

REPORT to the 4th Environment Ministers Conference

(23-25 June 1998, Aarhus, Denmark)

NGO Evaluation of National Environmental Action Plans in the NIS and NGO Common Agenda for the Future

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1. Introduction

At the 3rd Environment Ministers Conference in Sofia (23-25 October 1995) in the Conference Declaration Ministers of Environment specifically stressed the necessity of evaluation, by the end of 1997, of the progress achieved in CEECs/NIS in developing National Environmental Action Programmes (NEAPs).

Responding to this the Organization "GROMADYANSKA INITSIATYVA" (OGI International - the Civil Initiative Organization) initiated the SOFIA+3 Project and started to implement it in coalition with a number of NGOs from the NIS facilitating civil society participation in evaluation of NEAPs development and implementation process in the NIS. Important part of the SOFIA+3 Project is also development of the NGO Common Agenda for the Future to promote the NEAPs development/implementation in the NIS in partnership between NGOs and Governments (especially, Local Self-Governments). The Project was supported by the Regional Environmental Center for CEE (Szentendre, Hungary).

The SOFIA+3 coalition joins the following NGOs:

1. "ECO-Accord" (Russian Federation),
2. Foundation to Support Civil Initiatives in Tadjikistan,
3. Environmental Movement "Natura" (Moldova),
4. Ukrainian Environmental Union "Salvation from Chornobyls" (Ukraine),
5. EcoPravo-Kyiv (Ukraine),
6. Society for NGO Development and Support (Ukraine),
7. National Ecological Center (Ukraine),
8. NewREC NGO Coordination Council of Ukraine,
9. Environmental NGOs Council of Ukraine,
10. Municipal Management Center (Ukraine),
11. Institute for Ecology to National Ecological Center (Ukraine),
12. Foundation "Unicorn" (Ukraine),
13. Round Table Environmental NGOs of Belarus ,
14. International Habitat Center (Georgia),
15. Center of Social and Psychological Aid "GESTALT" (Ukraine),
16. OGI International (Ukraine).

Coalition building is continuing within all the Project implementation process to establish the NGO network, which will be able to monitor the NEAPs development and implementation process and, simultaneously, will be an important partner for the NIS Governments and Local Authorities within

the NEAPs/LEAPs development and implementation in the NIS.

The overall Goal of the Project:

The NGO evaluation of NEAPs process in the NIS and promoting development of partnership between NGOs, Governments, Local Self-Governments in the NIS for the future environmental and economic benefits.

Project Objectives:

- facilitation NGO evaluation of development/implementation of the National Environmental Action Plans (NEAP) in in the NIS countries involved in the project;
- collecting NGO inputs and ideas to the 4th Environment Minister Conference;
- defining the topics most important to NIS NGO community related to NEAPs;
- collecting and disseminating information related to the NEAPs and the 4th Ministerial Conference;
- formulating of the NGO Common Agenda for the Future to promote the NEAPs/LEAPs implementation in the NIS;
- development, publishing the Project Report to be presented on the NGO Special Session at the 4th Environment Ministers Conference in Aarhus.

The following work had been done within the Project implementation:

- At the very beginning of the Project it was presented to many NGOs, governmental and intergovernmental organizations by e-mail, on **the First International Conference "UKRAINE-HABITAT-II: Best Practices"** (4-8 October 1997, Kyiv, Ukraine), the **NGO Strategy Meeting** (8-11 November 1997, Ljubljana /lake Bled/, Slovenia), a number of Meetings with representatives of Governments of Ukraine, Moldova, Russian Federation, Belarus and Tajikistan etc.
- The Sofia+3 Project Web-page had been established. The bulletin "OGI Update" in English and Russian has been established. Since October 1997 No. 1-5 of the bulletin had been published in Russian and English.
- Questionnaires for NGOs in Russian and Ukrainian languages had been worked out. The information about the SOFIA+3 Project and Questionnaires were disseminated among more than 200 NGOs to enable them to make their inputs to the SOFIA+3 Meeting held on May 29 – June 1, 1998 and to the Sofia+3 Report to be presented on the NGO Special Session at the Environment Ministers Conference in Aarhus.
- Main documents and information related to NEAPs of Belarus, Moldova, Russian Federation, Tajikistan and Ukraine had been collected and disseminated among NGOs by the Sofia+3 National Consultants in this countries.
- During the Project implementation process a number of meetings with representatives of different organizations such as the UN Office in Ukraine, EAP Task Force (OECD), UN Economic Commission for Europe, US Agency for International Development (Kyiv), ISAR, International Renaissance (Soros) Foundation, REC (Szentendre, Hungary), ICLEI, the Tacis Environment Policies Project, the Tacis awareness raising Program etc. had been held to identify possible ways of joining efforts and of Major Groups involvement into development and implementation of NEAPs/LEAPs.
- On 27- 29 December 1997 the SOFIA+3 NGO Strategy Meeting had been held to discuss
 1. preliminary NGO evaluations of NEAPs process in Belarus, Moldova, Russian Federation, Tajikistan and Ukraine
 2. obstacles and solutions related to NEAPs development and implementation in the NIS
 3. Guidelines of the **NGO Common Agenda for the Future** to enable Major Groups participation within NEAPs development and implementation in the NIS
- Two National workshops were prepared and conducted for Belarus (April 2, 1998) and Ukraine (April 25-26, 1998) thanks to additional support of **ISAR /NIS West Office/** to
 1. make more comprehensive independent evaluation of NEAPs process in the countries
 2. identify interested NGOs and,
 3. identify new ways and opportunities (applicable for another countries involved) for partnership between NGOs, Local Governments and Governments within NEAPs/LEAPs development and implementation in Belarus and Ukraine
 4. to develop and adopt NGO propositions related to NEAPs/LEAPs to Governments of Belarus and Ukraine.

