



This action is funded by the European Union

ANNEX 1

of the Commission Implementing Decision on the Annual Action Programme 2015 in favour of the Republic of Belarus

Action Document for “Strengthening Air Quality and Environmental Management in Belarus” (SAQEM)

1. Title/basic act/ CRIS number	Strengthening Air Quality and Environmental Management in Belarus (SAQEM) CRIS number: ENI/2015/038-140 financed under European Neighbourhood Instrument			
2. Zone benefiting from the action/location	Belarus The action shall be carried out at the following location: whole country			
3. Programming document	Multi-annual Indicative Programme for EU support to Belarus MIP 2014-2017			
4. Sector of concentration/ thematic area	Environment			
5. Amounts concerned	Total estimated cost: EUR 14.5 million Total amount of EU budget contribution: EUR 14.5 million			
6. Aid modality(ies) and implementation modality(ies)	Project Modality <ul style="list-style-type: none"> • Direct management – procurement of services and supplies • Indirect management with the United Nations Development Programme 			
7. DAC code(s)	41010 – Environmental policy and administrative management; 41020 – biosphere protection; 41081 – Environmental education/training			
8. Markers (from CRIS DAC form)	General policy objective	Not targeted	Significant objective	Main objective
	Participation development/good governance	<input type="checkbox"/>	X	<input type="checkbox"/>
	Aid to environment	<input type="checkbox"/>	<input type="checkbox"/>	X
	Gender equality (including	<input type="checkbox"/>	X	<input type="checkbox"/>

	Women In Development)			
	Trade Development	X	<input type="checkbox"/>	<input type="checkbox"/>
	Reproductive, Maternal, New born and child health	X	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Main objective
	Biological diversity	X	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	X	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input type="checkbox"/>	<input type="checkbox"/>	X
	Climate change adaptation	<input type="checkbox"/>	X	<input type="checkbox"/>
9. Global Public Goods and Challenges (GPGC) thematic flagships	Environment and climate change			

SUMMARY

Environment is at the core of sustainable development strategies both in the EU and in the Republic of Belarus. It is a focal sector of intervention of the Multi-annual Indicative Programme for EU support to Belarus (MIP 2014-2017). Belarus has hitherto demonstrated a strong willingness and capacities for cooperation in this sector and shares common challenges (e.g. transition to a green, low carbon economy) as well as regional tasks (e.g. trans-boundary water basins management, long-range pollutants emissions abatement) and environmental security issues (e.g. construction of Ostrovets nuclear power plant) with the EU.

In line with the MIP and following consultation with the Belarusian authorities, the proposed Annual Action Programme for 2015 will concentrate on supporting effective air emissions and radiation monitoring and management. It will also contribute to modernise the air quality monitoring infrastructure, and to increase the participation of civil society organisations in implementing environmental policies and monitoring of environmental risks.

In line with the EU policy of critical engagement towards Belarus, the proposed programme will aim to benefit the population directly in improving the environmental situation, while promoting the participation of civil society in environmental management and governance.

1 CONTEXT

1.1 Sector/Country/Regional context/Thematic area

1.1.1 Public Policy Assessment and EU Policy Framework

Environment is a focal sector for EU and other Donors' assistance to Belarus. The European Union has an extensive history of engagement with the Government of the Republic of Belarus in this field. This sector is also a topic of the European Union-Belarus dialogue on modernisation issues, thus contributing to shaping an overall improved scope of cooperation. Good progress of the discussions held in the course of 2014 allowed to identifying air quality, water and waste management as the main areas of common interests, in particular with respect

to trans-boundary pollution issues affecting air quality, common rivers and biodiversity sites. These issues are also priorities of European Union regional cooperation under the Eastern Partnership, further allowing for a more consistent dialogue.

The “*Environmental Strategy of the Republic of Belarus until 2025*” defines the main principles and areas of environmental policy implementation in the country. It is delineated in five-year national action plans for the rational use of natural resources and environment protection (NEAPs). Sector-specific legislation has also been adopted, covering air quality, waste management and environmental protection. Environment legislation exists in many areas but its implementation needs to be developed further. Belarus makes particular efforts to make its legislation EU-compatible.

According to the World Health Organisation’s Global Health Observatory data on ambient air pollution, Belarus currently ranks at European average in respect to ambient air quality standards.⁷ However, unlike most EU countries, in Belarus the quantity of air pollutants discharged to the air continues to increase significantly. Stationary facilities discharged 462,800 tons of harmful substances into the atmosphere in Belarus in 2014, or 3.9% more than in 2013, according to National Statistical Committee of the Republic of Belarus. Increases in previous years were even more dramatic.⁸ Belarus industrial production structure, which is suffering a lack of modernisation, is almost exclusively based on the consumption of fossil energies and is deemed poorly energy-efficient. Under these circumstances, a greater reliance on cheaper, more polluting fuels by the industrial sector in Belarus to improve its competitiveness is not excluded and could further increase the relative differential between Belarus and the EU in terms of discharge of harmful substances in the atmosphere. Without intervention, air pollution in the country is likely to increase significantly over the next decade, not only making Belarus an above-average air polluter in Europe, but also threatening ambient air quality in the European Union.

Air quality governance in Belarus is part of environmental legislation and normative documents, including the law on the protection of the environment of 1992 as amended in 2013, the law on the protection of atmospheric air of 1997 as amended in 2008, and the law on ozone layer protection of 2001 as amended in 2014.

