



Brussels, 9 July 2021

Madame la Vice Première Ministre, Madame la Ministre des Affaires Etrangères,

Subject: Application of the ESPOO Convention to the construction of additional gas power plants capacities in Belgium.

weCARE is an Alliance of European NGOs promoting a very low carbon energy mix to contribute to the reduction of climate change. Such a mix must be sustainable as an integrated system, which means being clean AND affordable AND reliable.

Taking as a given the decision of the Belgian Government to phase out its nuclear power plants during the period 2022-2025, as being a political decision taken in a democratic State, weCARE is keen to know if and how the ESPOO Convention on Environmental Impact Assessment in a Transboundary Context is being or will be applied to the announced additional gas fired power capacities foreseen to accompany the nuclear phase out process. Indeed, the addition of thermal capacities is an activity specifically mentioned within the Appendix 1 of the ESPOO Convention as having a potentially significant environmental impact, requiring the full application of the Convention. In particular, by producing more CO₂, the gas plants may indeed have a geographically wide transboundary impact on the environment. weCARE wants to make sure that its Members will have an opportunity to contribute to the public consultations that should be part of the ESPOO procedure.

For this purpose, weCARE sent a letter to the Minister of Energy Tinne Van der Straeten on 12 June (copy given in annex 1), asking for details on the application of the ESPOO Convention to the addition of gas fired capacities in Belgium well in time, so that the procedure can be run smoothly and in good order.

Minister Van der Straeten replied in a letter dated 28 June (copy given in annex 2). After analysis, we concluded that the reply of the Minister does not respond to the concerns of weCARE. Indeed, the para 1 recalls the nuclear phase out policy of Belgium which was not the object of our letter. The para 2 talks about the CRMs which again was not the

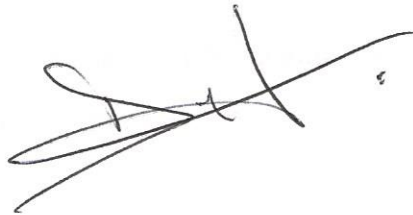
subject matter. The para 3 confirms that the addition of gas capacities is listed in the activities falling within the scope of the ESPOO Convention. And, last but not least, the para 4 puts the responsibility for the Environmental Impact Assessment at the level of the Regions. This last point does not seem right to us. Indeed, it is Belgium who is Party to the ESPOO Convention, and it is Belgium, at Federal level, who is therefore responsible for its full application.

weCARE would be grateful to you, as Vice Prime Minister and Minister of Foreign Affairs, to foster coordinated actions of the Ministers of Energy, Environment and Climate, at Federal and Regional levels as appropriate, to make sure that Belgium fully and properly applies its obligations as Party to the ESPOO Convention, in particular allowing civil society to participate in the relevant public consultations.

We remain at your disposal for any interaction you would like to get with weCARE, as a representative of civil society at European level.

Yours faithfully,

Marc Deffrennes
Richard Ivens
Serge Crutzen



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weCARE is a Brussels-based alliance of NGOs campaigning in Europe for Clean, Affordable and Reliable Energy for societal sustainability. The weCARE website describes the aims and specific activities of the alliance and lists the current member organisations: 100TWh BE, Jihocesti TatKove CZ, Ekomodernist FI, Sauvons le Climat FR, Patrimoine Nucléaire et Climat FR, 18for0 IE, Stichting EnergieTransitie en Kernenergie NL, Institute for Sustainable Energy PL, European Association for Energy Security SK, Terraprxaxis UK

weCARE is listed in the EU Transparency Register under number 473723535459-78.

Copies of this letter are sent to

*Federal Minister of Energy Tinne Van der Straeten
Federal Minister of Environment and Climate Zakia Khattabi*