

Secretariat to the Aarhus Convention
United Nations Economic Commission for Europe
Environment Division
Room 332, Palais des Nations
CH-1211 Geneva 10
Switzerland

10 August 2011

Communication to the Aarhus Convention Compliance Committee concerning compliance by Denmark with provisions of the Convention in connection with fees for appeals to the Nature and Environment Appeal Board (Ref. ACCC/C/2011/57)

Dear Ms. Smagadi

Dansk Ornitologisk Forening, DOF BirdLife Denmark has received your letter from the 14th of March 2011 concerning our communication to the Aarhus Convention, which you have registered under the symbol ACCC/C/2011/57.

First, I want to inform you that Mr. Christian Hjorth after 23 years as chairman of DOF has retired and Mr. Egon Østergaard has been elected as our new chairman. As vice-chairman I was involved in the preparation of the first communication and I will continue to be your contact.

Secondly, I will try to answer the question asked by the Committee: *What is the average yearly income in Denmark?*

Our understanding of your question is that you want to know the average yearly *personal* income in Denmark. Economic statistics is not a competence of DOF, but we have found the following information on page 16 in the attached report *Denmark in figures* from *Danmarks Statistik*, the national statistical bureau of Denmark. On page 16 it informs that in 2008 men's average disposable income was DKK 194.000 (EUR 26.000 EUR), while that of women was 164.000 (EUR 22.000). The disposable income is the income after the primary taxation.

We feel obliged to stress that our communication was not related to the fees for appeals to the Nature and Environment Appeal Board from individual persons. Our communication concerned the differentiation in fee structure, which impose a 6 times higher fee on NGO organisations and companies than on individual persons.

The admissions for individual persons to appeal to the Nature and Environment Appeal Board are generally in Danish laws restricted to cases, where the individual person is essential affected *e.g.*

Dansk Ornitologisk Forening



Vesterbrogade 138-140 • DK-1620 København V • Telefon 3328 3800 • E-mail: dof@dof.dk • www.dof.dk
Danske Bank, reg. nr. 4180 konto 4180 634932 • CVR nr. 33 97 26 28


BirdLife
INTERNATIONAL

by changes on their property or in their immediate neighbourhood. Only some few NGOs, like DOF BirdLife Denmark, who have nature or environmental protection as their objectives, are allowed to appeal decisions made by the authorities, which for instance will affect the nature or environment in public owned areas far from neighbours.

Compared to the economy of individuals, the economy of the Danish NGOs are poor and mainly based on membership fees and donations. The ordinary membership fee in DOF BirdLife Denmark is DKK 280 (EUR 37.6) a year. This level of fee is comparable to other NGO organisations in Denmark, and it is our belief that this fee is near to the optimal for keeping the members. This amount of money is used to deliver 4 magazines and to administrate the membership and our whole organisation with salary for the staff, housing, transportation and communication etc.. 10% of the membership fee is forwarded to our local branches for their work with organizing meetings, excursions and bird observation activities for the members plus the work for nature protection.

With the new appeal fee of DKK 3000 (EUR 403) our local branches need to use their whole share of the membership fees from 108 members just to pay for one appeal. Within the last half year our local branch in Northern Schleswig has sent 7 appeals on permits to increase pollution of nature and the water environment. They have hereby used their income for the whole year, and they are now eating on their small reserves.

Nevertheless, we will not allow the Danish Government to repress us politically or economically, and we will continue to appeal in favour of nature and environment until the bitter end. It is our belief that this discrimination and repression of our admission to appeal is a violation of the Aarhus Convention.

Yours sincerely



Niels Riis

Vice-chairman

