

We would like to note that the rules the Slovak Republic applies for not giving information to GLOBAL 2000 and other problems show that a non-compliance with Aarhus requirements is ongoing.

These obvious compliance issues indicate that the whole permitting procedures in Slovakia are not in line with the Convention.

We are right now in the licensing procedure for the operation of NPP MO34.

Exactly these days, the regulator UJD is about to refuse our appeal against their decisions of the step-by-step operating license for MO34. GLOBAL 2000 appealed against the decisions because of lack of facts to support those licensing decisions and lack of information in general. We usually are refused because of those "rules" of classification are applied, according to which nearly all environmental information procedure for nuclear installations requested is exempt from disclosure.

We would also like to note that salami tactics are used to claim that a specific issue (water, safety level) cannot be discussed at this point because it presumably has nothing to do with e.g. fuel facilities which are being licensed.

Moreover the changes for MO34 which were subject to EIA in 2010 were approved in 2008, several others were applied later as the plant's operator SE claims in consequence of the Fukushima follow up. So as public participant to the permitting procedure we did not receive any information which changes to the project were realized and the actual status of the plants is unknown to the public. Apart from this lack of information we are convinced that an EIA would be required for the plants Mochovce 34 to cover the changes undertaken.

To sum up: While the ACCC made clear, that the Slovak Republic is in violation with the convention, the steps pointed out here prove the continuation of this incorrect approach.

Besides, we would like to mention that the same salami tactics of cutting up major projects at NPP into tiny projects and then deciding that no EIA is needed and no information is provided, is currently ongoing at MO 12 und Bohunice 34.

GLOBAL 2000, Patricia Lorenz, March 15 2019