

# Intervention of Voci dalla Valle at the 83<sup>rd</sup> Meeting of the Compliance Committee of the Aarhus Convention

Tuesday, 11 June 2024

Esteemed members of the Compliance Committee,

We are Voci dalla Valle, a collective of concerned citizens from the Upper Metauro Valley in Italy, here to present our case for the admissibility of our communication regarding the project called "Intervento AN58 Itinerario internazionale E78 Grosseto – Fano".

Our communication highlights critical breaches of the Aarhus Convention by the Italian authorities during the decision-making process for this infrastructure project, specifically the adaptation of the Guinza Tunnel and its connecting roads. Considering that the project had already started in the 1980s, we would like to make clear that our communication refers to the current version of the project (with its executive project approved and published in 2023), which varies significantly from the previous ones and thus needs to fulfil the principles set out in the Aarhus Convention on its own.

Allow us to briefly outline our key arguments:

## 1. Lack of Early and Effective Public Participation:

- **Article 6.2 and 6.3:** The public was not informed at an early stage of the decision-making process. The notification of the final project approval only came after all necessary opinions from involved bodies were already acquired, leaving no room for public influence. For the current version of the project, no Environmental Impact Assessment with public participation has been conducted.
- **Article 6.4:** Citizens, including those directly affected by expropriations, were not involved at a stage when all alternatives were still open. The decision-making process proceeded without meaningful public consultation or opportunity for effective public influence.

## 2. Failure to Identify and Engage the Public Concerned:

- **Article 6.5:** For the current version of the project, starting in 2018, no efforts were made to identify and inform the public concerned nor by the Ministry, nor by A.N.A.S, nor by the local administrations. Our group, Voci dalla Valle, organised a public meeting on 07/09/2023, in which for the first time the general public was informed, and which saw significant interest and participation, proving the community's concern and the inadequacy of prior engagement efforts.

## 3. Lack of Accessible and Transparent Information:

- **Article 6.6:** The information regarding the project is buried within an overwhelming number of technical documents, making it inaccessible to the

general public. Key documents were either missing or not easily accessible. A non-technical summary, descriptions of the main alternatives and planned mitigation measures and the already mentioned Environmental Impact Assessment are not available.

**4. No Opportunity for Public Input:**

- **Article 6.7:** The public had no opportunity to submit comments or opinions on the project. One of our members did submit comments during the expropriation notice period, but these were not acknowledged or considered in the final decisions, contrary to **Article 6.8**.

**5. Lack of Explanation and Consideration:**

- **Article 6.9:** The reasons and considerations for the project's approval were not transparently communicated, further eroding public trust and denying the community a clear understanding of the decisions impacting their environment.

We assert that these violations have deprived our community of its right to participate in environmental decision-making processes that significantly impact our lives and environment. The procedural failures highlighted not only undermine the principles of the Aarhus Convention but also set a concerning precedent for future projects. In fact, we are observing the same violations stated in our communication taking place again during other phases of the same project that are being currently developed.

Given these substantial and procedural failings, we respectfully request the Compliance Committee to find our communication admissible and to take appropriate measures to address the violations of the Aarhus Convention by the Italian authorities.

Thank you for your time and consideration.

Voci dalla Valle