



EU + MS comments
on the Draft Declaration
on Environmental Democracy for Sustainable, Inclusive and Resilient Development

The EU and its Member States thank the Chairs of the Bureaux and the two Bureaux for preparing the Draft Declaration on Environmental Democracy for Sustainable, Inclusive and Resilient Development to be considered by the Meetings of the Parties to the Aarhus Convention and to the Protocol on Pollutant Release and Transfer Registers at a joint segment.

The EU and its Member States submit the following more general remarks on the declaration:

- With regard to the main topics addressed, we consider the declaration well drafted and support it in general.
- We suggest to refrain from inserting web-links with regard to specific initiatives since the declaration from our point of view is more of a political nature and should not single out specific initiatives (e.g. para. 17).
- We would call for a use of language normally used in the framework of the Convention in order to highlight future activities appropriately.

The EU and its Member States further have some concrete comments and suggestions:

- Para. 4: In our view, the last sentence using the term „civil liberties“ is too general; this should be qualified with regard to environmental matters.
- With regard to the paras addressing the Covid-19 situation (paras 5 and 25): Despite the undoubted problems caused by the pandemic for the exercise of the public's rights, we propose to also acknowledge in the declaration that (some) efforts were made to find solutions, such as the extension of timelines before the judiciary or the increased use of electronic means by governments. These positive aspects should also be mentioned. This is of course linked to harnessing best available digital technologies to ensure effective

access to information, public participation in decision-making and access to justice in environmental matters, as mentioned in para 22.

- Para 8: We suggest to add the word “rights” after indigenous peoples’, since we are of the opinion that this is the social issue, not the indigenous peoples themselves, as the text reads in its current form.
- Para 9: We would like to ask for clarification of the term „renewed territorial governance paradigm“ in the context of spatial planning.
- Para 10: We question whether the EU and its Member States obtain „map-based visualization“ with regard to PRTRs and whether they are helpful to find the location for infrastructure projects.
- Para 13: We propose to explicitly mention the “Escazú Agreement for the Latin American and Caribbean countries” which is the homologous Aarhus agreement for the ECLAC region.
- Para 14: We propose to phrase the last part as “is key for the implementation of all goals”, because the words “access of implementation“ seem to be not clear enough.
- Para 15: We propose to delete the last sentence, because these elements are not necessarily and completely included in the term the environment, including human health.
- Para 17: We do not quite understand the context of that single initiative in relation to the global environmental challenges mentioned in the paragraphs above. The placing of that reference should be reconsidered (e.g. integrating in para. 12 on commitments).
- Para 19: We do support the aim of that paragraph, however the term „culturally appropriate solutions“ should be explained in this context as well as „local and green material“ (checked against references to the concept of circular economy).
- Para 21: We would like to seek for clarification of the term „easy-to-access integrated information“ and its concrete meaning.
- Para 28: The effective provision of product information is mentioned, however, we do question whether the Protocol on PRTRs can deliver the expectations providing for standards.
- Finally, we propose to mention the GMO amendment in the section on the path for the future since we are hoping for just one Party to ratify the amendment so that the amendment will enter into force.