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This policy brief is intended for public policy makers and practitioners; it will also be useful for those groups and individuals seeking to influence the policymaking processes.

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Water sector: Current institutional arrangement and regulatory mechanisms

Summary

Water management system was basically established in Georgia in the second half of the nineties of last century. Since 2005 the system has gradually undergone changes; the latest large scale changes took place in March 2011. The present policy brief discusses the situation resulting from the reforms implemented in Georgia's water sector in respect of regulation framework and institutional arrangement; it also analyzes how much the current institutional arrangement and regulation instruments promote the achievement of national policy goals in the water sector. The policy brief also provides recommendations about what particular measures should be implemented to achieve policy goals.



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1. National policy goals in water sector

The Georgian National Water Policy, which is represented by numerous legislative acts, lacks uniform vision, consistency and result orientation. The goals and tasks of water resource management are not clearly defined. Moreover, the major water policy documents are actually inactive because they have not been updated as a result of the reforms implemented in the license and permit system as well as other relevant laws.

In frames of the European Neighborhood Policy, the Georgian Government has committed itself to approximate Georgia's environmental, including water legislation to the EU requirements. The National Program on Harmonization of the Georgian Legislation with that of the EU¹ provides those particular EU water directives, approximation to which is considered a priority. So far, Georgia has failed to take tangible steps in terms of harmonization with the EU approaches and principles. Despite it, the requirements set in the EU directives, according to the harmonization program, are formally declared compulsory and therefore, they represent the key goals of the National Policy.

Below there are those six EU Directives, which are deemed a top priority in the water sphere under the harmonization program:

1. Water Framework Directive (2000/60/EC);
2. Drinking Water Directive (98/83/EC);
3. Bathing Water Directive (2006/7/EC);
4. Control of Major Accident Hazards (Directive 96/82/EC);
5. Directive on Integrated Pollution Prevention and Control (2008/1/EC);
6. Urban Waste Water Directive (91/271/EEC).

Next chapters discuss how much the Georgian water management legislation and organizational arrangement provide the achievement of the goals of the above mentioned directives as a result of implementation of regulation and institutional arrangement reforms during past years.

2. Institutional framework for water management in Georgia

In Georgia, the responsibilities related to water management are dispersed among various agencies at national and local levels, though water management is basically carried out in a centralized way. In addition, the functions and responsibilities in the sphere of water management are not always clearly determined and overlapping is quite frequent. During past years, various functions of water management were transferred from one agency to the other. Moreover, following the reorganization carried out at the Ministry of Environment Protection, when natural resource management functions were transferred to the Ministry of Energy and Natural Resources, the fate of water management, as of natural resource, became quite obscure.

Nowadays, **the Ministry of Environment Protection** is the key agency in the sphere of water management. It is the Ministry's prerogative to protect and manage water, as well as to conduct water monitoring and carry out environmental control within its competence. However, the competence related to licensing the use of groundwater were transferred to the Ministry of Economic Development in 2008 and later to **the Ministry of Energy and Natural Resources** in 2011.

The Ministry of Labor, Health and Social Affairs determines the qualitative norms of the environment, including for drinking, surface, ground and coastal waters. **The Ministry of Agriculture** is responsible for controlling the quality of drinking water. **The Ministry of Regional Development and Infrastructure** carries out regional development policy. It is in charge of developing the key trends of uniform state policy over rehabilitation-development of water supply sector and of coordinating its implementation; promoting and coordinating the development of water supplies and implementing the measures on the introduction and promotion of water supply systems. Water Supply Regional Development Agency under the Ministry of Regional Development and Infrastructure was set up in 2009. It was designed as a coordinating structure aimed to promote the development of water supply and sewerage systems in Georgia. In 2010 the Agency was established as **the United Water Supply Company of Georgia** under the Ministry of Economy and Sustainable Development, as a result of the

¹ The National Program on Harmonization of the Georgian Legislation with that of the EU, the guidelines for the Action Plan, 2003.

merger of two large regional water companies. The United Water Supply Company of Georgia provides water supply and sewerage services in various regions of Georgia. In Tbilisi, Rustavi and Mtskheta similar services are provided by a private company **Georgian Water and Power Ltd. The Ministry of Economy and Sustainable Development** also participates in defining the directions for the development of water supply and sewerage, as well as melioration systems and for the coordination of their engineering along with the relevant agencies.

