



“Eco-TIRAS”
International
Association of River
Keepers

Asociația
Internațională
a Păstrătorilor Rîului
”Eco-TIRAS”

Str. Teatrăla 11A, Chișinău, MD-2012, Moldova
Tel. /Fax: (+373-22) 225615, 550953. E-mail: ecotiras@mail.ru
Codul fiscal: 1012620005971

E-mail: ecotiras@mail.ru; www.eco-tiras.org

Geneva, November 10, 2023

**Statement of Ilya Trombitsky, Eco-Tiras and European ECO-Forum,
at the Eighth meeting of the Task Force on Access to Information under the Aarhus
Convention and International Workshop on Access to Product Information,
agenda point 3(a)**

Access to environmental information remains the key point of the Aarhus Convention implementation, especially in EECCA region. 14% of communications to the ACCC deal with access to information. For dozens of years, it has not been solved adequately in Moldova. In theory, such access exists, but in reality, it is still very difficult to get it. The Compliance Committee is a useful tool, but not efficient enough because the procedures are very long, and as a result, it could solve only one concrete issue when the implementation of the AC as a whole remains unsolved.

As an example, a lot of efforts were made to simplify access to the “historical” hydro meteorological data, which is important in analyzing climate change processes. Today, this issue looks almost solved in Moldova. Because the issue of unreasonable costs of environmental information became the subject of communication to the ACCC, a new governmental regulation has been adopted, which establishes more clear methods of determining the costs of hydro meteorological information. Because this document is very fresh, we only started to check its efficiency. And I like to note that we already have evident signs of intention to commercialize the historical information already aggregated by requesting to pay for at least repeated “aggregation” of the already aggregated environmental data again in conditions of a lack of meta-information about existing aggregated data.

It is evident that the public should have access to the metadata on existing information. It will help to find the necessary information without bothering the governmental agencies.

Electronic access to “historical” environmental data is also a problem, not only because old data are on paper but also because frequently there is no willingness to put them on the Internet. Institutional instability and the lack of interest of state bodies in ensuring access to aggregated data create a situation where scientists and other interested parties should apply for “historical” data that should be open in databases but is closed to the public. It creates an additional burden for the state agencies to provide information from the databases with limited access. A similar picture we see when representatives of the public cannot be connected to ongoing monitoring systems to have the information online.

The costs of maintaining and retrieving publicly requested information, however, can be substantial, even if done electronically. When primary sources like hydro meteo stations submit paper reports to the central office, data from the report is entered into the database. Data entry operations cost time and money. Quality assurance for accurate data adds to the cost. But it is doing anyway. The placement of the aggregated data on the Internet is not costly and could not be the subject of financial economics.

So we see the necessity to attract the attention of the AC Parties to the issue of insurance of open access to the aggregated environmental data and metadata.