



**Republic of Serbia
MINISTRY FOR
ENVIRONMENTAL PROTECTION**

No. 337-00-129/2018-08

Date: 5 September 2018

22-26 Nemanjina St.

Belgrade

**MINISTRY OF THE ENVIRONMENT OF
THE REPUBLIC OF ESTONIA**

Mr. Siim Kiisler,

Minister of the Environment

President of the UN Environment Assembly

*Narva mnt 7a
15172 Tallinn
Republic of Estonia*

Dear Mr Kiisler,

The Ministry of Environmental Protection of the Republic of Serbia greatly appreciates your efforts as the President of the UN Environment Assembly to provide a platform for discussions about the promotion of innovative solutions in environmental protection and sustainable production and consumption, which are to be held during the Fourth Session of the UN Environment Assembly (UNEA-4) in March 2019, in Nairobi.

I would like to thank you for the Draft ministerial declaration. The Ministry of Environmental Protection of the Republic of Serbia and the Serbian Environmental Protection Agency, as a state body within the Ministry of Environmental Protection of the Republic of Serbia, has reviewed the documents received and hereby offers the following comments and suggestions:

In terms of the initiative for the finalization of the EU Strategy for a non-toxic environment – which includes a special aspect on the intensification of activities concerning the strengthening of the safe handling of chemicals policy as one of the three pillars of the EU's 7th Environment Action Programme - launched by the ministers of environmental protection of nine EU Member States, as well as towards facilitating and establishing circular economy elements, the Republic of Serbia undoubtedly supports the Strategy for a non-toxic environment drafting initiative, particularly as finding solutions to key chemical handling issues would become a priority: protection and control of use of nanomaterials and their release into the environment; exposure to endocrine disruptors; exposure to combined adverse effects of chemicals on human health and the environment, as well as mineralization of chemical substances harmful to human health and the environment.

We propose the below sentence be added to the Draft ministerial declaration, in the section corresponding to Priority 2:

Continue with maximizing the benefits of air quality management in order to promote progressive reduction of air pollution and reduce significant negative impacts of anthropogenic air emissions on the environment and human health.

Additionally, we propose that item 9 of Priority 2 of the Draft ministerial declaration be amended, to read as follows:

Commit to accelerate the implementation of Aichi Targets and consider a new time frame going beyond 2020, to halt biodiversity loss and improve the health of the world's ecosystems.

Establishing a precise and clear mechanism for monitoring and reporting on state of the environment as first priority in the implementation of the declaration is very important from the aspect of work of Serbian Environmental Protection Agency as a state body in charge for these activities in Serbia. Reporting as a part of Environmental monitoring system in every country need to include also climate change monitoring and need to be harmonized on the global level, but developing of global core set of indicators for monitoring of every environmental issue have a highest priority in this process. The best example is set of UN SDG indicators used on global level.

We want to stress that that additional work should be done on the establishment of a reporting system related to industrial and communal pollution, such as emissions into air and water, waste generation and management and all similar issues, which, in our opinion, are not sufficiently well implemented globally. There are various mechanisms for reporting on environmental polluters, but it is necessary to emphasize the role of PRTR protocol of the Aarhus Convention, as a very powerful tool for this kind of reporting. PRTR protocol is already being applied officially in 36 countries, but there are a big number of countries, such as EECCA countries which want to apply this tool in their environmental legal systems.

We want to emphasize the need for establishing a global monitoring system in a transboundary context, in particular transboundary air and surface waters pollution. The good example is system developed on the regional level in JRC Ispra, as Danube regional level monitoring system. But very important mechanism which is not established is real time transboundary monitoring of waste movement, especially hazardous waste movement. This tool need to be apply, first of all, in order to prevent disappearance of waste during the transport from country to country. Serbian Environmental Protection Agency planned to establish such a project with one of neighbouring countries for hazardous waste and secondary raw materials movements on real time and on truck level.

Transition existing mode of industrial production toward circular economics and application of LCA is very important for future economic growth, new jobs, as well as social aspect of human living. Through this activities it is necessary to promote two principles – “Waste is not waste, but a set of new industrial resources” and “Need for eliminate the idea of waste”. Using these principles introduction of circular economy in industrial facilities will be much economically feasible. SEPA has already actively participated in the promotion of the circular economy and the development of system of information exchange in this area.

It is also very important to establish a comprehensive system for dissemination data and information about state of Environment in every country at all levels - state, regional and local, intended for everyone from decision-makers in Governments to residents, NGOs and interested public. Serbian Environmental Protection Agency works very hard on the dissemination of information in electronic form, but also in the form of general and sectoral annual reports covering most of the Environmental areas.

With hopes of establishing a successful cooperation by achieving the desired outcomes of the consultations which will lead to the adoption of the Strategy during UNEA-4, I hereby express my support of the joint efforts, otherwise one of the priorities shared by all the ministers of environmental protection.

Sincerely yours,


MINISTER
Goran Trivan