

United Nations Development Programme

**Strategic Environmental Assessment of the 2006-
2010 National Tourism Development Programme of
the Republic of Belarus**

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October, 2005

Minsk

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List of abbreviations

MoE	Ministry of Natural Resources and Environmental Protection of the Republic of Belarus
MoST	Ministry of Sports and Tourism of the Republic of Belarus
NGOs	Non-Governmental Organizations
NSDS	National Sustainable Development Strategy of the Republic of Belarus for the period to 2020
Programme	2006-2010 National Tourism Development Programme of the Republic of Belarus
REC	Regional Environmental Centre for Central and Eastern Europe
SEA	Strategic Environmental Assessment
SPAs	Specially Protected Areas
UNDP	United Nations Development Programme
UNDP Regional Centre	United Nations Development Programme Regional Centre for Europe and CIS
WHO	World Health Organization

Executive Summary

Between January and October 2005, a UNDP/REC joint pilot project on Strategic Environmental Assessment of the 2006-2010 National Tourism Development Programme (the Programme) was implemented in Belarus. The primary objectives of the project were to:

- Test and demonstrate possible practical applications of the UN ECE Protocol on SEA in Belarus with a view to satisfying the requirement regarding public participation and consultations;
- Provide recommendations to improve and amend the National Tourism Development Programme.

Strategic Environmental Assessment (SEA) was conducted to identify possible environmental and health impacts of the Programme. The study encompassed separate components of the environment, such as water and land, biodiversity, air, and waste management. Potential health impacts resulting from the Programme were also analyzed.

The Programme's SEA was performed by a team of national experts selected in accordance with the UNDP rules and procedures. An advisory group composed of SEA international experts representing the UNDP Regional Centre (Bratislava), Regional Environmental Centre (Budapest) and the Central European University (Budapest) provided assistance to the SEA national team.

The Ministry of Environment and the Ministry of Health of the Republic of Belarus find it useful to take into account all possible environmental and health effects resulting from assessments of policies and programmes as mentioned by the Budapest Declaration on Environment and Health.

Positive and negative aspects are identified and discussed in relevant chapters of the SEA Report and the summary table of recommendations (Annex 1). This is where optimization proposals of the expert team can also be found to remove or minimize substantial negative environmental and health impacts which might arise from implementation of the Programme.

A connectivity and linkage analysis and evaluation of the draft Programme with regard to individual policy documents and legislative acts of the Republic of Belarus in the fields of environmental protection, health care and sustainable development prompted the expert team to conclude that the Programme is generally in compliance with the policies and acts analyzed, although certain shortcomings have been identified.

It has been established that the Programme does not fully reflect the requirements of Articles 21 and 26 of the Environmental Protection Act where it concerns allowable anthropogenic pressures on the environment, because it has no provisions to forecast potential environmental impacts from the Programme or account for the allowable recreational pressure on the environment.

The Programme also fails to take into account the requirements of the Water Code, Regulations on the Procedure of Performing Local Environmental Monitoring and Using its Data within the National Environmental Monitoring System of the Republic of Belarus where it concerns local monitoring of environmental sites by legal entities engaged in the use of sources of harmful environmental impact.

The Programme also does not fully reflect the requirements of Article 22; the Act on Specially Protected Areas and Sites of the Republic of Belarus where it concerns the development of ecological tourism in the Berezinsky Biosphere Reserve.

The Programme also overlooks the issue of waste disposal at specially protected areas regulated by Article 27 of the Waste Act of the Republic of Belarus.

By analyzing the Programme's goals, objectives, principles and priorities and comparing them against the sustainable use of natural resources and health protection, the experts concluded that the Programme's proposed goal generally meets the long-term development prospects of the tourism sector. Other positive aspects of the Programme also include the provisions designed to address social problems (e.g. building a scientific supportive framework for tourism development and small and medium-sized business), ecological problems (e.g. cleaning up and improving areas of land, new construction utilizing energy-efficient technologies and water and air treatment systems).

Regrettably, the proposed goal, objectives, principles and priorities are limited only to the economic development of the tourism sector while not addressing important aspects such as wise nature use within carrying capacity limits for recreation and society. On this account the Programme developers have been recommended to eliminate the problems identified.

The key proposals can be framed in a generalized manner as follows. The development of the tourism sector should build upon:

- **Wise nature use** i.e. directing public efforts to conserve and sustainably use the natural and cultural diversity within recreational carrying capacities of sites. In doing so, ecological education of tourism professionals and the population needs to be improved;
- **Addressing social problems** by maintaining physical and mental health, taking into account social modalities of sites, involving local people and companies in the tourism service sector through economic motivation;
- International practice and **in cooperation with key national policy documents** of different levels.

Programme activities have been evaluated using the environmental and health risk assessment matrix which assesses proposed (thematically grouped) activities. The experts rated a number of activities by types of environmental and health impacts as very positive or very negative. Similarly, very negative impacts have been identified. Following the matrix analysis, the planning team has been recommended to optimize this particular section (action plan) and the Programme in general.

Key recommendations are the following:

1. Develop the tourism development master plan based on the approved recreational pressures and the waste management concept.
2. Establish and consistently update the State Cadastre of Tourism Resources of the Republic of Belarus.
3. Develop new and renovate the existing tourism infrastructure, which is potentially dangerous for the environment and public health (e.g. gas stations, boiler houses, treatment facilities, parking lots, etc.) based on environmental feasibility studies, discussions with the concerned public and development of emergency prevention and management plans.
4. Ecological tourism centres should function on the basis of a well-organized network of tourism routes and ecological trails with the conservation and sustainable use of their landscape and environmental potential to meet recreational needs of people and tourists.
5. Add a provision on the integration of natural, historical and cultural complexes covered by the national ecological network of Belarus, now under development, into tourism activities.
6. Provide for the restoration of historical and cultural complexes (e.g. mansions, palaces and park ensembles, etc.) not only as monuments, but as active centres for reviving arts and crafts, folklore festivals and celebrations.

As outlined above, the implementation of Programme activities will have both negative and positive environmental and health impacts. Therefore monitoring needs to be identified as a separate component of the Programme.

When analyzing implementation mechanisms and monitoring, the experts noted the following positive aspects: The Programme contains the description of financial, economic, organizational, infrastructural mechanisms as well as certain elements of economic and socio-economic monitoring; and, there are activities supporting the public relations and performance and efficiency evaluation (i.e. the possibility to adjust the Programme every three years).

The Programme has also been found to have negative aspects. For example, implementation mechanisms and monitoring have not been provided within a separate section giving the impression they are non-existent. There is no detailed description of a mechanism to prevent negative environmental and health impacts. Also, ecological monitoring of Programme impacts are not mentioned. Highly detailed activities indicating the size of funding are not linked to specific executing agencies. There is no system to supervise Programme implementation, make necessary adjustments and assess impacts.

In view of the above, the expert team has put forward the following proposals:

1. Supplement the financial and economic mechanisms of Programme implementation with a budget line for environmental assessment and review of activities accompanied by substantial environmental and health impacts.
2. Include in the Programme a plan and mechanism of ecological and socio-hygienic monitoring with the formulation of relevant indicators and a procedure for using monitoring results to ensure the sustainability of the tourism sector.
3. Give local tourism authorities the power to monitor and supervise, and the right to submit proposals to respective government authorities to adjust the Programme in the course of its implementation.
4. Provide for the development of sectoral legislative acts with proper emphasis on the issues of environmental protection and health.

Introduction

In 2004, the UNDP Regional Centre for Europe and CIS (UNDP Regional Centre) jointly with the Regional Environmental Centre for Central and Eastern Europe (REC) with support from the UN Office in Belarus and the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus (MoE) implemented a regional Strategic Environmental Assessment capacity-building project. Four countries that are party to the UN ECE SEA Protocol to the Convention on Environmental Impact Assessment in a Transboundary Context, i.e. Armenia, Georgia, Moldova and Ukraine, have been selected to participate in the project. Belarus is considering joining the SEA Protocol. In this respect, the MoE displayed interest in building national capacity in the field of SEA in the country and expressed a willingness to participate in the UNDP-REC Project.

During the first stage of the project, Belarus conducted a country needs assessment to further develop national SEA capacity. As a result of this assessment, the MoE opined that a pilot SEA of one of the planned national programmes or policies would be the most effective activity to carry out within the framework of the project in Belarus. A pilot SEA was launched in Belarus in January 2005.

Selecting a Pilot SEA Programme

The selection process was started in January 2005 in order to identify a programme to be subjected to environmental assessment under the pilot project. To this end, consultations with a number of Belarusian ministries and institutions developing national and sectoral programmes have been held. These activities resulted in the UNDP Regional Centre and REC selecting the 2006-2010 National Tourism Development Programme of the Republic of Belarus (the Programme) formulated by the Ministry of Sports and Tourism of the Republic of Belarus (Ministry of Tourism) on the grounds of fully meeting the selection criteria. In its official letter sent to the UNDP Regional Centre, the Ministry of Tourism confirmed that it agreed to allow the 2006-2010 National Tourism Development Programme to become a subject of the pilot SEA. A list of ministries that have been consulted and programmes that have been considered during the selection process for the pilot SEA is given in Annex 2.

The following criteria were used during the selection of a pilot SEA programme:

- The implementation of the programme is likely to have substantial environmental and health impacts.
- It has to be a programme under development.
- The ministry responsible for the development of the programme should have a stake in the SEA and be ready to provide support to the SEA expert team.

Pilot SEA objectives

The following objectives of the pilot SEA have been identified:

- To test and demonstrate possible practical applications of the UN ECE SEA Protocol in Belarus to satisfy requirements regarding public participation and consultations;
- To provide recommendations to optimize and amend *the 2006-2010 National Tourism Development Programme of Belarus* (Later in the text the Programme).

Expert Team

The UNDP Regional Centre and REC have been the key supervising authorities for the implementation process of the pilot SEA in Belarus. Since this pilot project was the first experience of the SEA Protocol application in Belarus, an advisory group of international experts was created to

guide the national experts and supervise the quality of the Programme's environmental assessment. This group of international experts comprised representatives from the UNDP Regional Centre (Bratislava), Regional Environmental Centre (Budapest) and Central European University (Budapest). Annex 3A contains the list of international experts who have been involved in the pilot SEA.

The UNDP Regional Centre and REC supported by the UNDP Office in Belarus have created a team of national experts. Members of the team have been selected in compliance with the UNDP rules and procedures.

The team of national experts are professionals in the following fields: SEA National Team Coordination, environmental assessment, planning, health, air protection, waste management, water protection and sustainable use, biodiversity, land protection and sustainable use, and public participation (Annex 3B provides the list of members of the SEA national team). The primary objective of the team of national experts was to conduct an environmental assessment of the Programme. The SEA National Team Terms of Reference are contained in Annex 4.

The Programme's strategic environmental assessment was conducted between January to October 2005. The SEA national team completed the following tasks: prepare an SEA report, discuss the SEA report with the public and hold consultations with key stakeholders. Based on the evaluation results of the Programme, a number of recommendations were suggested which, in the opinion of the experts, will balance the Programme by accounting for sustainable nature use and health protection.

Consultations

As part of the pilot SEA there have been arranged consultations with environmental and health authorities and the public. The expert team decided that it would be most effective to hold consultations when the first draft of the SEA report is ready. To ensure a continuous interaction between the SEA team and the Programme developing team, an expert from the planning team joined the SEA team.

Consultations with environmental authorities and other stakeholders. A planned meeting with MoE representatives took place on August 5, 2005 where a draft SEA report was presented and recommendations from the expert team to optimize the Programme were discussed. The MoE specialists generally approved the recommendations and recognized the relevance of this work.

As part of the consultation process with key government stakeholders a round-table session was organized on September 9, 2005. It discussed, among other things, recommendations of the national experts to optimize the Programme. Apart from the national experts from the SEA team, discussions of the draft SEA benefited from input from a variety of ministries, sectoral and national plan developers and policymakers, specialists and researchers working in the field of environmental assessment and university teachers.

