

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

in the period 2010–2012

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# 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

1. *List the general legal, administrative and other measures taken in your country to implement the provisions of the Convention (art. 2, para. 2).*

The Planning Act, Consolidated Act No 937 of 24 September 2009.  
Statutory Order on the environmental assessment of certain private and public constructions, No 1510 of 15 December 2010  
The Raw Material Act, Consolidated Act No. 950 of 24 September 2009.  
The Law on the use of Danish subsoil, Consolidated Act No 960 of 13 September 2011  
The Law of Environmental Protection of the Sea, Act No 929 of 24 September 2009  
Statutory Order on Environmental Assessment of Marine Farms, No 382 of 25 April 2012  
The Law of the Continental Shelf, Consolidated Act No 1101 of November 2005  
Statutory Order of EIA regarding Off Shore Soil Storage, Off Shore Pipe Lines and Other Off Shore Activities, No 632 of 11 June 2012  
Statutory Order on EIA of certain projects in the territorial sea, No 809 of 22 August 2005  
Guidance Document on EIA of Danish Off Shore Wind Farms, October 2012

*Indicate any further measures to implement the provisions of the Convention that are planned for the near future.*

There are none for the moment.

3. *List the different authorities that are named responsible for the implementation of the EIA procedure in the transboundary context and domestically.*

Ministry of the Environment.  
Ministry of Climate, Energy and Building  
Ministry of Transport

4. *Is there an authority in your country that collects information on all the transboundary EIA cases? If so, please name it.*

Danish Nature Agency under the Danish Ministry of the Environment

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

The point of contact will have the responsibility of the Espoo-procedure.  
For certain cases there are examples of cooperation through joint bodies and common procedure has been created case by case.

For other cases Denmark will conduct the procedure through the point of contact. But Denmark has no special provisions regarding this.

6. *Is appendix I to the Convention transposed fully into your country's national legislation? Please describe any differences between the national list and appendix I to the Convention.*

Yes

7. *Does your country's legislation already cover fully the revised appendix I in the second amendment (ECE/MP.EIA/6, decision III/7)?*

Yes

#### PUBLIC PARTICIPATION

8. *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?*

Denmark asks the affected Party what kind of information they need for their procedure for Public Participation in the affected Party before we notify or consult according to the Espoo Convention. The information is all based on the same material that is being used for public participation in Denmark. The material to the affected Party should concentrate on transboundary issues.

### Article 3

#### Notification

#### QUESTIONS TO PARTY OF ORIGIN

9. *Describe how your country determines when to send the notification to the affected Party, which is to occur "as early as possible as and no later than when informing its own public".*

The notification is sent at the same time as the publication of the "notification of intent" takes place domestically.

10. *Indicate whether and how the following provisions are reflected in your national legislation:*

- a. *The stage in the EIA procedure when your country usually notifies the affected Party (art. 3.1);*

For projects likely to cause a significant adverse transboundary impact in another Party, the Danish legislation describes an obligation to notify and send the relevant material to the affected Party as soon as possible. The same procedure takes place if a possibly affected Party asks for information of the project. The EIA procedure in Denmark provides for public participation in two stages. First, before the EIA documentation is prepared, in the scoping phase, the public is given the opportunity to make suggestions for the project-specific guidelines for the content of the EIA documentation. Secondly, once the EIA documentation has been prepared, there is the opportunity for the public to comment both in writing and orally at a public hearing. The publication in the affected Party would take place at the same time as the domestic public is informed. Denmark provides the affected party with the same information as the Danish public and the Danish competent authority will get. The public and the competent authority in the effected party (ties) are also invited if a public hearing/meeting takes place in Denmark.

- b. *The format for notification. Please indicate whether this is the format as decided by the first meeting of the Parties in its decision I/4 ( ECE /MP.EIA/2, annex IV, appendix). If not, does your country use a format of its own (in which case, please attach a copy of it)?*

In principle we use the format but over time it has developed. Depending on the case there can be additional relevant information. As an example we enclose one of our latest notification letters (The Nord Stream Extension case)

- c. *The time frame for the response to the notification from the affected Party (cf. art. 3, para. 3, "within the time specified in the notification"), the consequence if an affected Party does not comply with the time frame, and the possibility of extending a deadline;*

In principle the time frame is the same as for the domestic responses. If the time frame is not complied with, the whole procedure will suffer from delays. Normally a short extension of the deadline is considered.