Belarus has ratified the United Nations Economic Commission for Europe (UNECE) Convention on Long-range Trans-boundary Air Pollution (CLRTAP) and intends to eventually ratify all three key protocols to the CLRTAP⁹. A number of documents, including detailed national plans for implementation of the requirements of the Persistent Organic Pollutants (POPs) and Heavy Metals protocols, were developed taking into consideration all the requirements of the protocols. A recent study concluded that Belarus already fully complies with the requirements of the former, which invites the likelihood of its ratification. The country has also included national emission reduction commitments line with in the amended Gothenburg Protocol, which sets reduction commitments for 2020 and beyond. Considering the fact that Belarus currently is not a party to the protocol, the commitments enshrined in it are of a voluntary nature, until ratification.

⁷ http://www.who.int/phe/health_topics/outdoorair/databases/cities/en/

⁸ http://belstat.gov.by/en/ofitsialnaya-statistika/otrasli-statistiki/okruzhayuschaya-sreda/current-data_2/air-polluting-emissions_2012_2/

⁹ The amended Gothenburg Protocol to abate acidification, eutrophication and ground-level ozone, the amended Protocol on Persistent Organic Pollutants (POPs) and the amended Protocol on Heavy Metals to reduce the negative impacts of emissions of cadmium, lead and mercury.

Water quality, waste management, environmental protection, soil degradation, industrial pollution and radioactive contamination from the Chernobyl accident in 1986 are Belarus' key environment issues, significantly affecting the population, the environment and the economy. Fallout from the accident at the Chernobyl nuclear power plant in Ukraine still affects the population, the environment and the economy of Belarus significantly. In 2011, about 14.5 % of the country's territory was contaminated with long-life isotopes of caesium-137. Belarus has a large industrial sector, including chemical and petrochemical industries, construction materials, wood and paper enterprises which are of key importance for the national economy, but also contribute to pollution. Land degradation is one of the most pressing ecological problems of Belarus and one of the factors that restrict the country's sustainable development. During the last decade land degradation processes have tended to increase as a result of climate change.

The foreseen Belarusian nuclear power plant under construction in Ostrovets and the foreseen Lithuanian nuclear power plant in Visaginas, both very close to the countries' borders, are perceived as a potential environmental risk factor adding-up to the risk in terms of radiation linked to the explosion of Chernobyl nuclear power plants. Radiation and impact on the cooling lakes as well as the possible negative effects on the trans-boundary Vilia and Neman rivers and the Baltic Sea are among the key environmental risks.

1.1.2 Stakeholder analysis

The Ministry of Natural Resources and Environmental Protection (MNREP) is the institution responsible for the state policy in the field of environment protection and rational use of natural resources, hydro-meteorological activity, coordination of the activity of other state institutions and local executive bodies, environment control, information on the state of the environment and measures for its rehabilitation. The ministry is also responsible for the development of legal instruments in the field of environmental protection (including legislation on air quality and atmospheric emissions), striving to harmonise the legislation with the EU requirements.

Air quality is one of the priorities in state environmental policy of Belarus and the air quality monitoring and management system is rather developed; it allegedly performs better than other ENI countries; however, it still requires strengthening to allow the country to fulfil all its international commitments.

Air quality monitoring is carried out within the framework of the National System of Environmental Monitoring (NSEM) established in 1993. At present, NSEM includes a number of organisationally independent types of environmental monitoring, including monitoring of the atmosphere and ozone layer. Air quality monitoring is carried out at various levels including the MNREP and its affiliated institutions/territorial bodies, including the National Centre for Radiation Control and Environmental Monitoring, the Republican Hydro-meteorological Centre, the Republican Aviation Hydro-meteorological Centre as well as five Regional Centres for Hydrometeorology and Environmental Monitoring (Brest, Vitebsk, Gomel, Grodno and Mogilev).

Other government institutions include the Ministry of Health (Department of Sanitary & Epidemiology), when engaged in environmental health matters, the Ministry of Education dealing with education on environmental matters, and in particular with the environmental syllabus at school level and at the vocational level.

Environmental civil society organisations (CSOs) are active in a vast number of areas, such as biodiversity, green economy, energy efficiency, renewable energy, chemical pollution, waste management etc. They are often working with the Government or local authorities, for instance in the framework of the two Aarhus centres active in the country, and receive EU and other donor funding.

1.1.3 Priority areas for support/problem analysis

Improved air quality management would strongly support Belarus' efforts in terms of climate change mitigation and improved population health. The Republic of Belarus has significantly advanced in adopting state of the art emission reduction approaches and measures. However, further progress is hindered by limiting reforms to the emission reduction sector only. Belarus so far has not made any steps in aligning with the European air quality policies, standards and legislation. Consequently, the country has huge potential for harmonising its air quality policies and its emission control systems with the EU legislation, in particular with the new Clean Air Programme for Europe and Ambient Air Quality Directive (and daughter directives), and the Industrial Emissions Directive.

The data collection system is disaggregated – with ambient air quality data obtained by the Belarus Hydro-meteorological Institute, while emission data is allegedly obtained by enterprises but reported in a separate stream to the Office of Statistics.

However, there is a disconnection between the regulator and those regulated – with the consequence that enforcement is poor. In addition, significant disconnection between agencies responsible for data monitoring, assessment and air quality enforcement remains.

More specifically, with respect to air quality monitoring, Belarus has not developed detailed rules for air quality monitoring, has insufficient air quality data collection, processing and interpretation, and limited access to real-time information on air quality. When sufficient information does exist, it is sometimes available with significant time delay. Furthermore, the country has incomplete emission inventories (missing fugitive emissions from diffused sources), and often air quality projections are missing and emission projections are limited. Additionally, the statistical approach and data formats for collecting data vary from those used in the EU and cannot be used in an air quality monitoring system that would be modelled on the EU system (e.g., those used by the European Environment Agency).