Public consultations. Consultations with the public involved two stages: The first stage was informing the public about a UNDP-sponsored pilot SEA in Belarus. The information was spread through BELSD and GREENBEL electronic mailing groups, which are actively used by Belarusian environmental non-governmental organizations (NGOs). Information about the pilot SEA was also posted on the MoE website. Additionally, the Belarusian radio in cooperation with the SEA national team prepared and aired a programme dedicated to the pilot SEA.

During the second stage, discussions of the draft SEA report were held with the public during a round-table event held on August 12, 2005 (see Annex 7). To allow the public enough time to review the draft SEA project and draft Programme, these documents were e-mailed in advance to a range of

Belarusian NGOs, Greenbel and Belsd mailing lists and placed on the websites of the MoE. Those who were unable to attend the round-table event had the opportunity to submit their comments and remarks regarding the draft SEA report by e-mail.

The public provided comments and proposals to the draft SEA project (See Annexes 8 and 9), which were assessed by the expert team. The SEA team responded to the public comments via email. Expert feedback to public comments are provided in Annex 9.

SEA Methodology

The Programme SEA employed the methodology proposed by the advisory group of international experts (See Expert Group Section). While implementing the SEA, the methodology was adjusted to account for specific features of the Programme.

While assessing the Programme, the experts identified both negative and positive environmental and health impacts potentially resulting from the Programme. The experts suggested specific optimization recommendations to remove or mitigate potential negative effects. These recommendations are compiled at the end of the respective chapters and in a summary table of recommendations (Annex 1).

The environmental baseline included environmental and health factors which can be substantially affected by the Programme, as well as factors that can substantially affect the implementation of the Programme.

The expert team analyzed linkages of the Programme to key policies and legislative acts of the Republic of Belarus in the fields of environmental protection, health and sustainable development. The main emphasis was placed on ensuring that the goals, objectives and strategic areas of development of the tourism sector in Belarus were in compliance with the national legislation and corresponded to the primary strategic initiatives of the country.

During the assessment, the objectives of the Programme were compared against the objectives of sustainable development, public health, sustainable water use, land and atmospheric resources, waste management and biodiversity conservation identified by the national experts.

To support the analysis of programme activities a matrix was used. The horizontal and vertical axes of the matrix indicates environmental factors and programme activities respectively. The experts assessed proposed activities as positive, negative or neutral in terms of their possible environmental and health impacts. Proposed implementation and monitoring mechanisms were also assessed.

The recommendations by the expert team to optimize the Programme are grouped in the Table of Recommendations (Annex 1). All recommendations have been split into three groups. A group of core recommendations included proposals to remove or minimize the possible negative impacts of the Programme implementation. The second group lists editing recommendations. The third group includes general recommendations suggesting new avenues of tourism sector development.

State of the environment and public health in the Republic of Belarus

In order to assess possible environmental and health impacts of the Programme the quantity and quality of natural resources and the socio-economic baseline which can affect or be affected by tourism development was determined. The following section provides a brief description of the current environmental status, as well as certain aspects of the sanitary and epidemic situation in the country.

Located at the centre of Europe the Republic of Belarus is a meeting place of the major trans-European railroads, roads, water and air ways between Western Europe and Asia creating tremendous opportunity for the development of transboundary tourism.

The flat **relief** of the country is an essential natural element instrumental in developing overall land aesthetics and appealing landscapes. More than a third of natural spatial complexes are valuable and one fifth is unique. Valuable landscapes are characterized by favorable environmental conditions and the presence of important natural resources (e.g. water, forest, biodiversity) are mainly found in the north of the country and to a lesser extent in the central region. Unique landscapes in the Poozerie and Polesie Areas are distinguished by well-preserved natural vegetation, rare forms of relief, scenic lakes, habitats of endangered species of flora and fauna and other natural aesthetic qualities. Unique natural landscapes of Belarus are an important tourism resource for the country. As of early 2004, the total area of conservation, recreational, historical and cultural land constituted 849,900 ha, having considerable potential for the development of a tourism industry.

Belarus is endowed with medicinal mud and there are 113 prospected peat deposits and 39 reserved lake deposits with sapropel. Some deposits are unique (the Sudoble Lake, Smolevichi District).

Water bodies are a valuable recreational resource of the country. There are about 21,000 rivers, 10,800 lakes, 153 water reservoirs and 1,500 ponds, a number of artificial water systems (Vileisko-Minskaya Water System, Berezinskaya System (169 km), which connects Western Dvina with Dnieper, Dnieper-Boug, Oginsky and Augustovsky Canals). The total length of waterways is 2,500 km however, most of them are not suitable for inner navigation because of shallow waters. The prospected reserves of underground mineral waters are greater than 14,300 m³/day. Water resources are marginally used for recreational purposes. Currently, only 0.5 percent of the country's lakes lend themselves to organized recreation. There is also a very small percentage of balneological facilities taking advantage of mineral springs.

The climate of Belarus is moderately continental with frequent Atlantic cyclones. Westward winds dominate. The optimal period with a 15-20 degree temperature range can be observed between May to September. The duration of summer sunshine is 740 – 875 hours in Belarus. June and July are the sunniest months of the year. Strong winds however, make the summer periods less comfortable.

The summer comfort period lasts the longest in the south-west of the country lasting over 70 days; in the far north-east – less than 52 days. The mean daily water temperature in water reservoirs is greater than +17°C throughout the entire summer comfort period.

The quality of recreational and climatic resources for winter health-improving activities depends on the duration of the comfortable period (average daily temperatures from -15°C to -5°C) and how long the snow cover lingers. From this perspective, the north-eastern parts of the country are the most auspicious.

Flora and fauna of the country are distinguished by uniqueness and diversity. The natural vegetative cover occupies about two thirds of the area and is represented by forest (37.8 percent), meadows, mires and shrubs. Forest holds the main tourism and recreation potential. Firry and firry small-leaved forest

dominates the northern part of the country, pinewood and derivative small-leaved forest are most common in the centre, and the south features mostly pinewood and pine broadleaved forest. In the west of Belarus, forest complexes are spread in a sporadic fashion. The largest 'islands' are used to support protected areas (Belovezhskaya Pushcha and Nalibokskaya Pushcha National Parks).

The territory of the country supports about 12,000 species of lower plants and mushrooms and 1,680 higher plants, of which 101 (or 1% of all identified) lower plants and mushrooms and 173 (or 10.3% of all identified) higher plants are listed in the Red Data Book of the Republic of Belarus. Thirty-nine plant species protected in Europe are found in Belarus. Ancient parks form a special group supporting more than 300 species of ligneous plants (only some 30 species of woody plants grow in natural conditions).

The present-day fauna of Belarus numbers 467 species of vertebrates, including 309 bird species, and over 30,000 invertebrate species. 105 species (or 22.7%) of identified vertebrates and 85 species (or 0.4 %) of identified invertebrates are listed in the Red Data Book of the Republic of Belarus.

Water bodies of the country contain about 60 fish species. Five of them (Vimba, Sterlet, Barbel, Brook Trout, European Grayling) are included in the National Red Data Book as rare or threatened.

There are also 7 reptiles and 13 amphibians.

Twenty-one mammals are game animals (Elk, Wild Boar, Deer, Roe Deer, Mountain Hare, European Hare, Beaver, Wolf, Fox, Muskrat, American Mink and Pine Marten) and there are 30 bird species.

Thus, the plant and animal world of Belarus is an excellent biological reserve and a basis for tourism development. At the same time, this important element of the environment requires special protection and governmental focus.

By the beginning of 2004, **specially protected areas** (SPA) (sanctuaries, national parks, reserves and monuments of nature) included 1,467 sites (landscape, biological, wetland, hydrological, geological and palentological) covering a total area of 1,582,800 ha or 7.6 percent of the country's area. Part of the country's SPA network are natural areas of international importance. These include the Belovezhskaya Pushcha National Park and the Berezinsky Biosphere Reserve. The Olmany Mires, Mid-Pripyat, Zvanets, Elnya, Osveisky, Kotra and Sporovsky, all national reserves, have been designated as Ramsar sites under the Ramsar Convention.

According to WHO **sanitary and epidemiologic** evaluations (in the European Region), the Republic of Belarus has a level of environmentally-induced diseases less than 20 percent, which is generally in line with similar indicators for Central and Eastern Europe. The general infection disease incidence has been steadily declining in recent years in the country. The epidemiological situation regarding extremely dangerous and quarantine infections does not cause alarm. In recent years, no extremely dangerous infections have been imported to the country.

Water-borne disease incidence is mainly conditioned by microbial and virus pollution of water taken from decentralized water supply sources constituting less than 10 percent of the total epidemic disease rate.

According to the hygienic assessment of air pollution danger by the cumulative atmospheric pollution indicator, air pollution is regarded as moderate in major regional cities (Brest, Vitebsk, Gomel, Grodno, Mogilev) and weak in the capital city of Minsk.

Radiation effects on human health related to the accident at the Chernobyl Nuclear Power Plant are of a multi-component and prolonged nature. However, there is a clear link between the Chernobyl accident and a rise in thyroid cancers as a result of large-scale radioactive iodine pollution during the post-accident period.

Noise pollution growth is similar to that of other European countries.

The food quality is in compliance with the established safety standards. The possibility of food contamination with radioisotopes is a specific peculiarity for the country. However, this applies only to products produced on private plots of land, and berries and mushrooms collected in contaminated areas.

By virtue of its geographic location, availability of well-preserved picturesque natural landscapes, lakes, a solid network of the specially protected areas, appealing hunting and fishing spots, stable sanitary and epidemiological situation, Belarus has good prospects for tourism development, especially focused on transboundary, ecological and agrarian tourism.

On the other hand, an analysis of the environmental, sanitary and epidemiological situation allows for the identification of **a number of potential constraints and barriers to tourism development**.

The total area of agricultural land, which is polluted with industrial, energy and transport sector emissions exceeds 600,000 ha. **Soil contamination** in cities continues to be high.

There is still an issue of **pollution of individual water reservoirs** used for recreational, cultural and household purposes. Every year in the summer a number of water reservoirs located in recreation zones of cities and other communities are closed for swimming because allowable bacterial pollution levels are exceeded.

Monitoring of drinking water indicates a steady decline in microbial pollution however, chemical indicators, especially the iron and nitrate content in decentralized water supply sources remains high.

Despite the continuing tendency of harmful emissions reduction from stationary and portable sources and the general reduction of major pollutants in the atmospheric air, **the air pollution level** remains higher than the standard. The major sources of pollutant emissions in the atmosphere in Belarus are automobile transport, power and industrial sites. The emission structure is dominated by carbon oxide, hydrocarbons, sulphuric dioxide and nitro oxides.

Belarus is traditionally faced with a problem of transboundary carryover of pollutants from Poland, Lithuania, Latvia and other states located to the west of the country.

Communal waste management in towns and other residential communities that have these services are basically limited to scheduled collection and removal of waste for disposal. As far as rural communities are concerned where such public utilities services are not available, the issues of waste collection and safe removal have not been addressed. In other words, the communal waste management system used in the country designed to handle ready waste – the so-called ‘end-of-pipe waste management’, fails to ensure environmentally effective waste management and can also be viewed as a barrier to tourism development.