- d. *The request for information from the affected Party (art. 3 para. 6), necessary for the preparation of the EIA documentation;*

Denmark takes contact to the point of contact to the Espoo convention in the affected Party and will be guided to the relevant Authorities in the affected Party that might have the relevant information.

- e. *How your country cooperates with the authorities of the affected Party on public participation (art. 3, para. 8);*

Denmark asks the affected Party what kind of information they need and where it should be sent to in the affected Party (which Authorities). The information is based on the same information that are used for public participation in Denmark.

- f. *When and 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?*

The affected Party is notified at the same time as the Danish public, and the information is based on the same material concentrating on transboundary issues. The kind of media to the Authorities in the affected Party depends on what the affected Party prefer. Usually it is both e-mail and snail mail with USB-sticks. The affected Party decides how their public is involved. The public and the competent authority in the affected party (ies) are also invited if a public hearing/meeting takes place in Denmark.

- g. *When and how the public in the Party of origin is notified (what kinds of media, etc., are usually used). What is normally the content of the public notification?*

The kind of media varies but usually newspapers and electronic media are used.

The public notification contains information of

- the project
- if there is an obligation of an EIA-procedure
- where and how additional information can be sought
- where comments can be given
- the timeframe for comments
- possible decisions of the project
- what steps are taken to include the public in the EIA-procedure

- h. 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.*

The notification has the same content. Transboundary issues may be in focus in the notification to the affected Party

- 11. 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, annex III, decision I/3), and as listed on the Convention website ([http://www.unece.org/env/eia/points\\_of\\_contact.htm](http://www.unece.org/env/eia/points_of_contact.htm))?*

Yes

#### QUESTIONS TO AFFECTED PARTY

- 12. Indicate whether and how the following provisions are reflected in your national legislation:*

- a. How your country decides whether or not to participate in the EIA procedure (art. 3, para. 3)?*

In general the competent authority - central and local authorities -, which also include environmental authorities, decide whether or not to take part in the EIA. If a project is of great interest for the public, Denmark would always participate in the EIA. Denmark would participate if it is to be 'severely affected' by an activity.

- b. The request from the Party of origin for information (art. 3, para. 6), necessary for the preparation of the EIA documentation;*

All kind of existing information are considered "reasonable obtainable". Additional analysis may be carried out if time allows. "Promptly" is taken to mean "as soon" as possible. It will always take time to collect information.

- c. How your country cooperates with the authorities of the Party of origin on public participation (art. 3, para. 8);*

Through dialog with the Party of origin and the affected local areas in the affected Party (Denmark) the Espoo point of contact in Denmark help facilitating the best way to include comments or objections to the Party of origin. This could be both written comments and/or consultation meetings.

- d. When and how the public is notified (e.g., what kinds of media, etc., are usually used).*

The public is notified by a public announcement in relevant newspapers or by electroical media. Other relevant media can be used if appropriate. The notification takes place as soon as possible after the receiving the material from the Party of origin.

## Article 4

### *Preparation of the environmental impact assessment documentation*

#### QUESTIONS TO PARTY OF ORIGIN

- 13. Indicate the legal requirements in your country, if any, related to:*

- a. The content of the EIA documentation (art. 4, para. 1; appendix II);*

According to the Danish legislation concerning EIA, the legal requirement for the content of an EIA documentation is similar to Appendix II in the convention.

- b. *The procedures for determining the content of the EIA documentation on a case-by-case basis (scoping procedure) (art. 4, para. 1);*

The Danish legislation concerning EIA contains procedure for the content of the EIA documentation. The Danish legislation is similar to the Convention

- c. *The identification of "reasonable alternatives" in accordance with appendix II, paragraph (b);*

This is done case by case. The developer is obliged to outline the main alternatives studied with an indication of the main reasons for the choices made taking into account the environmental effects.

- d. *The procedures and format for providing the EIA documentation domestically;*

The Danish legislation is similar to the Convention.

