

**REPORT OF FINLAND ON THE IMPLEMENTATION
OF THE CONVENTION ON ENVIRONMENTAL
IMPACT ASSESSMENT IN A TRANSBOUNDARY
CONTEXT**

in the period 2006–2009

Information on the focal point for the Convention

Name and contact information:

Ann-Britt Ylinen

Ministry of the Environment

PO Box 35, FI-00023 Government, Finland

Ann-Britt.Ylinen@ymparisto.fi

tel. +358-50 548 4146; fax +358-9-1603 9380

Information on the point of contact for the Convention

Name and contact information (if different from above):

Seija Rantakallio

Ministry of the Environment

PO Box 35, FI-00023 Government, Finland

Seija.Rantakallio@ymparisto.fi

tel. +358-400 143 937; fax +358-9-1603 9395

Information on the person preparing the report

- | | | |
|-------|------------------|---|
| i. | Country | Finland |
| ii. | Surname | Rantakallio |
| iii. | Forename | Seija |
| iv. | Institution | Ministry of the Environment |
| v. | Postal address | PO Box 35, FI-00023 Government, Finland |
| vi. | E-mail address | Seija.Rantakallio@ymparisto.fi |
| vii. | Telephone number | +358-400 143 937 |
| viii. | Fax number | +358-9-1603 9395 |

Date on which report was completed:

PART ONE – CURRENT LEGAL AND ADMINISTRATIVE FRAMEWORK FOR THE IMPLEMENTATION OF THE CONVENTION

In this part, please provide the information requested, or revise any information relative to the previous report. Describe the legal, administrative and other measures taken in your country to implement the provisions of the Convention. This part should describe the framework for your country's implementation, and not experience in the application of the Convention.

Article 2

General Provisions

DOMESTIC IMPLEMENTATION OF THE CONVENTION

1. *List the general legal, administrative and other measures taken in your country to implement the provisions of the Convention (art. 2.2).*
 - Act on Environmental Impact Assessment Procedure (1994, amended 1999 and 2006) and Decree on Environmental Impact Assessment Procedure (2006) (original decree enacted in 1994)
 - Decree on implementing the Convention on Environmental Impact Assessment in a Transboundary Context, September 1997
 - Bilateral agreement with Estonia since June 2002.
2. *Indicate any further measures to implement the provisions of the Convention that are planned for the near future.*
 -

TRANSBOUNDARY ENVIRONMENTAL IMPACT ASSESSMENT PROCEDURE

3. *Describe your country's national and transboundary environmental impact assessment (EIA) procedures and authorities (art. 2.2):*

- a. *Describe the EIA procedure in your country and indicate which steps of the EIA procedure include public participation;*

The EIA procedure consists of two phases: the EIA programme phase (scoping document phase) and the EIA report phase (EIA documentation phase). Both phases include public participation and the public is given the opportunity to comment on the EIA programme and the EIA report. The developer is in charge of preparing these two documents. The competent authority on EIA (in most projects this is one of the regional environmental authorities) checks the quality of the documents, and writes its own statement on the adequacy of these documents and gives it to the developer. The statement takes into account the opinions and views expressed by the public and other authorities, who have participated in the process. The EIA procedure is performed before the permitting procedures and the developer has to attach the EIA report and the competent authority's statement to the permit application. The permit shall state in what way the assessment report and the statement on it have been taken into account.

- b. *Describe how the different steps of the transboundary EIA procedure set out in the Convention fit into your country's national EIA procedure;*

- The sending of the notification and relevant additional information regarding the project and the impact assessment procedure takes place in the EIA programme phase. The notification is sent before or at the same time the EIA programme is made available to the public.
- The comments from the affected Party are taken into account in the competent authority's statement on the EIA programme.
- EIA documentation is sent to the affected Party for comments.
- Consultations usually take place in a written form and the initial time frame is set when the EIA documentation is sent to the affected Party.
- The comments from the affected Party are taken into account in the competent authority's statement on the EIA documentation.
- The final decision is sent to the affected Party after the decision has been made.

c. *List the different authorities that are named responsible for different steps of the transboundary EIA procedure (notification, consultation between Parties, public participation, etc.). Also list the authorities responsible for the domestic EIA procedure, if they are different;*

- The Ministry of the Environment is in charge of the transboundary EIA procedure (point of contact and focal point).
- Centres for Economic Development, Transport and the Environment (earlier the regional environment centres) are the competent authorities for the domestic EIA procedure. In nuclear energy projects, the competent authority is the Ministry of Employment and the Economy (previously the Ministry of Trade and Industry).

d. *Is there one authority in your country that collects information on all the transboundary EIA cases? If so, name it. If not, does your country intend to establish such an authority?*

The Ministry of the Environment collects the information.

4. *Does your country have special provisions for joint cross-border projects (e.g. roads, pipelines)?*

In the bilateral agreement between Finland and Estonia, Article 14 gives the competent authorities the possibility to agree to carry out a joint EIA within the framework of the national legislation. The Finnish-Estonian Commission on EIA may propose possible activities for joint EIAs to the competent authorities. The Commission has an advisory role.

IDENTIFICATION OF A PROPOSED ACTIVITY REQUIRING ENVIRONMENTAL IMPACT ASSESSMENT UNDER THE CONVENTION

5. *Is appendix I to the Convention transposed into your country's national legislation? Does your country's legislation already cover the revised appendix I in the second amendment (ECE/MP.EIA/6, decision III/7), and if so, how? Please describe any differences between the national list and appendix I to the Convention. Please explain how your country interprets terms such as "large" and "major" used in appendix I (including in items 4, 8, 11, 14, 16, 17 and, as appropriate, 22).*

-The Finnish list of EIA projects includes all the projects mentioned in appendix 1 to the Convention.

-The revised appendix I in the second amendment (in 2006) includes all other activities except wind power installations.

-Differences between the national list and appendix I can be seen by comparing the Finnish list of activities to that of the Convention's. The following is the Finnish list of projects.