Radioactive contamination is a problem specific to Belarus. The Chernobyl disaster is responsible for the radioactive contamination greater than 37 kBq/m² of a sufficiently large area of the country – about 23 percent (46,450 km²) with Cesium-137. Maximum Strontium-90 levels have been recorded with the 30-km zone reaching in some places 1,800 kBq/m². The Gomel and Mogilev Regions are the most heavily contaminated with Cesium-137 and Strontium-90, although there are large spots of radionuclide contamination found in other regions as well. Rivers within the basin of Dnieper, Sozh, Pripjat have been subjected to the most severe contamination, to a lesser extent – Neman and Zapadnaya Dvina. Water monitoring data points to a considerable reduction of mean annual concentrations of Cesium and Strontium in river surface water. The Cesium-137 and Strontium-90 content of the underground water within the Lower Pripjat catchment area is currently considerably higher than the maximum allowable concentrations. The radioactive contamination of the air depends on the combination of dust content in the ground layer of the atmosphere and weather conditions. From the time of the accident, it has been constantly decreasing and now this contamination is close to background levels. Radioactive contamination of food does not exceed allowable levels.

Thus, radioactive contamination may act as a hindrance to tourism development in limited areas of the country. However, it will not be a hindrance provided safety precautions are properly followed.

Findings and conclusions

The development of the tourism sector capitalizes on attractive natural resources and the cultural and historical legacy of the country. To keep the basis upon which the tourism industry hinges from falling apart, great efforts need to be applied to improve the state of the environment and public health. To this end, the expert group deems it necessary to:

- Identify priority development areas for tourism taking into account the country's natural resources which have the greatest potential for the development of the tourism sector;
- Include a description of the state of the environment and public health in the 2006-2010 National Tourism Development Programme. This description could use the text of this chapter;
- When planning and implementing the Programme's specific activities, special emphasis should be placed on the environmental assessment of activities which can potentially aggravate ecological factors liable to negatively affect tourism development in general.

Analysis and evaluation of the Programme's links to certain legislative acts and policies of the Republic of Belarus in the field of environmental protection, health and sustainable development

The tourism industry is a complex inter-sectoral system which cannot develop and function effectively in isolation from other sectors forming part of this system. Therefore, it is important that goals, objectives and strategic development areas of the tourism sector are in harmony with the national legislation of the Republic of Belarus and in alignment with strategic environmental, health and sustainability initiatives.

This section analyzes how the Programme is linked to major legislative acts and policies of Belarus, regulating relationships in the field of environmental protection and public health. The analysis covers the following components: public health, waste management, water and land resources, air protection and biodiversity conservation.

The expert team notes that the Programme does not generally contradict the legislative acts of the Republic of Belarus, more specifically **The Land Code, Tourism Act, Health Act, Plant Act, Animal Protection and Use Act, Atmospheric Air Protection Act, Ozone Layer Protection Act, as well as Architecture, Urban Development and Construction Act, Waste Act and other laws of the Republic of Belarus** (For a full list of legislation under review see Annex 5).

The Programme fits into many national initiatives including, **The National Sustainable Development Strategy of the Republic of Belarus through 2020 (NSDS), State Programme "People's Health", State Programme on the Development of Healthy Lifestyles and the State Programme of Rural Development**, as well as **the National Strategy and Action Plan for the Conservation and Sustainable Use of Biological Diversity of the Republic of Belarus**.

However, the compliance of the Programme with some of the legislative acts and policies could be strengthened. In particular, **The Tourism Act** defines environmental protection and creation of an enabling environment for health improvement of tourists as its key goals. However, environmental protection is not listed among the Programme's targets.

The expert team has found a discrepancy between the Programme and Article 22 of **The Specially Protected Areas and Sites Act** where it pertains to the development of ecotourism in the Berezinsky Biosphere Reserve. According to this article, "any activities not related to the purpose of the reserve, running counter to its objectives and directly or indirectly disrupting the course of natural processes or creating a risk of harmful impact on natural complexes and sites in the territory of the reserve are not allowed". In the reserve, one of the activities allowed is "raising ecological awareness", and "in specially designated sections of the reserve, which do not contain natural complexes and sites, which the reserve has been established to protect, it is possible to conduct activities designed to ensure the functioning of the reserve and livelihoods of people living on its territory in accordance with the Reserve Regulations". The expert team believes that a majority of main eco-tourism development areas set out in the Programme are in conflict with the list of activities allowed in the reserve.

The Programme does not comply with Articles 21 and 26 of **The Environmental Protection Act** where it concerns the definition of allowable anthropogenic loads on the environment, because it has no provisions on the forecasting of environmental impact of the Programme and taking into account the allowable recreational pressure on the environment.

The Programme also fails to comply with **the Water Code, the Environmental Protection Act, Regulations on the Procedure of Performing Local Environmental Monitoring and Using its Data within the National Environmental Monitoring System of the Republic of Belarus** and other

national normative acts (See Annex 5) by which legal entities engaged in the use of sources of harmful environmental impact are obliged to perform local monitoring of environmental sites. The Programme envisages the establishment of only one monitoring system – human resources potential and staffing needs forecasting. Monitoring of environmental impacts from tourism is not stipulated by the Programme.

The Waste Act of the Republic of Belarus prohibits dumping of wastes within reserves, national parks, sanctuaries and monuments of nature. The Programme suggests developing tourism within SPAs. This will require putting in place an effective waste collection and removal system in these areas (because many SPAs do not have one), while the Programme overlooks this issue. The NSDS provisions concerning a holistic approach to the problem of waste formation, accumulation and use, also has not been reflected in the Programme.

The expert team suggests making changes to the Programme to address shortcomings that have been identified. These changes are contained in the optimization recommendations provided in the sections on goal, objective and activity analysis, implementation mechanisms and the Programme monitoring plan.

Goal and objectives' assessment

The next stage of the Programme SEA analyzed the goals and objectives defined in the Programme concept and the version of the Programme which has been provided.

During the analysis, the Programme goal and objectives were compared against the objectives of sustainable development, public health, wise use of water, land and air resources, waste management and biodiversity conservation. At the end of the chapter, there are optimization recommendations which, in the opinion of experts, will help make the proposed document more balanced in terms of its environmental and health impacts.

It is the view of the experts that the proposed goal of the Programme generally reflects the long-term prospects of tourism development in the country. The National Sustainable Development Strategy of the Republic of Belarus covering the period until 2020 – one of the key policies of the country – views tourism as an activity potentially contributing to the development of economy and society. This message has been framed in the following wording: “formation and development of modern highly effective and competitive market-based tourism complex, capable of making a considerable contribution to the national economy”. The emphasis is made on the economic component while ecological and social dimensions of the goal are missing. Alongside other types of economic activities tourism however, can damage the environment in a substantial way if the use of nature is not wise. Ignoring the requirement to preserve and minimize environmental impact is also at variance with global tourism development trends. Hence, it is necessary to refine the wording of the Programme goal.

Given the above analysis, the Programme goal and supporting objectives, principles and priorities will be able to address only the issues of economic development. In particular, objectives define priority development areas of tourism, tools, including the improvement of Human Resource training and re-training system, but is limited to tourism services only. Therefore, additions and changes have been suggested to include ecological and social elements.

According to the Programme, one of the key targets is to expand tourism infrastructure and services, and to increase the number of tourists and visitors. For example, the projected tourist growth for the Brest Region is more than four times the current level - the number of visitors is expected to reach 82,700. As a result, there should be a four-time increase of agrotourism houses. This will invariably lead to higher water consumption and disposal, waste generation, medical assistance, commerce, etc.

This brings environmental benefits which will become available during the development of tourism recreational areas (e.g. removal of wastes from the area; construction of new treatment stations or renovation of the existing ones, cleaning up riverbeds, lakes and water reservoirs from bed sediments containing various types of pollution; installation of new filters at industrial points of discharges, etc.).

Earlier studies of the possible social impact caused by the development of ecological and rural tourism reveal that the key challenges to face will be queuing at shops and shortages of certain types of products.

In addition, medical care of foreign tourists is insurance-based. In the context of the country's transition to a new system of medical care coverage, insurance-based medicine and the current public health care system need to be reconciled. In order to address possible negative social effects of intensive development of entry and in-country tourism, the expert team finds it advisable to add to the list of regional development targets an item on the development of social services, including medical services, in accordance with a projected increase of visitor flow.

Such social aspects as the improvement of principles of sustainable tourism, ensuring popular demand for the restoration of physical and mental health have been neglected, which is one of the objectives of recreational business in general.

Additionally, the Tourism Development Programme, even indirectly, does not put forward objectives regarding air protection in potential tourism zones. Tourism is believed to be one of the ‘cleanest’ sectors of the national economy which does not do demonstrable harm to the air. Indeed, there is very little threat posed by recreational and tourism facilities, groups of tourists and individual visitors to air cleanliness. However, increasing flows of car tourists, heavier air travel, degradation and abstraction of forest for new development can degrade air quality indirectly.

The experts have been pleased to see that the Programme contains objectives to put in place a staff training and scientific support system for the tourism sector, which would contribute to finding solutions to social concerns.

An analysis of the proposed targets from the viewpoint of wise nature use has revealed a necessity to approach tourism and services development taking into account recreational carrying capacities of the environment to conserve “building stones” of tourism development – natural resources and development prospects for various areas of the tourism industry per se – ecological, and in part educational, rural and sports tourism.

There is not a single special area within Belarus where tourism would take priority in terms of nature use vis-à-vis other types of activities. To ensure a supply of tourism services for the population, wise use of tourism and recreational resources and to generate higher motivation of local companies to develop tourism, it is imperative to designate dedicated tourism areas as separate economic entities subordinate to local authorities.

Findings and conclusions

There are a number of recommendations suggested by the experts on the basis of the analysis to amend the Programme’s objectives, targets, principles and priorities. In the eye of the experts, proposed changes would help to appropriately integrate the concepts of sustainable nature use and public health in Programme objectives. Annex 2 contains the recommendations to amend Programme objectives and targets.

The expert team suggests framing Programme goals and objectives as follows:

*The strategic goal of the Programme is to develop a modern highly effective and competitive market-based tourism sector respecting the principles of **sustainable nature use**, catering to tourism needs of domestic and foreign citizens, capable of making a sizable contribution to development of the national economy **and addressing social problems**.*

To achieve this goal, the following tasks should be addressed during the implementation of the Programme:

- 1. Establishment of an effective tourism management system **on the basis of sustainable tourism development** to achieve the goal set.*
- 2. Improvement of a legislative and policy framework relating to tourism development linked to international practices and policy documents of different levels currently in force in the Republic of Belarus.*
- 3. Establishment of modern infrastructure to support the development of the Good Host industry taking into account health needs, both physical and mental.*
- 4. Galvanization of regional tourism policy, development of tourism centres and zones, tourism expansion into new areas considering recreational carrying capacities of an area.*
- 5. Establishment, promotion and positive development of a tourism image of the Republic of Belarus through the introduction of a single tourism and information network, wide use of modern technologies,*

- establishment of specialized tourism areas and consolidation of public effort toward the conservation and sustainable use of natural and cultural diversity of the country.*
6. *Consistent development of a multi-level staff training system for the tourism industry ensuring lifelong education and occupational progress, including in the field of environmental protection.*
 7. *Establishment of a scientific support system for the tourism sector to drive the decision-making process at different levels of tourism development in the Republic of Belarus.*

The key principles for tourism development are proposed to be worded as follows:

- *Establishment of equal conditions for economic entities engaged in private and public tourism **considering ecological capacities and social specifics of areas;***
- *Dominating market controls of the service sector;*
- *Orientation towards effective solution finding regarding specific consumers of tourism services.*

To better integrate tourism sustainability principles into the Programme, the expert team also suggests rearranging priorities of the national tourism development policy of Belarus. It is proposed that these priorities be redrafted as follows (The proposed changes are marked in boldface type):

1. *Establishment of a spatial structure for tourism infrastructure;*
2. *Involvement of rural residents in the tourism service sector through economic motivation;*
3. *Strengthening a system to monitor and control environmental and social impacts from tourism sector development.*

Assessment of proposed activities to implement the programme

A risk assessment matrix has been used to analyze environmental and health impacts of the proposed activities to implement the Programme. The horizontal axis of the matrix presents selected components of the environment (atmospheric air, natural landscapes, surface and underground water, land degradation and pollution, flora and fauna, monuments of nature, history, culture, local and tourist health). The vertical axis shows activities grouped together by an area or a theme (the matrix can be found in Annex 6). The following symbols were used to assess possible effects of Programme activities on proposed environmental factors:

- ++ very positive impact
- + positive impact
- 0 neutral impact
- negative impact
- very negative impact.

