



Re: C/54 - - comments from the Party concerned

Pat Swords

to:

Aphrodite Smagadi

05/06/2012 22:52

Cc:

"public.participation"

Hide Details

From: Pat Swords <pat.swords.chemeng@gmail.com>

To: Aphrodite Smagadi <Aphrodite.Smagadi@unece.org>

Cc: "public.participation" <public.participation@unece.org>

Dear Aphrodite

Thank you for these. I was very conscious about not bringing fresh information to the table as part of the comment process on the draft findings. However, in Section 2 of their Reply the EU has clearly not adhered to this principle.

With regard to the reference to consultations with the listed NGOs on the NREAP the following is a very important point, which has in my opinion been deliberately obscured by the Party concerned in its reply. As I stated in Section 7.5 of my Response of June 2011 to questions presented by the Compliance Committee, on the website of the department there was no access to the Submissions on the NREAP or how due account of the public participation exercise was taken account of in the final decision. I have since through a formal Access to Information on the Environment procedure requested from the Department the documentation relating to how due account of the public participation exercise on the NREAP was taken account of in the final decision. There was a refusal to provide me with this, instead only a hyperlink to their website where the Submissions are **now** posted was provided in way of reply, see below. I would be very grateful, if Section 2 of the Party's reply is accepted for consideration, that not only would the above be pointed out, but that two of the three listed NGOs, which participated, namely Coastal Concern Alliance and Birdwatch Limited pointed out clear limitations with regard to the Aarhus Convention, while all three NGOs, Coastal Concern Alliance, Birdwatch Limited and An Taisce (Ib) pointed out failings with regard to Strategic Environmental Assessment. The fact that to date no Strategic Environmental Assessment has been completed for this renewable energy programme demonstrates the manner in how due account of their participation was taken account of.

- <http://www.dcenr.gov.ie/Energy/Sustainable+and+Renewable+Energy+Division/Renewable+Energy+Directive+and+National+Renewable+Energy+Action+Plan.htm>

Regards

Pat Swords

On Thu, May 31, 2012 at 3:46 PM, Aphrodite Smagadi <[Aphrodite.Smagadi@unece.org](mailto:Aphrodite.Smagadi@unece.org)> wrote:

*(See attached file: frPartyObservationsDraft29May12.pdf.pdf)*

*(See attached file: FromPartyCover.pdf.pdf)*

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