Section 6 from the EIA Decree—List of projects

"Projects to which the assessment procedure shall be applied under section 4(1) of the Act on Environmental Impact Assessment Procedure are:

1) animal husbandry:

poultry houses and piggeries with more than

- a) 85,000 chickens or 60,000 hens,
- b) 3,000 pigs (with a weight of over 30 kg/pig) or
- c) 900 sows;

2) the extraction and processing of natural resources:

- a) the extraction, dressing and processing of metal ores and other mined minerals if the total amount of the extracted resource is at least 550,000 tonnes per annum, or quarries larger than 25 hectares;
- b) extraction of stone, gravel or sand if the area of extraction or excavation is larger than 25 hectares or the amount of the extracted land resource is at least 200,000 solid cubic metres per annum;
- c) asbestos extraction and installations for the processing and transformation of asbestos or products containing asbestos;
- d) the extraction, dressing and processing of uranium with the exception of test extraction, test dressing and other similar processing;
- e) peat production if the production area that can be considered as unified is more than 150 hectares;
- f) permanent alteration of natural forest, peatland or wetland over what can be considered a unified area above 200 hectares in size, by carrying out new ditching or by draining unditched peatland and wetland areas, by removing the tree stock permanently or by replanting the area with species of tree not indigenous to Finland;
- g) commercial production of crude oil and natural gas;

3) hydraulic engineering and regulation of waterflow:

- a) dams as referred to in section 9(2) of the Dam Safety Act (413/1984);
- b) reservoirs where the dammed or stored volume of new water or the increase in the volume of water is more than 10 million cubic metres;
- c) water body regulation projects, if the mean flow in the water body is over 20 cubic metres per second and the flow and water level conditions will change materially compared with the initial situation;
- d) transfer of water from one river basin to another where the volume of water to be transferred exceeds 3 cubic metres per second;
- e) flood prevention projects covering an area of at least 1,000 hectares;

4) the metal industry:

- a) foundries or smelting plants with an output of at least 5,000 tonnes per annum;
- b) iron and steel works, sintering plants and iron alloy manufacturing plants or calcining plants;
- c) metal works or calcining plants processing metals other than iron;

5) the forest industry:

- a) pulp mills;
- b) paper or board mills with a production capacity of more than 200 tonnes per day;

6) the chemical industry and the manufacture of mineral products:

- a) crude oil refineries;
- b) installations for the gasification and liquefaction of bituminous shale, coal or peat of at least 500 tonnes per day;
- c) factories manufacturing artificial fibres;
- d) plants using solvents or substances containing solvents and using at least 1,000 tonnes of solvents per annum;
- e) plants manufacturing on a large scale dangerous chemicals referred to in the Act on the safety of the handling of dangerous chemicals and explosives (390/2005);
- f) factories manufacturing mineral wool and cement;

7) energy production:

- a) boiler and power plants with a gross output of at least 300 megawatts;
- b) nuclear power plants and other nuclear reactors, including the demolition or decommissioning of these plants and reactors, except for research facilities intended for the production and conversion of fissionable and fertile materials and with a maximum continuous heat output of one kilowatt; nuclear power plants and other nuclear reactors cease to be categorized as such when the nuclear fuel and other radioactively contaminated elements have been permanently removed from the plant site;
- c) plants in which irradiated nuclear fuel is reprocessed;
- d) plants designed for the production and isotopic enrichment of nuclear fuel; the processing of irradiated nuclear fuel or highlevel waste; the final disposal of irradiated nuclear fuel; the sole purpose of final disposal of radioactive waste or the sole purpose of storing irradiated nuclear fuels or irradiated waste outside the production site (planned to last for more than 10 years);

8) the transmission and storage of energy and materials:

- a) main pipelines intended for the longdistance transport of oil and liquids other than water or wastewater;
- b) gas pipelines with a diameter of more than DN 800 millimetres and a length of more than 40 kilometres;
- c) overhead power lines of at least 220 kilovolts and a length of more than 15 kilometres;
- d) stores for oil, petrochemical products and chemical products when the total volume of the storage tanks for these substances is at least 50,000 cubic metres;

9) transport:

- a) the construction of motorways and expressways;
- b) the construction of a new road with four or more lanes of at least 10 kilometres of continuous length;
- c) the realignment or widening of a road so that the resulting continuous section with four or more lanes is at least 10 kilometres in length;
- d) the construction of longdistance railway tracks;
- e) the construction of airports if the main runway is at least 2100 metres long;
- f) shipping lanes, ports and loading and unloading facilities primarily intended for merchant ships of over 1,350 tonnes;
- g) canals and inland shipping lanes and ports for ships of over 1,350 tonnes;

10) water management:

- a) groundwater abstraction or the formation of artificially replenished groundwater of an annual volume of at least 3 million cubic metres;

- b) large raw water or wastewater tunnels;
- c) sewage treatment plants dimensioned for a population equivalent of more than 100,000;

11) waste management:

- a) hazardous waste disposal plants receiving hazardous waste for incineration, physiochemical treatment or disposal in landfills, and biological treatment plants dimensioned for a hazardous waste volume of at least 5,000 tonnes per annum;
- b) incineration plants for other than hazardous waste, or physiochemical treatment plants dimensioned for a waste volume of more than 100 tonnes per day and biological treatment plants dimensioned for a waste volume of at least 20,000 tonnes per annum;
- c) landfills for urban waste or sludge dimensioned for a waste volume of at least 20,000 tonnes per annum;
- d) landfills for waste other than that referred to in subparagraphs a and c and dimensioned for a waste volume of at least 50,000 tonnes per annum;

12) alterations to projects equivalent in size to projects referred to in paragraphs 1-11."

-The use of the terms "large" and "major":

Activity 4: Major is defined for foundries or smelting plants "with an output of at least 5000 tonnes per annum" and for metal works or calcining plants processing metals other than iron without a threshold.

Activity 8: Large-diameter is defined for oil "main pipelines intended for the long-distance transport" and for gas "pipelines with diameter of more than DN 800 millimeters and a length of more than 40 kilometres".

Activity 11: Large is defined "dams as referred to in section 9(2) of the Dam Safety Act".

Activity 14: Major is defined "total amount of the extracted resource is at least 550,000 tonnes per annum, or open-cast mining where surface of the site is larger than 25 hectares".

Activity 16: Major is defined "total volume of the storage tanks is at least 50 000 cubic meters".

Activity 17: Large is defined "above 200 hectares in size".

6. Please describe:

- a. *The legislation and, where appropriate, the procedures your country would apply to determine that an "activity", or a change to an activity, falls within the scope of appendix I (art. 2.3), or that an activity not listed should be treated as if it were (art. 2.5);*

The EIA Act, section 4, stipulates the scope of application and it reads as follows:

"(1) The environmental impact assessment procedure shall be applied to such projects and alterations to them for which an assessment is required to enforce an international agreement binding on Finland or which may have significant adverse environmental impacts, due to the special features of Finland's nature and environment. Further provisions on projects and alterations to them for which assessment is to be carried out will be issued by Government decree.

