

Appeal of the Eastern Partnership Civil Society Forum - Georgian National Platform member organizations to the Government of Georgia regarding ensuring elimination of inconsistencies identified in the 2017 National Action Plan for the Implementation of the EU-Georgia Association Agenda

The Office of the State Minister of Georgia on European and Euro-Atlantic Integration has submitted the updated environmental section of the 2017 National Action Plan for the Implementation of the EU-Georgia Association Agenda to the Eastern Partnership Civil Society Forum - Georgian National Platform member organizations for comments. This updated environmental section of the Action Plan is not consistent with national action plans for previous years, specifically obligations related to forestry governance are missing.

According to the statement of the Ministry of Environment and Natural Resources Protection of Georgia, "the forestry related commitments are captured in DCFTA section of the EU-Georgia Association Agreement, for which a special plan is to be developed under the guidance of the Ministry of Economy and Sustainable Development of Georgia. 2017 National Action Plan for the Implementation of DCFTA containing environmental actions including those in the forestry sector has been already approved".

The forestry sector cannot be considered only from a narrow view of "promotion of trade in timber products", since such approach does not take into account important environmental commitments undertaken by the country through the Association Agreement, which cannot be implemented without reforming the forestry sector and sustainable forest management required by the Road Map for EU approximation. E.g., when high conservation value forests are being cut, cutting areas are often allocated on sliding slopes and after all that only 30-35% of the demand on forest resources can be satisfied legally, creation and maintenance of Emerald Network, the candidate and potential sites of which are mainly forestlands, will not be realistic.

Moreover, the inconsistencies between the state policy documents and the removal of the whole sector that was included in previous plans and reports, leave an impression of deviation from the EU-Georgia Association Agenda and give the first alarming signs regarding the implementation of the Association Agreement.

Specifically,

- 2017 National Action Plan for the Implementation of the EU-Georgia Association Agenda which was supposed to flow organically from action plans for previous years, is not consistent with these documents and the forestry sector is no longer mentioned in it;
- "Development of the final version of the Forest Code" as stipulated in the 2017 National
 Action Plan for the Implementation of DCFTA contradicts to the Report on Implementation
 of 2016 National Action Plan, according to which "the final version of the Forest Code has
 been already developed";

- Both 2017 National Action Plan for the Implementation of the EU-Georgia Association
 Agenda and 2017 National Action Plan for the Implementation of DCFTA are inconsistent
 with the Roadmap for the implementation of the EU-Georgia Association Agreement in the
 fields of environment and climate action, according to which the majority of interim
 indicators and final results of the forestry sector have to be reached in 2017'
- The submitted documents do not mention the National Program on Firewood Consumption, which according to the Roadmap has to be approved and published in 2017;
- It is important to note, that the legal framework for the forestry sector and National Program on Firewood Consumption have been developed within the framework of multimillion EU-funded FLEG II Program;
- Non-fulfilment of commitments undertaken by Georgia under the projects being implemented under the aegis of the EU integration or postponing their implementation puts at risk the partnership relations with the EU and its member states;
- The Ministry of Environment and Natural Resources of Georgia works in isolation at a time
 when the realignment of the sector and the alleviation of existing energy and social pressure
 on forests go beyond the competences of a single ministry and require close interagency
 dialogue, including cooperation in the framework of the implementation of the Association
 Agreement;
- We would also like to know how the participation of public, including the Eastern Partnership Civil Society Forum - Georgian National Platform was ensured in the development of the environmental section of the 2017 National Action Plan for the Implementation of the EU-Georgia Association Agenda.

We consider, that the submitted document creates risks to the implementation of the EU-Georgia Association Agreement and therefore, call upon the Government of Georgia to suspend the approval of the document until the Ministry of Environment and Natural Resources of Georgia ensures its consistency with the previous documents and the Roadmap for the implementation of the EU-Georgia Association Agreement in the fields of environment and climate action.

Signatory organizations:

- 1. Caucasus Environmental NGO network (CENN)
- 2. Europe Foundation
- 3. Rondeli Foundation
- 4. Liberal Academy Tbilisi
- 5. Institute for Development of Freedom of Information (IDFI)
- 6. World Experience for Georgia (WEG)
- 7. Energy Efficiency Center Georgia
- 8. Foundation "Caucasus Environment"
- 9. The Greens Movement of Georgia
- 10. Human Rights Centre
- 11. Youth Alternative
- 12. Friedrich Ebert Stiftung
- 13. Levan Mikeladze Foundation
- 14. Union "Article 42 of the Constitution"
- 15. Biological Farming Association "Elkana"
- 16. "School-Family-Society" Association
- 17. Free Choice
- 18. Public Advocacy
- 19. Association of Tea Producers Georgia "Georgian Tea"
- 20. New Generation for Democratic Georgia
- 21. Railway Workers New Trade Union
- 22. Civil Society and Democracy Development Center
- 23. Association "Imedi"
- 24. Research-Intellectual Club "Dialogue of Generations"
- 25. International Organization of Human Rights protection and Prisoners social welfare
- 26. Women's Information Centre
- 27. Georgian Association "Woman in Business"
- 28. Association DEA
- 29. Women Enterprise" Fund Georgia
- 30. Cultural-Humanitarian Fund "Sukhumi"
- 31. Repatriates' Union
- 32. Women's Political Resource Center
- 33. Studio "Re"
- 34. Energy Efficiency Foundation
- 35. Imereti Union of Science "SPECTRI"
- 36. Teachers' Union "Education and Universe"
- 37. Bridge of Friendship Kartlosi
- 38. Civil Development and Human Rights Center
- 39. Save The Future Generation
- 40. Association "Atinati"
- 41. Association "Toleranti"
- 42. Association for the Farmers' Rights Defence
- 43. Enterprise Innovation Development Center
- 44. Rural Communities Development Agency
- 45. International Center for Environmental Research
- 46. Peaceful and Business Caucasus

- 47. Georgia International Development Agency
- 48. IDP Association "Consent"
- 49. Association "Psychea"
- 50. Helsinki Citizens' Assembly Georgian National Committee
- 51. Georgian foundation for strategic and international studies
- 52. Rural Communities Development Agency
- 53. RCT/Empathy
- 54. Non-entrepreneurial (Non-commercial) Legal Entity Business and Economic Development Center