With respect to air quality policy, Belarus has not sufficiently adopted specific strategic documents (strategies and/or actions plans) for air quality and lacks administrative capacity to deal with air quality management. Air quality standards for particulate matters (PM-10 and PM-2.5), are not sufficiently enforced and national application of emission ceilings is insufficient. On the operational level, Belarus lacks dispersion models at the national level, has insufficient air pollution measurement, monitoring, data collection, and data processing technology and technical infrastructure to conduct air quality management aligned with European policies.

While the engagement of CSOs in Belarus is improving, there remains a need to support and strengthen their capacities with a view to improving local environmental governance. Few CSOs have the capacity to participate in environmental management, even at very modest and local scales. There are few, or no environmental clubs and the level of regular interaction between the MNREP and environmental CSOs could be improved.

2 RISKS AND ASSUMPTIONS

Risks	Risk level (H/M/L)	Mitigating measures
<p>Overall context in Belarus becomes less favourable to the transition to a low emissions economy.</p> <p>Air quality is not considered as a high environmental priority by decision makers</p>	L	<p>Sustainable production and consumption approaches are promoted within AAP 2012 funded operations as well as relevant regional projects.</p> <p>Air quality is kept among the high environmental priorities in the EU-Belarus dialogue in the sector.</p>
<p>Component 1 and 2: bureaucratic delays are incurred during projects registration (1) and/or tendering process (2)</p>	M	<p>Belarusian counterparts and stakeholders are fully involved at all stage of process preparation and implementation</p>
<p>Component 2: Equipment, information systems, and software procured will have incompatibilities with the existing Belarus systems.</p>	L	<p>Requirements for procurement of equipment, information systems, and software that will be compatible with existing systems are made available by the Belarusian side when specifications are being prepared.</p>
<p>Component 3: Public access to environmental information developed by project will be insufficient. Civil society participation is too low and civil society actors are not able to engage in environmental monitoring in according with EU best practices</p>	M	<p>Efforts are made by the component's implementing agency to ensure real public access to relevant environmental information and creating wide awareness within Belarusian CSOs and local authorities.</p>
Assumptions		
<ul style="list-style-type: none"> • Belarus keeps its willingness to consider accessing the CLRTAP Gothenburg and POPs and Heavy Metals Protocols. • Transition to a green economy remains on the Belarusian reform agenda, in particular with respect to low carbon technologies and emissions reduction in the transport sector. • Good cooperation and coordination among MNREP and other key air quality emission and management stakeholders. • Further budget allocations for modernisation of air quality monitoring infrastructure. • Steps are taken by Belarus Government toward increased compliance with the Aarhus Convention on Access to Environmental Information. 		

3 LESSONS LEARNT, COMPLEMENTARITY AND CROSS-CUTTING ISSUES

3.1 Lessons learnt

Cooperation in the field of environmental management receives a high level of interest from the Belarusian authorities who demonstrate a high level of commitment and professionalism, as demonstrated by the production of a detailed and consistent set of proposals related to this programme. Belarus' authorities are highly supportive in implementing both recently launched projects on Green Economy (AAP 2012) and various regional operations in the field of environmental management. With respect to implementation, projects' registration has usually proven a cumbersome procedure creating long delays between contract signature and the starting of implementation. Lessons learned from the relevant regional programme (Air Quality Governance in the ENP East Countries) were included into the programme, in particular with regards to the issues of ensuring an effective and reliable data collection and management system, better involving civil society in environmental decision making and governance processes, including through capacity building activities, and eventually embedding policy reforms in the international framework established amongst others by both UNECE CLRTAP and the Aarhus conventions.

3.2 Complementarity, synergy and donor coordination

Donor co-ordination in the field of environment is high in Belarus. Programmes and projects are prepared in such a way as to avoid overlapping or large gaps. Complementarity is sought when appropriate (e.g. forestry management, waste management including hazardous waste). In the second half of 2014 and early 2015, various meetings have been organised by the Delegation of the European Union to Belarus in the framework of the formulation of this programme. The Government of the Republic of Belarus ensures a reasonable level of information regarding donors' assistance but does not yet implement a full-fledged sector co-ordination.

3.2.1 EU assistance

The EU's bilateral assistance to Belarus in the environment sector includes supporting the approximation with EU environmental legislation, local sustainable development, including a focus on the Chernobyl affected areas, and the transition to a green economy (on-going).

- **Support to the Development of a Comprehensive Framework for International Environmental Cooperation in the Republic of Belarus** (AAP 2008): the project aims at building strategic planning and management capacity of the Republic of Belarus in the field of environmental protection and information.

- **Support to Local Development in the Republic of Belarus** (AAP 2011): strengthening the national capacity of oblasts in socio-economic development management, and resolve local environmental issues through specific initiatives and the involvement of local residents.

- **Supporting the transition to a green economy in the Republic of Belarus** (AAP 2012): legislative and institutional support in the field of green economy; support to NGOs implementing activities related to the promotion of green economy in Belarus; installation of a pilot wind power plant.

Various small-scale projects financed under thematic programmes are implemented in the environment sector and co-ordination with the programme will be ensured as relevant.

Belarus has also been the beneficiary of a number of regional environmental projects:

Air Quality Governance in the ENPI East Countries (AIR-Q-GOV): as part of the overall goal of improving national systems of air quality assessment and management in the project countries, the project in Belarus has resulted in the adoption of technology-based emission limit values and recommendations for technology standardisation and organisation of an in-process emission control system in the cement industry.

Towards a Shared Environmental Information System (SEIS): modernisation of collection, exchange and use of the data and information required for the design and implementation of environmental policy.

