

From: Minería [REDACTED]
Sent: Monday, February 27, 2023 9:20 PM
To: ECE-Aarhus-Compliance <aarhus.compliance@un.org>
Subject: Re: ACCC/C/2017/153 (Spain) - letter from Party concerned

Dear ACCC Secretariat,

Regarding the Party's proposal to postpone the hearing, we wish to inform that Ecologistas en Acción has already made travel and accommodation arrangements for which no reimbursement is possible. We believe this places an unjust burden in our organization that had made considerable effort to be present in the hearing (Ecologistas en Acción indicated it's wish to be present in its email of January 30 and registered via Indico for that purpose following the Secretariat's instructions) in spite of the high costs of travelling to Geneva.

Also, both the grounds and the timing to request a postponement do not seem to justify such a measure. The procedure was started in 2017 and the Party had plenty of time to consider the facts presented by the communicants and observers. Given that no new facts have been presented, the main issue remains that in both instances (the San Finx and Varilongo mines) mine projects were approved without an environmental impact assessment and no public participation. Since 2017, the Party's authorities have made no effort to amend that decision and, on the contrary, have taken similar decisions in other mines in the same region (for example, the "Alberta I" lithium mine in Ourense and the Silán mine in Lugo, both of which had no environmental impact assessment).

Therefore, we hereby request that the date for the hearing is maintained based on the facts available in the file and on any clarifications that may be offered by observers and communicants.

Yours sincerely,

Cristóbal López Pazo

Co-coordinator, Mining Area

Ecologistas en Acción

Área de Minería
Confederación de Ecologistas en Acción

www.ecologistasenaccion.org