The authorities of Georgia's **autonomous republics and local self-government bodies** are responsible for controlling and regulation of water protection and use on their respective territories. However, their competences are not always unambiguous and clearly distributed. Moreover, since water management is completely centralized, the competences of local bodies in water sphere are extremely limited. Following the abolishment of the regional departments of the Ministry of Environment Protection, the Ministry has no regional team. However, it should also be noted that the competences and resources of regional departments are also quite limited.

Against the background of such distribution of functions, the coordination and cooperation among the state agencies related to water management is extremely weak. It should also be noted that as a result of reforms implemented in the license and permit system in 2005, the regulatory role of the Ministry of Environment Protection has significantly decreased. Moreover, as a result of reorganization carried out at the Ministry in 2011, various functions of the Ministry of Environment Protection (formerly, the Ministry of Environment Protection and Natural Resources), including natural resource management, were transferred to the Ministry of Energy and Natural Resources (formerly, the Ministry of Energy) that further downscaled the role of the Ministry of Environment Protection in the sphere of water resource management. Over the past years the role of the regional departments of the Ministry of Environment Protection was gradually limited and finally, in 2011 they were completely abolished. This is one more step behind in terms of decentralization of water resource management.

Thus, the issue of carrying out the state control by the Ministry of Environment Protection is quite

obscure after reorganization. The function of carrying out the state environmental control was transferred to the Agency of Natural Resources under the Ministry of Energy and Natural Resources. However, presently the Department of Ecological Expertise and Inspection of the Ministry of Environment Protection and the Agency of Natural Resources are both authorized to carry out control of the environmental impact permit conditions.

3. Water resources regulation mechanisms

Georgian water legislation is represented by over 15 laws and numerous bylaws. Below there is a short description of the most important laws today:

- **The Law on Water** is the key framework law regulating water resources, which defines the major issues of water protection and use. However, it should be noted that the Law on Water does not contain all aspects of water management, including groundwater management, which is regulated by the Law on Entrails.
- According to **the Law on Licenses and Permits**, presently, the **environmental impact permit** remains the only permit regulating water use. Moreover, water sphere covers a license on the extraction of minerals, regulating the use of groundwater, and fishing license. It should be noted that in parallel with making changes to the license and permit system in 2005, no updates were made to the Law on Water, as a result of which it is quite outdated and absolutely irrelevant. Generally, Georgian water legislation is fragmented and controversial. It does not contain effective mechanisms for the prevention of pollution and excessive water use; neither does it provide a precondition for the establishment of an adjusted water management system.
- Qualitative norms for the drinking water are defined by **order No 279 dated August 16, 2011 of the Minister of Labor, Health and Social Affairs "On the approval of the norms of qualitative condition of the environment."** The first part of this document on the consumption of drinking water has been replaced by **order No 349 dated December 17, 2007 of the Minister of Labor, Health and Social Issues "On the approval of technical regulations on drinking water."**

- The key rules of protection against surface water contamination are established by **order No 130 dated September 17, 1996 of the Minister of Environment Protection “On approval of the rules of protection of surface waters of Georgia from pollution.”** This document defines the key principles of preventing the surface water contamination.
- The rule of development and approval of the norms of maximum permissible discharge has been defined by **order No 169 dated December 29, 1997 of the Minister of Environment Protection “On approval of the regulation on maximum permissible norms of emission of harmful substances into the environment and pollution of the environment with microorganisms.”**
- According to the Law on Environmental Impact Permit, for all those activities, which are not subject to environmental impact permit, it is compulsory to observe environmental technical regulations determined by **order No 745 dated November 13, 2008 of the Minister of Environment Protection “On environmental technical regulations.”** This document defines technical regulation of discharge of waste water from industrial and non-industrial facilities into surface water bodies as well as technical regulation on removal of water from surface water bodies.

4. Analysis

4.1 Water management

Today water management is clearly centralized in Georgia, while water policy is not oriented to the implementation of concrete goals and tasks. The goals provided in water legislation are quite general. There are no concrete measures that would promote the implementation of these goals. In addition, there are no effective water quality management mechanisms. Georgian legislation does not take into consideration the principles of integrated management of water resources and there are no preconditions for moving to the model of water basin management.