While analyzing **positive aspects** of activities to implement the Programme the creation of tourism areas based on management plans will generally have a positive effect. This is because according to the Regulations on the Procedure of Creating Tourism Areas, one of the essential objectives is to protect and ensure sustainable use of tourism resources. In terms of spatial development and sustainable land use, this will help attach a certain status to territories having tourism resources, define activity and management plans. The latter will give the possibility to control various tourism impacts on natural complexes through the development of a state cadastre of tourism resources, thus preserving a high landscape potential to meet recreational needs of the population.

This activity coupled with tourism route development will require scientific inputs to determine the amount of recreational pressures a specific bio-community can absorb. Simultaneously, this will provide a possibility to control recreational loads on natural landscapes and monitor their condition.

With regard to health impact, well-grounded tourism route development will have a positive effect if it helps prevent negative perceptions and feelings in tourists and does not disrupt the life routine of local populations (fishing and berry spots, etc.).

Activities addressing the development of the Agrotourism Programme and the SWOT analysis of homesteads and agrotourism facilities in the territory of agro-towns will have a positive impact if along with organizational and economic activities, an environmental component and functionality of rural tourism sites are taken into account. In particular, this concerns the conservation and sustainable use of natural surroundings and the basic landscape structure in areas of agrotourism development.

The introduction of state certification of guides and interpreters will have a positive tourist health impact since it will contribute to improving services and performance quality of tourism professionals. The development of a national standard “Qualification and Certification of Staff in the Field of Sightseeing Services”, and development of the Rules of Tourism Services will also help improve ecological education of current and future tourism experts, as well as actual and potential tourists, mitigating possible negative environmental impacts.

As far as waste management is concerned, activities under the sections “Regulatory, Legislative and Organizational Support of the Programme” and “Tourism Infrastructure Development” can be regarded as exercising positive effects, if they include specific provisions on collection, monitoring, placement and removal of solid household waste. Site construction and renovation documents should be developed in accordance with the approved concept of waste management in tourism areas. The state of historical and cultural monuments will obviously benefit from government funding, should it be released to support the activities under these sections.

The construction of villages and other facilities will create more new jobs and contribute to improving the tourism service level. Local people will have better access to sport and entertainment facilities, service centres and shops, should they be built.

The construction and renovation of churches, monasteries, hotels, as well as the reconstruction of transport waterways – the Dnieper-Boug and Augustovsky Canals will produce a favorable health impact by providing full recuperation and creating opportunities for the development of historical, architectural, educational and ecological tourism. The water quality in the river of Gorodnichanka is expected to improve as a result of the restoration of the Swiss Valley and riverbed improvement works.

Creation of pedestrian precincts within towns will reduce the risk of transport accidents and noise loads. The pitching of zoological gardens in the village of Buinichi, Mogilev Region, will expand education tourism creating additional educational opportunities for children of this region.

Marketing effort, development of a common national tourism and information network and international activities within the WTO context will contribute to actions and decisions seeking to conserve natural resources and reduce the biocommunity impact.

A number of Programme activities relating to visits to specially protected areas are of a positive nature, because ecological tourism (including international) has always relied on these areas as a natural backbone. The availability of research units will form a sort of tourism monitoring system within these sites, making it possible to take the necessary steps, in particular, to mitigate environmental impact.

The expert team also finds it necessary to point out **the negative aspects** of activities to implement the Programme. Primarily these concern the construction of tourism villages and complexes which would increase the volume of polluted surface runoff from gas station locations (through an increasing area of hard surfaces), increase in the volume of sewage waters, possible leakage of untreated wastewater from sewage systems with further seepage into underground waters. Furthermore, the construction of

gas stations is likely to add emergencies and accidents to the overall impact as a result of oil spills, seepage and subsequent emergence of oil lenses.

Tourism infrastructure development (including automobile transport) will cause more discharges of pollutants into the air.

Any activities relating to infrastructure development failing to properly consider waste management aspects might lead to the pollution of the environment.

Due to demographic and other factors, the Republic of Belarus has a lot of free housing in rural areas, whereas the construction of new tourism villages and complexes is an expensive and environmentally unsafe undertaking requiring additional resources. Building sport, recreation and entertainment centres is loosely and indirectly linked to the tourism development fitting to a greater extent into sports advocacy and promotion among local people. It should be also borne in mind that these are very costly and environmentally dangerous constructions, which require a steadily high flow and concentration of tourists. Their construction and further functioning are only possible in towns and dedicated sport sites.

Pitching a youth camp near the Lake Vulkovskoe, Ivatsevichi District, may apply an intense anthropogenic burden on the adjacent bioresources through fire making, trampling, noise, etc.

The reconstruction of the Avgustovsky and the Dnieper-Boug Canals may entail pollution of surface waters with sewage and oil-contaminated water from ships, a rise in the groundwater level and possible flooding of adjacent areas (by building extra water locks). The restoration of the so-called “Swiss Valley” by reconstructing the riverbed of Gorodnichanka is open to question, for it might lead to a dramatic transformation of natural complexes, since the riverbed is involved. Besides, the riverbed improvement does not solve the problem of valley restoration.

The reconstruction of all listed water sites will produce a negative influence first of all on aquatic (habitat) and near-water animals (food, riverbank shelters).

Activities such as camping in the wild “unspoiled” nature (sleeping in tents), tours to mires, use of the Berezinsky Biosphere Reserve as a centre of ecological tourism of international importance might have very serious negative implications. “Unspoiled” nature will turn into “spoiled” nature, even if tours are organized in the most careful way, for example, due to disturbance factors (changes in the daily behavior of certain species, upset structure of biocommunities, etc.) and direct impact (catching animals, trampling and burning of the vegetative cover, collecting plants). The implementation of these activities might disorganize the existing natural complexes.

Findings and conclusions

In light of the above, the expert team proposes the following **recommendations** to optimize the Programme:

1. Build local treatment stations to treat polluted surface water and household (faecal) sewage; use modern materials, advanced technologies and equipment for the construction of sewage systems to reduce the negative environmental impact.

2. Follow **ecological requirements** and develop water protection activities during the construction (new) and expansion of the existing gas stations in compliance with paragraphs 5.2, 5.3, 5.8 of STB 17.1.3.05-99 “Protection of Surface and Underground Water from Pollution during Oil Storage”.

3. Develop an emergency prevention and management plan for those sites of tourism infrastructure which are potentially dangerous for the environment (e.g. gas stations, boiler houses, treatment facilities, parking areas, etc.).

4. The activity “Establishment of tourism areas, designing and endorsement of their master development plans” should be re-drafted as follows:

“Establishment of tourism areas, designing and endorsement of their master development plans reflecting the approved recreational loads and waste management concepts for tourism areas”.

5. In the text of the Programme pertaining to the implementation of its first stage, after the words “as well as the reconstruction and renewal of the infrastructure, strengthening the material and technical base” **add the words** *“taking into account environmental solutions”.*

6. Supplement item 5 of the Programme objective, after the words “tourism areas” with *and conservation and sustainable use of their landscape and ecological potential”.*

7. In connection with the previous, it is expedient and necessary to enhance positive effects of tourism development and supplement the major principles of the sector development with an item: *protection and sustainable use of tourism resources, planning and control of tourism activities.*

8. In section 4.3 “Ecological tourism”, the list of key areas of eco-tourism development should be extended by adding a separate item of the following content: *“Tourism routing and development of a local network of ecological trails.”* This recommendation should also find its way into section 5 of the Programme “Regional Tourism Policy”. The last sentence of the section should be supplemented with: *“An organized network of tourism routes and ecological trails is a compulsory functional element of eco-tourism centres”.*

9. In section 4.4 “Rural tourism”, the original landscape structure should be better preserved by adding *“as well as by preserving the structure and appearance of adjacent natural landscapes as much as possible”* to the first area of rural tourism development after the words ‘picturesque terrain’.

10. Activity 7 of the Programme should be reworded as follows: *“development and maintenance of the state cadastre of tourism resources of the Republic of Belarus”.*

11. Sport, health and entertainment centres should be excluded from the Tourism Development Programme and transferred under development plans for physical education and sport.

12. With regard to the activity “Car camping development”, the Programme should mention the seasonality of their operation which justifies them both economically and ecologically. The latter will manifest itself through reduced anthropogenic pressures on natural communities and their quick resuscitation once these pressures substantially diminish in the dead season.

13. Noting a generally positive nature of the activity “Restoration of Historical and Cultural Complexes (estates, palace-and-park ensembles, historical places, etc.)”, the Programme should have better specified and linked it to tourism goals and objectives. In particular, multifunctional rehabilitation of these sites should be foreseen, the one including not only their conservation as monuments and museums, but also as active centres for the revival of local arts and crafts, folk festivals and celebrations, scientific seminars, etc. By doing so, historical and cultural monuments will become multi-purpose tourism sites.

14. As far as the reconstruction of the Dnieper-Boug and the Avgustovsky Canals is concerned, the Programme should make a specific point about the need to conserve natural complexes at project implementation sites to a maximum degree.

15. With regard to the activity “Research of Tourism Development Problems on the Domestic and Foreign Markets”, topical issues faced by the industry should be better articulated. Primarily it concerns studies on spatial tourism development, as well as sector development in those Central and Eastern Europe countries where the natural conditions are similar (e.g., North Germany, Poland, Lithuania, Latvia).

16. International activities in the field of tourism should be mirrored in the Programme, particularly, in section 2 “Goals, Objectives, Principles and Priorities of Tourism Development”.

17. The Programme should include a provision on the involvement of natural, historical and cultural complexes located within the national ecological network, now under development, into tourism activities.

Analysis of programme implementation mechanisms and monitoring

According to the modern planning concept, defining implementation mechanisms for plans and programmes is a precondition for their success. These mechanisms involve financial and economic aspects (e.g. activity implementation costs, economic efficiency, expected economic benefits), organization (management system, timeframes, specific executors), investment (investment policy, sources of funding), infrastructure (legislation and policy framework, staffing and equipment capacities, etc.), information, etc.

Identification of control, monitoring and evaluation mechanisms are decisive factors contributing to the planning process. Monitoring and evaluation are to be conducted on a regular basis. Track development indicators and trends have to be monitored throughout the implementation period. Control, monitoring and evaluation are there to ensure the implementation of a programme, make decisions about redistribution of resources, adjustment of objectives and targets of programmes and plans.

Implementation of programme activities is normally associated with environmental and community impact. Tourism development plans are no exception with regard to possible negative and positive environmental and health impact. Therefore, ecological monitoring is required as part of any programme to prevent negative impact from implementation of programmes and plans. This chapter analyzes Programme implementation (and control) mechanisms and monitoring.

Implementation mechanisms. A review of the Programme generally entitles us to state that there are a number of elements of implementation mechanisms. For example, the Programme contains a description of financial and economic mechanisms, namely estimation of costs for certain activities, forecast and analysis of economic benefits, etc. In organizational terms, the Programme identifies those who will be executing various activities and timeframes.

The infrastructure mechanism encompasses a number of activities seeking to ensure legislative and policy support including, development of cadastres and registers, rules and regulations (activities under Legislative and Organizational Support of the Programme Section). Moreover, there are a number of provisions dealing with legislation and regulatory framework that are prescribed in the section “Developing a Highly Effective Management System for the Tourism Sector”. Let it be noted that they prioritize, among other things, “the development of a set of measures to reduce risks involved in the consumption of tourism services”, implying a reduction of environmental and health risk.

