrasing Brecht's, you may lose when exercising your rights, but you already lost if you do not try. We hope this guide will help you protect the environment for the benefit of present and future generations.

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WHAT IS THE ESPOO CONVENTION ABOUT?

The Espoo Convention is the short name for the UNECE Convention on Environmental Impact Assessment in a Transboundary Context, signed at Espoo (Finland) in 1991.

The Espoo Convention is an international treaty that obliges states to evaluate the environmental impact of commercial projects when such projects can affect the environment of another state. You must be consulted when such evaluation takes place!

Example: A private company plans to set up a coal power plant near the border with a neighbouring state. Before the country of origin (the country where the power plant will be located) gives a permit for this, it must notify the neighbouring state about the planned construction.

Pay attention: What is the country of origin? Normally it refers to the country on whose territory a proposed project is to be located. However, it may also refer to activities which are outside of the country's territory but are under its control (for example, extraction in the continental shelf or a marine gas pipeline which falls outside national territorial waters).

Ref: Article 1, paragraph ii

Today, the Espoo Convention places obligations on 44 parties (43 states and the European Union).

Country/Party	Date of ratification
Albania	4 Oct 1991
Armenia	21 Feb 1997
Austria	27 Jul 1994
Azerbaijan	25 Mar 1999
Belarus	10 Nov 2005
Belgium	2 Jul 1999
Bosnia and Herzegovina	14 Dec 2009
Bulgaria	12 May 1995
Canada	13 May 1998
Croatia	8 Jul 1996
Cyprus	20 Jul 2000
Czech Republic	26 Feb 2001
Denmark	14 Mar 1997
Estonia	25 Apr 2001
European Union	24 Jun 1997
Finland	10 Aug 1995
France	15 Jun 2001
Germany	8 Aug 2002
Greece	24 Feb 1998
Hungary	11 Jul 1997
Ireland	25 Jul 2002
Italy	19 Jan 1995
Kazakhstan	11 Jan 2001
Kyrgyzstan	1 May 2001
Latvia	31 Aug 1998

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Country/Party	Date of ratification
Liechtenstein	9 Jul 1998
Lithuania	11 Jan 2001
Luxembourg	29 Aug 1995
Montenegro	9 Jul 2009
Netherlands	28 Feb 1995
Norway	23 Jun 1993
Poland	12 Jun 1997
Portugal	6 Apr 2000
Republic of Moldova	4 Jan 1994
Romania	29 Mar 2001
Serbia	18 Dec 2007
Slovakia	19 Nov 1999
Slovenia	5 Aug 1998
Spain	10 Sep 1992
Sweden	24 Jan 1992
Switzerland	16 Sep 1996
The former Yugoslav Republic of Macedonia	31 Aug 1999
Ukraine	20 Jul 1999
United Kingdom of Great Britain and Northern Ireland	10 Oct 1997

A fully updated list of the countries is available at the Convention's website:
<http://www.unece.org/env/eia/>

Pay attention: The Convention is only applicable to activities which started after the Convention entered into force for a specific country. Pay attention to the date of entry into force when checking the list of parties.

WHAT EXACTLY DOES THE ESPOO CONVENTION MEAN FOR YOU?

First consult – then permit

Before allowing an industrial project to take place, the country of origin must notify and consult affected parties and the public in the affected area.



Pay attention: What is an affected party? It is a country which could be affected by the transboundary impacts of a project located in another country.

Ref: Article 1, paragraph iii

The affected country and the public in the affected area must be able to express its views and comments about the proposed project. The final decision on the proposed project must take due account of these comments. The final decision must be communicated to the affected country and the public.

Pay attention: What is a final decision? Generally, it is a permit to start construction or operation of an industrial project. In practice, specific title or form of the decision (permit, approval, decree, etc.) depends the legal framework of a particular country.

Not all projects are subject to consultations under the Convention. The Espoo Convention applies only to limited types of projects, basically those listed under Appendix I to

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the Convention. Currently, the list contains 17 activities, including large power plants, steel production, motorways, dams, mining, etc.