Clima East: supporting the beneficiaries so that they are better equipped for greenhouse-gas emission reductions and better prepared to deal with climate change impacts.

Green Economy in Eastern Partnership Countries: integrating principles of green economy into national development plans/strategies and legislative/regulatory frameworks; support to practical implementation of these principle, including approximation with EIA/SEA Directives in line with the Espoo Convention and its SEA Protocol.

EU-NGOs Project "Strengthening Environmental Governance by Building the Capacity of Non-Governmental Organisations": this EU funded grant project is implemented by UNDP and aims to strengthen internal and external capacities of NGOs for better environmental governance. While this existing project covers different environmental issues the added value of the proposed action under Component 3 would be to focus on air quality.

Also worth noticing is the substantial support to cross-border environmental initiatives provided by the three CBC programmes involving the Republic of Belarus, i.e. Baltic Sea Region Programme, Poland-Belarus-Ukraine and Belarus-Lithuania-Latvia.

3.2.2 Other Donors

The Global Environment Facility (GEF) is the second largest donor in Belarus after the EU. The UNDP and the World Bank are the main implementing organisations for the EU and GEF-funded projects in Belarus. In addition, environmental projects in Belarus are funded by the Swedish International Development Agency (SIDA), the U.S. Agency for International Development (USAID) and the Government of Germany. The European Bank for Reconstruction and Development (EBRD) has launched an energy efficiency loan program for local banks. The main programmes by other donors are as follows:

- Integrated Solid Waste Management Project for Belarus;
- Small Grants Programme of the Global Environment Facility (GEF SGP);
- Belarus Green Cities: Supporting Green Urban Development in Small and Medium Sized Cities in Belarus;
- Removing Barriers to Wind Power Development in Belarus.

3.3 Cross-cutting issues

The proposed programme will be in line with the EU environmental principles. It has in addition a good potential for engaging in good governance and gender attention, in particular through the activities of its civil society/public participation component. The programme shall

also contribute to reducing gender related inequalities in terms of air pollution effects on human respiratory health¹⁰.

Human rights may be indirectly affected by improved access to environmental information under the Aarhus Convention¹¹.

4 DESCRIPTION OF THE ACTION

4.1 Objectives/results

Overall Objective

The **overall objective** of the programme is to improve air quality in the Republic of Belarus.

Specific Objectives

The **specific objectives** of the programme are as follows:

→Component 1 - Support to effective air emissions and radiation monitoring, and improved environmental management

- Result 1.1 – Air quality management and monitoring legislation is harmonised with the EU legislation, in particular the Air Quality Directive and the Emission Ceiling Directive and significant steps are taken for the ratification of three key CLRTAP Protocols;
- Result 1.2 – Permitting of air emissions is integrated into a unified environmental permitting system in line with the EU Industrial Emission Directive;
- Result 1.3 – Advanced methodologies for inventories of emissions and environmental management are developed and implemented, in line with the PRTR Protocol to the Aarhus Convention;
- Result 1.4 – Belarus air quality and radiation monitoring network and related data management systems are improved in line with SEIS.

Component 2 - Modernisation of air quality and radiation monitoring infrastructure

- Result 2.1 – Mobile laboratories and stationary equipment are procured, delivered, installed and calibrated consistently with the existing data collection and processing systems.

Component 3 - Involvement of civil society organisations in environmental monitoring, and improvement of environmental governance at local level

- Result 3.1 – At least six "environmental monitoring clubs" in the "Green Schools" and/or public environmental councils which work in the framework of the regional authorities are set up/supported in the regions of Belarus (at least one in each oblast);
- Result 3.2 – Three or more CSOs engage in the development and delivery of environmental training and educational outreach in at least 70 Green Schools across the country;
- Result 3.3 – At least 15 Green Schools¹² co-operate with local environmental monitoring bodies¹³ for data collection and management;

¹⁰ In particular the need for prolonged maternal care to children affected by air pollution.

¹¹ UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

¹² See section 4.3 for an explanation on the Green Schools programme.

- Result 3.4 – CSOs are engaged into regular policy consultations with governmental bodies responsible for environmental issues, and act as reliable partners in policy implementation activities.

4.2 Main activities

Component 1 – Support to effective air emissions and radiation monitoring, and improved environmental management

Result 1.1 Air quality management and monitoring legislation is harmonised with the EU legislation, in particular the Air Quality Directive and the Emission Ceiling Directive and significant steps are taken for the ratification of three key CLRTAP Protocols

- To assess and strengthen institutional capacity of the relevant stakeholders at central, regional and local level;
- To update national policy, legislation and regulations for air quality monitoring, and to harmonise them with the relevant EU acquis;
- To prepare a time-bound and cost-estimated roadmap allowing for the decision on the ratification by the Republic of Belarus of the CLRTAP Gothenburg POPs and Heavy Metal Protocols.

Result 1.2 Permitting of air emissions is integrated into a unified environmental permitting system in line with the EU Industrial Emission Directive

- To prepare guidelines for an integrated environmental permit system in line with the Industrial Emission Directive;
- To support harmonisation of policy-making and implementing processes with EU best practices, including the development of quality assurance and control requirements;
- To pilot a series of 4-6 integrated pollution permits with selected industrial companies and relevant governmental authorities.

Result 1.3 Advanced methodologies for inventories of emissions and environmental management are developed and implemented, in line with the PRTR Protocol to the Aarhus Convention

- To assess existing quality assurance and control standards and provide recommendations for improvements of quality assurance and control systems for ambient and point sources;
- To review current methodologies on air emission inventories; to pilot and test new, contemporary system of inventories; to train relevant personnel accordingly.