It should be noted that the current monitoring system needs significant technical improvement. Presently, Georgia conducts monthly monitoring of physical-

chemical qualitative elements only in 22 rivers, while in the nineties of last century similar monitoring was conducted in 72 rivers. Monitoring of a total of 33 elements is conducted. Neither a great part of organic substances, nor the priority substances defined by the EU Water Framework Directive are actually measured. Hydrological observations are carried out only at 29 stations out of previously existing 150 stations. Except for the seven stations, which were rehabilitated and equipped quite recently, the stations are not equipped in line with modern standards. Hydro biological monitoring is in the process of gaining its foothold in Georgia. The National Environmental Agency, in frames of international projects, is working over the improvement of both equipment and methods. However, multiyear observations and accumulation of information are needed to define the type-specific characteristics of water bodies.

Numerous licenses and permits existing in the sphere of water consumption were abolished as a result of reforms carried out in the system of licenses and permits in 2005-2006. Currently, there are only fishing and groundwater consumption licenses. Management of water quality and amount is being carried out through **environmental impact permit** and **environmental technical regulations**.

Environmental impact permit is issued at a national level by the Ministry of Environment Protection. Nowadays, the system of issuing this permit needs serious improvement (see subchapter 4.3).

As far as water service expenses are concerned, the EU Water Framework Directive requires full withdrawal of water service expenses that cannot be achieved in Georgia so far. According to the survey conducted in 2005, the existing financial resources are not enough to maintain the existing water services². There are no formal methods or rules for calculation of water service tariffs. Tariff increase is complicated because of the population's social condition. Moreover, 'polluter pays principle,' which is the key guideline in the environmental sphere of the world, does not act at all. Pollution tax has been abolished, while a tax of surface water resource consumption is practically inactive. According to the

2 The 2005 financial strategy of Georgia's urban water supply and water cleaning systems

law, a water use license holder³ is subject to payment of a tax. After abolition of water use licenses, it became practically impossible to administer the taxes. Based on the above mentioned, today there are no mechanisms to encourage water conservation in Georgia.

4.2 Drinking and bathing waters

There is no formalized procedure in Georgia, which would identify, describe bathing waters and define bathing water profiles. Bathing waters are subject to the same regulations, which are generally determined for surface waters. There are no requirements defined for the quality of bathing waters during a swimming season. Microbiological monitoring is conducted only at some bathing water bodies in Georgia. Furthermore, the assessment and classification of bathing water condition by quality does not take place, though it is required by EU Bathing Water Directive. Respectively, no measures are planned and implemented for the improvement of bathing water quality.

The current legislation does not regulate public informing on the quality of bathing water, character of pollution, causes and duration, possible threats and measures taken. Public informing is envisaged by the regulation on the rules of restricting the rights of water consumers in special cases⁴; however, water user is obliged to inform the population on possible threats, while the state and local self-government bodies are obliged to publish through mass media the conditions of restricted water use. It should also be noted that the state sanitary supervision agencies, indicated in the document, which are responsible for the assessment of sanitary-hygienic condition of water supply systems and bathing waters, as well as for the research of pollution area, do not exist any longer.

4.3 Pollution control

Accidental pollution

In Georgia, the facilities with increased risk and the related processes are regulated by the **Law on Controlling Technical Danger**. The facilities, equipment, devices, processes and so on, which

contain a potential technical risk and which in case of an accident or incorrect exploitation, can cause harm to human life, health, property and environment are believed to pose increased risks. The Technical and Construction Inspection under the Ministry of Economy and Sustainable Development carries out supervision over such facilities.

It should be noted that this law mostly applies to the facilities containing a risk of technical accidents, and unlike the EU Directive on Control of Major Accident Hazards, it does not envisage preventing of major accidents related to emission of hazardous substances.

Moreover, the Law on Controlling Technical Danger does not envisage preparation of safety reports, accident prevention policy or emergency plans and raises general requirements to the owner of the facility. The EU Directive on Control of Major Accident Hazards details those minimum data and information, which should be included in the safety report, accident prevention policy and emergency plans prepared by the owner of the facility.