- On May 29 – June 1, 1998 the OGI jointly with the UN office in Ukraine organized the SOFIA+3 Meeting to review NEAPs progress in the NIS and to develop possible ways and discover new opportunities for Major Groups participation in further NEAPs development and implementation process in the NIS. During the Meeting there was made averaged evaluation of success of the NEAP key elements implementation in the NIS (see Figure below). To enable this evaluation there was worked out a questionnaire, which include the items mentioned below Figure. The evaluation includes opinions of representatives from NGOs, Governments, Local Authorities and Scientific Community. The Meeting was one more step towards building partnership and establishing constructive dialogue between NGOs, Local Self-Governments and Governments within NEAPs development and implementation. Originally, the SOFIA+3 Project foresaw only NGO participation in this Meeting. Recognizing importance of partnership between Major Groups within further NEAPs/LEAPs development and implementation the OGI invited to participate in the SOFIA+3 Meeting representatives both of NGOs and Governments, Local Self-Governments and Scientific Community from the NIS. Additional expenses for the Meeting had been covered by **the International Renaissance (Soros) Foundation – East East Program**.
- On the SOFIA+3 Meeting it was adopted Declaration, which includes recommendations to participants of the 4th Environment Ministers Conference (23-25 June 1998, Aarhus, Denmark) and consists of the following chapters:
 1. Environment for Europe Process: its success and perspectives in the NIS;
 2. National Environmental Action Plans: evaluation and recommendations for the future;
 3. Environmental financing in the NIS and effectiveness of external assistance;
 4. Public participation in making decision process.
- The following countries are currently involved in the SOFIA+3 Project: Belarus, Kazakhstan, Kyrgyzstan, Moldova, Russian Federation, Tajikistan and Ukraine.
- As a result of implementation of the SOFIA+3 Project the NGO Evaluation of NEAPs for the countries involved had been made and NGO Common Agenda for Future had been drafted.
- Thanks to additional support of ISAR and International Renaissance (Soros) Foundation the NGO evaluation of NEAP process and producing the project report became only one of goals of the SOFIA+3 Project. Additionally to national seminars in Belarus and Ukraine, within framework of the SOFIA+3 Project:
 1. The development of intensive training course "**Environmental Management in Local Self-Governance**" had been started. The course is aimed at providing assistance to Local Governments in development and implementation of Local Environmental (and Health) Action Plans with participation of experts from Major Groups, national Governments and international organizations. It is expected that the training course will integrate different methodologies, which have showed good results in the NIS.
 2. Together with other interested NGOs the OGI started to work out mechanism for establishing partnership between NGOs and Governments, Local Self-Governments and Business and Industry Group to promote successful elaboration and implementation of Local Environmental (Health) Action Plans and local environmental investments programs.
 3. Within SOFIA+3 Project Ukrainian NGOs proposed NEAP structure and requirements to the NEAP, some elements of which may be applicable to the NIS as well.

We appreciate refocusing of the Environment for Europe process to the NIS and recognize importance of Major Groups common efforts to gain real implementation of recommendations of the 4th Environment Ministers Conference. Only when Governments shift more responsibilities and empowerment to civil society organizations, only in partnership between NGOs, Governments, Local Self-Governments and Scientific Community the realistic and effective NEAPs/LEAPs can be developed and implemented.

In our opinion, the number of serious environmental problems in the NIS and in Europe as well still has not received sufficient attention of governments and their urgency is underestimated. There are some problems which must be on the agenda for the future:

- Nuclear safety;
- Chemical safety;
- Ecological disasters consequences liquidation;
- Ecological and economical consequences of the armed conflicts and army-industrial development complex liquidation;

- Sustainable agriculture;
- Sustainable tourism.

2. NGO Evaluation of the National Environmental Action Plans in the NIS

Within the SOFIA+3 Project the NGO NEAP evaluation had been made for Belarus, Moldova, Russian Federation, Tajikistan and Ukraine. Kazakhstan and Kyrgyzstan were involved on final stage of the project and detailed evaluation had not been done. The evaluation for each country had been made according the criteria presented in the document "Framework for Developing NEAPs", which were revised after the Sofia Conference, in consultation with NEAP Co-ordinators and approved by the EAP Task Force in April 1996. Some key evaluation elements were suggested by NGOs.

We realize, that there is no single model for developing and implementing NEAPs. Each NEAP must be designed to function within a specific national context to be effective and to meet interests of key stakeholders of society. In spite of in-country economic constrains and comparably low political support of NEAPs many efforts had been undertaken by Governments of the NIS countries to fulfill commitments taken on the 3rd Environment Ministers Conference (Sofia, 1995), but much more must be done (including problems indicated on Figure above). Tables below include the NGO NEAP evaluation which complement the evaluation made by EAP Task Force (OECD). for NIS countries (excluding Tadjikistan) . The evaluation is aimed to highlight some gaps in NEAP process and to identify factors, which obstacle effective NEAP elaboration and implementation by cooperative efforts.