(2) The assessment procedure shall also be applied in individual cases to a project or a material alteration to a completed project, other than that referred to in subsection 1, that will probably have significant adverse environmental impact comparable in

type and extent to that of the projects referred to in subsection 1, also taking into account the combined impact of different projects.

(3) In addition to what is provided in subsection 2, the character and location of the project and the nature of its impacts shall be taken into account when considering the significance of the impacts in individual cases. Further provisions on the principles of discretion will be issued by Government decree."

If it is unclear whether or not an activity or a change to an activity falls within the scope of the mandatory list of projects, it is the competent authority who makes the determination in accordance with the EIA legislation.

If the competent authority considers in an individual case that the assessment procedure should be applied to an activity not listed (a new activity or a change to an activity), it makes a screening decision (from 1 September 2006, before then the Ministry of the Environment made the decision). In determining how to apply the assessment procedure to individual projects, special consideration is given to criteria such as those mentioned in appendix III to the Convention (EIA Decree, para. 7, which is identical to annex III of the EIA Directive). The competent authority discusses the matter with the appropriate authorities before it makes the decision.

- b. How your country conducts transboundary EIA cooperation (through points of contact, through joint bodies or within bilateral or multilateral agreements);*

Mainly through points of contact. With Estonia, also with the bilateral EIA Commission, which functions under the bilateral transboundary EIA agreement.

- c. How a change to an activity is considered as a "major" change;*

A change to an activity is always considered "major" when the threshold of the mandatory list is exceeded. These changes are included in the mandatory list of projects.

If any other change is considered major with having significant adverse impact, the competent authority makes a decision to apply the assessment procedure to this individual activity.

- d. How such an activity, or such a change to an activity, is considered "likely" to have a "significant" adverse transboundary impact (art. 2.3 and 2.5, and the Guidelines in appendix III).*

The competent authority uses expert judgement to examine projects on a case-by-case basis. The Ministry of the Environment is consulted if necessary. Additionally, the possible affected Party can be consulted.

PUBLIC PARTICIPATION

- 7. Does your country have its own definition of "the public" in national legislation, compared to article 1(x)? How does your country, together with the affected Party, ensure that the opportunity given to the public of the affected Party is equivalent to the one given to your country's public as required in article 2, paragraph 6?*

In the definition section of the EIA Act "the public" is described through the opportunity to participate in the EIA procedure. Participation means interaction in environmental impact assessment between the developer and the competent authority and other authorities, and those whose circumstances or interests may be affected by the project (including associations and funds).

The process of public participation is usually discussed with the point of contact of the affected Party before the notification is sent. The affected Party can choose to arrange the public hearing period simultaneously with the Party of origin. Relevant material on the project and its impact, mainly focusing on transboundary impact is provided to the affected Party for public comment in the language of the affected Party.

Article 3

Notification

QUESTIONS TO PARTY OF ORIGIN

8. *Describe how your country determines when to send the notification to the affected Party, which is to occur “as early as possible and no later than when informing its own public”? At what stage in the EIA procedure does your country usually notify the affected Party (art. 3.1)*

The timing to send the notification is stipulated by the EIA Act. Notification is done after the developer has submitted the EIA programme to the competent authority on EIA. The notification is sent no later than when the Finnish public is informed about the EIA programme.

9. *Does your country provide any information to supplement that required by article 3, paragraph 2?*

A notification letter is used to cover the content mentioned in Article 3.2. The relevant parts or the whole assessment programme is translated and included in the notification to supplement the letter.

10. *Does your country use the format for notification (as decided by the first meeting of the Parties, decision I/4, in document ECE /MP.EIA/2)? If not, in what format does your country normally present the notification?*

For some projects the format for notification is used. It is more common to use a combination of a letter and information covered in the EIA programme.

11. *Describe the criteria your country uses to determine the time frame for the response to the notification from the affected Party (art. 3.3, “within the time specified in the notification”)? What is the consequence if an affected Party does not comply with the time frame? If an affected Party asks for an extension of a deadline, how does your country react?*

The time frames have to be set according to the EIA Act to match the domestic EIA procedure to guarantee that the comments from the affected Party can be taken into account. Usually the answer is requested one to two weeks after the end of the public hearing period to give the affected Party time to collect the submitted comments and prepare a summary of these comments.

Responses have usually been received on time. Sometimes more time has been given on request. If an affected Party asks for an extension of a deadline, it is usually granted within the time frame of the national procedure. The competent authority needs to give its statement within one month after the end of the hearing period, which leaves little flexibility to extend the deadline.

12. Describe when your country provides relevant information regarding the EIA procedure and proposed activity and its possible significant adverse transboundary impact as referred to in article 3, paragraph 5. Already with the notification, or later in the procedure?

The information is submitted with the notification.

13. How does your country determine whether it should request information from the affected Party (art. 3.6)? When does your country normally request information from the affected Party? What kind of information does your country normally request? How does your country determine the time frame for a response from the affected Party to a request for information, which should be “prompt” (art. 3.6)?

Usually it is the developer who gathers the basic information already before the EIA procedure officially begins. In most cases, the request is made on the initiative of the competent authority on EIA. The information is requested within the same time frame as the answer to the notification. The need may also come up later in the procedure, and the request is done at that point and a timely deadline is set. The time frame can also be agreed between the points of contact of the PoO and AP.

14. Please describe:

a. How your country cooperates with the authorities of the affected Party on public participation (art. 3.8), taking into account that the Party of origin and affected Party are both responsible;

In the bilateral agreement with Estonia it states that the competent authority of the affected Party shall arrange for distribution of the notification and EIA documentation to the authorities and the public.

It is common practice also with EIAs in other neighbouring countries that the affected Party accepts the responsibility to organize public participation. As the Party of origin, Finland offers to give any support needed to arrange public participation.

b. How your country identifies, in cooperation with the affected Party, the “public” in the affected area;

The affected Party is able to identify the public in the affected area better and it is the affected Party who usually then informs the public (e.g. an announcement in newspapers, press releases) after the formal notification has been received.

c. How the public in the affected Party is notified (what kinds of media, etc are usually used). What is normally the content of the public notification?;

Normally the affected Party defines the content of the notification to the public.

d. Whether the notification to the public of the affected Party has the same content as the notification to your country’s public. If not, describe why not. At what stage in the EIA procedure does your country normally notify the public of the affected Party?

It is common practice that the affected Party posts the notification on the Internet and possibly elsewhere.

