2 February 2023

To:

The Ministers of the Government of Israel

Greetings,

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

The undersigned environmental groups respectfully apply to you with a request for amendments for the Arrangements Law being currently under consideration, which include 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 provisions we welcome. However, at the same time, there are several provisions that pose significant environmental risks. Therefore, we propose deleting or amending these sections in order to prevent and reduce harm to people and to nature.

It has now become clear to all that we are in the midst of two interrelated crises – the climate crisis and the ecological crisis –that endanger the quality and well-being of our lives, if not its very existence. Hence, it is necessary not only to avoid promoting proposals harmful to humans and the environment, but also to take proactive action.

Although several other environmental organizations have submitted their own detailed comments, in this letter, we would like to highlight some of the significant flaws and deficiencies found in the Arrangements Law which we believe need to be addressed:

* **Downgrading the status of the environmental consultants in the planning institutions**  The planning processes have far-reaching consequences for our environment, significantly affecting our quality of life. The Arrangements Law proposes privatizing the position of the environmental consultant in the planning committees, effectively transferring responsibility for the field of the environment from the Ministry for the Protection of the Environment to the private sector. This shift could lead to most serious damage to harm to the health of the public, the environment, and the local ecological system.
* **Expanding 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 impact on the environment, and, in fact, without a plan. This is a potentially dangerous step, particularly in light of the fact that in the coming years, hundreds of kilometers of power lines are to be installed throughout the country. If this clause is approved, the public will not be able to have any say in the planning of these lines.

* **A very partial reference to the climate crisis and the ecological systems crisis**

These represent two of the greatest threats to us 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 promoting renewable energies, this is just a drop in the ocean, which actually emphasizes what is lacking: the law does not allocate resources to stimulate a significant transition to renewable energies; it does not promote carbon taxation or pricing; it does not promote a low- or zero-carbon economy; it does not allocate resources to the various government ministries for manpower, research, and preparing for climate change in their field; it does not allocate resources for restoring nature, nature-based solutions to prepare for climate change, and more.

We hope that the government of Israel will adopt the proposed amendments to the Arrangements Law submitted by the environmental organizations, especially with respect to the important topics indicated above. We consider it vital that the government amend its plans to prevent harm to citizens, the environment, and nature and instead adopt operative proposals to promote the quality of life and the environment in Israel while confronting the challenges ahead.

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)