BELARUS

KEY EVALUATION ELEMENTS		EVALUATION
STATUS and OBJECTIVES	TYPE OF DOCUMENT(S)	National Programme for Rational Use of Natural Resources and Environmental Protection for 1996-2000, but this document does not comply entirely with NEAP structure requirements and principles.
	DATE OF ADOPTION	Adopted on 15 October 1996.
	LEVEL OF ADOPTION	Cabinet of Ministers' approval in 1996. The National Program didn't approved by Parliament or President yet.
	MAIN GOAL(S)	Improve environmental conditions for population; Ensure rational use of natural resources; Protect biodiversity
PROCESS	LEADING AGENT (S)	Ministry of Environment, Scientific Research Center "Ecologija"
	PARTICIPATION BY MAJOR GROUPS (STAKEHOLDERS)	Top-down consultation and approval process only with other ministries and regions. Role of Local Authorities and Scientific Community is not clearly defined. NGOs were invited to participate in several seminars but they weren't involved in the process as key actors. Poor involvement of Business and Industry Group.
	SECTORAL INTEGRATION	Other ministries included requirements of the National Programme in their plans. The National Programme do not fully correlate with objectives of the Sustainable Development Strategy. Biodiversity Action Plan do not fully coordinate with the National Programme.

<p>ROLE OF EXTERNAL SUPPORT</p>	<p>External support in form of only bilateral experts assistance for the preparation of environmental programs. No external financial support for NEAP. External investments into environmental programs are very limited because of general in-country constrains. Most assistance within the process is provided by EAP Task Force (OECD), UNDP and Tacis. Without external financial support NEAP can not be effectively implemented.</p>	
<p>OBSTACLES</p>	<ul style="list-style-type: none"> ● NGOs and other Major Groups are not involved in NEAP process as key actors within development, planning and implementation of NEAP; ● Lack of procedure for NGO involvement; ● Lack of finances; ● Inadequate legislation base ● Distance, distrust, government "fear" of NGOs; ● Low information and experience exchange; ● Low environmental awareness and education of population. 	
<p>NEAP ELABORATION</p>	<p>CRITERIA FOR PRIORITY SETTING</p>	<ul style="list-style-type: none"> ● Health of population; ● State of environment, scale of pollution; ● Economic constrains; ● Requirements of legislation;
	<p>DATA ANALYSIS</p>	<p>Leading and sectoral agencies analyzed implementation of the previous programme and monitoring data for 5 years.</p>
	<p>PRIORITY SETTING METHOD</p>	<p>The method is not clear, and seems to be dependent only on available finance.</p>
	<p>OBJECTIVES AND TARGETS</p>	<ul style="list-style-type: none"> ● Improve management system in order to prevent further degradation of environmental conditions; ● Reduce water and air pollution; ● Rehabilitate environmental conditions (long-term);
	<p>ECONOMIC ANALYSIS</p>	<p>In-country economic constrains makes a such analysis very complicated. From the National Programme it is not clear why implementation of the Programme will be beneficial for economy and for potential investors.</p>
	<p>FINANCIAL RESOURCES</p>	<p>Main financial resources:</p> <ul style="list-style-type: none"> ● Payments by enterprises – pollutants; ● Extra-budgetary environmental fund; ● Budget subsidies; ● Minor part from bank credits and foreign investments
	<p>TIMETABLE AND REVISIONS</p>	<p>The order of minister with a list of dozens key measures, timetable and responsible agencies. Ministry of Environment prepares annual reports to Government on the measures undertaken.</p>
	<p>OBSTACLES</p>	<ul style="list-style-type: none"> ● Effective finance generation mechanisms are not introduced; ● Mechanism of creation of entry point for effective

		<p>involvement of Scientific Community, NGOs and Business and Industry Group is not developed;</p> <ul style="list-style-type: none"> • No references to experts/organizations made data analysis; • Environmental education and awareness is neither priority nor main objective • Very often objectives of governmental programmes do not coincide with priorities of local communities
IMPLEMENTATION AND RESULTS	POLICY REFORMS	<ul style="list-style-type: none"> • 20 legal drafts prepared, 10 approved, • tax for use of natural resources introduced, • system of ecological expertise and licensing introduced, <p>but, unfortunately, mentioned above policy reforms do not result in improvement of environment and do not generate additional financial resources specifically for environment. Often internal financial resources for environment are used for resolving in-country economic and social problems.</p>
	INSTITUTIONAL STRENGTHENING	Extra-budgetary funds established; project preparation unit set up, but all this under strong state control. Shift more responsibility and empowerment from Government to NGOs, Scientific Community is not a priority at the moment. No essential institutional reforms yet.
	INVESTMENTS	According to official data 2% of DGP had been spent on the environment, specifically for priority projects related to water, wastes and radiation problems. External investments are not involved.
	GENERATION INTERNAL RESOURCES	Mechanism for generation of internal human and financial resources for national environmental benefits is not defined. No activity to attract interest of Major Groups, especially, Business and Industry Group to national environmental programmes and projects.
	CHANGE IN ENVIRONMENTAL CONDITIONS	Mostly improvement of environment is due to economic recession. Current monitoring data are not sufficient to evaluate qualitatively changes in environmental conditions. On local level, where major stakeholders are interested in improving environment, implementation of the National Programme is much better.
	OBSTACLES	<ul style="list-style-type: none"> • Insufficient implementation of laws and regulations; • Lack of capacity to match resources and needs; • Lack of environmental industry and effective infrastructure; • Lack of appropriate system for improvement of management skills; • Government often does not consider NGOs as one of sources of qualified personnel.

