

From: Mutert, Tina [REDACTED]

Sent: Thursday, November 10, 2022 5:48 PM

To: ECE-Aarhus-Compliance <aarhus.compliance@un.org>

Subject: AW: Opportunity for Parties and stakeholders to comment on Compliance Committee's draft advice on decision VII/8m (Netherlands)

[REDACTED]

Dear Members of the Aarhus Convention Compliance Committee,

Thank you for the opportunity to comment on the draft advice to the Netherlands concerning the implementation of paragraph 3 (a) of decision VII/8m.

To this we would only like to note that from our point of view, the question addressed in paragraph 14 whether a change in the identity of an operator could significantly change the basic parameter of an activity should not be answered in general as proposed by the draft. In this regard a case by case assessment of the activities in Annex I is required and a change in the identity of an operator is only relevant in rare case. In our view this is only justified concerning nuclear activities, because of their high risk potential, but e.g. not with regard to typical industrial installations.

Furthermore, we would like to indicate that it might be useful to make reference to the Guidance on the Applicability of the Espoo Convention to the Lifetime Extension of Nuclear Power Plants (<https://unece.org/environment-policy/publications/guidance-applicability-convention-lifetime-extension-nuclear-power>).

Your sincerely

On behalf of

Tina Mutert