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Date: 26/02/2014 09:55
Subject: Re: Draft report of Aarhus Convention Compliance Committee on the implementation of decision IV/9d concerning the Republic of Moldova

Dear Fiona,

Thank you for MOP5 draft decision concerning Moldova' case of non-compliance number 30. The current draft decision you sent is fully based on the information that the Government of the Republic of Moldova has approved the draft Law on Access on Environmental Information, which is a true.

But in accordance with the Constitution of Moldova, the laws are adopting by the Parliament of the Republic of Moldova and the government is one of bodies which has a right and a duty to propose the draft laws. In this respect from the legal point of view **the current stage of the draft law is only intermediate one and could not be the final argument for such kind of MOP decisions.**

We have a democratic pro-European majority in the Parliament but current developments within the draft law in the Parliamentary Committee still not give a guarantee that this law will be adopted. Moreover, the issue of harmonization of Moldovan legislation with the EU Directive 2003/4 is a duty of the Republic of Moldova in accordance with its Association Agreement with the EU, preliminary approved in Vilnius in October 2013.

In this respect I am sure that the content of the MOP decision on the Moldovan case should be based not on efforts but on realised actions, i.e. adoption or non-adoption of the draft Law in two readings until the Maastricht MOP.

I expect that currently created situation around the draft law will be a good signal for the democratic majority in Moldovan government and a Parliament **to do real efforts based on the clear political will to adopt this law until MOP5.**

I hope that current comments will help the AC Compliance Committee and a MOP5 to adopt a right decision which ensure a progress in AC implementation by the Republic of Moldova

With best wishes,

Ilya Trombitsky,
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