MOLDOVA

KEY EVALUATION ELEMENTS	EVALUATION
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STATUS and OBJECTIVES	TYPE OF DOCUMENT(S)	National Environmental Action Plan (NEAP) for 1996 – 1998 approved by June 7, 1996
	DATE OF ADOPTION	
	LEVEL OF ADOPTION	Government approval in June 1996. Parliament didn't discuss and adopt the NEAP.
	MAIN GOAL(S)	Improve planning and identify priorities; development of appropriate legislation, involve stakeholders; integrate environment in sectoral programmes; mobilize financial resources
PROCESS	LEADING AGENT (S)	NEAP Implementation Office and Strategy and Programmes Division at Ministry for Environmental Protection
	PARTICIPATION BY MAJOR GROUPS (STAKEHOLDERS)	Consultation process mainly with other ministries and regions. Very weak involvement of Local Authorities. Academic institutions were involved through the working groups; NGOs were invited to participate in several seminars but they weren't involved in the process as key actors. No involvement of Business and Industry Group.
	SECTORAL INTEGRATION	Other ministries partially included recommendations the NEAP in their programmes. The NEAP do not fully coordinate with other sectoral programmes due to economic constraints.
	ROLE OF EXTERNAL SUPPORT	NEAP development was supported by World Bank and UNDP. External support was also in form of bilateral experts assistance for the preparation and implementation of measures related to NEAP (Takis) . External investments into environmental programs are very limited. Without further external financial support NEAP can not be effectively implemented and integrated in sectoral policies.
	OBSTACLES	<ul style="list-style-type: none"> ● Poor involvement of NGOs, Local Authorities and other Major Groups into NEAP process; ● Lack of procedure for NGO involvement; ● Lack of finances; ● Inadequate legislation base and tax system; ● Weak coordination between ministries and other organizations; ● Low information and experience exchange; ● Low environmental awareness and education of population
NEAP ELABORATION	CRITERIA FOR PRIORITY SETTING	<ul style="list-style-type: none"> ● Health of population; ● Productivity of national economy; ● Changes of quality of environment.
	DATA ANALYSIS	Within analysis the data from ministries and sectoral agencies on state of environment and health had been taken into account. Often the data were in contradiction with statistical data. In this case assessments by experts had been made.

	PRIORITY SETTING METHOD	Experts assessment on water quality as the top priority, land erosion, air pollution, biodiversity and wastes.
	OBJECTIVES AND TARGETS	The NEAP has only objectives, targets are not defined. Objectives of NEAP: development of qualitative targets for policy and institutional areas, quantitative media specific targets. Most of NEAP measures provide only political framework for development of media specific targets taking into account available capacities.
	ECONOMIC ANALYSIS	No economic analysis. From the National Programme it is not clear why implementation of the NEAP will be beneficial for economy and for potential investors.
	FINANCIAL RESOURCES	Main financial resources: <ul style="list-style-type: none"> • Very low state budget subsidies; • Minor part from bank credits and foreign investments • Major part of the NEAP is supported by external financial sources.
	TIMETABLE AND REVISIONS	Ministry of Environment prepares annual report to Government on the measures undertaken within NEAP. Activities within NEAP are linked to availability of funding on national and local level. No government responsibilities in relationships with NGOs and other Major Groups.
	OBSTACLES	<ul style="list-style-type: none"> • Effective finance generation internal mechanism is not introduced; • Mechanism of creation of entry point for effective involvement of Scientific Community, NGOs and Business and Industry Group is not developed; • Up to date management skills are necessary; • Environmental education and awareness is not a target; • Very often objectives of governmental programmes do not coincide with priorities of local communities
IMPLEMENTATION AND RESULTS	POLICY REFORMS	<ul style="list-style-type: none"> • 10 legal drafts prepared, 6 approved, • tax for use of natural resources introduced. <p>Undertaken policy reforms do not still result in improvement of environment and do not generate more internal financial resources specifically for environment. Very often internal financial resources for environment are used for resolving in-country economic and social problems.</p>
	INSTITUTIONAL STRENGTHENING	NEAP Implementation Unit and Environmental Unit at the Cabinet set up. Department for Environmental Protection was raised to Ministry status. Shift more responsibility from Government to NGOs, Scientific Community is not a priority at the moment. Several ministries assigned unit/person responsible for environment. No institutional reforms on local level.
	INVESTMENTS	Mainly external investments:

	<ul style="list-style-type: none"> • 7 projects on technical assistance; • 4 investment projects financed by credits by GEF, UNDP, Taxis, other programs) with limited support from national and municipal budgets
GENERATION INTERNAL RESOURCES	Mechanism for generation of internal human and financial resources for national environmental benefits is not defined. No activity to attract interest of Major Groups, especially, Business and Industry Group to national environmental programmes and projects.
CHANGE IN ENVIRONMENTAL CONDITIONS	SOx, NOx reduction due to use of gas, reduction of pesticides use due to stronger control and higher prices. About 1/3 reduction of use and contamination of water due to economic constrains. Current monitoring data are not sufficient to evaluate qualitatively changes in environmental conditions.
OBSTACLES	<ul style="list-style-type: none"> • Insufficient implementation (fulfilling) of laws and regulations; • Lack of capacity to match resources and needs; • Absence of shifting responsibility and empowerment from Government to NGOs and other Major Groups; • Lack of environmental industry and effective infrastructure; • Lack of appropriate system for internal resources generation and improvement of management skills.

