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09 Dec 2013

## Further Additional Supporting Information Concerning the Alleged Non-Compliance of the United Kingdom

Reference:

My initial complaint, via e-mail, 22 March 2013

My additional supporting information, via e-mail, 10 July 2013

This information wishes to bring before the Espoo Convention's Implementation Committee additional supporting information relating to concerns about a failure of compliance of the United Kingdom (UK) with its obligations under the Convention on Environmental Impact Assessment in a Transboundary Context [Espoo 1991], hereafter 'The Convention'. Non-compliance is alleged on the grounds that the UK, as the party of origin, failed not notify affected neighbouring states, including the Republic of Germany, about the proposed construction of two nuclear reactors of the type European Pressurized Reactor (EPR) at Hinkley Point (Hinkley Point C), Somerset, UK.

In addition to the detailed description of the issue in my last letter (10 July 2013), please allow me to bring additional arguments and information to your attention.

Firstly, I would like to point out that Article 2 Paragraph 6 of the Convention asserts an immediate right to participation of the concerned public. The Convention's further regulation regarding the bilateral organization of that participation between the Parties tends to pragmatic reasons of an organisational nature. The right to participate cannot depend solely on how interested and engaged the governments of affected Parties are – or not interested and not engaged for that matter. In other words, Article 2 Paragraph 6 of the Convention provides the right to participation of concerned publics without intermediary.

Secondly, I would like to draw your attention to two other nuclear power plant (NPP) construction procedures in Finland, for the Finnish authorities dealt and deal with transboundary public participation in quite a different manner. A few years ago, the environmental impact assessment procedures for the NPP project "Olkiluoto 3" – back then an EPR was under consideration and is today being built – included transboundary notification and transboundary participation. Today, a new transboundary procedure for the NPP construction project Pyhäjoki is on its way. For Pyhäjoki too, an EPR is under consideration and transboundary notification and transboundary public participation was extended to potentially affected Parties by the Finnish authorities.



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Kind regards,

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