



EUROPEAN UNION

DELEGATION TO UKRAINE

Ambassador, Head of Delegation

Kyiv, 8 October 2010
SD/ /D(10) / 2522

Dear Ms Holovko,

Subject: Request of CEE Bankwatch Network/ National Environment Centre of Ukraine (NECU)

Thank you very much for your letter of 22 September 2010 concerning the execution of budget support in the sectors of transport development and environmental protection in Ukraine that are to be implemented in the framework of the European Neighbourhood and Partnership Instrument.

We would like to reassure you that the Commission follows closely the measures undertaken by Ukraine to consult NGOs on national strategies in both sectors. The Commission will actively continue its dialogue with Ukraine to encourage improvement of communication with civil society, including during the implementation of the budget support programme.

As far as the transport sector is concerned, the Draft National Transport Strategy was published on the web-site of the Ministry of Transport and Communications of Ukraine according to Ukrainian legal requirements for public consultations. The Ministry received a number of comments, which were taken into consideration during the finalisation of the draft strategy as we have been informed by the representatives of the Ministry. Furthermore, the Minister of Transport and Communications initiated consultations on the Draft Strategy with professional unions in each transport sub-sector. Such consultations were concluded in July 2010 before submission of the Draft Strategy to the Cabinet of Ministers. We may, therefore, conclude that there were wider discussions with civil society on Draft Transport Strategy of Ukraine than is envisaged by Ukrainian legislation.

The Commission also welcomes the Ukrainian initiative to incorporate numerous environmental issues in the Draft National Transport Strategy. Among environmental principles mentioned in the Draft Strategy are priority of environmental safety, strong compliance with environmental standards and regulations in transport activities; prevention of environmental pollutions and adverse impact on human health that arise from rapid motorisation of city transport; implementation of the economic mechanism of environmental management and protection based on the principle of "polluter pays"; enforcement and strengthening of existing international regulations on all transport modes for the carriage of dangerous goods; and stimulation of the priority development of energy saving and environmentally friendly modes of transport and intermodal technologies. Stimulation of sustainable development of transport giving priority to the environmentally friendly and energy efficient modes of transport and development of public passenger transport as an alternative to the use of the private car are listed as among priorities of the transport development in the country.

As it is widely agreed Ukraine needs a comprehensive transport strategy and the Draft Strategy that is currently submitted to the Cabinet of Ministers for approval is a first big step. We agree that this document needs still to be improved, and we will continue to provide assistance to help our Ukrainian partners to address numerous issues in transport sector as well as support strategy implementation through technical assistance and sector budget support operations.

With regard to the environmental protection sector, the Commission is aware of the reported shortcomings in the public consultations process on the National Environmental Strategy of Ukraine. Since we insisted that the strategy should be developed in an open and transparent fashion, taking account views of all stakeholders, we have requested and received reassurances that these shortcomings would be adequately addressed.

As you may know, the draft Strategy was sent back from the Cabinet of Ministers because of complaints by a group of NGOs that there had been lack of public consultations. Subsequently consultations took place and the Ministry of Environment confirmed that comments had been received and were available on their website. The Ministry also confirmed that a hearing had been held with NGOs during the review of the Strategy by the respective Parliamentary Committee.

Taking into account interests of various stakeholders and striving to ensure a transparent and open process of the strategies' development are conditions for the EU sector support programme to be established. They will continue to be preconditions for further disbursement of funds. In addition, the Commission will actively continue its dialogue with Ukraine aimed at promoting ambitious and robust measures to combat climate change.

If you have any further issues to raise or any questions to ask concerning sector budget support operations in Ukraine, please do not hesitate to contact us

Yours sincerely,



Jose Manuel Pinto Teixeira

cc : Mr. H. Mingarelli, Mr A. Januszewski

Ms. I. Holovko
National Coordinator for Ukraine
National Environmental Centre of Ukraine (NECU)
CEE Bankwatch Network\
Na Rozcesti 1434/ 6
190 00 Praha 9 – Liben
Czech Republic
iryna@bankwatch.org