RUSSIAN FEDERATION

KEY EVALUATION ELEMENTS		EVALUATION
STATUS and OBJECTIVES	TYPE OF DOCUMENT(S)	Action Plan of the Government (APG) for 1996-1997 exists only. National Environmental Action Plan (NEAP) for 1998 – 2000 is under development.
	DATE OF ADOPTION	
	LEVEL OF ADOPTION	APG - Government approval. Not sufficient political support of NEAP on highest governmental level and by Parliament.
	MAIN GOAL(S)	<ul style="list-style-type: none"> • Health and biodiversity protection; • Minimize economic losses according to the National Strategy for Sustainable Development.
PROCESS	LEADING AGENT (S)	Department on Environmental Programmes for the State Committee (FORMER MINISTRY) of Environment. No special unit for NEAP development and implementation.
	PARTICIPATION BY MAJOR GROUPS	Consultation process with other ministries and regions. Academic institutions are involved through the working

	(STAKEHOLDERS)	groups; NGO representatives are members of Interagency Commission on NEAP development. NGOs aren't still a key actors within NEAP development. Poor involvement of Business and Industry Group.
	SECTORAL INTEGRATION	It is planning to link NEAP with the National Strategy for Sustainable Development and to include its objectives in programmes of other ministries and agencies..
	ROLE OF EXTERNAL SUPPORT	No external financial support for NEAP. External support is only in form of experts assistance for the preparation and implementation of measures related to NEAP (Center for Project Preparation and Implementation (CPPI), Tacis) . External funding is provided for Regional EAPs (the World Bank and the US through CPPI). External investments into environmental programs are very limited. Without further external financial support NEAP can not be effectively implemented and integrated in sectoral policies.
	OBSTACLES	<ul style="list-style-type: none"> • Not sufficient financing; • Weak coordination between ministries and agencies; • Low information and experience exchange; • Low environmental awareness and education of population.
NEAP ELABORATION	CRITERIA FOR PRIORITY SETTING	<ul style="list-style-type: none"> • Health of population; • Influence on inhabitation environment; • Prevention of economic losses.
	DATA ANALYSIS	The data from ministries and sectoral agencies on state of environment and health. Extensive analysis based on State of Environment Reports.
	PRIORITY SETTING METHOD	Selecting major urgent problems from 41 programmes and key national projects. The main difficulty is the size of country and the diversity of regional and local environmental problems.
	OBJECTIVES AND TARGETS	Defined in a very general form
	ECONOMIC ANALYSIS	Lack of cost-benefit analysis.
	FINANCIAL RESOURCES	<p>Expected financial resources:</p> <ul style="list-style-type: none"> • Payments for natural resources use and pollution; • Extra-budgetary environmental fund; • Budget subsidies; • External financial support.
	TIMETABLE AND REVISIONS	Timetable is available
	OBSTACLES	<ul style="list-style-type: none"> • Effective finance generation internal mechanism is not introduced; • Entry points for involvement of NGOs and Business and Industry Group is not defined;

		<ul style="list-style-type: none"> • Up to date management skills are necessary; • Environmental education and awareness is not a target; • Often objectives of governmental programmes do not coincide with priorities of local communities
IMPLEMENTATION AND RESULTS	POLICY REFORMS	<ul style="list-style-type: none"> • New laws on wildlife and certification; • Regulations for ozone depleting substances and toxic wastes transportation; • Increased application of environmental expertise; • Kyoto obligations. <p>Undertaken policy reforms do not still result in essential improvement of environment and do not generate more internal financial resources specifically for environment. Very often internal financial resources for environment are used for resolving in-country economic and social problems.</p>
	INSTITUTIONAL STRENGTHENING	Center for Project Preparation and Implementation set up. Shift more responsibility and empowerment from Government to NGOs, Scientific Community is not a priority at the moment. Regional and Local Programmes launched, but no essential institutional reforms on local level.
	INVESTMENTS	Mostly internal financing of NEAP. Regional EAPs funded by the World Bank and the US through CPPI.
	GENERATION INTERNAL RESOURCES	Mechanism for generation of internal human and financial resources for national environmental programmes is not defined. No practical steps to attract interest of Business and Industry Group to national environmental programmes and projects.
	CHANGE IN ENVIRONMENTAL CONDITIONS	Difficult to estimate contribution of NEAP
	OBSTACLES	<ul style="list-style-type: none"> • Insufficient implementation of laws and regulations; • Lack of capacity to match resources and needs; • Lack of coordination between ministries and other stakeholders; • Weak environmental service center; • Lack of capacity for self-development.

TADJIKISTAN

KEY EVALUATION ELEMENTS		EVALUATION
STATUS and OBJECTIVES	TYPE OF DOCUMENT(S)	State Environmental Programme for 1997 - 2007. Special document titled as National Environmental Action Plan does not exist. Tadjikistan is not involved into Environment for Europe process yet.
	DATE OF ADOPTION	

	LEVEL OF ADOPTION	Government approval. Low political support of NEAP on highest governmental level and by Parliament
	MAIN GOAL(S)	
PROCESS	LEADING AGENT (S)	Ministry of Environmental Protection
	PARTICIPATION BY MAJOR GROUPS (STAKEHOLDERS)	Very low involvement.
	SECTORAL INTEGRATION	The State Environmental Programme do not coordinate with plans of other ministries and agencies.
	ROLE OF EXTERNAL SUPPORT	No external support for NEAP.
	OBSTACLES	<ul style="list-style-type: none"> • NGOs and other Major Groups are not involved in consultation process; • Lack of finances; • Inadequate legislation base; • Low information and experience exchange; • Low management skills; • Low environmental awareness and education of population.
IMPLEMENTATION AND RESULTS (for State Environmental Programme)	POLICY REFORMS	Adopted environmental laws do not work
	INSTITUTIONAL STRENGTHENING	Very weak environmental institutions.
	INVESTMENTS	No external and internal environmental investments.
	GENERATION INTERNAL RESOURCES	N/a
	CHANGE IN ENVIRONMENTAL CONDITIONS	N/a
	OBSTACLES	<ul style="list-style-type: none"> • Insufficient implementation of laws and regulations; • Lack of capacity to match resources and needs; • Weaken environmental institutions and infrastructure; • Lack of appropriate system for improvement of management skills; • No government responsibility in relationship to Major Groups.

