2 February 2023

To:

The Ministers of the Israeli Government

Greetings,

**The Position of the Environmental Groups on the Arrangements Law**

The undersigned environmental groups are hereby honored to apply to you with a request that you amend the Arrangements Law being promoted at present, which includes amendments to the National Infrastructure Law as well as the draft of structural changes to the 2023–2024 budget.

We believe that the Arrangements Law contains a number of important clauses we welcome, at the same time there are many environmentally problematic clauses we propose be deleted or amended in order to prevent and reduce harm to man and nature.

At this time, when we are already aware that we are in the midst of two interwoven crises, a climate crisis and an environmental crisis, which endanger the quality and well-being of life and even its very existence – it is desirable not only to avoid promoting proposals that are harmful to man and his environment, but also to march forward.

Among all the problems to be found in the Arrangements Law, regarding which we have submitted separate, detailed comments from several of the environmental organizations, in this letter we wish to emphasize a number of significant lacks and defects that, in our opinion, must be corrected in the Arrangements Law:

* **Harm to the status of the environmental consultants in the planning institutions** – the planning processes have far-reaching consequences to the environment in which we live, and, to a significant extent, they determine the quality of our lives. The Arrangements Law suggests privatizing the position of the environmental consultant in the planning committees and in effect to transfer the field of the environment from the Ministry for the Protection of the Environment to private hands, which would lead to the most serious harm to the health of the public, the environment and the ecological systems.
* **Promotion of the electricity grid without a plan** – the Arrangements Law proposes permitting the construction of new transmission power lines (161 and 400 lines) without any detailed plan, with no examination of alternatives, without a survey of the affect on the environment, and in fact without a plan. This is a destructive step, particularly in light of the fact that in the coming years, hundreds of kilometers of power lines are to be constructed throughout the country. If this clause is approved, these lines will be promoted without the public having any ability to influence the planning.
* **A very partial reference to the climate crisis and the ecological systems crisis** – two of the greatest threats in the coming years (see, for example, the report of the World Economic Forum – Risks 2023[[1]](#footnote-1)). Although the Arrangements Law includes certain concessions for the promotion of renewable energies, this is a drop in the ocean that highlights what is lacking: the law does not allocate resources to stimulate a significant transition to renewable energies; it does not promote the taxation or pricing of carbon; it does not promote a low- or zero-carbon economy; it does not allocate resources to the various government ministries for manpower, research and preparation for climate change in their field; it does not allocate resources for the rehabilitation of nature and nature-based solutions to prepare for the climate changes, etc.

We hope that the government of Israel will adopt the proposed amendments to the Arrangements Law submitted by the environmental organizations, and specifically on the important topics indicated above and will amend its plans so that they avoid harm to citizens, the environment and nature and instead adopt operative proposals for the promotion of the quality of life and the environment in Israel while confronting the challenges at our doorstep.

 Respectfully,

1. [https://www.weforum.org/reports/global-risks-report-2023/digest?\_gl=1\*zttr85\*\_up\*MQ..&gclid=CjwKCAiAuOieBhAIEiwAgjCvcnT0ASVsj8mAoPNkImyH7gLUy-ySjgIxI6VIsnj7B5kJdgP6MpEyvRoCsFoQAvD\_BwE#report-nav](https://www.weforum.org/reports/global-risks-report-2023/digest?_gl=1*zttr85*_up*MQ..&gclid=CjwKCAiAuOieBhAIEiwAgjCvcnT0ASVsj8mAoPNkImyH7gLUy-ySjgIxI6VIsnj7B5kJdgP6MpEyvRoCsFoQAvD_BwE#report-nav) [↑](#footnote-ref-1)