15. Does your country make use of contact points for the purposes of notification as decided at the first meeting of Parties (ECE/MP.EIA/2, decision I/3), and as listed on the Convention website (http://www.unece.org/env/eia/points_of_contact.htm)?

Yes, the list of points of contact is used in this way. The list is VERY useful and a key to close cooperation.

QUESTIONS TO AFFECTED PARTY

16. *Describe the process of how your country decides whether or not to participate in the EIA procedure (art. 3.3)? Who participates in the decision-making, e.g. central authorities, local competent authorities, the public, environmental authorities? Describe the criteria or reasons your country uses to decide.*

The notification is usually sent out for comments to relevant authorities, research institutes and at least one main environmental NGO. The general public is also informed through public notice. The material sent by the Party of origin is put on its web site and also displayed in relevant places. The comments received and the expert judgement of the Ministry of the Environment provide the basis for the decision on participation.

17. *When the Party of origin requests your country to provide information relating to the potentially affected environment, how does your country determine what is “reasonably obtainable” information to include in its response? Describe the procedures and, where appropriate, the legislation your country that would apply in determining the meaning of “promptly” in the context of responding to a request for information (art. 3.6)*

Some sources of information can be easily given, such as a website address, a list of research reports and other useful publications. The time frame can be agreed together with the Party of origin. Finland's EIA legislation names the Finnish Environment Institute as the competent body to assist in obtaining the expertise needed in the assessment procedure. Requests to provide information are fairly rare.

18. *Please describe:*

a. *How your country cooperates with the authorities of the Party of origin on public participation (art. 3.8), taking into account that the Party of origin and affected Party are both responsible;*

In the bilateral agreement with Estonia it states that the competent authority of the affected Party shall arrange for distribution of the notification and EIA documentation to the authorities and the public.

It is common practice also with EIAs in other neighbouring countries that the affected Party accepts the responsibility to organize public participation.

b. *How your country identifies the “public” in the affected area;*

The identification is made by determining the expected extent of the likely significant adverse environmental impact. Some projects are announced in the whole country, some regionally, some even fairly locally.

c. *How the public is notified (e.g. what kinds of media, etc., are usually used). What is normally the content of the public notification?;*

The public is informed through public notice in the relevant newspapers. A media release supplements the public notice. The public notice contains a description of the project, how to access the material, who to contact for additional information, where to send comments, and the deadline for comments. The notification material, which is received from the Party of origin, is always displayed on the PoO's web pages, as well as in relevant places.

d. *At what stage in the EIA procedure does your country normally notify its public?*

The timing of notification depends on the legislation of the Party of origin. The public is notified as soon as technically possible after the receipt of the notification.

Article 4

Preparation of the environmental impact assessment documentation

QUESTIONS TO PARTY OF ORIGIN

19. *What is the legal requirement for the minimum content of the EIA documentation (art. 4.1, appendix II)?*

The content of the EIA documentation is stipulated in Sections 9 and 10 of the Decree on Environmental Impact Assessment Procedure and it reads as follows:

"Section 9 –Assessment programme

The assessment programme shall contain, on a sufficient scale:

- 1) information on the project, its purpose, planning stage, site, landuse needs and connections with other projects, and on the developer;
- 2) alternatives for implementing the project, one of which shall be nonimplementation, unless for specific reasons the lastmentioned alternative is unnecessary;
- 3) information about the plans, permits and comparable decisions required for implementation of the project;
- 4) a description of the environment, information on investigations into environmental impact already carried out and planned, and the methods and assumptions to be applied in acquiring and assessing the material;
- 5) a proposal for a definition of the area of impact to be studied;
- 6) a plan for arranging the assessment procedure and the related participation; and
- 7) an estimate of the project planning and implementation schedule and of the date when the investigations and assessment report will be completed.

Section 10 Assessment report

The assessment report shall contain, on a sufficient scale:

- 1) the information referred to in section 9 above [i.e. the assessment programme], after verification;
- 2) an explanation of how the project and its alternatives relate to land-use plans and such plans and programmes for use of natural resources and environmental protection which are relevant with regard to the project;
- 3) the main characteristics and technical solutions of the project, a description of operations, such as products, outputs, raw materials, traffic, other materials, and an estimate of the types and amounts of waste, discharges and emissions taking into account the planning, construction and utilization stages of the project, including possible demolition;
- 4) the main information used in the assessment;
- 5) an account of the environment, and an estimate of the environmental impact of the project and its alternatives, any deficiencies in the data used, and the main uncertainty factors, including an assessment of the possibility of environmental accidents and their consequences;
- 6) an account of the viability of the project and the alternatives;
- 7) a proposal for action to prevent and mitigate adverse environmental impact;

- 8) comparison of the project's alternatives;
- 9) a proposal for a monitoring programme;
- 10) an account of the performed assessment procedure and its public participation;
- 11) an account how the coordinating authority's statement on the assessment programme has been taken into account; and
- 12) a non-technical, clearly presented summary of the information in subparagraphs 1-11."

20. *Describe your country's procedures, if any, for determining the content of the EIA documentation on a case-by-case basis (scoping procedure) (art. 4.1).*

The EIA programme prepared by the developer and the competent authority's statement on how to possibly amend it (based on the views of the authorities, the public, and the affected Party) provide the outline for the content of the EIA documentation.

21. *How does your country identify "reasonable alternatives" in accordance with appendix II, paragraph (b)?*

Alternatives are identified on the basis of the national decree on EIA. In the EIA programme the developer should include, on a sufficient scale, alternatives for implementing the project, one of which shall be non-implementation, unless for specific reasons the latter is unnecessary. The affected Party has the opportunity to comment on the alternatives, during the hearing period of the EIA programme. The competent authority on EIA specifies the alternatives to be assessed based on the proposal by the developer and the comments given on these by other authorities, NGOs, the public and the affected Party.

22. *How does your country identify "the environment that is likely to be affected by the proposed activity and its alternatives" in accordance to appendix II, paragraph (c), and how does it define "impact" in accordance with article 1(vii)?*

The EIA programme also includes the developer's proposal for a definition of the area of impact to be studied. This preliminary definition can then be commented on during the hearing period by domestic authorities and the public, as well as by authorities and the public of the affected Party.

The environment is defined in the EIA Act:

Environmental impact means the direct and indirect effects inside and outside Finnish territory of a project or operations on

- a) human health, living conditions and amenity;
- b) soil, water, air, climate, organisms and biological diversity;
- c) the community structure, buildings, landscape, townscape and cultural heritage; and
- d) the utilization of natural resources; plus
- e) interaction between the factors referred to in subparagraphs a-d.