UKRAINE

KEY EVALUATION ELEMENTS		EVALUATION
STATUS and OBJECTIVES	TYPE OF DOCUMENT(S)	"Main Directions of the State Policy in Field of Protection of Environment and of Use of Natural Resources and Environmental Safety" approved by Cabinet in 1997 and

		<p>Parliament on March 5, 1998. Ukraine currently follow an incremental policy development approach: injection of some EAP elements into the traditional environmental policy planning and capacity building in "hot spots". Government and NGOs approach to NEAP development and vision of NEAP structure were differing. In NGO opinion "Main Directions..." is a political document and for implementation of its objectives into practice it is necessary to develop Regional Environmental Action Plans and, in parallel, NEAP of Ukraine. At the moment, majority of elements of the NEAP structure, which was proposed by NGOs within SOFIA+3 project, are acceptable for Ministry of Environmental Protection and Nuclear Safety of Ukraine.</p>
	DATE OF ADOPTION	
	LEVEL OF ADOPTION	Cabinet approval in 1997, Parliament approval on March 5, 1998.
	MAIN GOAL(S)	<ul style="list-style-type: none"> ● Address environmental problems in "hot spots" ● Create environmental policy framework; ● Formulate long-term environmental policy; ● Formulate priorities and objectives.
PROCESS	LEADING AGENT (S)	Ministry of Environmental Protection and Nuclear Safety of Ukraine.
	PARTICIPATION BY MAJOR GROUPS (STAKEHOLDERS)	<p>Top-down consultation and approval process with other ministries and regions. Mechanism of involvement of Local Authorities and Scientific Community is not clearly defined. To promote NGOs involvement into formulating environmental policy the NGO Environmental Council to the Ministry had been established. Nevertheless, because of lack of appropriate legal procedure the NGOs still do not actively participate in the NEAP process. Poor involvement of Business and Industry Group.</p>
	SECTORAL INTEGRATION	Three rounds of consultations and "top – down" formal approval by the ministries. Sectoral integration is weak.
	ROLE OF EXTERNAL SUPPORT	<p>No external financial support for NEAP. External support is only in form of experts assistance for the projects preparation and policy development (the World Bank, UN/ECE, Tacis) . External funding is provided for several Regional EAPs (the World Bank and the US). External investments into environmental programs are very limited. Without further external financial support NEAP can not be effectively implemented and integrated in sectoral policies</p>
	OBSTACLES	<ul style="list-style-type: none"> ● NGOs and other Major Groups are not involved in NEAP process as key actors within environmental policy development, planning and implementation; ● Lack of legal procedure for NGO involvement; ● Lack of finances; ● Insufficient legislation base to identify entry points for NGOs; ● Low information and experience exchange; ● Low environmental awareness and education of

		population
NEAP ELABORATION	CRITERIA FOR PRIORITY SETTING	<p>No references to mechanism for criteria development.</p> <p>"Hot spot" level criteria:</p> <ul style="list-style-type: none"> ● Health of population; ● Radioactive contamination; ● Water and air quality; ● Land contamination and wastes; ● Economic effectiveness of measures.
	DATA ANALYSIS	Expert assessment based on State of Environment Reports and "hot spot" health and environment data.
	PRIORITY SETTING METHOD	<p>The method used within experts assessment is not clear. Assessment had been made by the Ministry of Environmental Protection, other Ministries, Cabinet, Parliament Committee, National Commission on Sustainable Development, Academy of Sciences. No involvement of NGOs and Business and Industry Group into experts assessment. The following priorities are defined:</p> <ul style="list-style-type: none"> ● Nuclear safety; ● Drinking water supply; ● Industrial pollution and waste generation.
	OBJECTIVES AND TARGETS	"Main Directions" include 15 long-term objectives. This is one of reasons why NGOs consider Main Directions as political document, but not as NEAP. It is difficult to identify several major objectives and short-time targets.
	ECONOMIC ANALYSIS	No economic analysis in Main Directions. Methodology for economic analysis is not defined or developed yet .
	FINANCIAL RESOURCES	<p>Main financial resources:</p> <ul style="list-style-type: none"> ● Payments by enterprises – pollutants and for use of natural resources; ● Budget subsidies. <p>Internal financial resources, which must be used for environment still are used for resolving in-country economic and social problems.</p>
	TIMETABLE AND REVISIONS	NO timetable. Ministry of Environmental Protection prepares annual reports for Government on the measures undertaken within available financing. Revisions: no government responsibilities in relationships with NGOs and other Major Groups is formulated.
OBSTACLES	<ul style="list-style-type: none"> ● Effective finance generation mechanisms are not introduced; ● Mechanism of creation of entry point for effective involvement of Scientific Community, NGOs and Business and Industry Group is not developed; ● No references about what experts/organizations made data analysis; 	