Moreover, unlike this Directive, the Law on Controlling Technical Danger does not envisage public informing and readiness, as well as informing the neighboring states about the possibility of a major accident with trans-boundary effects. According to the Law on Controlling Technical Danger, the owner of the facility is obliged to notify only the Technical and Construction Inspection about an accident.

It should be noted that the Law on Controlling Technical Danger, which was adopted in 2010, replaced the **Law on Hazardous Chemical Substances**. Among the key goals of this law there were protection of human health and environment against harmful effects of hazardous chemical substances and introduction of management of safe use of hazardous chemical substances. The law was regulating the production, keeping and consumption of hazardous chemical substances and monitoring of technical safety conditions.

It should be noted that the Law on Hazardous Chemical Substances envisaged the issues of publicity of information about hazardous chemical substances. Moreover, the law contained the requirements for exchanging information about hazardous chemical substances, including the

³ The Law of Georgia on Taxes on the Use of Natural Resource; December 29, 2004, article 3

⁴ Order No 308 dated November 5, 2002 of the Minister of Labor, Health and Social Affairs "On the approval of the rules of restricting the rights of water consumers in special cases"

requirement for exchanging information among the interested states. The law also obliged the producers of chemical substances to prepare a special educational-information material on correct and safe production, transportation, consumption of chemical substances, as well as safety, prophylactic and other measures. However, these requirements had a general nature and the law did not specify what kind of information was compulsory to be exchanged and in which particular cases.

Chapter 16 of the law contained the measures on avoiding the emergency situation caused by the use of hazardous chemical substances. In particular, according to the law, the managers of the facilities using hazardous chemical substances were obliged to develop a list of possible accidents and emergency situations, along with forecasting their circumstances; plans of measures on readiness for accidents and emergency situations and the necessary actions, including the plans of rendering medical aid to the personnel and population; also the plans of action during the emergency situations. The plan should have envisaged the issues of operative warning of emergency service, local self-government bodies and population about the state of emergency. However, it did not envisage the particular details, namely some issues envisaged by the Directive on Control of Major Accident Hazards, such as: the situation and developments possible to cause accidents; measures on their control and reduction of possible negative impacts; description of early warning actions, etc.

According to the law, in case of an accident, local self-government bodies were obliged to inform the public through mass media about the accident, its character and scale, possible consequences and necessary measures to mitigate these consequences.

Unlike the Law on Controlling Technical Danger, the Law on Hazardous Chemical Substances covered the list of those facilities, which were producing or keeping chemical substances; however, the law did not specify any criteria on identifying such facilities.

The Law of Georgia on Protecting the Population and Territory from Emergency Situations of Natural and Technogenic Character aims at avoiding the emergence and spread of emergency situations, reducing the harm caused by emergency situations and liquidating the damage. According to

this law, the industrial facilities are obliged to plan and implement the measures preventing emergency situations, to notify the authorized bodies about the emergency situation. The law also envisages the publicity of information about emergency situations. In particular, Georgian state, autonomous, regional and local governmental bodies, as well as the administration of the facility, are obliged to inform the population timely and distinctly through mass media.

According to article 27 of this law, **decree No 154 of the Government of Georgia dated June 4, 2010 “On the approval of the instruction concerning the rule of submitting a safety declaration”** was adopted. The instruction requirements apply to the facilities with increased technical risks, including to the facilities, from where, in case of an accident, hazardous chemical substances may be released into the atmosphere. It should be taken into consideration that this list does not contain all those facilities, which are regulated by the Directive on Control of Major Accident Hazards. The law obliges the facilities with increased risks to prepare a safety declaration. Moreover, the law specifies those data, which should be included in a special form of the declaration. These data mostly comply with the information required by the Directive on Control of Major Accident Hazards.

Safety declarations are filled for a term of three years. Moreover, there is no authorized central body identified, whom a safety declaration shall be submitted to. It is also unclear, whether it is compulsory for a facility to prepare a safety plan, because a declaration does not indicate whether any such plan exists at all. It is not also specified, whether there is a system of notification of personnel or the population of the adjacent territory in case of an accident. It should be noted that the legislation does not envisage any requirements for implementation of restoration measures by an industrial facility. The Georgian legislation also does not provide any instructions about the actions in case of a major accident with trans-boundary effects. Decree 68 dated March 21, 2008 of the Georgian Government “On the rule of defining the classification of emergency situations”, determines the concept of trans-boundary emergency situations. However, the Georgian legislation does not define the measures on notification and reaction as well as the actions to be taken following the liquidation of consequences.

