



Exmos. Srs. Prof. Dr. Mr. Jonas Ebbesson Chair, Aarhus Convention Compliance Committee United Nations Economic Commission for Europe

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Subject: Request to appear as Observer in PRE/ACCC/C/2021/186

Dear Chair,

The Municipal Council of Boticas (Portugal) has become aware of the existence of communication PRE/ACCC/C/2021/186 regarding access to environmental information and public participation in the Barroso Mine project, that is located in the municipality of Boticas.

Since the present Administration learned about the proposed lithium project, it has attempted by all possible means to obtain access to relevant public information, given the great concerns that have emerged within our communities and wider region, also in terms of safeguarding our municipality's status as a UN FAO Globally Important Agricultural Heritage Systems site. However, efforts by the Municipal Council have been mostly met with silence by competent national Authorities.

For example, on November 21, 2019 the Municipality made a request for environmental information directed at the Portuguese Environmental Agency (APA) regarding permits given to Savannah Resources to use water from nearby rivers, APA



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failed to provide any response in spite of subsequent informal reminders.

Similarly, when the process to grant "Strategic Industrial Project" (PIN) status to the "Mina do Barroso" project was ongoing in 2018 and 2019, the Municipality made a number of requests for relevant environmental information which were all ignored. This includes a December 21, 2018 request to the Directorate General of Energy and Geology (DGEG).

The Municipal Council of Boticas is aware of how the efforts made by the communicants and other citizens and NGOs to obtain timely access to environmental information regarding "Mina do Barroso" have been severely limited.

In that context, the Municipality has repeatedly petitioned national authorities to obtain an extension of the public consultations period given the irregularities in the process, including absence of critical documents during the first 20 days of the consultation.

As the closest public administration to the affected communities, the Municipal Council of Boticas wishes to appear as an observer in the current PRE/ACCC/C/2021/186 proceedings, offering to provide any additional information on how the environmental impact assessment procedure has been carried out and the obstacles that have arisen for adequate public participation, including those relating to access to environmental information.

Yours sincerely,

Fernanco Queiroga

Mayor / President of President of the Municipal Council