Result 1.4 Belarus' air quality and radiation monitoring network and the related data management systems are improved in line with SEIS

- To assess current air quality monitoring system and provide recommendations for improvements;
- To update national air quality assessments (new modelling, improved databases) and pilot them in a selected urban area; to train relevant personnel accordingly.

Component 2 – Modernisation of air quality and radiation monitoring infrastructure

¹³ For instance, oblast (regional) hydrometeorology and environmental monitoring office under the MNREP and their local branches.

Result 2.1 Mobile laboratories and stationary equipment are procured

- To procure, deliver, install and calibrate consistently with the existing data collection and processing systems mobile laboratories and stationary equipment.

Component 3 – Involvement of civil society organisations in environmental monitoring, and improvement of environmental governance at local level

Result 3.1 At least six "environmental monitoring clubs"/public environmental councils are set up/supported in the regions of Belarus (at least one in each oblast)

- To define an approach for establishing environmental monitoring clubs/public environmental councils and allowing them to engage in environmental monitoring activities appropriate to Belarus;
- To support the engagement of environmental monitoring clubs/public environmental councils in environmental monitoring activities in the framework of the Aarhus Convention.

Result 3.2 Three or more CSOs engage in the development and delivery of environmental training and educational outreach in at least 70 Green Schools across the country

- To select through a call for proposal CSOs that will develop and deliver training in the field covered by the Aarhus convention and environmental monitoring;
- Selected CSOs prepare an environmental monitoring training programme and deliver it in at least 70 Green Schools.

Result 3.3 At least 15 Green Schools co-operate with local environmental monitoring bodies¹⁴ for data collection and management

- To carry out air quality and other environmental monitoring in at least 15 Green Schools; when necessary, to procure and install light monitoring equipment;
- To deliver training courses and workshops facilitating co-operation between the schools and local air quality monitoring authorities;
- To establish common processes for the utilisation of the monitoring equipment and regular reporting; to prepare pedagogical guidelines for Green Schools and material related to environmental monitoring activities.

Result 3.4 CSOs are engaged into regular policy consultations with governmental bodies responsible for environmental issues, and act as reliable partners in policy implementation activities

- To enhance the efficiency and the scope of activities of the Aarhus Centre network in Belarus;
- To improve the effectiveness of the Public Consultative Environmental Council as a platform for environmental policy discussion;
- To improve CSOs capacities to engage with local authorities and the population in participatory activities to support environmental and sustainable development activities; to carry out development activities in at least four demonstration sites¹⁵;

¹⁴ For instance, oblast (regional) hydrometeorology and environmental monitoring office under the MNREP and their local branches.

- To support professional mobility for CSO's representatives and other relevant stakeholders (e.g. staff of public bodies in charge of environmental management), including participation in international events and targeted study visits.

4.3 Intervention logic

The programme will concentrate on improving ambient air quality conditions and the state of the terrestrial protected areas through a simultaneous strengthening of the legislative and regulatory environment and enforcement mechanisms for effective air quality management practices. The use of technology-based emission limit values will be increased, as will application of binding requirements for operation of polluting installations and of integrated permitting (in the sense of Directives 96/61/EC and 2010/75/EU). Air quality standards, limit values, and averaging periods will be aligned with those used in the EU. Human and technical (see below) capacities to do so will be improved.

Experience has shown that many technical assistance activities, and more specifically pilot projects, have suffered from the lack of basic equipment and/or infrastructures that would have allowed their successful completion. The Republic of Belarus is implementing a modernisation and upgrade of the air quality monitoring system and has allocated EUR 2.83 million (BYR 33 billion) over the period 2011-2015, which is not enough to bring the monitoring network to EU standards, in particular with regards to monitoring and reporting requirements set by the CLRTAP, including the protocols Belarus intends to join¹⁶. This funding shall complement the programme and increase the empowerment of the beneficiary country, as well as the overall sustainability of the programme.

The contribution from the EU for the equipment in Component 2 is intended to enhance the monitoring network with standards that apply in the EU. This will allow Belarus to comply with the Convention on Long-range Trans-boundary Air Pollution (CLRTAP) in a number of ways. First, the country will have in place the proper equipment to effectively monitor air pollution. Second, it will procure software and expertise necessary to develop fully-compliant air quality models and allow for a leap in reporting under the Convention. And third, the monitoring and information system will allow access to air quality data and air quality management system by the public and local authorities. The CLRTAP is the main regional policy instrument to limit and to gradually prevent and reduce discharges of air pollutants and thus combat the resulting trans-boundary pollution.

In the sense of the Aarhus Convention on Access to Information, Public Participation in decision-making and Access to Justice in Environmental Matters, Belarusian CSOs are not sufficiently involved in permitting processes or granted easy access to information on air quality and pollution sources. While the engagement of CSOs in Belarus is improving, there remains a need to support and strengthen their capacities for improving environmental governance. Few CSOs have the capacity to participate in environmental management, even

¹⁵ Activities can be related to natural resources management, support of ecotourism, biodiversity, waste management, etc.

¹⁶ Gothenburg Protocol to abate acidification, eutrophication and ground-level ozone, the Aarhus Protocol on Persistent Organic Pollutants (POPs) and the Aarhus Protocol on Heavy Metals to reduce the negative impacts of emissions of cadmium, lead and mercury.

at very modest and local scales. There are few, or no environmental clubs and the regular interaction between the MNREP and environmental CSOs could be formalised. This intervention aims to increase the involvement of CSOs in environmental governance through working with civil society organisations at the local level, developing approaches to sound local governance of air quality management in conjunction with the state bodies at the oblast level.

The Green Schools program is a joint initiative by the Ministry of Natural Resources and Environmental Protection and the Ministry of Education, supported by the European Union and implemented by the UNDP. There are currently 140 Green Schools across the country and the project aims at maximizing the use of this network to raise environmental awareness of youth and the public as a whole, train teachers by conducting observation of the status of ecosystems and biodiversity by pupils, and run an intense awareness raising campaign. Involving CSOs in the Green Schools program will allow to increasing the profile of environmental CSOs among Belarusian youth, education professionals, and local and national government authorities.

5 IMPLEMENTATION

5.1 Financing agreement

In order to implement this action, it is foreseen to conclude a financing agreement with the partner country, referred to in Article 184(2)(b) of Regulation (EU, Euratom) No 966/2012.

5.2 Indicative implementation period

The indicative operational implementation period of this action, during which the activities described in section 4.2 will be carried out and the corresponding contracts and agreements implemented, is 60 months from the date of entry into force of the financing agreement.

Extensions of the implementation period may be agreed by the Commission's authorising officer responsible by amending this decision and the relevant contracts and agreements; such amendments to this decision constitute technical amendments in the sense of point (i) of Article 2(3)(c) of Regulation (EU) No 236/2014.

5.3 Implementation modalities

5.3.1 Procurement (direct management)

Component 1

Subject	Type (works, supplies, services)	Indicative number of contracts	Indicative trimester of launch of the procedure
Support to effective air emissions and radiation monitoring, and improved environmental management	Services	1	Q2 2016

Component 2

Subject	Type (works, supplies, services)	Indicative number of contracts	Indicative trimester of launch of the procedure
Preparation of technical specifications for supply of equipment and software	Services	1	Q1 2016
Preparation of technical specifications for supply of equipment and software	Services	1	Q1 2016
Supply of equipment and delivery of the necessary related services	Supplies and services	2-5	Q2 2016

Evaluation, audit, communication and visibility

Subject in generic terms, if possible	Type (works, supplies, services)	Indicative number of contracts	Indicative trimester of launch of the procedure
Evaluation	Services	1	Q2 2018
Audit	Services	1	Q3 2019
Communication and visibility	Services	1	Q2 2017

5.3.2 Indirect management with an international organisation

Component 3 of this action may be implemented in indirect management with the United Nations Development Programme in accordance with Article 58(1)(c) of Regulation (EU, Euratom) No 966/2012. This implementation entails the involvement of civil society organisations in environmental monitoring, and improvement of environmental governance at local level. This implementation mode addresses three potential benefits/constraint linked to implementing the programme's component 3: the benefits of having an international organisation such as the UNDP mitigating the potential distrust between civil society organisations and public administrative bodies with regard to carrying out activities in common, the capacity to deal with a large amount of relatively small contracts and the need to implement the various actions in a co-ordinated way so as to maximize the results achieved overall.

This implementation is justified because the UNDP has acquired a wide experience on implementing environmental projects in Belarus, and specifically working with the Belarusian CSOs dealing with environmental and local development issues. In the framework of AAP 2008 and 2012 (environment), AAP 2010 (Energy efficiency) and AAP 2011 (local and regional development) the UNDP has demonstrated outstanding operational and financial management capacities as well as the ability to act as an efficient co-ordination platform between the various stakeholders involved in the proposed programme (CSOs, Government, local authorities, enterprises).

The entrusted entity would carry out the following budget-implementation tasks: act as the contracting authority for the procurement and grant procedures. It will prepare and manage the calls for proposals, evaluate the validity of the proposals as being in conformity with the requirements of the programme, award the tender and carry out the supervision of activities carried out by the grantees.

The entrusted international organisation is currently undergoing the ex-ante assessment in accordance with Article 61(1) of Regulation (EU, Euratom) No 966/2012. The Commission’s authorising officer responsible deems that, based on the compliance with the ex-ante assessment based on Regulation (EU, Euratom) No 1605/2002 and long-lasting problem-free cooperation, the international organisation can be entrusted with budget-implementation tasks under indirect management.

5.4 Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission’s authorising officer responsible may extend the geographical eligibility in accordance with Article 9(2)(b) of Regulation (EU) No 236/2014 on the basis of urgency or of unavailability of products and services in the markets of the countries concerned, or in other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

5.5 Indicative budget

	EU contribution (amount in million EUR)
5.3.1 Component 1 - Support to effective air emissions and radiation monitoring, and improved environmental management - procurement (direct management)	3.3
5.3.1 Component 2 - Modernisation of air quality and radiation monitoring infrastructure – procurement (direct management)	7.5
5.3.2 Component 3 - Involvement of civil society organisations in environmental monitoring, and improvement of environmental governance at local level – indirect management with the UNDP	3.5
5.3.1 Evaluation and audit	0.1
5.3.1 Communication and visibility	0.1
Totals	14.5

5.6 Organisational set-up and responsibilities

Direct management (service/supplies contracts)

Components 1 and 2, as well as activities related to evaluation, audit, communication and visibility, will be implemented by the European Union, through its Delegation in Belarus, via service and supplies contracts.

All contracts implementing Components 1 and 2, as well as activities related to evaluation, audit, communication and visibility, will be awarded and implemented in accordance with the procedures and standard documents laid down and published by the Commission for the implementation of external operations, in force at the time of the launch of the procedure in question.

Indirect management

Component 3 will be implemented in indirect management with the UNDP as explained in section 5.3.2 above.

A Steering Committee shall be set up to oversee and validate the overall direction and policy of the project (or other responsibilities to be specified). The project steering committee shall meet at least twice a year. The project steering committee shall be made up of a representative of the Beneficiary country, of the entrusted entity (UNDP), of the Delegation of the European Union to Belarus and of representatives of the CSOs carrying out the activities.

