

Secretary to the Aarhus Convention Compliance Committee
United Nations Economic Commission for Europe
Environment Division
Palais des Nations
CH-1211 Geneva 10, Switzerland

Sent by e-mail to aarhus.compliance@un.org

Reykjavík, 5 February 2024.

Re: Communication to the Aarhus Convention Compliance Committee concerning compliance by Iceland with Articles 6, 8 and 9 of the Convention in connection with legislation on fish farming (PRE/ACCC/2019/168).

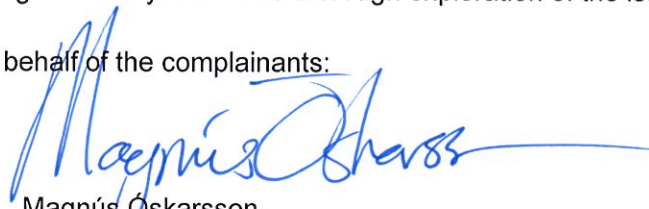
Reference is made to your letter dated 22 January 2024. My clients are of the opinion that a hearing is needed in this case. My clients want to emphasize the importance of a hearing for a comprehensive and fair assessment of the issues at hand. We believe that a hearing would contribute significantly to the Committee's understanding of the situation and the significance of the case for public interests.

Complexity of the Issues and Facts: Iceland has changed the legislation in this area recently and it is necessary to be able to discuss those developments. We believe that can be best understood through a detailed oral presentation and possibly Q&A session if permitted.

Public Interest and Transparency: We believe a hearing would promote transparency and public trust in the decision-making process. My clients are environmental association with many members who want to understand how cases are decided. The process of this case has taken a very long time, and my clients feel the deserve an opportunity to face the state of Iceland and demand answers or, as the case may be, to have its representatives refuse to answer questions before the committee.

Opportunity for Direct Interaction: A hearing allows for direct interaction between the committee and the parties, facilitating a more dynamic and thorough exploration of the issues.

On behalf of the complainants:



Magnús Óskarsson,
Attorney-at-law.