Pay attention: What is a project? The Convention uses the term “activity”.

In practice, this is either a new activity (for example, a new road) or a significant change to an existing activity (e.g. an additional unit in a power plant) which requires a permit from public authorities.

Ref: Article 1, paragraph v

Note that there are at least two possible scenarios for you when you are concerned about a proposed project: you live in a country where the project will be constructed (you are in the country of origin) or you are concerned about a project that will be located in another country (you are in the affected country). In the first situation, you can only enforce the application of the Espoo Convention. In the second situation, you have specific procedural rights. In both cases, you need to understand when and how the Convention shall be applied to be able to challenge the legality of the proposed project. For the sake of clarity, this guide describes the relevant requirements and your rights from the perspective of you being concerned by a project in another country.

Pay attention: Are you located in the country of origin? Then push your government to apply Espoo Convention. Inform citizens in the neighbouring country about their rights and help to exercise them!

Example: Recently environmental activists in Belarus, with the help by European ECO Forum, pushed their Government to start procedures under Espoo Convention with relation to a proposed nuclear power plant. As a result, the public in several concerned countries was able to comment about the proposed project, including Lithuania, Latvia, Ukraine, Austria.

ARE YOU CONCERNED ABOUT A PROPOSED PROJECT IN ANOTHER COUNTRY?

If you feel concerned about a proposed project in another country, first check whether the proposed project requires consulting with you under the Espoo Convention. If it does, then you can demand to be consulted before it is put into operation.

Your checklist includes two major issues:

- is a proposed project listed in Appendix I to the Convention?
- is it likely to cause a significant adverse transboundary impact?

The proposed project must meet all the requirements described above.

Is it listed in Appendix I?

The first thing to do is to look at the Appendix I to the Espoo Convention and check whether your project falls under any types of activities listed there.

Pay attention: Appendix I is an attachment (and integral part of) to the Espoo Convention. As of today, it lists 17 types of activities to which the Convention must be applied. Appendix I is always displayed in the text of the Convention. In particular, it can be found on the official web-site of the Espoo Convention: <http://www.unece.org/env/eia/>



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Appendix I lists various types of activities, from nuclear reactors to deforestation. Note: most of the activities know a “threshold value”, which is a requirement on the size or specific characteristics of an activity. Therefore, it is often not enough to find an activity on the list, but also important to prove that it meets minimum requirements on its size.

Example: A thermal power station may be subject to the Espoo Convention’s requirements only when its heat output is 300 megawatts or more. At the same time, a regular nuclear power station is always subject to Espoo procedures (if it meets the requirements on impact, described below).

Impact on you – key to your participation

Application of the Convention is triggered depending on the possible impact by a proposed project. More specifically, the impact should be:

- o Transboundary
- o Adverse
- o Significant
- o Likely

Pay attention: What is meant by impact? Impact means any effect, caused by a proposed activity, on the environment, including human health.

Ref: Article 1, paragraph vii

The impact you are concerned about should be “transboundary”. This means it cannot originate from a project located in the same country. Instead, the impact should come from a project located in another (e.g., neighbouring) country. At the same time, “trans-

boundary” impact does not only mean having global, but any geographical scope (e.g., local).

Example: A large oil pipeline is planned in country X. The Espoo Convention is applicable in case the pipeline might have an impact on the environment of another country(-ies). If the pipeline only impacts the environment of country X itself, the Convention is not applicable.

The impact you are concerned about should be “adverse” (negative). This means that while all impacts are “screened”, you must be consulted only if you are going to be negatively affected by the proposed activity.

The impact you are concerned about should be “significant”. This often poses a problem in practice. The key criteria to define significance are the size, location and effects of the proposed project. These criteria are described in Annex III to the Espoo Convention. In practice, the proponents often try to split the project into small parts and by doing so to evade overall assessment and significance criteria. This is called “salami slicing” and it cannot be justified under the Espoo Convention.

Example: A company wants to build a waste incinerator for pesticides just a few kilometres from the area where you live. Clearly, the impact on you would be very different if such an activity would take place a few thousands kilometres from you.