- e. *The procedures and format for providing the EIA documentation to the affected Party. If there is a difference between the procedures and format domestically and for the affected Party, please explain;*

Please see 10. a

- f. *The procedures for the examination of, and the deadlines for comments on, the EIA documentation domestically, and how the comments submitted domestically are addressed;*

The time frame for comments depends on the specific legislation involved. The time frame will normally be 4-8 weeks. If the competent authority does not receive the comments in time they cannot be taken into consideration in the decision making process. If the decision-making procedure permits, an extension will be granted. A reasonably extension we normally be granted.

- g. *The procedures for the examination of, and the deadlines for comments on, the EIA documentation from the affected Party, and how the comments submitted by the affected Party are addressed;*

The time frame for comments depends on the specific legislation involved. The time frame will normally be the same as for domestic comments. If the competent authority does not receive the comments in time they cannot be taken into consideration in the decision making process. If the decision-making procedure permits, an extension will be granted. A reasonably extension we normally be granted

- h. *The procedures for public hearings domestically;*

For projects likely to cause a significant adverse transboundary impact in another Party, the Danish legislation describes an obligation to notify and send the relevant material to the affected Party as soon as possible. The same procedure takes place if a possibly affected Party asks for information of the project. The EIA procedure in Denmark provides for public participation in two stages. First, before the EIA documentation is prepared, in the scoping phase, the public is given the opportunity to make suggestions for the project-specific guidelines for the content of the EIA documentation. Secondly, once the EIA documentation has been prepared, there is the opportunity for the public to comment both in writing and orally at a public hearing. The publication in the affected Party would take place at the same time as the domestic public is informed. Denmark provides the affected party with the

same information as the Danish public and the Danish competent authority will get. The public and the competent authority in the effected party (ties) are also invited if a public hearing/meeting takes place in Denmark.

The same material as provided for the domestic public will be provided for the affected Party. The transboundary issues will be outlined to the affected Party. In some cases all the material has been translated. In other cases not all material will be translated. A summary will always be translated as well as information on the procedure, time frame, possibilities for involvement, etc. The point of contact in the affected Party will be contacted to provide guidance on this matter.

*i. The procedures for public hearings held on the territory of the affected Party.*

Please see 13 h. Furthermore meetings can be arranged on the territory of the affected Party if it so wishes. This will be arranged through the Parties point of contacts from case to case.

#### QUESTIONS TO AFFECTED PARTY

*14. Indicate the legal requirements in your country, if any, related to:*

*a. The procedures and deadlines for comments on the EIA documentation to be submitted to the Party of origin;*

The Point of Contact in Denmark facilitate the case to the relevant authorities in Denmark and the authorities see to it that the public is informed and the comments from the public and the relevant authorities will be collected by the Point of Contact. Denmark is obliged to answer within the timeframe set by the Party of Origin or - if it is not possible to answer within this timeframe - explain why Denmark asks to extend the timeframe.

*b. The procedures for public participation in the review of the EIA documentation domestically, and the authority responsible for the execution of the aforementioned procedures;*

Please see 14. a.

*c. The procedures for the examination of the EIA documentation domestically.*

The competent authorities evaluate the project on the basis on the EIA report and the back ground reports that follow the scope of Appendix II of the Convention. The competent authority asks for further information if necessary until the information is considered sufficient to base appropriate comments on.

## Article 5

### Consultations

#### QUESTIONS TO PARTY OF ORIGIN

*15. Indicate the legal requirements in your country, if any, related to the following provisions:*

*a. The procedures for cooperation with the affected Party related to consultations;*



When an affected Party so wishes the Point of Contact in the Party of Origin as well as the affected Party cooperates, coordinates and facilitate consultations in either of the countries.

*b. The stages, procedures and deadlines for consultations with the affected Party;*

Consultations are usually offered in a consultation letter to the affected Party, and arrangements are made between the countries point of Contacts to facilitate consultation meetings. If there is a domestic consultation meeting in Denmark, the affected Party is offered to participate.

*c. The stages, procedures and deadlines for consultations domestically, and who participates in the consultations.*

It is considered from case to case if a consultation meeting is offered already by the public hearing. If the case is of great significance in Denmark this is the case, otherwise consultation meetings will be held on the request of the public. The public is then informed in detail of the possibility to have a meeting and where to ask for the meeting.

