

Dear President Gherhes
Dear colleagues

I am writing to you as I am following with some concern the discussions about the reorganisation of the environmental administration in Romania. I have seen the letter written by your Association to Minister Borbely and NEPA President Nagy and posted at your Internet site. You will understand that I am concerned having been the Team Leader in the EU Phare Project that has established in the years 2002-2004 the Regional Environmental Protection Agencies (REPA) and also the National Environmental Protection Agency (NEPA). Later on, in 2005-2009 I was the Resident Twinning Advisor in two consecutive EU Twinning Projects that supported the NEPA and coordinated 8 regional EU Twinning Projects which were carried out - also in two phases - at the same time as the Twinning Projects in the NEPA. Therefore, I was considerably involved in the system of environmental administration in Romania which is now under discussion.

I understand from the letter posted at your Association's Internet site that the plans being discussed in government do not foresee the complete closing of the REPA (of which I have also heard in recent days) but that they intend to downsize the REPA considerably. It is important to remember that there were very good reasons - shared at the time by all in Romania and in the EU - to establish the REPA and to support them with a series of not less than 16 EU Twinning Projects. They were to provide the link between the central and the local county levels and had especially the task to coordinate and support the Local Environmental Protection Agencies (LEPA) in the counties. Thus, the REPA were meant as the cornerstones of the decentralized (territorial) environmental administration. Most important to me have always been the roles and functions of the REPA in environmental planning, especially waste management planning, as technical partners in the preparation and implementation of Structural Funds projects, and as authorities in the issuing of Integrated Pollution Prevention and Control (IPPC) permits. It is well known that IPPC is one of the most important matters in EU environmental policies; all member states had to issue the IPPC permits for new and existing installations, and the EU Commission is closely watching - through infringement procedures - the processes in the member states in order to make sure the IPPC system is correctly enforced. Currently the system of the EU to control industrial pollution is under review and further development; the experience of IPPC authorities will be crucial.

With the establishment and strengthening of NEPA, REPA and LEPA - as well as with the establishment and strengthening of the National Environmental Guard - Romania has just put in place the environmental administration that is considered necessary and essential to implement the EU environmental Acquis Communautaire. Whatever the plans are to reorganize the environmental administration in Romania, it will be important to ensure that the environmental authorities especially at the territorial level can continue to fulfil their essential functions in implementing Romanian and EU environmental policies. Environmental protection is a new governmental task with new governmental institutions that first of all need support and strengthening. I cannot think that anyone denies that the future of all of us depends on a clean environment and intact natural resources for which a strong government is indispensable.

I am ready to assist with any advise on how administrative reform and reorganisation can be carried forward in these times of economic and financial crises which no doubt exist. Governments must take measures to review expenditures, also costs of public administrations. However, this must be done carefully and reasonably, and governments should not weaken those branches where administrative action is needed and has only recently been established and strengthened with considerable efforts. Once again, environmental protection is our responsibility for the future.

With my best regards and wishes

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