The impact you are concerned about should be “likely”. Likelihood means a degree of probability that the proposed project will affect you. In practice, “likely” means “having a high probability” and is subject to expert opinion. However, in some cases – such as

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in the case of industrial accidents - it can be more a question of whether the accident is likely to cause impact than what is the likelihood of the accident itself.

Pay attention: What if the country of origin denies any impact on you? Your own country can request setting up a special international scientific body – an Inquiry Commission – which is to decide whether the proposed project is likely to have an adverse significant transboundary impact.
Ref: Article 3, paragraph 7 and Appendix IV.

Example: In 2004, Romania requested setting up an Inquiry Commission concerning a navigation project in the Danube river delta (Ukraine). The commission unanimously decided that the project in question was likely to cause significant adverse transboundary impact.

Note that in many cases a proposed project is likely to affect several countries. In this case the country of origin shall start consultations with each of the affected countries.

ARE YOU CONSULTED?

If a proposed project is identified as falling under requirements of the Espoo Convention (as described above), the country of origin shall start a consultation procedure with affected countries. This is a separate procedure which is additional to any relevant national permitting process. At the same time Espoo Convention procedures shall be carried out before a decision is taken to authorize the proposed project.

In short, a consultation procedure is a dialogue between two (or more) countries about a proposed project on the basis of environmental impact assessment documentation. This dialogue necessarily includes the possibility for the public to raise its concerns.

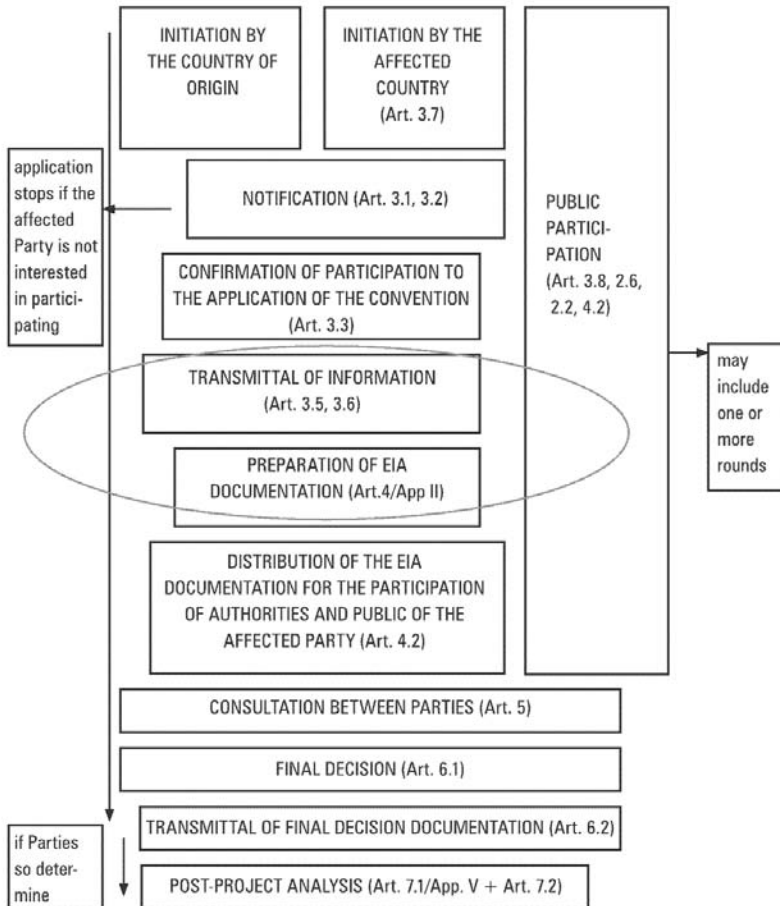
A consultation procedure includes these key stages:

- Notification of the affected countries
- Preparation of the environmental impact assessment documentation
- Consultations between countries concerned
- Final decision

In addition, all these stages include specific procedural steps required by the Convention. The graph on the next page provides an overview of various procedural steps within consultation procedures under the Espoo Convention.

