

To:
The Energy Community of South East Europe Secretariat
Slavtcho Neykov
Director

Subotica, 3.11.2011

Subject: Request for proper public consultations for the Regional Energy Strategy

Dear Mr. Neykov,

We learned from the ECSEE website that there is an ongoing process for the preparation of a Regional Energy Strategy. A document called “**Proposal for Establishment and Task Force Mandate**” indicates that public consultations on a short concept paper of the Regional Energy Strategy will be launched on November 7th, 2011.

According the timeline proposed, we couldn't help but notice that further consultations are not envisioned for any of the next stages of the preparation of the Strategy.

We would hereby like to request that a proper consultation process and involvement of the public takes place in the preparation of the final version of the Regional Energy Strategy. Obviously, a document such as the Strategy affects a wide variety of stakeholders. Public consultations only on the short concept paper cannot ensure in-depth comments to be made due to the limited information provided in the paper. Consultations on a draft final document however, with all the details elaborated can help to ensure the proper involvement of the public in decision making processes regarding the future-shaping Strategy.

We therefore, urge the ECSEE, as the coordinating institution, to take the following steps in ensuring public participation:

1. Make available the draft final Strategy on the websites of ECSEE and European Commission for the public consultation process
2. Allow sufficient time for comments and opinions by interested stakeholders (at least 30 days, but ideally 120 days). Comments and opinions could be submitted online to ensure better organized collection and coordination.
3. Organise consultations meetings in the country-signatories of the Treaty to allow local communities and NGOs to participate.

We sincerely hope that the process that has been started can be improved with our recommendations.

Looking forward to your response,

Predmet: Zahtev za odgovarajućim konsultacijama za Regionalnu energetska Strategiju

Poštovani gosp. Neykov,

Saznali smo na internet stranici ECSEE da je u toku process izrade i pripreme Regionalne energetske Strategije. Dokument pod nazivom "Predlog za uspostavljanje i mandat radne grupe" navodi da će javne konsultacije vezane za kratak idejni document Regionalne energetske Strategije biti započet 7 novembra 2011.

Prema predloženom vremenskom okviru, nismo mogli a da ne primetimo da naredne konsultacije nisu predviđene niti za jednu od daljih faza pripreme Strategije.

Hteli bismo stoga da zatražimo da se redovni process konsultacija i uključivanje javnosti obavi u pripremi finalne verzije dokumenta Regionalna energetska Strategija. Očigledno je, da document kao što je Strategija utiče na široku grupu stejkholdera. Javne konsultacije samo za kratak concept ne mogu osigurati detaljnije i dublje komentare s obzirom na ograničen obim informacija koji će biti objavljen. Konsultacije vezane za finalni dokument sa svim elaboriranim detaljima nasuprot tome mogu osigurati odgovarajuće učešće javnosti u procesu donošenja odluka vezanim za buduće formiranje Strategije.

Zahtevamo stoga od strane ECSEE, kao koordinirajuće institucije da preduzme sledeće korake kako bi se obezbedilo adekvatno učešće javnosti:

1. Učini dostupnim tekst finalne verzije Strategije na internet stranicama ECSEE i Evropske komisije za process javnih konsultacija
2. Dozvoli dovoljno vremena za komentare i mišljenja zainteresovanih stejkholdera (od barem 30 dana, a idealno od 120 dana). Mišljenja i komentari mogu biti prikupljeni i on line kako bi se obezbedilo organizovano prikupljanje mišljenja i koordinacija.
3. Organizuje konsultativne sastanke u državama potpisnicama Energetske zajednice kako bi se omogućilo lokalnim zajednicama i NVOima da učestvuju.

Iskreno se nadamo da process koji je započet može biti poboljšan ovim našim preporukama.

Očekujući vaš odgovor,