23. *Does your country give the affected Party all of the EIA documentation (art. 4.2)? If not, which parts of the documentation does your country provide?*

It depends on each case. Sometimes the whole EIA documentation is translated, but more often only the relevant parts concerning the project and its transboundary environmental impact are translated and given to the affected Party. In practise, the whole EIA report is usually sent to the affected Party even though it is only in Finnish in most cases.

24. *How does your country cooperate with the authorities of the affected Party on distribution of the EIA documentation and the submission of comments (art. 4.2), taking into account that the Party of origin and affected Party are both responsible? How does the competent authority in your country (as the Party of origin) deal with the comments (art. 4.2)?*

The transfer and receiving of comments is organized between the points of contact. It is common that the affected Party distributes the material in its country, collects the comments in its country and submits these to the Party of origin. Comments from the affected Party are treated on an equal basis with the national comments. The competent authority takes them into account when forming its view of the adequacy of the documentation. The competent authority's statement includes a summary of the other statements and opinions. The statement is sent to the affected Party for information.

25. *Describe the procedures and, where appropriate, the legislation that define the time frame for comments provided "within a reasonable time before the final decision" (art. 4.2)? What is the consequence if the affected Party does not comply with the time frame? If an affected Party asks for an extension of a deadline, how does your country react?*

The comments are requested in good time before the final decision, as the EIA precedes the permitting process and is a separate procedure. Section 7 stipulates the timing of the assessment and reads as follows:

"(1) The environmental impact of a project must be investigated in an assessment procedure in accordance with this Act before any action relevant in terms of environmental impact is taken to implement the project.

(2) The assessment must, however, at the latest be carried out before the decisionmaking referred to in section 13."

It is possible to extend the deadline, within the time limits specified in the national EIA Act. Usually the answer is requested two weeks to one month after the end of the public hearing period to give the affected Party time to collect the submitted comments and prepare a summary of the comments. The competent authority needs to give its statement within two months after the end of the hearing period, which leaves some flexibility to extend the deadline.

26. *What material does your country provide, together with the affected Party, to the public of the affected Party?*

The same material that the point of contact of the affected country receives can be provided to the public, that is, the translated parts of the EIA documentation which include, e.g. the description of the project and its transboundary environmental impact. Also the whole EIA documentation may be provided and the statements of the competent authority.

27. *Does your country initiate a public hearing for the affected public, and at what stage, whether in the affected Party, in your country or as a joint hearing? If a public hearing is held in your country, as Party of origin, can the public of the affected Party, public authorities, organizations or other individuals come to your country to participate?*

This is decided on a case-by-case basis by the points of contact, the competent authority on EIA and the developer. If requested, the affected Party assists with the public hearing. The public and authorities of affected Party can come and participate in the hearings.

QUESTIONS TO AFFECTED PARTY

28. *Describe the procedures and, where appropriate, the legislation your country would apply to determine the meaning of the words "within a reasonable time before the final decision", this being the time frame for comments (art. 4.2)?*

It is assumed that the Party of origin acts in accordance with the Convention and provides this opportunity.

29. *How does your country cooperate with the authorities of the Party of origin on the distribution of the EIA documentation and the submission of comments (art. 4.2), taking into account that the Party of origin and affected Party are both responsible?*

The transfer and receiving of comments is organized between the points of contact. It is common that the affected Party distributes the material, collects the comments in its country and submits it to the Party of origin.

30. *Who is responsible for the organization of the public participation in the affected Party? Is the public participation normally organized in accordance with your legislation as the affected Party, with the legislation of the Party of origin, with ad hoc procedures, or with bilateral or multilateral agreements?*

The point of contact of the affected Party usually agrees the arrangements with the point of contact of the Party of origin on how the public participation should be arranged in each case.

In projects between Estonia and Finland, the bilateral agreement between these two Parties is followed as described earlier.

Article 5

Consultations

QUESTIONS TO PARTY OF ORIGIN

31. *At which step of the EIA procedure does the consultation in accordance with article 5 generally take place? Describe the procedures and, where appropriate, the legislation your country would apply to determine the meaning of “undue delay”, with regard to the timing of the entry into consultation? Does your country normally set the duration for consultations beforehand? If there seems to be no need for consultation, how does your country determine not to carry out consultations?*

The initial time frame for consultation is set when the EIA documentation is sent to the affected Party. The timing follows the time frames set in the national legislation.

32. *On what level do you arrange for consultation: national, regional or local? Who usually participates in the consultation? Describe the responsibilities of the authorities involved. By what means do you usually communicate in consultations, for example by meeting, exchange of written communications?*

The involved Parties agree on ways to perform the consultation. The point of contact of the affected Party collects the national views and forwards them and its own opinion to the Party of origin, usually in a written form.

The cover letter attached to the EIA documentation also includes a request for the affected Party to conduct oral consultations. Oral consultations are arranged by the Ministry of the Environment. Usually the developer and relevant national and regional authorities are represented and also experts from the affected Party. The Ministry of the Environment has been the head of delegation in these consultations from the AP's side. Some parts of the consultation may be held without the developer. A written memorandum is agreed afterwards between the Parties involved and supplementary written comments may also be received afterwards from the affected Party.

QUESTIONS TO AFFECTED PARTY

33. *On what level is the consultation normally held: national, regional or local? Who normally participates in the consultation? By what means does your country usually communicate in consultations, for example by meeting or by the exchange of written communications? How does your country indicate if there is no need for consultations?*

The point of contact arranges the distribution of the EIA documentation to national, regional and, possibly also, local authorities (depending on the project) and the public, collects comments and forwards them and its own summary statement in a written form to the Party of origin. If there is a need for further consultations, it will be indicated in the statement. Oral consultations are requested if it is unclear in the EIA documentation whether the relevant comments have been and will be taken into account. These points are always of utmost importance to the country. Oral consultations take place on the national level (between governments, i.e. ministries of the environment), but participants can also be relevant authorities, experts and regional environmental authorities.

Article 6

Final decision

QUESTIONS TO PARTY OF ORIGIN

34. *For each type of activity listed in appendix I, identify what is regarded as the "final decision" to authorize or undertake a proposed activity (art. 6 in conjunction with art. 2.3); also provide the term used in the national legislation in the original language. Do all projects listed in appendix I require such a decision?*

The "final decision" is a permit for implementation of a project or any other comparable decision. All projects listed in Appendix 1 require a decision.