#### QUESTIONS TO AFFECTED PARTY

*16. Indicate the legal requirements in your country, if any, related to the following provisions:*

*a. The procedures for interaction with the Party of origin related to consultations;*

The Point of Contact will coordinate with the Point of Contact in the Party of Origin to conduct possible consultations.

*b. The stages, procedures and deadlines for consultations domestically, and who participates in the consultations.*

The consultations are coordinated from case to case with the Point of Contact in the Party of Origin.

## **Article 6**

### ***Final decision***

#### QUESTIONS TO PARTY OF ORIGIN

*17. Indicate the legal requirements in your country, if any, related to the following provisions:*

*a. The definition of "final decision" related to the implementation of the planned activity; the content of decisions; and procedures for their adoption;*

A final decision would be a "permit" according to the legislation. it could also be a rejection of a project. The authority responsible for the permit depends on the project. Different authorities are the final decision and permission authorities. It could for instance be The Ministry of The Environment, The Ministry of Climate, Energy and Building, Ministry of Transport or a municipality. The competent authorities evaluates the project on the basis on the EIA report and the back ground reports that follow the scope of Appendix II of the Convention. The competent authority asks for further information if necessary until the information is considered sufficient to base an appropriate permit or rejection on, and to set out the right conditions on which the permission for the project is based. A final decision would be a "permit" according to the legislation or a rejection of a project.

- b. *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, para. 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 or a rejection of the project. (Permit= Tilladelse) Yes, all the projects listed in appendix I require such a decision.

- c. *The procedures for informing of the "final decision" domestically and for the affected Party;*

The final decision is notified to the developer as well as the decision is made public domestically and also notified to the affected Party.

- d. *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, para. 1)?*

Yes

- e. *The opportunity to review the decision if, before the activity is implemented, additional information becomes available according to article 6, paragraph 3.*

Denmark has not had any experience yet.

## **Article 7**

### ***Post-Project Analysis***

18. *Indicate the legal requirements in your country, if any, related to:*

- a. *Post-project analysis (art. 7, para. 1);*

It has become more common in the EIA-procedure to include post-project analysis. The permitting authority may decide that a monitoring/ environmental programme shall be prepared.

- b. *Procedures for informing of the results of post-project analysis.*

In general the permitting authority decides the information procedure. Information of the results from post-project analysis will also be available on relevant web sites.

## **Article 8**

### ***Bilateral and multilateral agreements***

19. *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.*

No formal written agreement, but frequently meetings with Sweden and with Germany on EIA in a transboundary context are held. The subregional meetings under the Espoo-konvention (work programme) are very usefull.

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

No

## Article 9

### *Research programmes*

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

There has been research and monitoring of the effect of offshore wind farms and other projects on benthic communities, fish, mammals and birds, comparing the situations before and after the establishment of two large demonstration offshore wind farms. There are also a great number of data and experience from a bridge connecting Denmark and Sweden and from The Nord Stream Project with pipe lines through the Baltic Sea.

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

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

Very soon

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

Very soon

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

Denmark has ratified the Protocol

## PART TWO – PRACTICAL APPLICATION DURING THE PERIOD 2010–2012

*Please report on your country's practical experiences in 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; and 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 2010–2012

25. *If your country's national administration has a list of transboundary EIA procedures that were under way during the reporting period, in which your country was Party of origin or affected Party, please list it.*

- Oil and gas activities in the Danish area of the economic zone the North Sea
- Wind turbines called "Strom Nord" in the Baltic Sea area of the German economic zone
- The fixed link across the Fehmarnbelt between Denmark and Germany
- Nord Stream Gas Pipeline in the Baltic Sea
- Decommissioning of the Swedish Nuclear Power Plant "Barsebäck"
- Wells in the Danish area of the economic zone of the North Sea.
- Wind farm at the Island Anholt in Danish area of the economic zone of Kattegat