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The flow-chart of the stages of an assessment according to the Convention



Source: Guidance on the Practical Application of the Espoo Convention, ECE/MP/EIA/8

Have you been notified?

The country of origin must notify all possibly affected countries about the proposed project. If the country of origin does not notify them, this is already a violation of its legal obligations under the Espoo Convention. The notification has to include certain information on the proposed activity.



Pay attention: The notification is a formal start of the procedure. It is obligatory for the country of origin.

Ref: Article 2, paragraph 4 and Article 3, paragraph 1.

Lack of notification is probably the most frequent violation of the Convention. You can check whether a notification has been sent to your country by contacting your national focal point for the Espoo Convention (normally this is the Ministry of Environment). If no notification was sent, you can push your government to contact the country of origin and also put pressure on the country of origin yourself by contacting the focal point there or by contacting non-governmental organizations. You can also contact the European ECO Forum if you need help identifying relevant NGOs in the country of origin.

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Pay attention: European ECO Forum contacts:

Mr. Andriy Andrusevych

European Eco Forum Legal Expert on the Espoo Convention

e-mail: andriy.andrusevych@rac.org.ua

Find the official focal point in your country here:

<http://www.unece.org/env/eia/focalpoints.htm>

If the notification was sent, your government has to respond whether it wishes to participate in the environmental impact assessment (EIA) procedure. Note however that sometimes governments do not want to have any consultations on the proposed project for political or other reasons. When this is the case and when your government informs another country that it does want to enter into consultations, it stops the whole process. It means you will not be consulted since your government decided not to start consultations under the Espoo Convention.

Pay attention: In a situation where your government has deprived you of the possibility to participate in an EIA under the Espoo Convention, there are still several opportunities available for you under another treaty – the Aarhus Convention. For more about the Aarhus Convention see <http://www.unece/env/pp>

You must be notified about the proposed project if the countries concerned have decided to enter into consultations. You have the right to be informed about the proposed project and submit your comments or objections. It is a joint obligation of your country and the country of origin. The government must inform the public residing in the areas likely to be affected. Today, many governments use electronic mail and websites to inform the public about such projects.

Did you get a project description?

It is not enough to have only brief information about the proposed activity. Upon start of the consultations between the countries concerned, detailed documentation on environmental impact assessment must be prepared (EIA documentation). This may include the need for your own country to send information about affected areas. The EIA documentation may be developed in a different form depending on national legislation (study, report, etc). EIA documentation prepared by the country of origin must be distributed to the public concerned. You must have a possibility to study it.

Pay attention: EIA documentation must contain, as a minimum:

- (a) a description of the proposed activity and its purpose;
- (b) a description, where appropriate, of reasonable alternatives (for example, locational or technological) to the proposed activity and also the no-action alternative;
- (c) a description of the environment likely to be significantly affected by the proposed activity and its alternatives;
- (d) a description of the potential environmental impact of the proposed activity and its alternatives and an estimation of its significance;
- (e) a description of mitigation measures to keep adverse environmental impact to a minimum;
- (f) an explicit indication of predictive methods and underlying assumptions as well as the relevant environmental data used;

Note: this list is not the ceiling – more information can be included upon your request!

Ref: Article 4, paragraph 1 and Appendix II.

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The following elements of EIA documentation are especially important to consider: alternatives and the potential impact on the affected country. Too often, the country of origin puts little emphasis on assessing alternatives to the proposed activity, including zero-option (no-action alternative). As the public concerned, you can require a revision of EIA documentation to include alternatives. Quite often, the EIA documentation you get is a translated copy of “national” EIA, and therefore it often lacks assessment of the impact on your area (areas in the affected country). Since the proposed activity was already screened as likely to have a transboundary impact, an assessment of such impact must be part of the EIA documentation you get.

The EIA documents you get must be equal (in terms of content) to those available to the public in the country of origin. However, in practice the country of origin may develop a short version of the EIA documentation for consultations with other countries, which may not be sufficient for effective and adequate participation of the public. You can request access to full EIA documentation in your own language.

