From: G II 1

To: Aarhus Compliance

Cc: info genf diplo, G II 1, Lutz Dagmar

Date: 21/11/2016 18:28

Subject: AW: ACCC/C/2013/92 (Germany) - Committee's draft findings

Dear Ms. Marshall,

Thanks for your message. Hereby I confirm the receipt as requested.

After a first preliminary study of the draft findings I have to confess that we are surprised. Therefore, in order to be able to prepare our comments, I have to ask for a prolongation of the deadline (until mid or end of January 2017).

As you know the end of the year is always a very busy period in authorities and Ministries. Especially in our unit we are currently inter alia dealing

- with the legislative implementation of decision V/9h
- with the finalization of the National Implementation report of the Convention (due in December 2016)
- with our statement in compliance case 137 (due on 3 January 2017).

Therefore we do not have the sufficient human resources for preparing a proper and well-coordinated answer to the draft findings in the time period provided. The same workload applies to our lingual service that is burdened as well with the above mentioned tasks and that is needed for translating the draft findings into German language and our final statement into English (any national coordination can only take place in the domestic language, because everything else would treated as unfair).

We count on the understanding of the Committee, bearing in mind that obviously also the Committee was struggling with its workload in finalizing the draft statements during the last 1 and a half years.

Best regards

Matthias Sauer Head of division

Division G II 1

Freedom of Information legislation, Environmental Liability Legislation, Better Regulation Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety