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For the attention of the Aarhus Convention Compliance
Committee
United Nations Economic Commission for Europe

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Comments on AC/CC.VM-2/Inf.5 – Possible ways to address the significant increase in the Committee's workload

Dear Members of the Compliance Committee,

we submit the following comments on document AC/CC.VM-2/Inf.5 in advance of the open session at the Committee's second virtual ordinary meeting (15 and 18 June 2026).

Green Legal Impact Germany is an environmental law NGO based in Germany. We use law and the rule of law as a lever for environmental protection and human rights, and we support civil society actors in understanding, applying and improving the law in this regard. We have ourselves submitted communications to the Committee and follow its work closely.

1. The Committee's underfunding is alarming

We are deeply concerned by the persistent and structural underfunding of the Committee and its secretariat. The Aarhus Convention Compliance Committee is one of the most effective and respected international compliance mechanisms in the field of environmental and human rights law. Its growing caseload reflects not a failure but a success: civil society and members of the public trust this body. That trust must not be undermined by a lack of resources.

The consequences of underfunding are already very concrete. The reported measures are signs of an institution under serious strain.

We call on all Parties to significantly and urgently increase their financial contributions to the Convention and its bodies. The cost of inaction is borne not by governments, but by the members of the public and civil society organisations who rely on this mechanism to vindicate their rights - and, ultimately - by people and planet due to weaker environmental protection.

2. The root cause: continued non-compliance by Parties*

The increase in the Committee's workload is, at its root cause, not a structural problem to be solved through procedural reform alone. It is, to a significant degree, the direct result of the continued non-compliance of Parties with the Convention, which gives rise to communications from the public and submissions from other Parties. The Committee's growing caseload is in part a reflection of its own success and credibility. Parties should therefore intensify their efforts to ensure that their legal

frameworks comply with the Convention – and provide adequate funding for the secretariat accordingly.

That said, we recognise that, given the current resource constraints, the Committee must address the symptoms as best it can. In this spirit, we welcome the proposals set out in document AC/CC.VM-2/Inf.5 as a pragmatic and proportionate response to an exceptionally difficult situation. We have confidence in the Committee's ability to implement these measures while maintaining the quality of its work.

3. Procedural streamlining must not disadvantage vulnerable communicants

While we support the proposed measures in principle, we wish to draw attention to a risk that must be carefully managed: the procedural streamlining is likely to disproportionately affect individuals, community groups, and small NGOs that lack extensive experience with the Convention and have limited access to legal support. These are precisely the actors the Convention is designed to empower.

The introduction of summary determinations of inadmissibility, and the new procedure for determining whether additional information falls within the original scope of a case, will reduce the guidance and iterative support that such communicants currently receive. We therefore call on the Committee to consider accompanying measures that offset this effect – for example, through enhanced and accessible guidance materials, clearer templates, or targeted outreach to less experienced communicants. The Committee's recent initiative to publish detailed reasoning for inadmissibility determinations is a greatly welcomed step in the right direction and we encourage its continuation and further development.

4. The streamlined MOP follow-up procedure is appropriate

We support the streamlined follow-up procedure on decisions and requests of the Meeting of the Parties as proposed in section V of the document. The current procedure places a disproportionate burden on the Committee and the secretariat, particularly given the record number of 20 follow-up decisions during the intersessional period 2026–2029. A leaner procedure that preserves the core elements of transparency and participation is both necessary and justified.

More broadly, we call on all Parties to treat compliance decisions not as the beginning of a prolonged procedural exchange, but as a clear obligation requiring prompt and independent action. The Committee should not have to expend scarce resources on guiding and reminding Parties that have already been found to be in non-compliance.

5. The urgency of timely decisions

As an organisation that has submitted communications to the Committee, we know from direct experience how frustrating it is to wait years for a decision – or to refrain from submitting a communication in the first place because the environmental harm will have become irreversible or legally moot by the time a finding is adopted. Procedural acceleration is therefore not merely an administrative matter; it is a question of the practical effectiveness and credibility of the Convention's compliance mechanism.

We thank the Committee for its continued work under exceptionally difficult conditions and for the transparency of this consultation process.

Yours sincerely,

Henrike Lindemann,
Managing Director