Can you submit your comments or objections?

You have the right to express your comments or objections on the proposed project. This may happen in several ways: at a public hearing in your country, by submitting written comments to your authorities (focal point of the Espoo Convention) or even directly to the relevant authorities of the country of origin.

It is important to understand that both countries – the country of origin and the affected country – bear joint responsibility for organizing the public participation process. The country of origin cannot effectively organize consultations with you without involving your own government. Therefore, it is important to understand that your government plays a role and is obliged to facilitate consultations with the public concerned. Yet, the country of origin must offer you the possibility to comment on the proposed activity (even if no hearings or other procedures are organized in your own location).

Pay attention: Be prepared for public hearings. Consider asking your government for procedural details in advance: who can participate, how to register, what possibilities are there to present your comments, who will summarize the comments and send them to the country of origin?

ARE YOUR CONCERNS TAKEN INTO ACCOUNT?

The final decision to authorize a planned activity must take due account of your comments. In addition, the final decision must take due account of the EIA study and the result of consultations between governments on the proposed project. At a minimum, this means that you have the right to receive the final decision. The decision itself must include reasons and considerations on which it is based. Therefore, the final decision should include text with consideration of the comments received.



IS THE COUNTRY IN VIOLATION?

There are numerous possible violations of the Espoo Convention, especially related to procedural requirements. Such violations may include:

- Country of origin does not apply the Espoo Convention to the proposed activity
- The public is not consulted while consultations between governments take place
- The procedure for consulting the public is not in line with the requirements of the

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Espoo Convention

- The outcomes of public participation are not taken into account

Clearly, the first tool to ensure compliance is national remedies (administrative procedures, courts). At the same time, the Convention has a special body entrusted to oversee implementation of the Convention – the Implementation Committee.

Pay attention: The Implementation Committee was established by a decision of the Meeting of the Parties (MOP) of the Espoo Convention. The key legal documents governing its work are Decision II/4 of the second Meeting of the Parties and Operating Rules (Annex IV to Decision IV/2 of the MOP).

How can the Implementation Committee help?

The Implementation Committee can open proceedings if the Convention was violated in a specific case. The Implementation Committee can open a case in two situations: a) if a country files a submission alleging non-compliance, including by another country or b) acting on its own initiative when it becomes aware of possible non-compliance.

The second method is most relevant for NGOs. As a member of the public, you can send a complaint (formally called “information”) to the Implementation Committee alleging that a country failed to implement the Convention. Such complaint does not automatically start a case, but if the allegations are considered serious enough the Committee can start a case on its own initiative.

Your complaint may allege non-compliance either by your own or by another country. The complaint can be sent by regular or electronic mail.

Your complaint must meet the following basic requirements:

- (a) it is not anonymous;
- (b) it relates to an activity listed in Appendix I to the Convention likely to have a significant adverse transboundary impact;
- (c) the information is the basis for a profound suspicion of non-compliance;
- (d) the information relates to the implementation of the Convention provisions.

Pay attention: The Implementation Committee developed a special form to help NGOs to file such information. The form is available at the Convention's web-site (<http://www.unece.org/env/eia>) ; you can also get it from European ECO Forum legal focal points (see *Getting Help*). In addition to requirements described, the form introduces a new item called "Description of issue" - this is where you should describe alleged violations in detail.

In addition, you can encourage your government to file a submission in a specific case. This would automatically trigger the case in the Implementation Committee.

What can happen if you win your case?

After the Implementation Committee finds that a country was in non-compliance, the case is submitted to the Meeting of the Parties of the Convention. The MOP can take several "sanctions" (or measures) vis-à-vis a country that was found to be in non-compliance with the Convention. It can request adoption of new legislation, or even suspension of the project itself. What is most important is the political pressure which such decisions put on a country. The Implementation Committee and MOP will monitor the implementation of the decision by MOP.

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Pay attention: What is the Meeting of the Parties (MOP)? The MOP is the highest body of the Convention. In practice, it is a high-level meeting of government officials (often attended by a number of ministers) where key decisions are taken for the future work under the Convention, and amendments are adopted to the Convention's text.the MOP).

