

Attracta Uí Bhroin
The Irish Environmental
Network
Macro Resource Centre
1 Green Street
Dublin 7
Ireland

13th July 2014

Ms Fiona Marshall,
Secretary to the Aarhus Convention Compliance Committee
United Nations Economic Commission for Europe
Environment Division
Palais des Nations
CH-1211 Geneva 10, Switzerland

Email: Aarhus.Compliance@unece.org

**Re: Submission to the Aarhus Convention Compliance Committee re.
Communication ACCC/C/2014/112**

Dear Ms Marshall,

Below is a memorandum in respect of the observations made by observers present from eNGOs within the Irish Environmental Network¹ and the Irish Environmental Pillar² at the public session of the Aarhus Convention Compliance Committee held in Geneva on 24 June 2016 which considered Communication number ACCC/C/2014/112 concerning Ireland.

The second part of the oral observation we made and documented here was *ex tempore*. However the written memorandum in respect of that observation provided here we submit reflects the oral comments made, based on our notes of same.

In addition to the above we are also providing below and attached:

- Some additional notes and footnotes in the text of the memorandum on our observation to add clarity to the comments made or the implications of same;
- An Annex I, including tabulated data to substantiate the comments made in respect of the timeframes taken in respect of requests for access to environmental information, incorporating appeals;
- Two further Annexes (attached) as referenced to support our assertions, specifically:

¹ **The Irish Environmental Network** is an umbrella network that works to support environmental NGOs through access to funding and services. It consists of 34 environmental NGOs that carry out their work through practical conservation work, campaigning, lobbying and raising public awareness of environmental and conservation needs

² **The Irish Environmental Pillar** is comprised of 29 national independent environmental non-governmental organisations (NGOs), who work together to represent the views of the Irish environmental sector. The Environmental Pillar was established as an independent national social partner by decision of the Government in 2009. The work of our members covers a broad range of areas including habitat conservation, wildlife protection, environmental education, sustainability, waste and energy issues, as well as environmental campaigning and lobbying. The members work towards achieving Sustainable Development, according to the [Rio Declaration](#) of 1992. These principles require the balancing of the three pillars of Sustainable Development – social, environmental, and economic.

- Annex 2 : The 2015 annual report from the Commissioner for Environmental Information
- Annex 3: The judgement of the Irish High Court in Minch v The Commissioner for Environmental Information, [2016] IEHC 91
- A post script to address a specific comment made by Legal Counsel for the Party Concerned in response to certain of our observations.

Finally, we thank the Secretariat for its assistance to us in this matter, and the Committee for its further consideration of our remarks.

Yours sincerely

Attracta Uí Bhroin

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