5.7 Performance monitoring and reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process and part of each implementing partner's responsibility for the part of the programme it is carrying out. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (outputs and direct outcomes) as measured by corresponding indicators, using as reference the logframe matrix. The report shall be laid out in such a way as to allow monitoring of the means envisaged and employed and of the budget details for the action. The final report, narrative and financial, will cover the entire period of the action implementation.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

5.8 Evaluation

Having regard to the nature of the action, a mid-term evaluation will be carried out for this action or its components via independent consultants contracted by the Commission.

It will be carried out for learning purposes, in particular with respect to procurement, delivery and installation of air quality and radiation monitoring equipment and the effectiveness of multi-stakeholders activities in the field of environmental monitoring.

The Commission shall inform the implementing partner at least two months in advance of the dates foreseen for the evaluation missions. The implementing partner shall collaborate

efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with the partner country and other key stakeholders. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

5.9 Audit

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts or agreements.

5.10 Communication and visibility

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated at the start of implementation and supported with the budget indicated in section 5.5 above.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country, contractors, grant beneficiaries and/or entrusted entities. Appropriate contractual obligations shall be included in, respectively, the financing agreement, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Manual for European Union External Action shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

6 PRE-CONDITIONS

N/A

APPENDIX - INDICATIVE LOGFRAME MATRIX (FOR PROJECT MODALITY) ¹⁷

The activities, the expected outputs and all the indicators, targets and baselines included in the logframe matrix are indicative and may be updated during the implementation of the action without an amendment to the financing decision. The indicative logframe matrix will evolve during the lifetime of the action: new lines will be added for listing the activities as well as new columns for intermediary targets (milestones) when it is relevant and for reporting purpose on the achievement of results as measured by indicators.

	Intervention logic	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
Overall objective: Impact	The overall objective of the programme is to improve air quality in the Republic of Belarus.	Belarus will improve the capacity to meet the requirements of the air quality acquis by 2020.	Belarus air pollution regulation not aligned with the EU acquis or CLRTAP protocols (2016) Belarus air quality monitoring system needs modernisation (2016) Integrated pollution permitting regulation not in place in (2016) CSOs not significantly involved in environmental monitoring in	Belarus will align its air pollution regulation with the EU acquis and with CLRTAP protocols (2020). Belarus will have modernised air quality monitoring system (2020) Belarus will have integrated pollution permitting regulation in place (2020) CSOs will increasingly participate in environmental monitoring (2018)	National program for the adoption of the Acquis National air quality reports EU Regular Progress Reports Publications by the Belarus Aarhus Centre of reports on air quality, air emissions and projections, summaries of national and regional management plans to be provided to the general public, as well as to International Organisations including:	Sufficient administrative capacities to efficiently absorb technical assistance

¹⁷ Mark indicators aligned with the relevant programming document mark with '*' and indicators aligned to the EU Results Framework with '**'.

	Intervention logic	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
			2016		<ul style="list-style-type: none"> • Annual reports to the European Monitoring and Evaluation Programme (EMEP) under CLRTAP • Four-yearly reports on emission projections to EMEP under CLRTAP • Regular annual reports by the EEA. • Annual reports to the Coordinated European Particulate Matter Emission Inventory (CEPMEIP) for emissions of particulates. <p>European Environmental Agency annual emissions and air quality reports.</p>	
Specific objective(s): Outcome(s)	To improve air quality management and carry out air quality monitoring in full compliance with the Convention on Long-range Trans-boundary Air Pollution, other relevant international environmental	Relevant legal texts, regulation, and sub-regulations developed and submitted to adoption and adopted; Number of trainings held; Type and quantity of equipment purchased;	In force air quality management strategy, legislation and regulations (2015)	Revised or new air quality management strategy, legislation and policies (2020)	Project quarterly interim reports, internal reviews of progress and adjustment of plans; Project annual reports;	Good cooperation and coordination among MNREP and other key air quality management stakeholders Continuation of

	Intervention logic	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
	<p>agreements and EU legislation;</p> <p>To align Belarus environmental permitting regulations with international standards and EU legislation;</p> <p>To better involve civil society organisations in environmental policy design and implementation and in monitoring of environmental risks, including sharing of environmental information</p>	<p>Number of CSOs trained and number of school children taught environmental curriculum.</p>	<p>Environmental permitting regulations (2015)</p> <p>CSOs, green schools and public entities not cooperating in the field of environmental governance (2015)</p>	<p>Integrated environmental permitting system (2020)</p> <p>CSOs, green schools and public entities, cooperate in a structured way to improve environmental decision-making and governance, in particular in the field of air monitoring (2020)</p>	<p>Publications by the Belarus Aarhus Centre of reports on air quality, air emissions and projections, summaries of national and regional management plans to be provided to the general public, as well as to international organizations including:</p> <ul style="list-style-type: none"> • Annual reports to the European Monitoring and Evaluation Programme (EMEP) under CLRTAP • Four-yearly reports on emission projections to EMEP under CLRTAP • Regular annual reports by the EEA. • Annual reports to the Coordinated European Particulate Matter Emission Inventory (CEPMEIP) for 	<p>MNERP budget for modernisation of air quality monitoring equipment.</p>