Example: Ukraine faced MOP sanctions in 2008 in relation to a navigation project in the Danube river delta. The MOP issued a caution and a declaration of non-compliance to Ukraine, and requested to repeal the final decision on the project, to develop new legislation and to suspend all works in the delta.

WIDER DECISIONS

In many cases, the government takes a decision which assumes implementation of certain projects in the future. It can concern energy policy, forestry development programmes, etc. Such decisions are not “project level” themselves, i.e. they do not authorize a specific pipeline or plant. However, they still require assessment from the perspective of their environmental impacts. This is called strategic environmental assessment.



Strictly speaking, the procedures under the Espoo Convention apply to project-type activities, while countries are encouraged to apply the Convention to plans, programmes and policies.

Pay attention: In some cases, it is hard to distinguish between project level and programme/plan level decisions. Various considerations shall be taken into account in a specific case to distinguish between the project-type and programme-type decision. The title of a decision (e.g., Nuclear Development Programme) is not a decisive argument. Legal and practical consequences of the decision shall be of primary importance in defining whether a decision is of a project type or not.

In 2003, the countries adopted the Protocol on Strategic Environmental Assessment (SEA) to partially address this issue. It entered into force (became legally binding for the states) on July 11, 2010.

WHAT IS STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)?

Strategic environmental assessment means the evaluation of the likely environmental, including health, effects, which comprises the determination of the scope of an environmental report and its preparation, the carrying out of public participation and consultations, and the taking into account of the environmental report and the results of the public participation and consultations in a plan or programme.

The Protocol establishes detailed procedural requirements on the SEA process, including screening, scoping, carrying out the evaluation itself, public participation, and the final decision-making. The Protocol is much more detailed – in comparison with the Espoo Convention – on public participation requirements. You can learn about your rights under SEA by consulting a series of publications on this issue by the European ECO Forum: Participatory SEA and Public Participation in Strategic Environmental Decisions. All publications are available at <http://www.participate.org>.

WHAT ARE THE KEY DIFFERENCES BETWEEN THE ESPOO CONVENTION AND THE SEA PROTOCOL?

There are two major differences between these two instruments:

- Subject matter (EIA v. SEA)
- Transboundary aspect

The difference in subject matter is covered above. It is important to understand the transboundary aspect as well. The Convention puts a major focus on procedures dealing with proposed projects that have **transboundary** effects. In contrast, the SEA Protocol focuses largely on **national** decision-making. In other words, it provides the public with wide participation rights in national decision-making (inside your own country). The SEA Protocol addresses the transboundary effects issue, too, by requiring consultations between the country of origin and the affected country on the proposed plan or programme.

KEY ISSUES TO REMEMBER



- The Espoo Convention requires an environmental impact assessment for certain activities which may have negative transboundary effects
- The public in the affected areas has the right to know and express comments or objections about a proposed activity before the government authorizes such activity
- The public can complain about violations of the Espoo Convention to the international body – the Implementation Committee
- The SEA Protocol provides for wide public participation opportunities in strategic decision-making
- Public Participation Campaign of the European ECO Forum is a coalition of environmental NGOs in pan-European region and can help you enforce the Convention or the Protocol



GETTING HELP

This publication is available in English, Russian, Turkish and Ukrainian. For more copies contact us.

For further information you can contact European ECO Forum:

Ms. Mara Silina

Enlargement Coordinator,
European Environmental Bureau/EEB (AISBL)
Federation of Environmental Citizens Organisations
<http://www.eeb.org>

Chair of the CB and Coordinator Public Participation Campaign,
European ECO Forum
<http://www.participate.org>
e-mail: mara.silina@eeb.org

Mr. Andriy Andrusevych

Governing Board Member, Co-founder
Resource & Analysis Center “Society and Environment”
<http://www.rac.org.ua>

Legal Expert,
European ECO Forum
<http://www.participate.org>
e-mail: andriy.andrusevych@rac.org.ua