		<ul style="list-style-type: none"> Objectives of governmental programmes often may not coincide with priorities of local communities
IMPLEMENTATION AND RESULTS	POLICY REFORMS	Policy reforms are not visible. Undertaken policy reforms do not work properly and do not result in improvement of environment
	INSTITUTIONAL STRENGTHENING	No unit for NEAP/REAP development and implementation is set up. Shift more responsibility from Government to NGOs, Scientific Community is not a priority at the moment. Changes in structure of Ministry are mostly related to efficiency of use of available finances. Mandates enlarged to include nuclear and industrial safety issues. Poor institutional reforms in relationship with NEAP.
	INVESTMENTS	Investments are not involved because appropriate mechanism is not developed.
	GENERATION INTERNAL RESOURCES	Mechanism for generation of internal human and financial resources is not developed. Poor activity to attract interest of Major Groups, especially, Business and Industry Group to national environmental programmes and projects.
	CHANGE IN ENVIRONMENTAL CONDITIONS	<ul style="list-style-type: none"> Increased amount of protected areas; Reduction of water consumption due to introduction of payments for water use; <p>Improvement of environment is mostly due to economic recession. Current monitoring data are not sufficient to evaluate qualitatively changes in environmental conditions.</p>
	OBSTACLES	<ul style="list-style-type: none"> Insufficient implementation of laws and regulations; Lack of capacity to match resources and needs to resolve environmental problem; Weak coordination between ministries and other stakeholders; Lack of environmental industry and capacity for self-development; Lack of appropriate system for improvement of management skills; Government still does not consider NGOs as one of sources of qualified personnel.

We also note with satisfaction, that the EAP Task Force working group involved the NIS NGOs to preparation of report on evaluation of the NEAP progress for Aarhus. We are glad, that the report turned out to be interesting, includes main successes, problems and tasks for the future. We are satisfied that a number recommendations of the NGOs are reflected in it.

At the same time, we wanted to underline especially a number of problems, which the NEAP process in the NIS countries has confronted:

- The ideas of the Environmental Action Plan for Central and Eastern Europe (EAP) have not received yet sufficient support in the NIS . To our mind, the international organizations and the national governments did not give this proper attention. Preparation of the Russian EAP issue was conducting for a long time (2 years), there was no sufficient its distribution on the NIS territory. The national seminars on presentation of the Russian issue of EAP in many cases passed formally. The various sectors of society representation was not supplied.
- As a result, the EAP ideas have not received proper political and public support in many NIS

countries.

- Practically in all NIS countries (except Kazakhstans and, possibly, Kyrgyzstan) the public informing and the involving it into the NEAP development process was insufficient. Neither the public organizations, nor mass media were not informed of the NEAP process properly.
- In majority of the NIS countries, with rare exception, the NEAP development was not integrated into the other national and sectoral programmes, especially to the National strategies of sustainable development.
- In spite of the fact, that many these problems were discussed at the Sofia Environment Ministers Conference in 1995, not all expressed ideas have turned into reality.

For successful development process in the future is necessary:

- To involve Tadjikistan and Turkmenistan into NEAP development process.
- NIS region countries should achieve the NEAP precise priorities, concrete action plans, the analysis of efficiency of the nature saving measures. The involving of all society sectors into the process of the NEAP development and implementation is necessary.
- To continue improvement of environmental planning and development of effective mechanisms of NEAP implementation.

We consider it expedient to prolong the mandate of the EAP Task Force and call the international organizations, and first of all, EAP Task Force:

- To continue the NIS assistance on effective environmental policy introduction, NEAP preparation and realization according to in-country necessities, with transference of this assistance in NIS countries directly.
- To improve EAP Task Force coordination with other organizations rendering the assistance to NIS countries in related directions (by the UN Development Program, World bank, Tacis etc.).
- To develop concrete instruments on EAP ideas propagation among the main society sectors (especially the higher governmental levels, nongovernmental organizations, members of the Parliament and business) and to help countries to involve them wider into the NEAP development and realization process.
- To help countries to integrate NEAPs objectives into the various state plans development, special attention to the National strategies of sustainable development.
- To help NIS countries in development of methodology for evaluation of effectiveness of environmental projects, including evaluation of economic losses as a result of doing nothing.

We call governments:

- To develop legal procedures for NGOs and other Major Groups involvement into the NEAP and other national programs development and realization.
- To strengthen use of internal resources for the NEAP realization and projects support.
- To create the favorable mechanism for private sector participation in the Local Environmental Action Plans development and realization.

3. Environmental financing in the NIS and the efficiency of the external assistance

The main part of the environmental investments in the NIS comes from the internal resources, however their absolute size remains on a very low level. Thus, the further assistance in development of mechanisms of the environmental projects financing is necessary for countries of NIS region, especially concerning internal resources mobilization.

As for the external NIS assistance for the environmental projects financing, it yet has not become the internal financing catalyst, as it was supposed earlier. Of course, because of economic constrains the NIS region needs in external financial assistance, but the rendering of the external assistance mechanisms require serious perfecting.

The streams of the assistance to NIS countries during the last years considerably have amplified. The set of cooperation programs within the international organizations, multilateral and bilateral agreements, funds, nongovernmental organisations is carried out. These programs vary on the purposes, scales and outcomes. The certain successes are reached for all this:

- the transfer of new knowledge and experience for ecological problems solution, necessary for operation in new conditions of transition to market economy and democratic society, takes place;
- many successful projects directed on environmental problems solution is realized; the programs of the civil society support have helped greatly in creation of environmental movement in the NIS, to increase its potential in the environmental decision making process, to create the information space both in NIS region and external relation with the world;
- in a number of the NIS countries (especially, in Ukraine) the United Nations Offices (UNDP) started to work with NGOs directly building partnership between NGOs and Governments.