	Intervention logic	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
					<p>emissions of particulates.</p> <p>Legal texts, regulation, and sub-regulations adopted;</p> <p>Air quality monitoring infrastructure modernised, its effect seen on the internet;</p> <p>Reports of CSOs in Belarus and in the EU on CSOs participation in air quality monitoring.</p>	
Outputs	<p>Res. 1.1 – Air quality management and monitoring legislation is harmonised with the EU legislation, in particular the Air Quality Directive and the Emission Ceiling Directive and significant steps are taken for the ratification of three key CLRTAP Protocols.</p> <p>Res. 1.2 – Permitting of air emissions is integrated into a unified environmental permitting system in line with the EU Industrial Emission Directive.</p>	<p>Policy recommendations adopted; Strategic documents adopted; Laws, council of ministers' decisions adopted. Number of compliance submissions & communications with CLRTAP</p> <p>Integrated permitting regulation adopted Number of training events held and stakeholders trained Number of pilot integrated permits applied for</p> <p>Number of analyses developed Assessments of training needs Number of training courses, seminars and study tours;</p>	<p>2015 in force air quality management strategy, legislation and regulations</p> <p>2015 environmental permitting regulations</p> <p>2015 in force methodology for emissions inventories</p>	<p>Revised or new air quality management strategy, legislation and policies (2020)</p> <p>Integrated environmental permitting system (2020)</p> <p>New emissions inventories methodology adopted and used</p>	<p>Project quarterly reports;</p> <p>Progress reports on trainings organized;</p> <p>Certificates of training issued by supplier (education evaluation forms)</p> <p>Transposed EU documents published;</p> <p>Law on the protection of the environment of 1992 is amended;</p>	<p>Good cooperation and coordination among MNREP and other key air quality management stakeholders</p> <p>Continuation of MNERP budget for modernisation of air quality monitoring equipment.</p> <p>Local authorities and communities establish fruitful dialogue and show</p>

	Intervention logic	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
	<p>Res. 1.3 – Advanced methodologies for inventories of emissions and environmental management are developed and implemented in line with the PRTR Protocol to the Aarhus Convention.</p> <p>Res. 1.4 Belarus air quality and radiation monitoring network and the related data management systems are improved in line with SEIS.</p>	<p>Number of stakeholders trained New comprehensive inventory developed</p> <p>Number of analyses, assessments, & specifications performed & developed Number of training events held and stakeholders trained</p>	<p>2015 existing radiation monitoring network</p>	<p>(2020)</p> <p>Belarus radiation monitoring network uses new modelling databases and has piloted them in selected urban areas (2020)</p>	<p>The law on the protection of atmospheric air of 1997 is amended;</p> <p>The <i>Environmental Strategy of the Republic of Belarus until 2025</i>” is updated;</p> <p>Belarus has taken the necessary steps allowing the ratification of the three key protocols to the UNECE Convention on Long-range Trans-boundary Air Pollution (CLRTAP); Statistical data base on emissions.</p> <p>Spatial distribution of the air emissions.</p> <p>National emission projection reports.</p> <p>Clean air plans, action (alarm) plans for emission reduction</p> <p>Website access to air quality monitoring by</p>	<p>interest in programmes and projects.</p> <p>Sites for equipment installation prepared and protected</p>

	Intervention logic	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
	<p>Res. 2.1 – Mobile laboratories and stationary equipment are procured, delivered, installed and calibrated consistently with the existing data collection and processing systems.</p> <p>Res. 3.1 – At least six "environmental monitoring clubs"/public environmental councils are set up/supported in the regions of Belarus (at least one in each oblast).</p> <p>Res. 3.2 – Three or more CSOs engage in the development and delivery of environmental training and educational outreach in at least 70 Green Schools across the country.</p>	<p>Launching of tender, obtaining bids, carrying out bid evaluation & awarding contract to selected supplier. Quantity, quality and timeliness of equipment and services delivered.</p> <p>Number of monitoring clubs established Number of training events and environmental monitoring events held</p> <p>Number of CSOs engaged in delivery of curriculum Number of Green Schools receiving environmental curriculum Number of training event held & number of lecturers trained</p> <p>Number of CSO-monitoring bodies agreements concluded Number of feedback provided by CSOs Number of training events held & stakeholders trained</p>	<p>16 automated stationary units (2015)</p> <p>Absence of clubs/councils established in 2015</p> <p>Absence of such activities in 2015</p> <p>Absence of such cooperation in 2015</p>	<p>10 mobile air monitoring laboratories and 30 automated stationary units are procured (2018)</p> <p>At least one club and/or council created in each region of Belarus (2019)</p> <p>At least 70 green schools engaged with CSOs in educational activities targeting more than 2000 pupils across the country and 200 trainers in (2019)</p> <p>15 schools engaged, targeting about 450 pupils and 30 trainers in (2019)</p>	<p>modernised equipment.</p> <p>Provisional and final acceptance certificates</p> <p>Component 3 project reports</p> <p>CSO activity reports</p> <p>Websites with environmental curriculum at Green Schools</p> <p>Aarhus centers publications</p>	

	Intervention logic	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
	<p>Res. 3.3 – At least 15 Green Schools co-operate with local environmental monitoring bodies for data collection and management.</p> <p>Res. 3.4 – CSOs are engaged into regular policy consultations with governmental bodies responsible for environmental issues, and act as reliable partners in policy implementation activities.</p>	<p>Number of disseminations events by CSOs</p> <p>Number of relevant data sets provided by the Aarhus Centre</p> <p>Number of meeting of the Public Consultative Environmental Council held</p> <p>Number of sites adopted</p> <p>Number of stakeholders participating in professional capacity building events</p>	<p>Absence of a structured co-operation in 2015</p>	<p>Structured multi-stakeholders dialogue on environment (air quality) is held in all regions from 2019</p> <p>The Public Consultative is meets regularly on environmental decision-making issues from 2017</p>		