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Le 27 mars 2015

*Aarhus Compliance Committee*  
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Madam,

**N.réf : COALITION NATURE 00000524 AL/LR/1583**  
**V.réf : Pre-admissibility – Communication de *La Coalition nature* du 5 septembre 2014**

Hereunder is a summary of our letter of this 27<sup>th</sup> of March 2015:

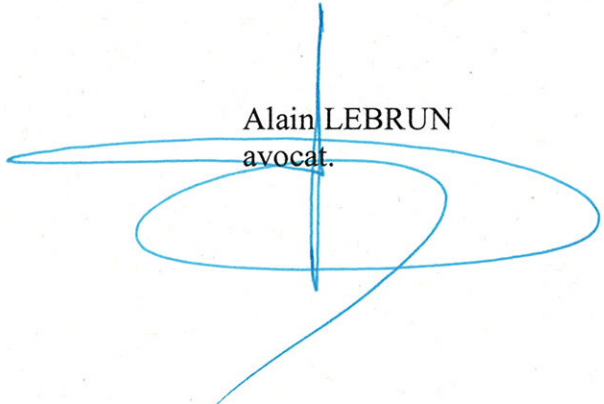
“The communicant’s communication alleges a general lack of enforcement of the Aarhus Convention on behalf of Belgium, the Netherlands and Luxembourg through the Benelux Union. The point is that there is no provision in the Benelux Union framework which acknowledge that the Benelux Union falls within the scope of application of the Aarhus Convention and, therefore, must apply its rule.”

Here is the problem: Benelux Union – which is an instrument of Belgium, the Netherlands and Luxembourg – does not have to guarantee the rights that the three countries must, on their own, ensure.

There is no specific example of breaches, because the communication is not about a specific breach yet. It is about a general failure of implementation in an international organization (which is a duty of the States, following articles 3.1 and 3.7 of the Convention) which can possibly lead to a breach.”

Regards.

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avocat.



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