According to the Georgian legislation, those activities, which are characterized with significant environmental impacts, are regulated by the environment impact permit. To obtain a permit, the actors have to carry out environmental impact assessment (EIA). Based on the ecological expertise of EIA report, the Ministry of Environment Protection grants an environmental impact permit. According to the environmental impact assessment regulation⁵, EIA report should contain the definition of the probability of possible emergency situations caused by the activities as well as the assessment of their possible consequences. Furthermore, EIA report should also contain the plans of reaction on emergency situations. However, it does not mean a safety plan on emergency situations that is determined by the Directive on Control of Major Accident Hazards. At the same time, it should be noted that EIA reports reflect the probability of emergency situations and the plans of reaction on emergency situations quite weakly.

Based on the above mentioned, and in order to meet the requirements reflected in the Directive, it is essential to subject the types of activities indicated in the Directive to relevant regulations. Since the Law on Technical Danger and the Law on Protecting the Population and Territory from Emergency Situations of Natural and Technogenic Character do not cover all types of facilities, which are regulated through the Directive, it would be expedient to prepare sectoral EIA guidelines for such facilities, that would help reflect these issues in EIA report and environmental impact permit conditions.

Integrated pollution control

As mentioned above, in Georgia the activities with potential environmental impacts are regulated by environmental impact permit. In 2005 reforms were implemented in Georgia's license and permit system, as a result of which the number of environmental licenses and permits was significantly reduced. The key goal of the reform was to simplify the system of licenses and permits and to introduce "one window" principle. Environmental impact permit envisaged regulation of impact from various activities on various components of the environment - in particular, emissions into the air; discharge into water; water consumption; waste production, etc. At a glance,

such permit envisages integrated approach towards environmental management. However, environmental impact permit system has numerous weak sides and shortcomings that ultimately cause a failure to meet the requirements set out in the Directive on Integrated Pollution Prevention and Control.

First of all, after implementing reforms in the system of licenses and permits, the types of activities subject to environmental permits were reduced significantly. Particularly, the 2007 Law on Environmental Impact Permit does not apply to a number of important activities envisaged by the Directive, such as: various branches of food industry, processing of dairy products, intensive poultry or pig farming facilities, wood processing, etc. Moreover, the list of activities included in the Law on Environmental Impact frequently contains large categories and is less detailed. Therefore, it is often disputable whether or not this activity is subject to permit.

While making decisions in the process of issuing environmental impact permits, the following issues are not taken into consideration: use of pollution prevention measures and best techniques; minimization of waste production; energy saving; accident prevention and harm minimization that are the requirements of the above mentioned EU Directive. Moreover, permit conditions are not established fully that creates problems at the level of monitoring the permit conditions. Furthermore, the environmental impact permit system does not cover the issues of trans-boundary pollution.

The means of public informing and participation are imperfect. In particular, preparation of a short non-technical summary on the issues discussed in EIA is not envisaged. The entity, implementing the relevant activities, is responsible for public informing, organizing public discussions and receiving remarks before submitting an application to the Ministry of Environment Protection for receiving a permit. Afterwards, a decision on issuing a permit is made through a simple administrative procedure, unlike the system existing before 2005, when environmental permit was issued through public administrative proceeding. Simple proceeding means that participation in decision making process is limited and it is possible only for the interested parties. Because of limited terms, absence of particular procedures for public informing and participation, it is almost impossible to participate in the decision making process on issuing a permit. Moreover, the

⁵ Approved by order No 14 dated October 4, 2011 of the Minister of Environment Protection of Georgia.

public is not provided with information about the issued permit, permit conditions and any further changes to permit conditions, as well as about decision substantiation and results of public participation. There is no mechanism for informing the neighboring countries in case of the projects with trans-boundary effects. Moreover, the monitoring results defined by the permit conditions are not available to the public.