Another good point to the Programme is that it provides for a three-year adjustment plan, which presupposes a performance evaluation allowing for adjustment of the Programme. Public relations activities contained in the Programme are a pronounced positive aspect of the information-related implementation mechanism.

The presence of certain elements of monitoring is also positive. In particular, the Programme includes indicators (programme parameters) to check efficiency on a year-by-year basis, which is an attempt to perform economic and socio-economic (employment growth) monitoring.

At the same time, the Programme has a substantial drawback such as, implementation mechanisms and monitoring are not organized as a separate section, which creates a disjointed picture about the planning of Programme implementation mechanisms and their monitoring, including impact.

The Programme totally overlooks mechanisms to prevent negative environmental and health impacts as well as ecological monitoring of the Programme impact. It does not appear possible to evaluate financial and economic implementation mechanisms vis-à-vis conservation activities. According to the

current legislation, activities involving possible environmental impact are subject to environmental expert review, which the Programme fails to mention. Therefore, a suggestion is made to specify spending planning to include environmental expert review of Programme activities.

A review of the organizational mechanism of the Programme implementation has brought about a different problem. Programme activities are described with a sufficient degree of detail, e.g. “Reconstruction of the Dnieper-Boug Canal”, “Restoration of the Nemtsovichi Estate in the village of Skoki, Brest Region”, etc., and state and local authorities are assigned as executing agencies (Ministry of Transport, Brest District Executive Committee), which by the nature of their powers should act as contracting and supervising authorities with regard to these activities. Thus, a draft Programme having a specific activity with the amount of the required funding does not have a specific executor for that activity. Therefore, it is useful to indicate when possible, concrete executors. If it is not possible the implementation process should be split into two (or more) stages indicating specific timeframes. For instance, the following pattern could be used “1. Tender and selection of an organization for an activity, Executor – Ministry of Transport, Implementation Period – 1st quarter, 2006. 2. Implementation of an activity – Organization A – Implementation Period, Stage 1 – end of 2006, Stage 2 – 2006-2007”.

The organizational mechanism (aspect) of the Programme should define a system to monitor its implementation, make adjustments and assess effects. The Programme does not reflect the need to integrate information about the set-up of a control mechanism. It is envisaged that the Programme will be approved by the Council of Ministers of the Republic of Belarus in a resolution which would indicate the overall supervision mechanism and a responsible authority. As mentioned above, the draft stipulates that the Programme be adjusted every three years. But these control mechanisms will span in time, whereas quick and responsive control is necessary. For example, an assessment of recreational carrying capacity of a site may be shown that it is impossible to develop tourism without detriment to the environment, whereas Programme activities have been already approved and are subject to revision only in three-year’s time.

In this context, it is suggested that local authorities dealing with matters of tourism management in tourist areas established under regional executive committees be vested with operational powers to monitor the Programme implementation within these areas and the right to submit proposals to respective superior government authorities to adjust the Programme in the course of its implementation.

Improvement of the tourism-related legislative and policy framework are limited only to the quality of services in the draft paper. There is no provision to elaborate normative and technical legal acts linked to environmental protection needs resulting from the tourism sector development. In order to improve the legislative and regulatory mechanism of Programme implementation to help prevent negative effects on nature, it is recommended to foresee the development of normative and technical legal acts in the field of environmental protection for the tourism sector.

A staff training system for the tourism industry is geared only to tourism services as such. The Programme is not meant to train staff to ensure environmental security of the tourism sector. The information component embedded in the Programme does not comprise ecological education, which considerably heightens the risk of negative environmental impacts resulting from Programme implementation.

Monitoring. Lack of ecological monitoring is an essential shortcoming of the draft Programme under review. Given likely negative environmental and health impacts of the Programme (a number of activities, by expert estimates, have projected negative implications), the experts believe that it is necessary to integrate into the Programme a plan and mechanisms to monitor the community and environmental impact of the Programme.

All economic entities are required by law to carry out mandatory local monitoring. This requirement is contained in the following legal sources: Article 36 of the Environmental Protection Act of Belarus (2002), Article 89 of the Water Code of the Republic of Belarus (1998), Regulations on the Procedure of Performing Surface Water Monitoring and Using its Data within the National Environmental Monitoring System of the Republic of Belarus, Guidelines on Local Environmental Monitoring by Legal Entities Engaged in the Use of Sources of Harmful Environmental Impact, Regulations on Social and Hygienic Monitoring. In this context, the experts deem it advisable and well-substantiated to integrate basic ecological, social and hygienic monitoring in the Programme. It would appear possible in light of expected rapid growth of the sector to place ecological, social and hygienic monitoring within the purview of regional dedicated tourism management units currently under formation.

The experts have suggested a set of quantitative indicators to conduct monitoring, for which there is no need to do additional research or introduce new forms of statistical reporting. It can be done on the basis of the available indicators.

The following are suggested **indicators** to achieve objectives during the first stage:

- Real cash income growth owing to tourism development;
- Records of imported infections;
- Growing complaints of the population about increased noise pollution and other socially-induced inconveniences (access to medical assistance, water supply, access to public transportation, shops and community services);
- Volume of municipal waste generated by the tourism industry to the number of tourists in a calendar year (waste production minimization indicator);
- A ratio of actual recreational load to the mean critical load on recreational sites, persons per hectare;
- Changes in pollution of surface waters used for recreational purposes, as well as underground water within a recreation area;
- Community flora structure, general projective cover and species abundance, natural structure and layering of timber stand, intensity of moss and lichens on tree trunks;
- Availability of rare animal species.

As part of research support of the Programme the experts recommend to plan designing ecological, social and hygienic indicators for the tourism sector as well as monitoring techniques and determine approaches, areas and resources for monitoring and using its feedback to ensure the sustainable development of the sector.

Findings and recommendations

Thus, to improve implementation mechanisms and monitoring of the Programme, it is recommended to:

- Include Implementation Mechanisms and Monitoring as a separate section of the Programme;
- Vest local authorities dealing with matters of tourism management in tourist areas linked to regional executive committees with power to monitor the Programme implementation within these areas and the right to submit proposals to respective government authorities to adjust the Programme in the course of its implementation.
- Give local tourism management authorities the functions to monitor and supervise the implementation of the Programme in tourism areas linked to regional executive committees, and the right to make the necessary adjustments considering environmental and health impact of certain activities;

- Provide for environmental expert review costs in the financial and economic implementation mechanisms with regard to activities likely to cause environmental impact;
- Make provisions for the development of normative and technical legal acts in the field of environmental protection for the tourism sector;
- Ensure that the staff training system has a component to train professionals for environmental security of the tourism sector;
- As part of scientific support of the Programme, plan activities to develop environmental and socio-hygienic indicators, local areas, resources for monitoring, and use monitoring data to ensure sustainable development of the sector.

Annex 1: Summary table of recommendations

№	Section	Recommendation	Comment
Core recommendations			
1.	Section 1. “Evaluation of the current state of the tourism industry in the Republic of Belarus”	Include a description of the environmental and health state in the 2006-2010 National Tourism Development Programme of the Republic of Belarus.	The tourism sector relies on attractive natural resources and cultural and historical legacy.
2.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add objective “to improve principles of sustainable tourism, ensure popular demand for the restoration of physical and mental health”	This is one of the objectives of recreation in general.
3.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add objective: “Make provisions for government financing of programmes designed to provide scientific support for tourism development and infrastructure development”	There is no scientific support for the national tourism sector for the time being
4.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Re-draft Paragraph 1 as follows: “The strategic goal of the Programme is to develop a modern highly effective and competitive market-based tourism sector respecting the principles of sustainable nature use , catering to tourism needs of domestic and foreign citizens, capable of making a sizable contribution to development of the national economy and addressing social problems in the Republic of Belarus ”	Like other economic activities, tourism can be very harmful to the environment, if the wise use of nature principle is not followed.
5.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Expand objective 5: “Galvanization of regional tourism policy, development of tourism centres and zones, tourism expansion into new areas based on wise nature use and sustainable development of tourism areas”	The way tourism activities are organized regionally helps shape the tourism industry, which is duly embedded in the sectoral development objectives (Section 2). Given that, in order to stop regional ecological problems from ever occurring, the Programme should be more articulate about the fact the environmental component is treated on par with economic considerations.
6.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add next item to key objectives: “Implementation of the UN-adopted tourism sustainability concept as an environmentally safe form of using natural and cultural resources at a national level”	The concept of sustainable development and use of resources is at the centre of any economic activities nowadays.

№	Section	Recommendation	Comment
7.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add the following objective to the task list “ Creating conditions for the conservation of natural potential and prevention of negative environmental and health impact from tourism ”	<p>In terms of sustainable development, “sustainable tourism means planning the use of tourism resources in such a way as to meet economic, social and aesthetic needs of modern society, while conserving cultural integrity, biodiversity and ecological processes”.</p> <p>However, a set of tasks that has been formulated to support the achievement of this objective addresses only economic development. In particular, they define priority development areas for tourism, implementation instruments, including the improvement of the legislative and policy framework and staff training system.</p> <p>In view of what has been said, we believe that the task list should be extended to include those aiming “to conserve and to ensure sustainable use of natural resources ...”, and to minimize possible negative health impacts tourism development might cause.</p>
8.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add the following objective to the task list “ Ensure the development of social services, including medical care, in accordance with sector growth targets ”.	<p>According to the Programme, one of the key targets is to expand tourism infrastructure and services, and to increase the number of tourists and visitors. To take one example, the projected tourist growth for the Brest Region is more than four times, the number of visitors is expected to reach 82,700, there should be a four-time increase of rural tourism houses. This will invariably lead to higher water consumption and disposal, waste removal, medical assistance, commerce, etc.</p> <p>Surveys of negative social effects induced by ecological and rural tourism indicate that littering, queuing at shops and shortages of certain types of products are the main things local people complain about.</p> <p>In addition, medical care of foreign tourists is insurance-based. In the context of the country’s transition to a new system of medical care coverage, insurance-based medicine and the current public health care system need to be somehow reconciled. In order to address possible negative social effects of intensive development of entry and in-country tourism, we find it advisable to <u>integrate the proposed task in regional development targets.</u></p>
9.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add the following objective to the task list: Integrate the Tourism Development Programme into comprehensive regional socio-economic development plans.	<p>In the long run, tourism may worsen economic situations of most of the people in areas where the sector displays robust growth. Normally, larger numbers of tourists coming into particular regions send prices on an upward course which consequently might reflect upon people’s incomes in a situation when different sectors of economy develop unevenly. Besides, sociological surveys show that, one way or another, tourism, especially ecological, rural and sport tourism, limits established traditional practices of local people. To address this concern, a role of commodity and cash relations should be strengthened, conditions should be set in place for the employment of other income sources, including from tourism development. To stave off social tension, it is imperative that Programme objectives dealing with regional aspects of the sector development are integrated in comprehensive regional development programmes. The above line of reasoning justifies the inclusion of the proposed objective in the task list.</p>

№	Section	Recommendation	Comment
10.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add the following objective to the task list of the Programme: “Ensure tourism development taking into account and in cooperation with national policies of different levels.	The Tourism Development Programme pursues the chief task of developing the tourist sector in the Republic of Belarus, which like any other sector of the national economy is a source of waste, in this case – municipal waste. Waste is to be dealt with by developing effective waste management systems building on the existing (active) national systems. Therefore the Programme design process and development of activities to implement it should be guided by the major policies and legislation that we have mentioned. At the moment, the Tourism Programme is practically deprived of linkages to these documents and requires readjusting. For example, the Programme suggests developing tourism in the territory of reserves, national parks, whereas the National Waste Act of the Republic of Belarus explicitly forbids dumping of wastes in the territory of reserves, national parks, wilderness areas, monuments of nature (etc., see Article 27). This requires a fairly sophisticated system to collect and dispose of waste produced here in other areas. The Tourism Programme overlooks this issue.
11.	Section 2 “Goals, objectives, principles and priorities of tourism development”	We suggest adding the following objective to the task list: “Ensure effective waste management for the benefit of better environment”.	Since the tasks listed in the Programme do not contribute to achieving this goal, the SEA team has suggested a wording which does.
12.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add objectives: <i>1. Develop the spatial component for tourism business based on amendments and changes to the existing legislative and policy framework.</i> <i>2. Establish priority dedicated tourism sites.</i> 3. Maintain sustainability parameters within tourism sites, centres, roads.	Tourism services rely on local territorial resources. Tourists need beaches, parks, places to collect berries and mushrooms, skiing tracks and bikeways, camping and picnic areas, etc. But still there is not a single special area within Belarus where tourism would take priority in terms of nature use vis-à-vis other types of activities. In national parks, a recreational function is by right dominated by nature conservation considerations. In Belarus, recreation and tourism areas are not designated as land uses, therefore tourism and recreational functions therein are of a secondary nature, giving way to the interests of forest and agricultural enterprises. Cultural and tourism zones designated by urban developers only have a potential possibility to specialize historical quarters of towns in tourism services. The cultural and tourism zones themselves are far more important in the town structure as assemblages of administrative, trade, banking and other offices. The secondary nature of tourism functions in specific areas is the main reason why tourism is considered and perceived as a secondary subject on the part of authorities at different administrative levels. This explains why in the present context of limited investment resources, the tourism infrastructure is financed residually, and local administrations often address the issues of tourism development in an incomplete and downright formal manner.
13.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add principles: <i>-involvement of local entities (people, authorities, business) in tourism services development,</i> <i>- wise use of natural recreational resources,</i> - macroeconomic efficiency of tourism.	
14.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add priorities: <i>- ensure sustainable natural environment, conservation of natural, historical and cultural heritage within country’s tourism zones</i> <i>- create the spatial component for the tourism sector;</i> - involve rural communities in tourism services by generating economic motivations;	Thus, the National Tourism Programme of Belarus should identify priorities and ways of building a spatial basis for the tourism sector in the form of dedicated tourism sites. The proposed additions are needed to help achieve this task.

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15.	Section 2 “Goals, objectives, principles and priorities of tourism development”	<p>Two additional objectives are suggested:</p> <p>1) Development of tourism and related services should contribute to reduced technogenic impact on the environment within tourism zones.</p> <p>2) Development of tourism and related services should take into account recreational carrying capacities of a site.</p>	<p>It would add substance to the analytical part of the Concept and the Programme itself if it confirmed ‘the water potential’ of the Republic of Belarus by giving some figures (approximately 21,000 rivers and 11,000 lakes), citing examples of its uniqueness, describing the old water ways and systems (the Oginsky Canal, Avgustovsky Canal, Berezinskaya Water System), which are now under restoration.</p> <p>Nothing is mentioned about those good points to the environment which can and should occur as a result of site development for recreation (e.g. removal of wastes from the area, construction of new treatment stations or renovation of the existing ones to improve the water quality in a water body, cleaning up riverbeds, lakes and water reservoirs from bed sediments containing various types of pollution; installation of new filters at industrial points of discharges, etc.). Similarly, the Programme fails to mention negative aspects bound to occur naturally as a flow of tourists increases, what kind of efforts (compensatory measures) should be applied to minimize negative health impact, including on water bodies (water ecosystems).</p>
16	Subsections 4.1 “Transit and transboundary tourism” and 4.2 “Educational tourism”	<p>Add the following to a set of educational tourism activities:</p> <p>Apply local decision making (architecture, design, logistics, etc.) to ensure environmental and health safety of transport network development.</p>	<p><i>The development of transit and educational tourism is connected with heavier transport streams, which causes the road accident rate to grow (according to WHO estimates), air pollution and related diseases and noise load to increase.</i></p> <p>Road accidents are the leading cause of death from injuries sustained by tourists visiting the EU. At the same time, successes of dedicated programmes which have been put in practice prove that it is possible to resolve this problem.</p> <p>Transport development brings another negative effect, i.e. air pollution, which, in the long term, develops impact-induced pathologies, increases of noise load on people living in the impact zone of highways and city roads.</p> <p>To ensure increasing transport safety from the point of view of road accident and air pollution prevention, it is advisable to broaden a list of activities intended to support educational tourism.</p>
17.	Section 4.4 “Rural tourism”	<p>A list of preconditions for rural tourism development should be expanded to include:</p> <ul style="list-style-type: none"> • A change of lifestyle (reduction of stress load), • A possibility to stay in a clean environment. 	<p>One of the primary health-improving elements of rural tourism for city dwellers is ‘a change of lifestyle’ (reduction of noise load) and ‘a possibility to stay in a clean environment’. The inclusion of these prerequisites in the rural tourism plan is well-justified.</p>
18.	Section 5. “Regional tourism policy”	<p>The National Park Braslav Lakes can be included in a list of prospective centres of international tourism with good potential as an alternative to the Berezinsky Reserve.</p>	
19.	Section 5. “Regional tourism policy”	<p>It is proposed that apart from historical towns, national parks and other protected areas, a list of prospective tourism areas of international and national importance can be extended by adding attractive and valuable (in recreational terms) transboundary areas (territories). The latter can be represented by both border towns and their vicinities (Brest, Grodno, Oshmyany, Postavy, Braslav, Mstislavl, etc.), and well-preserved natural transboundary complexes.</p>	
20.	Section 8. “Projected economic efficiency of Programme activities”	<p>Section 3 «Programme Goals and Objectives” declares the need “to improve tourism legislative and regulatory framework”. The first stage of the Programme implementation does not contain this provision. As a result, during the second stage, with no legislative framework in place, large tourism sites are created and start functioning and their activities are not regulated by anything.</p> <p>It is not clear from Section 1 of the Concept, which regulatory and methodological criteria have been used to define the main areas of tourism development by type in the Republic of Belarus. In order to distinguish the dominating types of tourism, an evaluation of cultural and historical heritage will not suffice, natural and recreational potential (including that of water bodies) for particular types of tourism is also necessary. Without this kind of evaluation, it is impossible to accurately calculate maximum allowable recreational loads on natural complexes, which are derivatives for the calculation of a carrying capacity of recreational infrastructure and tourism route development</p>	

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21.	General recommendations	<p>It is expedient to add priority areas:</p> <ul style="list-style-type: none"> - <i>Responsive decision making about the establishment of dedicated tourism sites;</i> - <i>Support the development of tourism sites as free economic zones provided sustainability parameters are maintained;</i> - <i>Development and regular updating of spatial plans and schemes and their integration into regional development.</i> 	Considering the importance and relevance of spatial planning measures for the organization and successful functioning of the tourism sector
22.	General recommendations	Include as a separate section “Implementation mechanisms and monitoring”;	Given negative environmental and health risks of the Programme (a number of activities, by expert estimates, have projected negative implications), the experts believe that it is necessary to integrate into the Programme a plan and mechanisms to monitor the community and environmental impact of the Programme. All economic entities are required by law to carry out mandatory local monitoring.
23.	General recommendations	Vest local authorities dealing with matters of tourism management in tourist areas established under regional executive committees with the power to monitor Programme implementation within these areas, and the right to propose the necessary adjustments taking into account the environmental and health impact of certain activities of the Programme;	
24.	General recommendations	<p>As indicators for the achievement of objectives during the first stage, the following are suggested as quantitative indicators to conduct monitoring, for which there is no need to do additional research or introduce new forms of statistical reporting:</p> <ul style="list-style-type: none"> - Real cash income growth owing to tourism development; - Records of imported infections; - Growing complaints of the population about increased noise pollution and other socially-induced inconveniences (access to medical assistance, water supply, access to public transportation, shops and community services); - Volume of municipal waste generated by the tourism industry by the number of tourists in a calendar year (waste production minimization indicator); - A ratio of actual recreational load to the mean critical load on recreational sites, persons per hectare; - Changes in pollution of surface and underground waters used for recreational purposes; - Community flora structure, general projective cover and species abundance, natural structure and layering of timber stand, intensity of moss and lichens on tree trunks; - Availability of rare animal species. 	
25.	General recommendations	As part of scientific support of the Programme, plan activities to develop environmental and socio-hygienic indicators, local areas, resources for monitoring, and use monitoring data to ensure sustainable development of the sector.	
26.	General recommendations	Provide for environmental expert review costs in the financial and economic implementation mechanisms with regard to activities likely to cause environmental impact.	According to the current legislation, the implementation of activities accompanied by possible environmental impact presupposes environmental expert review of a project.

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27.	General recommendations	Consider developing normative and technical legal acts in the field of environmental protection for the tourism sector and designating dedicated tourism areas as independent economic entities accountable to the local authorities.	Improvement of the tourism-related legislative and policy framework are limited only to the quality of services. There is no provision to elaborate normative and technical legal acts linked to environmental protection needs resulting from the sector development. In order to improve the legislative and regulatory mechanism of the Programme implementation to help prevent negative effects on the environment, it is recommended to foresee the development of normative and technical legal acts in the field of environmental protection for the tourism sector. There is not a single special area within Belarus where tourism would take priority in terms of nature use vis-à-vis other types of activities. To ensure a supply of tourism services for the population, wise use of tourism and recreational resources, and generate higher motivation of local companies to develop tourism, it is imperative to designate dedicated tourism areas as independent economic entities accountable to the local authorities.
Editing recommendations			
28.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Add “ without detriment to the environment ” to the Programme goal.	The strategic goal of waste management, under the laws of the Republic of Belarus given the existing situation regarding municipal waste management is <i>to minimize harmful impact of wastes on the environment</i> , which can be achieved by: Reducing (minimizing) the generation of municipal waste; Reducing the volume of municipal waste sent for disposal; Collecting secondary resources and their recycling; Creating environmentally safe stations for waste disposal. In view of the above, the Programme’s goal concerning waste management is to <i>minimize harmful environmental impact of waste generated by the tourism industry</i> . The said goal can be reached by addressing the following conservation issues: Minimized waste generation; Collection (extraction) of secondary resources; Reduction of the volume of waste sent for disposal. This goal is not present in the Programme.
29.	Section 2 “Goals, objectives, principles and priorities of tourism development”	Also supplement objective 7: after “improvement of skills of tourism staff”, write down “ <i>including in the field of environmental protection</i> ”.	
30.	Section 4. “Maximizing efficiency of the available tourism resources”	Redraft Paragraph 8 as suggested: “ <i>increasing the number of border crossing points, simplification of a procedure to obtain visas, passport and customs control for tourists, improvement of sanitary protections of sites</i> ”.	<i>Violation of sanitary protection, emergence of new diseases.</i> One of the key conditions for the development of transboundary and transit tourism is to create the most favoured treatment for foreign citizens crossing the border. The relaxation of customs control and regime activities to ensure the most favoured treatment may upset the sanitary and epidemiological wellbeing of the country’s population in general when, in particular, very dangerous infections are imported. Besides let it be mentioned that within the CIS agreement the Republic of Belarus implements its commitments to ensure the sanitary protection of territories within the Commonwealth of Independent States. In view of the above, we find it necessary to supplement projected priority areas of services export development.
31.	Subsection 4.3	Replace the words “national parks” with “recreational and economic	The key functions of reserves do not use the notion of ‘tourism’. Instead there is ‘educational

