

From: Σταμούλη Εβελίνα [REDACTED]
Sent: 12 April 2019 13:24
To: ECE-Aarhus-Compliance
Cc: [REDACTED]
Subject: Re: ACCC/C/2017/149 (Greece) - question of clarification for the Party concerned

Dear Ms.Marshall,

First of all we apologize for the lateness of the response. According to the Statement which was submitted by the Hellenic Ministry of Environment and Energy to the Compliance Committee regarding the aforementioned case, we do not challenge the admissibility of the communication directly according to the provisions of paragraph 20 of Decision 1/7 of the Contracting Parties to the Convention.

However, we would like to highlight the paragraph II(H) of the aforementioned Statement which is linked with the application of paragraph 21 of Decision 1/7. Particular emphasis should be given to the regime of the right to appeal in the country, according to which we believe that the Aarhus Convention requirements are sufficiently met for the following reasons:

- a) According to national case law, legal interest in the national legal order, meaning the locus standi in an environmental proceeding has been widened. Therefore, the environmental proceedings in our country relating to environmental protection have been transformed into public interest proceedings.
- b) Legal protection is effective and it is not costly. Indeed, the determination of the application discussion day needs more time. However, the parties can ask for the acceleration of the discussion date with the submission of a preference application.

we remain at your disposal should you need further clarifications

best regards

Evelina