1. Crude oil refineries (excluding undertakings manufacturing only lubricants from crude oil) and installations for the gasification and liquefaction of 500 tonnes or more of coal or bituminous shale per day.

-environmental permit in accordance with the Environmental Protection Act

2. Thermal power stations and other combustion installations with a heat output of 300 megawatts or more

-environmental permit in accordance with the Environmental Protection Act

and nuclear power stations and other nuclear reactors (except research installations for the production and conversion of fissionable and fertile materials, whose maximum power does not exceed 1 kilowatt continuous thermal load).

-permitting procedure in accordance with Nuclear Energy Act

3. Installations solely designed for the production or enrichment of nuclear fuels, for the reprocessing of irradiated nuclear fuels or for the storage, disposal and processing of radioactive waste.

-permitting procedure in accordance with the Nuclear Energy Act

4. Major installations for the initial smelting of cast-iron and steel and for the production of non-ferrous metals.

-environmental permit in accordance with the Environmental Protection Act

5. Installations for the extraction of asbestos and for the processing and transformation of asbestos and products containing asbestos: for asbestos-cement products, with an annual production of more than 20,000 tonnes finished product; for friction material, with an annual production of more than 50 tonnes finished product; and for other asbestos utilization of more than 200 tonnes per year.

- environmental permit in accordance with the Environmental Protection Act
- 6. Integrated chemical installations.
 - permitting procedure in accordance with the Act on the Safety of the Handling of Dangerous Chemicals and Explosives
- 7. Construction of motorways, express roads */ and
 - permitting procedure in accordance with the Highway Act
- lines for long-distance railway traffic and
 - permitting procedure in accordance with the Railway Act
- of airports with a basic runway length of 2,100 metres or more.
 - permitting procedure in accordance with the Aviation Act
- 8. Large-diameter oil and gas pipelines.
 - permitting procedure in accordance with the Act on the Redemption of Immoveable Property and Special rights
- 9. Trading ports and also inland waterways and ports for inland-waterway traffic which permit the passage of vessels of over 1,350 tonnes.
 - permitting procedure in accordance with the Water Act
- 10. Waste-disposal installations for the incineration, chemical treatment or landfill of toxic and dangerous wastes.
 - environmental permit in accordance with the Environmental Protection Act
- 11. Large dams and reservoirs.
 - permitting procedure in accordance with the Water Act
- 12. Groundwater abstraction activities in cases where the annual volume of water to be abstracted amounts to 10 million cubic metres or more.
 - permitting procedure in accordance with the Water Act
- 13. Pulp and paper manufacturing of 200 air-dried metric tonnes or more per day.
 - environmental permit in accordance with the Environmental Protection Act
- 14. Major mining, on-site extraction and processing of metal ores or coal.
 - permitting procedure in accordance with the Mining Act
- 15. Offshore hydrocarbon production.
 - permitting procedure in accordance with the Water Act
- 16. Major storage facilities for petroleum, petrochemical and chemical products.
 - permitting procedure in accordance with the Act on the Safety of the Handling of Dangerous Chemicals and Explosives
- 17. Deforestation of large areas.
 - permitting procedure depends on the reason for deforestation

35. *How does the EIA procedure (including the outcome) in your country, whether or not transboundary, influence the decision-making process for a proposed activity (art. 6.1)?*

According to the national EIA legislation, it must be obvious how the EIA documentation and a competent authority's statement on it have been taken into account by the authority making the final decision.

36. *Are the comments of the authorities and the public of the affected Party and the outcome of the consultations taken into consideration in the same way as the comments from the authorities and the public in your country (art. 6.1)?*

The outcome of the impact assessment, the EIA documentation and the statement of the competent authority (which includes a summary of national comments and public comments from the affected Party) are included in the permit application to enable the permit authority to take them into account in its decision.

37. *How is the obligation to submit the final decision to the affected Party normally fulfilled? Does the final decision contain the reasons and considerations on which the decision is based? (art. 6.2)*

After the final decision is made, it is sent to the affected Party. The final decision contains the reasoning and considerations on which the decision is based. However, as the EIA is done early in the planning, there may be a delay before the decision is done and can be sent to the affected Party.

38. *If additional information becomes available according to article 6, paragraph 3, before the activity commences, how does your country consult with the affected Party? If need be, can the decision be revised? (art. 6.3)*

In such a case it is possible to reconsider the decision, for example, in accordance with the Environmental Protection Act.

Article 7

Post-Project Analysis

39. *How does your country determine whether it should request a post-project analysis to be carried out (art. 7.1)?*

There has been no need so far for a post-project analysis.

40. *Where, as a result of post-project analysis, it is concluded that there is a significant adverse transboundary impact by the activity, how does your country inform the other Party and consult on necessary measures to reduce or eliminate the impact pursuant to article 7, paragraph 2?*

-

Article 8

Bilateral and multilateral agreements

41. *Does your country have any bilateral or multilateral agreements based on the Convention (art. 8, appendix VI)? If so, list them. Briefly describe the nature of these agreements. To what extent are these agreements based on appendix VI and what issues do they cover? If publicly available, also attach the texts of such bilateral and multilateral agreements, preferably in English, French or Russian.*

Finland has a bilateral agreement with Estonia, established in 2002. The objective of the agreement is to promote and develop further the implementation of the Convention between the Parties. The agreement applies to proposed activities listed in an annex to the agreement, and to any other proposed activity under the national EIA procedure of the Party of origin. The Parties have established a joint EIA commission that has an advisory role and acts as a forum for information exchange and dispute settlement. It is partially based on Appendix VI, for example, (b), (d) and (g) are included in the agreement.

42. *Has your country established any supplementary points of contact pursuant to bilateral or multilateral agreements?*

No supplementary point of contact has been established.

Article 9

Research programmes

43. Are you aware of any specific research in relation to the items mentioned in article 9 in your country? If so, describe it briefly.

9 (c) Nord Stream project: Transboundary environmental impacts of the project from Finland will be monitored also on the Estonian side. The research will begin in 2010.

Ratification of the amendments to the Convention and of the Protocol on Strategic Environmental Assessment

44. If your country has not yet ratified the first amendment to the Convention, does it have plans to ratify this amendment? If so, when?

End of 2011.

45. If your country has not yet ratified the second amendment to the Convention, does it have plans to ratify this amendment? If so, when?

End of 2011.

