

April 15, 2005

Mr. Frits Schlingemann
Director and Regional Representative
UNEP Regional Office for Europe

Cc: Elena Kvitsinskaia and Danica Valnicek, UNEP;
Captain Norouz Tavana and Hamid Gaffarzadeh, CEP;
NGO Working Group on the Tehran Convention

Enc.: Russian translation of letter

Dear Mr. Schlingemann:

We, the undersigned environmental NGOs, request that during the April 20th meeting in Geneva the United Nations Environment Programme advise the Parties to the Tehran Convention to reconsider the decision to create an NGO participation accreditation process. Recognizing UNEP's position as the world's leading environmental organization, and understanding the fragility of the Caspian basin's environment, we request that UNEP advise the Parties that the draft Rules of Procedure be revised in accordance with the most progressive environmental legislation. The principles governing the Tehran Convention must be at least as comprehensive as those governing the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

These principles are outlined in Sections IV (Notification), V (Observers), and VI (Presence of the Public) of the Annex to the Rules of Procedure of the Aarhus Convention.

Section IV (Notification) states: "The secretariat shall...provide notification in the official languages of the Meeting of any meeting, including information on the date and venue, at least six weeks before it is due to take place to...e) Relevant non-governmental organizations, qualified or having an interest in the fields to which the Convention relates, that have requested to be so notified; and f) Any member of the public that has requested to be so notified."

Section V (Observers) states: "Representatives of any of the organizations referred to in rule 5, paragraph 2 (e), shall be entitled to participate in the proceedings of any meeting governed by these rules, unless one third of the Parties present at that meeting objects to the participation of representatives of that organization."

Section VI (Presence of the Public) states: "The meetings of the Parties shall be open to members of the public, unless the Meeting of the Parties, in exceptional circumstances,

decides otherwise especially to protect the confidentiality of information pursuant to the Convention."

An accreditation process, rather than strengthening democracy and guaranteeing public participation in decision-making, risks limiting diverse and valuable input into the development of the Convention while simultaneously strengthening corrupt and non-transparent practices already prevalent in the Caspian region. The Tehran Convention has the potential to substantially improve the quality of environmental protection and regional cooperation in the Caspian region. We urge you to encourage the Parties to the Convention to demonstrate their commitment to democratic principles and globally recognized legal standards by employing the Aarhus Convention in the Rules of Procedure for the Tehran Convention.

We look forward to hearing from you.

1. Andrey Aranbaev, International Socio-Ecological Union (Ashgabat, Turkmenistan)
2. Azer Garaev, Azerbaijan Society for the Protection of Wildlife (Baku, Azerbaijan)
3. Vitalii Gorokhov, EcoJuris (Moscow, Russia)
4. Farida Guseinova, Green Movement of Azerbaijan (Baku Azerbaijan)
5. Andrey Zatoka, International Socio-Ecological Union (Dashkhovus, Turkmenistan)
6. Samir Isaev, Ecolex (Baku, Azerbaijan)
7. Galina Kozlova, Ecograph (Baku, Azerbaijan)
8. Giorgi Komakhidze (Batumi, Georgia)
9. Vadim Nee, LEEP (Almaty, Kazakhstan)
10. Elena Sangina (Astrakhan, Russia)
11. Elchin Sultanov, Azerbaijan Ornithological Association (Baku, Azerbaijan)
12. Kate Watters on behalf of Crude Accountability (Alexandria, Virginia, USA)
13. Olga Yakovleva, Yuriks (Moscow, Russia)
14. Sergey Solyanik on behalf of Green Salvation (Almaty, Kazakhstan)
15. Shynar Izteleyova, EcoTAN (Atyrau, Kazakhstan)
16. Askhat Kayumov, Ecological Center "Dront", (Nizhny Novgorod, Russia)
17. Lyubov Konstantinova Sokolova, Kolsk Regional Association "For Safe Drinking Water and Food" (Murmansk, Russia)
18. Galina Chernova, Center "Globus" (Atyrau, Kazakhstan)
19. Marina Rikhvanova, Baikal Environmental Wave and International Socio-Ecological Union (Irkutsk, Russia)
20. A.V. Yablokov, Center for Environmental Policies (Moscow, Russia)
21. Vladimir Lagutov, Green Don (Novocherkask, Russia)
22. Vladimir Afonin, Community Environmental Fund "Caspian" (Almaty, Kazakhstan)

23. Yuri Valuev, Piligrim (Baku, Azerbaijan)
24. Igor Khadzhamberdiev, Suvakun Begaliev, and Rustam Tukhvatshun, Advisors for the NGO network "Water and Pollution" (Kyrgyzstan)
25. Alexander Veselov, Association of Lawyers/Environmentalists of Russia
26. Andrei Laletin, Friends of Siberian Forests (Krasnoyarsk, Russia)