

Secretariat to the Aarhus Convention Compliance Committee  
United Nations Economic Commission for Europe  
Palais des Nations  
8-14 avenue de la Paix  
CH - 1211 Geneva 10, Switzerland  
Email: [aarhus.compliance@un.org](mailto:aarhus.compliance@un.org)

14 October 2022

Dear Aarhus Convention Secretariat,

**Re: UK Action Plan in accordance with MoP-7 Decision VII/8S**

We write further to the 76<sup>th</sup> Meeting of the Aarhus Convention Compliance Committee, during which the Committee was due to start a review of the Action Plans required under the Decisions of the 7<sup>th</sup> Meeting of the Parties to the Convention. We understand that at its 77<sup>th</sup> meeting in December 2022, the Committee will, where needed, discuss the plan of action prepared by a Party concerned in open session (further to the [Information Note](#) circulated by the Secretariat on 7 February 2022).

We would like to take this opportunity to request the Committee discusses the UK Action Plan further to Decision VII/8S (which covers the UK and prohibitive expense, among other matters). The Committee is in receipt of our respective submissions following the circulation of the Plan (see [here](#), [here](#) and [here](#)). These submissions explained in some detail our concerns about the lack of engagement with stakeholders in the period leading up to the publication of the Plan and the paucity of its substantive content.

The UK Plan failed to include any tangible proposals in relation to England, Wales and Northern Ireland and while it gave some general indication as to the processes and legislation through which reforms may theoretically be undertaken in Scotland, it was hugely disappointing that after a decade of findings of non-compliance there are similarly no commitments to actual proposals in response to the recommendations of Decision VII/8S. These concerns are compounded by the fact that we wrote to Defra in 2021 setting out, in some detail, the main barriers to compliance with Article 9(4) regarding prohibitive expense and how these barriers might be addressed (see the link above).

We believe the devolved administrations of the UK would benefit from an open and informed discussion about the UK Plan and how it could meaningfully address ongoing barriers to environmental justice. We would be grateful if the Committee could consider this request when deliberating which Action Plans to consider in open session.

Please do not hesitate to contact us if you require any further information or clarification on any of the points made in this letter.



Yours faithfully,

Carol Day (Consultant Solicitor) and Rosie Sutherland (Head of Legal), the RSPB

Will Rundle (Head of Legal), Friends of the Earth England, Wales and Northern Ireland

Angus Eames, Lawyer, UK Environment, ClientEarth

Ben Christman (in-house solicitor) and Shivali Fyfield, Environmental Rights Centre for Scotland

Mary Church, Friends of the Earth Scotland