

**From:** Mara Silina  
**Sent:** 30 November 2012 12:40  
**To:** Fiona Marshall  
**Subject:** a few comments on Recommendations on PPDM

Dear Fiona,

I hope you are fine. Please find below a few general comments on the Recommendations on PPDM. The European ECO Forum has made its comments earlier already and we did it also at the PPDM meeting in October. Please let me know if you want this to be in a pdf format for posting on the website. I can make it together with our earlier comments.

**Comment 1** – there is a great dis-balance between the recommendations regarding Article 6,7 and 8. We would suggest to reorganize the whole document in a way that it gives:

- a. General recommendations which would apply to all three articles of the Convention
- b. Specific recommendations applying to each individual article 6,7 and 8

**Comment 2** – recommendations for Article 8 should clearly indicate the beginning and the end of the public participation process based on the very first drafts of the proposed legislative act and have a clear indication of different methods and tools to be used (open consultations, web based templates, public hearings, stakeholder consultations etc.)

**Comment 3** – on a general character of Recommendations. Recommendations should be user-friendly, in an easy to understand language thus they can be used by different stakeholders. It is important that they are clear and strong in order to avoid any misinterpretation or misunderstandings when using them.

That's it this time.

Best regards, Mara

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**Mara Silina**

Aarhus and Enlargement Programme Coordinator  
Co-chair of the Coordination Board and  
Public Participation Campaign Coordinator of the European ECO Forum

**EEB, BOULEVARD WATERLOO 34, 1000 BRUSSELS, BELGIUM**

**Tel:** +32 (0) 2289 1305 | **Fax:** +32 (0) 289 1099 | **Email:** [mara.silina@eeb.org](mailto:mara.silina@eeb.org) | **Websites:**  
<http://www.eeb.org/>; <http://www.participate.org> | **Twitter:** [http://twitter.com/Green\\_Europe](http://twitter.com/Green_Europe)

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