Due to lack of technical and human resources, control over permit conditions is carried out quite weakly. Moreover, the distribution of functions of controlling the enforcement of legislation regulating the environmental and natural resource use between the two agencies (the Ministry of Environment Protection and the Ministry of Energy and Natural Resources) caused duplication of functions between the Agency of Natural Resources of the Ministry of Energy and Natural Resources and the Department of Ecological Expertise and Inspection of the Ministry of Environment Protection.

Urban wastewater

Discharge of wastewater from urban wastewater treatment facilities is regulated by the environmental impact permit. It is essential to define in the environmental impact assessment process those admissible discharge norms for particular treatment facility, which will meet the maximum admissible norms of discharge of harmful substances and the qualitative norms of surface waters determined by the Georgian legislation.

Today, almost all wastewater treatment facilities are idle in Georgia. As a result, presently urban wastewater represents one of the major sources of surface water pollution. The facility located in the Gardabani district, which treats urban wastewater transported from Tbilisi and Rustavi, provides only primary, mechanical treatment. Moreover, a significant part of wastewater is not connected to a collector and directly flows into the Mtkvari River. According to the permit conditions of the Gardabani wastewater treatment facility, the latter should be fully rehabilitated by 2018. However, no rehabilitation works have started so far.

Georgian legislation does not envisage the possibility of establishment of stricter standards for sensitive waters. Though, this issue is taken into consideration in the process of granting an environmental impact

permit. Moreover, there are no requirements for monitoring the waters discharged from urban wastewater treatment facilities and received waters, as well as for regular publishing of relevant reports.

As already mentioned above, Urban Waste Water Directive sets requirements for some industrial sectors. In particular, according to the Directive, the industrial sectors set out in Annex III of the Directive, which mostly discharge into surface waters biodegradable waters rich in nutrients, must be subject to special regulations or permits. These sectors mostly cover the branches of food industry, which, according to the Georgian legislation, do not require environmental impact permits. Respectively, these activities are regulated by environmental technical regulations. However, these regulations define uniform standards of discharge without giving due consideration to the peculiarity of the activities, sensitivity of the given environment and other important issues. Moreover, both environment impact permit conditions and technical regulations are not fulfilled appropriately.

5. Recommendations

1. To eradicate the faults and shortcomings existing in Georgian water legislation and to provide effective protection and management of water resources, it is vital to create a uniform framework document in water sphere, which will cover all types of water bodies, including groundwater.

2. To provide effective management of water quality it is necessary to develop ecological tasks for each type of water body and to classify water bodies by their ecological statuses. For this purpose, it is crucial to establish a formalized, adjusted system for hydrological and water pollution monitoring. Taking into consideration the existing scarce human and technical resources, it may be expedient to plan monitoring so that the monitoring program firstly involves sensitive and mostly affected water bodies. It is also essential to translate the results of monitoring in the parameters of ecological status of water and to plan further steps for improving water quality.

3. The system of environmental impact permits needs further strengthening. It is expedient to introduce an integrated permit for large industrial facilities and comparatively simplified environmental permit for

medium-sized and small industrial facilities. Used technologies and measures on pollution prevention should be taken into consideration in the process of issuing a permit. It is also necessary to provide full public participation in decision making process. It is also essential to develop a mechanism to provide the involvement of neighboring countries in the process of making decisions on the activities with trans-boundary effects. Moreover, the public should be informed about the permit applications submitted to the Ministry of Environment Protection, as well as issued permits, their substantiation, permit conditions, any changes to permit conditions and monitoring of permit conditions. It is also urgent to provide relevant inspection of EIA, permit conditions and environmental technical regulations.

4. It is also necessary to settle the problem related to administering the taxes on consumption of surface water resources.

5. It is expedient to prepare sectoral guidelines on environmental impact assessment for the types of activities indicated in the EU Directive on Control of Major Accident Hazards to ensure that the issues

related to accident prevention and management are appropriately reflected in EIA reports and permit conditions.

6. It is vital to specify the goals for the reduction of surface water pollution with urban wastewater as well as the relevant program on equipping Georgian settlements with wastewater collection and treatment systems.

The views expressed in this publication are those of the author, reflect Green Alternative's position and should not be taken to represent those of the Embassy of the Kingdom of Netherlands in Georgia.

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