At the same time, not all assistance programs are effective enough, that happens due to a number of the reasons:

- very often during the assistance programs development the priorities of the countries-recipients are not taken into account, the representatives of countries (both state institutions, and target groups) are not involved into the priority setting and planning process;
- the mismatching in the international organizations operations and duplication of their programs is observed;
- because of long bureaucratic procedures used for projects approval the assistance is out of time very often. For example, in a number of NIS countries the Tacis project "Development of Common Environment Policies in the NIS and Mongolia" has offered its assistance in the NEAP development, when in a number of countries the NEAP development process was close to completion (or already was finished) with the assistance of the World Bank. As a whole, the realization of this project started with a big delay and, as a corollary, a number of objectives of the project need to be revised to make the project effective and useful on the places;
- in the most cases almost all financial resources of international programs are spent for the foreign experts payment and purchasing equipment in the West. The foreign experts experience and knowledge is very useful for concrete programs development, however, they not always understand adequately a situation in the NIS region and, especially, on the places. Sometimes, because of non-adequate understanding of situation in the NIS region, the recommendations produced by the foreign experts are not always effective. At the same time a potential of local experts and advisers remains unused, but they, as a whole in the NIS, have a rather high professional level, have better orientation in the conditions of programs realization;
- in a number of cases there is no proper monitoring of the foreign advisers activity and of quality of the assistance provided within programs/projects realization;
- with general similarity of processes in the NIS the conditions difference grows, and this is not taken into account in the most cases of the international organizations activity;
- the deficit of the information about the specificity of the international financial institutions activity, about international organizations and assistance programs is observed;
- governments of a number of the NIS countries do not undertake proper efforts to promote increasing of the external assistance efficiency;
- the World Bank being active in the NIS do not undertake perceptible efforts towards working with NGOs and other Major Groups directly to make its projects more effective and comprehensive.

We call:

- the international organizations, assisting countries and the NIS countries in the partnership with Major Groups to analyze the efficiency of the international cooperation programs and to produce the recommendations on how to make them more effective;
- to undertake measures for improvement of the Projects Preparation Committee activity, because it not corresponds to needs of the NIS countries;
- to reconsider radically the EU Tacis Program procedures and activity and to modify the Program according to the needs of the NIS countries.

4. Factors which obstacle effective involvement of NGOs into NEAP process

1. Lack of finance and capacities both in Governments to involve NGOs and in NGOs to initiate

their involvement.

2. NGOs, Governments and Local Authorities see their role in developing of NEAPs in different ways. Government does not consider NGOs as one of key actors within NEAP elaboration and implementation. Effective mechanism and clear procedures for NGO involvement are not elaborated.
 3. Lack of adequate skills on places.
 4. Confusing empowerment with power and participation with enforcement.
 5. Economic crisis causes people to focus on basic livelihoods versus participation.
 6. Insufficient implementation of laws and regulations. "Every-day" changes in legislation.
 7. No tax exemptions for NGOs and, as a result, big administrative expenses even for environmental projects management.
 8. Undeveloped systems (infrastructure) for sharing information and skills.
 9. No long term planning of the NGO common efforts.
 10. Civil society is not a priority for Government in transition period.
 11. State institutions are not interested yet in creation environment enabling the NGOs and other Major Groups involvement.
 12. No Government "responsibility" in relationship with the involvement of NGOs.
 13. Predominance of NGO own corporate interests. Inadequate attention to broad, objective needs.
 14. Unhealthy competition between NGOs for scarce resources.
 15. Cultural and historical factors very often constrain growth and empowerment of NGOs:
 - skepticism of concrete impact/intention of participation,
 - lack of political culture of society,
 - people don't communicate,
 - old wine in new bottles; transition of old laws into new conditions.
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5. NGO Common Agenda for the Future benefits of the Environment for Europe process

The NGO Common Agenda for the Future comprises propositions of NGOs made within the SOFIA+3 Project as a result of analysis of questionnaires, which had been filled and submitted to the OGI by about forty NGOs from the NIS. The following 12 items were proposed to be put in the Agenda:

1. Increase use of participatory approaches within NEAP/LEAP elaboration and implementation.
 2. Strengthening NGO capacities to mobilize resources for NGOs participation as one of key actors in the NEAP/LEAP development.
 3. Strengthening NGO contribution to training and education for NEAP/LEAP benefits.
 4. Create the NGO consulting and resource centers to promote elaboration and development of LEAPs. Collect methodologies and NEAP/LEAP success stories. Establish the Environmental Action Plans learning network.
 5. Promote increasing flow of resources for NGOs and communities working for environmental policies development on national and local levels.
 6. Development of sustainable, effective mechanisms for partnership between governments and NGOs within NEAP/LEAP process.
 7. Enhancement of cooperation between NGOs, private sector and other groups of society within cooperative projects for national and local environmental benefits.
 8. Enable NGO participation in national and local planning.
 9. Gain support from politicians for NGO participation in environmental decision-making.
 10. Lobbying enabling legislation including tax incentives for the environmental NGOs.
 11. Building NGO capacity for increased empowerment at the local level, fostering relationship between NGOs and Local Authorities.
 12. Put into practice ongoing assessment, evaluation of cooperative Government - NGO activity within environmental decision-making on national and local level.
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6. AFTERWORD

The OGI together with NGOs – participants of the SOFIA+3 Project express gratitude to

- **the Regional Environmental Center for Central and Eastern Europe (Szentendre, Hungary);**
- **International Renaissance (Soros) Foundation;**
- **ISAR (the West NIS Office)**

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- **the Tacis Awareness Raising Programme** for promoting dissemination of information on results of the SOFIA+3 Project among mass-media

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