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	“Ecological tourism”	zones of national parks”.	tourism’, which implies a ban on visiting a site by large tourist groups and even small spontaneous groups.
32.	Subsection 4.3. “Ecological tourism” and Section 5 “Regional tourism policy”	<p>Exclude the Berezinsky Biosphere Reserve as a site not intended for tourism development and having solely conservation and educational functions.</p> <p>Delete the word “reserves” from Paragraph 1, cl. 4.3</p> <p>Cross out the Berezinsky Biosphere Reserve from a list of ecotourism centres of international importance in section 5.</p>	<p>The key territories for ecotourism development are specially protected areas, playing a vital role in the conservation of the country’s biodiversity. Considering the value of these areas, economic decisions contained in the Programme should be particularly carefully calibrated and take into account environmental requirements, especially since this is the necessary basis for the development of ecotourism. It should be noted that the National Tourism Development Programme is aware of this importance, therefore it names specially protected areas having research departments in their structural units anchors of ecotourism in the country.</p> <p>According to Article 22 of the Specially Protected Areas and Sites Act, “any activities not related to the purpose of the reserve, running counter to its objectives and directly or indirectly disrupting the course of natural processes or creating a risk of harmful impact on natural complexes and sites in the territory of the reserve are not allowed”. In the reserve, one of the activities allowed is “raising ecological awareness”, and “in specially designated sections of the reserve, which do not contain natural complexes and sites, which the reserve has been established to protect, it is possible to conduct activities designed to ensure the functioning of the reserve and livelihoods of people living on its territory in accordance with the Reserve Regulations”. The ecotourism development in a reserve is incongruous with the spatial structure of its territory. The Berezinsky Biosphere Reserve can remain on the tourism route list and used for educational tourism.</p>
33.	Section 4.3 “Ecological tourism”	<p>It is advisable to add a paragraph:</p> <p>“In order to develop ecotourism in the country it is necessary to: develop routes and identify allowable recreational loads on specially protected areas for the sake of biodiversity and sustainability of biocommunities</p>	<p>To ensure long-term development of ecotourism, tourism services at SPAs need to be developed within reproduction capacities of the environment. In that case SPAs will also perform their functions, i.e. animal and plant protection, biodiversity conservation, which forms a basis for ecotourism development. This implies:</p> <ul style="list-style-type: none"> • Development of tourist routes in those sections of protected areas which are not critical for biodiversity; • Identification of optimal anthropogenic loads in a site.
34.	Section 4.4 Rural tourism	Remove the line “a possibility to consume environmentally clean products” from among rural tourism mainsprings which, however, does not downplay the appeal of this type of tourism.	The Programme (Section “Rural tourism”) points to “a possibility to consume environmentally clean products” as one of the appeals of rural tourism. Where rural tourism is concerned, this means food products grown or produced at private plots of land. As mentioned before, statistics show that these products are heavily contaminated with radioisotopes (controlled indicator in products grown at private plots of land). The content of chemical substances, including toxic ones, in food stocks and products is not controlled in the country. Under the law, only a product owner can apply for an analysis of food products grown at private plots of land. Therefore it is basically impossible to speak about the quality and cleanness of products grown at private gardens. Besides, the term “environmentally clean food products” is not applied in the country and is not commonly used in world practice.
35.	Subsection 4.6 “Recreational and health-improving tourism”	Add the words “One of the major factors of the very possibility of health-improving tours are climate and weather conditions”	The comfortable period for winter recreation is when the mean daily temperature reaches -5°C, but does not drop below -25 °C, and all types of winter recreation are available. The comfortable period for summer recreation is determined by a number of days with the mean daily temperature above + 15°C, and all types of summer recreation become available. The duration of the swimming season depends on a number of days with the water temperature above 17°C. Within Belarus, the duration of swimming season ranges between 110 and 180 days in a year.

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			<p>It is very important to take into account weather phenomena which discomfort tourists: excessive cold and heat; excess and lack of UV; weather changeability; stuffiness; hygrothermic discomfort; heavy wind loads; lasting fog; heavy precipitation; intensive thunders.</p> <p>These phenomena are harmful for people physiologically. They hinder most recreational activities, except for going to museums and exhibitions. No recreational activities are possible during thunderous meteorological conditions: storms, gales and hurricanes.</p> <p>The Programme fails to identify optimal comfort zones (good for recreation throughout most of the year), comfort zones with varying degrees of favourability in summer and winter and discomfort zones, which are dominated by offensive weather conditions during any season.</p>
36.	Section 2. “Evaluation of the current state of tourism in the Republic of Belarus”	After the words “reconstruction and renewal of infrastructure, enhancing a material and technical base”, add the words “ taking into account conservation solutions, including when managing waste ”	Increasing numbers of tourists will lead to more waste, which would in turn speed up ‘the wear and tear’ of a material and technical base supporting the waste collection and transportation process and exhaust waste disposal sites. It is therefore necessary to foresee the infrastructure modernization.
37.	New avenues		
38.	<p style="text-align: center;">Chapter. Tourism areas.</p> <p><i>A spatial backbone of the tourism sector should be formed by specialized, dedicated areas tourism. A tourism area is a territory which has a potential (i.e. resources) to generate and support tourism services and comprises recreational lands accommodating tourism service providers and infrastructure. Tourism areas should be established as landscape parks, which would include recreational reserves, recreational land and infrastructure. Landscape parks should enjoy a land user and legal entity status subordinate to local authorities. Recreational reserves, as a new type of specially protected areas, should function to conserve natural recreational resources and support ecotourism-based recreational activities. Recreational lands are lands used by tourism establishments, tourists and holidaymakers as beaches and swimming areas, sport ground, Alpine skiing tracks, bikeways, parks, camping and picnic areas, playing fields and other recreational activities which enjoy a special legal treatment.</i></p> <p><i>A landscape park as a legal entity should conduct activities to ensure efficient tourist service, ecological safety and recreational efficiency, sustainable use of recreational resources and conservation of natural complexes, involvement of local people and civil groups in tourism services. The main objectives of landscape parks are: to ensure natural development of landscape complexes, protection and sustainable use a site’s recreational potential; to revitalize traditional nature use and economic practices (arts and crafts), preserve ethnographic originality and develop folk arts, protect monuments of folk culture and architecture; to organize large-scale recreational servicing in compliance with ecologically allowable recreation standards and activities to support (maintain) natural complexes in their optimal condition; ecological education and development of recreation-related conservation skills in different types of landscapes, healthy lifestyle advocacy and support of supreme working efficiency and longevity through active tourism.</i></p> <p><i>To create conditions for the sustainability of tourism areas, first of all it is necessary to make regular amendments to the legislative framework and designate the status of tourism areas in the Tourism Act, landscape parks and recreational reserves in the Specially Protected Areas and Sites Act, recreational lands in the Land Code. Landscape parks should be created outside the boundaries of the existing SPAs of national importance.</i></p> <p><i>Specific landscape parks and recreational lands should be primarily linked to districts identified by the spatial master plan as areas of large natural complexes and as tourism and recreational areas, where there is a stipulated priority development strategy for nature conservation, tourism and recreation. At the same time, urbanized areas should not be ignored either since they are a source of high tourism demand. The functioning of tourism areas and institutions largely depends on how far they are situated from them geographically.</i></p>		

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39.	Re Section 4.3 “Ecotourism”	<p>Section 4.3. “Ecotourism” is flawed due to the outdated interpretation of the notion itself, methodologically incorrect classification of different kinds of tourism and recreation activities, and the exclusive priority of the existing SPAs as sites for ecotourism. The new redraft of Section 4.3. reads as follows:</p> <p style="text-align: center;">Section 4.3. “Ecotourism”</p> <p><i>Due to the specifics of nature and recreation potential of Belarus, ecotourism is inherently more competitive than other kinds of tourism. The modern concept of ecotourism is based on the principle of sustainable development. Ecotourism is a free-time educational and health-promoting activity manifested in a form of temporary migration and sojourn in a natural environment (biosphere ecotourism), and/or active participation in public conservation activities (ecological schools, festivals, volunteer movement, etc.) characterised by the use of a complex of services provided on the basis of harmonious exploitation and rational area-based infrastructure. The main specific principles for organisation of ecotourism are described in the Quebec Declaration on Ecotourism (2002): contributes actively to the conservation of natural and cultural heritage; includes local and indigenous communities in its planning, development and operation, and contributing to their well-being; interprets the natural and cultural heritage of the destination to visitors; lends itself better to independent travellers, as well as to organised tours for small size groups. National and landscape parks must play a central role as main service-providers for ecotourists.</i></p> <p><i>The main types of ecotourism in Belarus:</i></p> <ul style="list-style-type: none"> - family recreation amid natural ecosystems and traditional rural landscape; - info-scientific tours organised to watch animals and plants; - tours on non-motor means of transportation; - eco-educational tours for pupils and students in accordance with their study curriculum; <p><i>Ecotourism organisation must build on the following principles:</i></p> <ul style="list-style-type: none"> - environmental security; - socio-cultural security; - recreation efficiency; - economic efficiency. <p><i>The principle of environmental security prevents destruction of ecosystems used by tourists, and precludes any harm to the life or health of tourists in the natural environment. This principle can be implemented through observation of norms of environmentally permissible recreation pressures, establishment of a tourism infrastructure which minimises negative effects on ecosystems, conservational awareness-raising among tourists, timely prevention and mitigation of adverse consequences of the “wild” tourism (litter, poaching, unsanctioned cutting of trees). In order to endure environmental security, it is required to inform tourists and operating personnel about the existing environmental threats, provide services under adequate sanitary and aesthetic conditions, and cater good quality food.</i></p> <p><i>The principle of socio-cultural security stipulates, first of all, the development of such forms of tourism and recreation activities which do not require transformation of the environment and traditional lifestyles of local population, and instead promote revival of folk elements of culture (arts, crafts, rituals); secondly, it also stipulates attraction of such tourists who are far from ethnic, religious or class discrimination, who uphold family values, have no prejudice against rural conditions and poverty, and who would not be the source of dissemination of bad habits, diseases, foul language, and other negative or socially dangerous influences.</i></p> <p><i>The principle of recreation efficiency stipulates organisation of tourism services based on a comprehensive recreation and health programme and good quality hospitality services that maximise satisfaction of ecotourists. It is very important not only to improve the quality of the tourism services, but also find the target customers who are willing to observe the principles of environmental and socio-cultural security.</i></p> <p><i>The principle of economic efficiency is manifested in general through provision of tourism services where revenues are higher than the aggregate costs of all the engaged service-providers. For ecotourism this principle has a different connotation which emphasises the goals of sustainable development for the tourist area. The principle of economic efficiency of ecotourism stipulates the priority of improving the well-being of local communities through their direct involvement in the tourism business, and cost-effectiveness of the services provided by national and landscape parks.</i></p>	
40.	Below is the proposed new subsection to Section 4. “Maximizing efficiency of the available tourism resources”	<p style="text-align: center;">Hunting tourism</p> <p>Hunting tourism is one of the actively developing areas of the tourism industry of Belarus. It contributes to the wise management of hunting resources. Hunting is a combination of interaction with nature, physical exercise, and esthetic satisfaction from seeing animals at large. Hunting trophies still retain their prestigious significance. Taking into account the existing potential of the hunting industry of Belarus, the development of hunting tourism in the country marked out for a brilliant future.</p> <p>The development of hunting tourism in Belarus relies on the big hunting estates of the country and registered hunting estates of the national parks that can sell a share of hunting certificates to foreign tourists.</p> <p>The main types of hunting tourism:</p> <ul style="list-style-type: none"> – tours to hunt wild ungulates (moose, wild boar, roe deer, red deer); – wolf hunting tours; – feather game hunting tours. <p>The development of hunting tourism in Belarus requires:</p> <ul style="list-style-type: none"> – service infrastructure (including accommodation, food, ancillary services); 	