46. If your country has not yet ratified the Protocol on SEA, does it have plans to ratify the Protocol? If so, when?

-

PART TWO – PRACTICAL APPLICATION DURING THE PERIOD 2006–2009

Please report on your country's practical experiences of applying the Convention (not your country's procedures described in part one), whether as Party of origin or affected Party. The focus here is on identifying good practices as well as difficulties Parties have encountered in applying the Convention in practice; the goal is to enable Parties to share solutions. Parties should therefore provide appropriate examples highlighting application of the Convention and innovative approaches to improve its application.

CASES DURING THE PERIOD 2006–2009

47. Does your country's national administration have information on the transboundary EIA procedures that were under way during the period? If so, please list these procedures, clearly identifying for each whether your country was the Party of origin or the affected Party. If your country does not have any experience of applying the Convention, why not?

Finland as the Party of origin

1-9 are presented in the previous questionnaire

10. Sewage treatment plant in Lappeenranta, 2006 (year indicates the time of the notification)

(affected Party: Russian Federation*)

11. Nord Stream gas pipeline, 2007

(affected Parties: Estonia, Latvia, Lithuania, Poland, Germany, Denmark, Sweden and Russian Federation)

12. New nuclear power plant unit, Olkiluoto 4, 2007

(affected Parties: Sweden, Estonia, Lithuania, Germany, Poland, Norway, Austria, Russian Federation, Latvia*, Denmark*)

13. New nuclear power plant unit, Loviisa 3, 2007

(affected Parties: Sweden, Estonia, Lithuania, Germany, Poland, Norway, Austria, Russian Federation, Latvia*, Denmark*)

14. New nuclear power plant, Fennovoima Oy, 2008

(affected Parties: Sweden, Estonia, Lithuania, Germany, Poland, Norway, Austria, Latvia*, Denmark*, Russian Federation*)

15. Final disposal of spent nuclear fuel, 2008

(affected Parties: Sweden, Estonia*, Germany, Lithuania*, Latvia*, Norway, Denmark*, Russian Federation*)

16. Suurhiekkä offshore wind farm and marine sediment extraction, 2007

(affected Party: Sweden)

17. Offshore wind farm, 2008

(affected Party: Sweden)

18. Mielmukkavaara wind farm, 2009

(affected Party: Sweden)

19. Offshore wind farm in Tornio, 2009

(affected Party: Sweden)

20. Biodiesel project in Kemi and Äänekoski, 2009

(affected Party: Sweden)

21. Extension of offshore wind farm in Kemi, 2009

(affected Party: Sweden)

*notification only, Party did not participate in the EIA

Finland as an affected Party

1-6 are presented in the previous questionnaire

7. Encapsulation plant and final repository for spent nuclear fuel, 2005 (year indicates the receipt of notification)

(Party of origin: Sweden)

8. Wind farm on Finngrundén, 2006

(Party of origin: Sweden)

9. Offshore wind farm (Hiidenmaa), 2007

(Party of origin: Estonia)

10. Narva power plants, 2007

(Party of origin: Estonia)

11. Ignalina nuclear power plant, 2007
(Party of origin: Lithuania)

12. Nord Stream gas pipeline, 2007
(Parties of origin: Sweden, Denmark, Germany and Russian Federation)

13. Tapuli iron-ore mine and Kaunisvaara mill, 2009
(Party of origin: Sweden)

14. Sahavaara iron-ore mine, 2009
(Party of origin: Sweden)

15. Railway connection between Pajala (Sweden) and Kolari (Finland), 2009
(Party of origin: Sweden)

48. *Does your country object to the above list of transboundary EIA procedures being included in a compilation of such procedures to be made available on the website of the Convention? (Indicate “yes” if you object.)*

No.

49. *Are there projects other than those mentioned above for which a transboundary EIA procedure should have been applied, but was not? Explain why.*

No.

50. *Provide information on the average duration of transboundary EIA procedures, both of the individual steps and of the procedures as a whole.*

The average time frame would be from one to two years.

EXPERIENCE OF THE TRANSBOUNDARY ENVIRONMENTAL IMPACT ASSESSMENT PROCEDURE IN 2006–2009

51. *If your country has had practical experience, has the implementation of the Convention supported the prevention, reduction or control of possible significant transboundary environmental impacts? Provide practical examples if available.*

There has been no systematic follow-up on this issue, but as adverse impacts are dealt with in the transboundary procedure, the answer on that basis is yes.

52. *How has your country interpreted in practice the various terms used in the Convention, and what criteria has your country used to do this? Key terms include the following: “major change” (art. 1 (v)), “a reasonable time” (art. 3.2(c), art. 4.2), “promptly” (art. 3.6) and “a reasonable time frame” (art. 5). (Do not provide references to answers to earlier questions 6 (b), 11, 13, 25 and 31.) If your country experiences substantial difficulties interpreting particular terms, does your country work together with other Parties to find solutions? If not, how does your country overcome the problem?*

It is customary that the points of contact discuss the interpretation of different terms, if need be. There have been no major obstacles in interpreting the terms in the past period.

53. *Please share with other Parties your country’s experience of using the Convention in practice. In response to each of the questions below, either provide one or two practical*

examples or describe your country's general experience. You might also include examples of "lessons learned" in order to help others.

- a. *How in practice has your country identified transboundary EIA activities for notification under the Convention, and determined the significance and likelihood of adverse transboundary impact?;*

Usually it is the competent authority on EIA who contacts the Ministry of the Environment if there is the possibility that the Convention must be applied because of potential significant transboundary environmental impacts connected to a project.

Discussions on the likelihood of adverse transboundary impacts with the possible affected Parties (through the points of contact) have also taken place.

- b. *Indicate whether a separate chapter is provided on transboundary issues in the EIA documentation. How does your country determine how much information to include in the EIA documentation?;*

It is recommended by the Ministry of the Environment that it is an advantage to provide a separate chapter on transboundary impacts, as this would help give the affected Party a good picture of the impacts. This may also minimize the need for translations.

The main items to be included in the documentation are defined in the first phase of the EIA – the assessment programme phase (scoping).

- c. *What methodology does your country use in impact assessment in the (transboundary) EIA procedure (e.g. impact prediction methods and methods to compare alternatives)?;*

Different methods are used to predict different impacts. For some impacts, models are used, such as for noise, air quality and (potentially) unpleasant odours. For many of the impacts, expert analysis is used.

For comparing alternatives it is advisable to use disaggregative comparison methods instead of aggregative.

