

From: Priska Lueger
Sent: Thursday, October 29, 2020 7:13 PM
To: ECE-Aarhus-Compliance
Cc: Fiona Marshall; Lorenz, Patricia; Thomas Alge
Subject: Decision VI/8e (Czechia) - comments on the final progress report

Dear members of the Aarhus Convention Compliance Committee,
Dear Ms. Marshall,

Thank you for the possibility to provide comments on the final progress report of the Czech Republic on decision VI/e.

We would like to express our concerns regarding paragraphs 4(b) and 6(b)(ii) of decision VI/e:

Participants in the EIA procedure regarding nuclear reactors are entitled to participate in the subsequent building and siting procedure. However, at this point, the reactor type is not yet defined leading to a black box procedure. This leaves the procedure according to the Atomic Act as the only environmental procedure in which the reactor type is already known. As pointed out in our previous comments and statements, members of the public are not entitled to participate in this procedure.

In this respect we note with regret that the Czech Republic has not submitted a list of all the subsequent procedures required to permit a NPP, nor an explanation as to in which of those subsequent procedures the public concerned are entitled to participate.

Regarding the Building Act, legislative changes seem to be ongoing and currently it is hard to estimate what exact impact the outcome will have on public participation. We will gladly provide more detailed information as soon as we can report on any concrete issues.

With best regards,
Priska Lueger



Mag.a Priska Lueger
Environmental Lawyer

www.oekobuero.at
www.justiceandenvironment.org

The content of this e-mail is confidential and may also contain legally privileged information. If you are not the intended recipient you may not process, use, transmit or reproduce this e-mail or any enclosed attachments. In the event that you received this e-mail by mistake please inform the sender immediately and delete this e-mail and any attachments. The sender does not accept liability for any transmission errors.