- Windfarm at Södre Mitsjöbanken in the Swedish area of economic zone in the Baltic Sea
- European Spallation Source ESS AB at Lund in Sweden
- Disposal site at Harrislee in Northern Germany
- Offshore Wind farms called "Ostseeperle" in the Baltic Sea area of the German economic zone
- Offshore Wind farms called "Ostseeschatz" in the Baltic Sea area of the German economic zone
- Offshore Wind farms called "Baltic Eagle" in the Baltic Sea area of the German economic zone
- Galloper offshore wind farm in the UK area of the economic zone in the North Sea
- Offshore wind farm in the UK area of economic zone in the North Sea at Dogger Banke
- Offshore wind farm called Horns Rev 3 in the Danish area of the economic zone in the North Sea
- Offshore wind farm called Kriegers Flak in the Danish area of the economic zone in the Baltic Sea
- Dredging and dumping at Falkenberg in the Swedish area of the economic zone in Kattegat
- Implementation of new Nuclear Power Plant Units" project called Paks NPP II project in Hungary

26. *Does your country object to the inclusion of the above list of transboundary EIA procedures in a compilation of such procedures to be made available on the website of the Convention? (Indicate "yes" if you object.)*

No Denmark does not object.

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

It depends on the complexity of the case. The duration of most cases is short - a couple of months - others seem to extend because of the complexity.

#### EXPERIENCE IN THE TRANSBOUNDARY ENVIRONMENTAL IMPACT ASSESSMENT PROCEDURE DURING THE PERIOD 2010–2012

28. *If your country has had practical experience in the transboundary EIA procedure during the reporting period, has the implementation of the Convention supported the prevention, reduction or control of possible significant transboundary environmental impacts? Provide practical examples if available.*

Yes - in general the focus on environmental impact and transboundary environmental impact has developed.

29. *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. *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?*

If there are transboundary issues these have a separate chapter in the EIA documentation. The information relevant is included with the same procedure as for domestic environmental issues.

b. *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 have your country applied?*

No translation between Denmark, Norway and Sweden as we understand each others languages. For the notification letters for other countries we use English. Some of the bigger EIA will also be in English. There will also be a summary in the language of the specific countries. Before notifying Denmark (Point of Contact) asks what kind of translation the Affected Party need.

- c. *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? 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)?*

The Point of Contact in Denmark always coordinate with the Point of Contact in the relevant Parties to find a way to conduct for instance consultation meetings. In general there is a very good cooperation between the Point of Contacts. Some Parties may have a more formal administrative procedure than others but the process has till now always succeeded.

- d. *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?*

We have not experienced any serious difficulties but of course translation of letters in other languages and different formal procedures can be a barrier but so far not a crucial one. Article 5 supports the possibility of information of the project and the possibility to comment on the project.

- e. *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;*

Please see 10. a and 29. b

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

Denmark has carried out post-project analysis on for instans off shore wind farms and the bridge connection between Sweden and Denmark and the Nord Stream Pipe Line.

- g. *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 and Skanled Gas Pipe Line. Joint meetings between Points of Contact and between Points of Contact and developer. Agreements on the timing of for instance notification and consultation letters.

- h. *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"?*

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

Point of Contact/Focal Point

CO-OPERATION BETWEEN PARTIES IN 2010–2012

30. *Does your country have any successful examples of how it has overcome difficulties arising from different legal systems in neighbouring countries? If so please specify.*

The Subregional meetings has developed good cooperation connections and though you of course must follow the laws and administrative procedure in each country the process is easier to conduct when there already is developed a basis for cooperation and to the right information source.

EXPERIENCE IN USING THE GUIDANCE IN 2010–2012

31. *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 (ECE/MP.EIA/7);*

Yes

- b. *Guidance on subregional cooperation (ECE/MP.EIA/6, annex V, appendix);*

Yes

- c. *Guidelines on good practice and on bilateral and multilateral agreements (ECE/MP.EIA/6, annex IV, appendix).*

Yes

CLARITY OF THE CONVENTION

32. *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?*

No

AWARENESS OF THE CONVENTION

33. *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.*

Yes. Point of Contact conduct meetings with other authorities and stakeholders.

34. *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?*

No

SUGGESTED IMPROVEMENTS TO THE REPORT

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

Some questions are quite similar and cover the same content - which requires the same answer as a previous answer. The similar questions could be made as one question instead.

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