- d. *Translation is not addressed in the Convention. How has your country addressed the question of translation? What does your country usually translate? What difficulties has your country experienced relating to translation and interpretation, and what solutions has your country applied?;*

Translation is again an issue that is often settled between the points of contact. The need for translation varies from case to case. The material provided for public information is translated into the language of the affected Party. In some cases (npp) the whole EIA report was translated into English. As Finland is bilingual, some EIA documents are available also in Swedish in addition to Finnish.

At public hearings simultaneous interpretation has been used in some cases.

- e. *How has your country organized transboundary public participation in practice? As Party of origin, has your country organized public participation in affected Parties and, if so, how? What has been your country's experience of the effectiveness of public participation? Has your country experienced difficulties with the participation of its public or the public of another Party? (e.g. have there been complaints from the public about the procedure?);*

As an affected Party, Finland has organized public participation as follows in the projects during 2006-2009:

- oThe Point of Contact's public announcement was sent to relevant newspapers.
- oThe Point of Contact's press release on the activity was published.
- oA public information meeting about the project and its potential impacts was held in the case of the Nord Stream Gas Pipeline project and deemed unnecessary in others.
- oEIA documentation was available for public review in relevant places, and it was also put on the Internet with supporting information.
- oThe public was given an opportunity to send comments to the Point of Contact during a given time frame.

It is common practice in the neighbouring countries that the affected Party takes on the responsibility for organizing public participation. As a Party of origin, Finland offers to give any support needed in arranging public participation. For example, Finland has helped to organize public information meetings in Estonia in various EIA activities.

- f. *Describe any difficulties that your country has encountered during consultations, for example over timing, language and the need for additional information. As an affected Party, have consultations under article 5 supported the prevention, reduction or control of possible significant transboundary environmental impacts?;*

No specific difficulties.

- g. *Describe examples of the form, content and language of the final decision, when it is issued and how it is communicated to the affected Party and its public;*

The form of the decision may differ in various project types because they are based on different permitting procedures in different acts. The decision contains, e.g. a description of the project, its impacts, the decision itself, its justification and how the EIA has been taken into account. The final decision is granted usually in Finnish and, in some cases, also in Swedish. The decision is sent to the point of contact of the affected Party. Translation of the decision into English in parts or completely may be needed.

- h. *Has your country carried out post-project analyses and, if so, on what kinds of project?;*

No.

- i. *Does your country have successful examples of organizing transboundary EIA procedures for joint cross-border projects? Please provide information on your country's experiences describing, for example, means of cooperation (e.g. contact points, joint bodies, bilateral agreements), institutional arrangements, and how practical matters are dealt with (e.g. translation, interpretation, transmission of documents, etc.);*

The Nord Stream project is an example of a cross-border project with four Parties of origin and Russia voluntarily acting in the role of Party of origin. All Parties of origin were also affected Parties. Additionally, four more countries participated in the EIA as affected Parties.

Coordination of the procedure was done through cooperation between the points of contacts of the Parties of origin, with several meetings taking place during the procedure. Notification with the scoping document and the EIA documentation was

sent simultaneously to the affected Parties to comment on. Also supplements to the scoping document involving new alternatives were sent to the affected Parties for comments. Public hearings were coordinated to take place simultaneously in all of the affected Parties. The scoping document and EIA documentation were translated into the affected Parties' languages.

- j. Name examples of good practice cases, whether complete cases or good practice elements (e.g. notification, consultation or public participation) within cases. Would your country like to introduce a case in the form of a Convention's "case study fact sheet"?*

Nord Stream should be introduced, but all PoOs should participate in the preparation.

- k. Identify the most common means of applying the Convention (e.g. through focal points, joint bodies, multilateral agreements).*

Through focal points.

CO-OPERATION BETWEEN PARTIES IN 2006–2009

- 54. Does your country have any successful examples of how it has overcome difficulties arising from different legal systems in neighbouring countries?*

Discussions and mutual respect has proven to be successful means. Long-term cooperation between countries helps to familiarize Parties with the different legal systems.

EXPERIENCE IN USING THE GUIDANCE IN 2006–2009

- 55. Has your country used in practice the following guidance, adopted by the Meeting of the Parties and available online? Describe your country's experience with using these guidance documents and how they might be improved or supplemented:*

- a. Guidance on public participation in EIA in a transboundary context;*

Yes, but no specific experiences to be described.

- b. Guidance on subregional cooperation;*

Yes, but no specific experiences to be described.

- c. Guidelines on good practice and on bilateral and multilateral agreements.*

Yes, but no specific experiences to be described.

CLARITY OF THE CONVENTION

- 56. Has your country had difficulties implementing the procedure defined in the Convention, either as Party of origin or as affected Party? Are there provisions in the Convention that are unclear? Describe the transboundary EIA procedure as applied in practice, where this has varied from that described in part one above or in the Convention. Also describe in general the strengths and weaknesses of your country's implementation of the Convention's transboundary EIA procedure, which your country encounters when applying the Convention.*

No major difficulties have been experienced. The active application of the Convention has brought us a lot of experience in the field.

AWARENESS OF THE CONVENTION

57. *Has your country undertaken activities to promote awareness of the Convention among stakeholders (e.g. the public, local authorities, consultants and experts, academics, investors)? If so, describe them.*

The North Calotte Environmental Council financed a seminar organized by the Lapland Regional Environment Centre on "Environmental Impact Assessment in the North Calotte Transboundary Areas, 3rd–4th May 2006 in Rovaniemi, Finland". The aim of this seminar was to gather together actors and stakeholders dealing with environmental impact assessment problematics to hear qualified authorities and researchers speak about the interpretation of legislation in practice in Finland, Sweden and Norway. A report of the seminar is available in English and can be downloaded from www.ymparisto.fi/download.asp?contentid=69113&lan=EN.

The Ministry of the Environment has arranged training on how to apply the Convention for EIA competent authorities. Presentations on application of the Convention have taken place in different forums, and participants include developers, consultants, academics, members of Parliament and so on. The Nord Stream project brought the Espoo Convention into the media as a common concept.

58. *Does your country see a need to improve the application of the Convention in your country and, if so, how does it intend to do so? What relevant legal or administrative developments are proposed or ongoing?*

A study has been launched to evaluate the existing experience on applying the Convention and identify areas needing improvement in Finland.

SUGGESTED IMPROVEMENTS TO THE REPORT

59. *Please provide suggestions for how this report may be improved.*

If questions are modified or changed from the previous questionnaire, please indicate these changes.

* * * * *