

From: Aarhus Punto Foca [REDACTED]
Sent: jeudi, 5 septembre 2024 08:51
To: ECE-Aarhus-Compliance <aarhus.compliance@un.org>; Jaime Loreto Fraile Jiménez de Muñana [REDACTED]; Eduardo Salazar [REDACTED]; iidma@un.org; gopal.shilpakar@un.org; Ana Barreira [IIDMA]
Cc: Fiona Marshall <fiona.marshall@un.org>
Subject: RE: Decision VII/8p (Spain) - communicant's comments on letter from the Party concerned regarding Committee's first progress review

Dear Fiona,

We stand by our previous remarks. The purpose of an integrated environmental permit is to assess compliance with emission regulations at the site, not beyond. Thus, in that particular procedure it is the municipality where the facility is located that is informed. In a similar way, when assessing the potential long range effects, as a part of Environmental Impact procedure, we determine which other municipalities could be affected and notify them accordingly.

It is impossible to notify potentially affected municipalities in the IEP procedure, because it does not include the technical modelling process required to determine which municipalities could be potentially affected.

But the principles and obligations of the convention are safeguarded by the fact that an EIA procedure is also required, and it is at that stage that we identify other municipalities.

One of the principles of good administration is to avoid duplication of procedures and administrative burdens.

It does not make sense to perform identification of potentially affected municipalities twice.

On the subject of individuals living in the immediate vicinity, we believe that the public bulleting is a better option. Immediate vicinity is an abstract concept. Any interested party is always notified in any procedure, including IEP, as per Law 39/2015. Once again, there is no need to duplicate.

Kind regards,