



GREEN
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To: Vincent Rey
Head of Cooperation
Delegation of the European Union to Georgia

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We would like to express our gratitude for opportunity to participate in a civil society consultation for the EU Member States' and Switzerland's Joint Programming documents.

We would like to thank the donor community for supporting Georgia's economic and social development. Our comments related to the Sectoral Strategy Fiche "Sustainable use of Natural Resources".

The Sector Strategy Fiche "Sustainable use of Natural Resources" reviews different sectors (Energy, Environment, Water, Waste, Climate, Biodiversity, Natural disasters) and determines key issues that need to be addressed by the Donors in 2017-2020 in Georgia.

Environment

It's welcomed, that Sector Fiche on Sustainable Use of Natural resources identified the support to GoG in implementing EU environment acquis. For that as one of the major focus will go to elaboration of National Action Plan (2017-2021). However, taking into account the fact that none of the NEAP developed till now, has not been implemented by Georgian Government, its important before going writing the new one to do extensive evaluation why the activities of NEAP 1 and NEAP 2 have not been implemented in order to figure how to make the NEAP really instrumental and what is the NEAP's role in country's planning system.

Another important issue is that, in accordance of Association Agreement between Georgia and EU, article 302 (2) "Cooperation shall also aim at integrating environment into policy areas other than environment policy". The integration of environment in other policy areas actually represents the one of the major goals of the NEAP 2. From our assessment the implementation of NEAP 2, failed because Georgia does not have the state environmental policy that would defined the objectives, aims and priority directions in environment protection.

The prompt implementation of Policy Planning System Reform Strategy 2015-2017 without any delay will also support the integration of environment in other policy areas.

In addition, it's important to underline that Georgia's government efforts in for protection of ambient air quality are very limited. Activities defined under NEAP 2 (2012-2016), already during drafting was recognized as insufficient.

According to the NEAP 2, short term targets to achieve long term goal, have clean air throughout Georgia that is safe both for human health and the environment, were:

- Improvement and step-by-step automation of the existing air quality monitoring network that will make it possible to assess the state of ambient air and factors affecting the air quality;

- Reduction of industrial emissions through the introduction of modern energy saving technologies and proper enforcement of the requirements of environmental impact permits;
- Gradual reduction of vehicle emissions through introduction of relevant instruments based on international experience and national specifics.

From those activities very few has been implemented. It includes three additional automatic air quality monitoring stations and some improvement of fuel quality, that still does not corresponds the EU standards. Meanwhile, according to the WHO report “Ambient Air pollution: a global assessment of exposure and burden of diseases”¹, the average pollution by PM2.5 in cities is 23 µg/ m³ and on whole country 19 µg/m³, that twice higher than WHO recommendations. The same report models the death of 90 people per 100 000 due to the diseases caused by ambient air pollution.

According World Health organization May 2016, Georgia defined as number one in the world, due to the mortality rate attributed to the air pollution (indoor and outdoor) and it is 292 person per 100 000². The research was strongly challenged and opposed by the Georgian Government. As the WHO mission arrives into the country, it appears that it appears that WHO study contains some inaccuracy, “particularly, from three components for one the data from 2003-2005 was used. That means that in case of ambient air pollution Georgia is not in first place in the world. The new data will be available soon”³. However, mission expresses its concerns related to outdoor air pollution and the Georgia’s stand with cardiovascular diseases. It stressed that Georgia’s air pollution corresponds the medium air pollution of the Eastern Europe that does not create the optimistic ground⁴.

In order to solve air pollution problem in Georgia, it’s important to develop the State program that would address the all aspects of air pollution both industrial and transport emission’s and proposes the integrated approach for harmful emissions reduction. Would be important to ensure that EU Member States direct support for creation of State program, both in terms of technical advice and development of supportive programs as development of public transport intermodal system both in Tbilisi and between the cities, work with local municipalities and etc.

Energy sector

One of the sectors reviewed by the document is Energy sector. According to it Georgia heavily depends on energy imports in winter thus strengthening national energy security represents key energy challenges for the country. One of the key priorities determined is “to satisfy the growing demand for electricity, mainly by untapping the potential of Georgia's hydropower sources”.

It should be noted that the same chapter of the document recognises that “electricity generation by hydropower plants is significantly affected during the winter period,” thus making unclear how further development of Hydro potential can contribute to diversification of the energy mix of the country and decrease energy imports in winter.

While the document also recognises that HPPs are environmentally and socially sensitive and in order to ensure full compliance with national and international norms there is high need of strengthening environmental and social impact assessments, the document not mentions the fact that country still misses National energy strategy as well as energy needs assessment of the country. Therefore the main concern of the HPP development is not only weak environmental legislation but also the fact that country does not have clear targets or directions how hydro power development can decrease energy dependence and fit together with all renewable energy and energy savings alternatives.

Its notable that while government claims about growing demand for electricity country still lacks energy efficiency policies and delays disclosure of the first National Energy Efficiency Action Plan (NEEAP).

We strongly believe that promotion and support of energy efficiency measures should be the top priority of the document together with the development of other renewables (Wind, Solar, etc.) while the development of the

¹ <http://apps.who.int/iris/bitstream/10665/250141/1/9789241511353-eng.pdf?ua=1>

² <https://www.iea.org/publications/freepublications/publication/WorldEnergyOutlookSpecialReport2016EnergyandAirPollution.pdf>

³ <http://jandacva.ge/jandacvis-msoflio-organizaciis-egspertebi-saqartveloshi-imyofebian/>

⁴ IBID

Hydro potential has to be put on hold until national energy strategy and energy needs assessment will be prepared together with the Strategic Environmental Assessment (SEA) and river basin management plans.

We are looking forward for further discussion and cooperation

Sincerely Yours



Manana Kochladze
Chairwoman