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		<ul style="list-style-type: none"> - information service (collection of information from hunting estates about the numbers and types of game birds and animals they are ready to offer, with what trophy arrangements, etc.; processing and systematisation of information and its presentation to foreign hunters; information about hunting prices); - formalisation of hunting tour arrangements (contract on the type and conditions of hunting, transportation, gamekeeper's assistance, permits to bring hunting weapons and ordnance to the country, export certification of hunting trophies); - training of specialists on organisation and management of hunting and hunting trophies. <p>Good hunting tourism requires scientifically justified management of game population in order to maximise the turnover and ensure the constant level of hunting yield through a strict control of the game population status by the system of accounting and indicators.</p> <p>The development of hunting tourism shall promote investments into the fauna conservation activities and higher level of biotechnical arrangements at hunting estates.</p> <p>Belarus has a potential for increased use of game species (i.e. 20 mammals, 32 birds, 1 reptile, 29 fish species, 2 invertebrates), especially vertebrate species, that can create the basis for the development of hunting tourism, and furthermore, Belarus has conducted detailed scientific research on this group of animals.</p>	
41.	Subsection 4.2 "Educational tourism"	It is necessary to reconcile car parking network development with ecological requirements regarding their location in water protection areas (WPA) (to satisfy the Regulations on WPAs and Coastlines).	Cultural and tourism zones are developed within natural complexes, the majority of which are found within water protection areas (WPAs) and coastlines of water bodies of the country
42.	Subsection 4.3. "Ecological tourism"	Before developing river and lake tours, it is necessary to assess their recreational capacities from the point of view of critical recreational loads on the basin and coastline with an eye towards developing recreation supportive infrastructure (parking lots, food and accommodation) within water protection areas, because they represent the main sources of pollution for the basin (Paragraph 15, Regulations on Water Protection Areas and Coastlines of Large and Medium-sized Rivers).	
43.	Subsection 4.3. "Ecological tourism"	<p>Since the tourism legislation and regulatory framework needs to be improved, it is advisable to identify criteria of 'ecologically clean natural areas' (contamination levels, etc.) for every type of tourism (ecological, rural, sport tourism, etc.).</p> <p>We recommend to take inventory of underground springs flowing into tourism areas to check if their water meets the established quality requirements.</p>	
44.	General recommendations	<p><i>In our opinion, a guidebook for foreign tourists by all means should include the following information:</i></p> <ul style="list-style-type: none"> - <i>forest behaviour, getting ready for going out in the woods (clothing, repellents, etc.);</i> - <i>poisonous berries and mushrooms;</i> - <i>radioactive contamination of forest products;</i> - <i>how to give first aid in the forest, etc.</i> <p><i>To develop a tourist warning system about potential natural dangers: extreme air and water temperatures, storms, snowfalls, thunders, as well as about dangerous animals and plants (predators, poisonous snakes, spiders, plants, mushrooms) and the presence of nature-induced focal diseases in a specific territory. The latter is particularly relevant for national parks Belovezhskaya Pushcha and Prip'yatsky, where there are foci of diseases transmitted via bites of ticks.</i></p>	<p>A small guidebook for foreign tourists need to be produced or the instructor training system should have a section on ensuring health security when staying in Belarus.</p> <p>This document is necessary to satisfy Article 10 of the Tourism Act, by which tourism companies and agents should provide all-embracing information about travel specifics and ensure security of tourists while they stay within the country.</p>
45.	Subsection 4.6 "Recreational and health-improving tourism"	The reconstruction of sanatoriums 'Naroch', 'Ushachi', etc., located within water protection areas of water bodies should be accompanied by mandatory hydroecological feasibility studies with regard to these sites and their recreational infrastructure.	According to Paragraph 15, Regulations on Water Protection Areas and Coastlines of Large and Medium-sized Rivers.

№	Section	Recommendation	Comment
46.	General recommendations	It is necessary to foresee a standardized list of quality requirements to water bodies used for specific types of tourism, rather than recreation in general as the case is now.	The section suggests developing criteria and technical regulations to ascertain the compliance of services with the established standards. It should be noted that since the recreation industry offers people, among other services, water tourism, as part of a common standard (technical regulations), it is necessary to develop a standardized list of water quality requirements applicable to water bodies used for specific types of tourism, rather than recreation in general as the case is now. This will help adequately assess the tourism potential of water bodies and assure the quality of tourism services people can access at rivers and watercourses with the minimization of environmental damage.
47.	General recommendations	<p>To supplement the Programme with a subsection “Ecological aspects of tourism development”, containing among other activities the following.</p> <ol style="list-style-type: none"> 1. To identify ways to minimize negative impact of the tourism industry on the environment, for which purpose to channel more funding into research on environmental and human impact of tourism and recreation; 2. To make adequate management decisions and take measures to reduce negative environmental impact of tourism and recreation on a permanent basis. 3. To assess recreation zones and tourism development areas from the point of view of maximum allowable loads on natural complexes. 4. To develop a system of conservation measures indicating sources of financing and the amount of money released for these purposes within current and planned tourism development areas 	<p>Environmental protection is every state’s top-priority objective, for it ultimately serves to improve the health of every person and the nation on the whole and reproduce labour resources. Recreation and tourism also ultimately aim to help the country build a healthy nation.</p> <p>Tourism can also produce negative environmental impacts. The sector is seasonal by nature, therefore a number of tourists in a given area at the peak of a season can sharply differ from tourist availability during the dead season. Hence, local people will also considerably increase pressures on the environment during that time. This happens among other things as a result of air pollution. Increasing flows of tourists visiting fragile natural areas may jeopardize their conservation.</p> <p>More tourists also means more transportation by air, road and railroad. 60 percent of air travel are directly linked to tourism, hence tourism is responsible for polluting the air with CO₂, NO, NO₂, CO, lead compounds, carcinogenic substances. Vehicle exhaust and waste discharges from the energy sector cause acid rains, climate change and local air pollution.</p> <p>Tourist travel presupposes moving from home to a point of destination and back. In actuality, traveling to a destination and returning home accounts for 90 percent of energy consumed by tourism. Tourism is responsible for about 50 percent of passenger transportation, including most international flights. In turn, transport is one of the essential factors of global climate change.</p> <p>Tourism can produce negative water impact (effluent from recreation facilities, car parking areas, camping sites, etc.). Lakes and low-flow water bodies are most sensitive to this kind of impact. There are water bodies distinguished by a small degree of resistance to human impact, whose coastlines cannot be allowed for development liable to harm the environment. These are deep water bodies with a small water table, low-flow and low mineralized water reservoirs which normally have depressions with a small area of shallow waters. Belarus has many such lakes. As a rule, they are very scenic, so holidaymakers prefer them for rest. The most popular of these are the Lake Dolgoe (the deepest lake in Belarus), Ginkovo (Glubokoe District), Sarro (Beshenkovichi District), Beloe, Vechelie and Dolzhino (Ushachi District), Bolduk and Glublya (Myadel District), the Sorochanskies Lakes (Ostrovetsky District), Zaronovskoe Lake (Vitebsk District, etc.)</p> <p>The tourism sector heavily relies on the integrity of the natural environment. Excessive tourism might easily overstep critical environmental loads (environmental receiving potential), which an area can sustain, thus putting tourism in danger.</p> <p>It is necessary to identify the maximum loss of resources which would not lead to substantial degradation of ecosystems or biodiversity or to species extinction, as well as the pollution ceiling for air, water and environment pollution based on the tolerance of the assimilating capacity of a local ecosystem.</p> <p>To this end, it is possible to include in the Programme the term ‘carrying capacity’ used in the tourism sector of developed countries.</p> <p>The carrying capacity method is widely used to determine the capacity of a site to find out the maximum level for development of tourism, agriculture, industry and infrastructure.</p> <p>A carrying capacity analysis is based on the following key components or aspects: physical and</p>

№	Section	Recommendation	Comment
			<p>ecological, socio-demographic, political and economic. Carrying capacity is often resorted to as a way of deciding how many tourists a specific area can handle. The hypothesis is that an increase in recreational activities intensifies the environmental impact causing soil compression, vegetation destruction, wildlife disturbance and other effects.</p>
48.	General recommendations	It would be useful to develop “ The Tourism Code ” as part of the Programme implementation which would cover conservation and other tourism-related issues, including waste disposal practices tourists should know about.	In the Programme, ‘ecotourism’ includes “visits to clean natural sites that are intact or least transformed by human activities – reserves, sanctuaries, national parks”. In terms of environmental waste impact, these sites are least protected, because waste can be collected only along roads crossing these sites or in designated areas for organized rest. The Waste Act of Belarus prohibits dumping of wastes within reserves, national parks, sanctuaries and monuments of nature, which means they will have to be disposed of elsewhere. This demands a responsible approach on the part of tourists when it comes to waste collection and disposal. Tourists will have to be advised on the rules in advance, before they actually visit these sites.
49	General recommendations	To avoid negative health effects, it is advisable to instruct tourists in the rules of behavior in and after the forest (in particular, the choice of clothing and body inspection after being in the forest) or include this information in a special tourist guidebook.	<p><i>Risk of natural focal infections</i> According to WHO reference information, Belarus is a country which does not require making special medical preparations to visit (vaccinations, etc.) and is allowed without limitations in the context of negative health impact. The most common natural focal diseases found in Belarus include tick-borne encephalitis and Lyme borreliosis, enterovirus infections, cercariosis. Almost the entire area of the country is endemic for tick-borne encephalitis. A series of surveys held across the country resulted in a cadastre of administrative districts (91), where agents of tick-borne encephalitis have been found to circulate (see Annex). A new type of anthropurgic foci develops around large cities. Staying in the forest for a long time, especially large forest areas (ecological and rural tourism), may lead to an encounter with ticks and other insects with ensuing adverse emotional reactions. Even though tick-borne encephalitis is practically not recorded in the country, which is a sign of low pathogenecity of the circulating strain, precautions evidently need to be taken.</p>

Annex 2: List of ministries that have been consulted and programmes (current and planned) that have been considered during the selection process for the pilot SEA

Ministry	Programme
Ministry of Sport and Tourism	2006-2010 National Tourism Development Programme of the Republic of Belarus
Ministry of Energy	A dedicated programme designed to ensure that at least 25 percent of the total energy production (electrical and heat) comes from local fuels and alternative sources for the period to 2012.
Ministry of Agriculture and Food	2006-2010 National Programme on the Conservation and Use of Reclaimed Land
Ministry of Public Utilities	<i>Clean Water</i> National Programme
Ministry of Architecture and Construction	2006-2015 Construction Sector Development Programme
Ministry of Transport and Communications	
Ministry of Economy	2006-2010 Socio-Economic Development Programme of the Republic of Belarus
Institute of Urban Development linked to the Ministry of Architecture and Construction	Spatial Development Plan of the Brest Region

Annex 3: A list of experts who have been involved in the pilot SEA

A. List of international experts consulted on the pilot SEA

Jiří Dušík	Regional Environmental Centre for CEE (Budapest). Programme manager
Henrietta Martonakova	UNDP Regional Centre for Europe and CIS (Bratislava) Project coordinator
Aleh Cherp	Central European University. Professor
Ausra Jurkeviciute	Regional Environmental Centre for CEE (Budapest). Project coordinator

B. Members of the SEA National Group

Alexander Gnedov	Waste management
Irina Zastenskaya	Health care
Ludmila Ivashechkina	Environmental assessment
Mikhail Kalinin	Water management
Sergey Kuchmel	Biodiversity conservation
Elena Loginova	Air pollution
Victoria Misiuchenko	Environmental assessment
Irina Sukhiy	Public participation
Alexander Tarasenok	Wise land use
Igor Choulba	SEA National Group Coordinator
Victor Yankovenko	Planning team
Valentin Yatsukhno	Sustainable use of land resources

Annex 4: ToR for SEA Expert Team, which carried out the Pilot SEA Project

Background

UNDP Regional Center for Europe and CIS, in co-operation with Regional Environmental Centre for Central and Eastern Europe (REC for CEE) supports Belarus in capacity building for implementation of the UNECE SEA Protocol, which Belarus signed in May 2003. The key objectives of the UNDP/REC project are to raise awareness on the SEA process, to build the capacity of professionals, local authorities and developers on SEA implementation, to implement a SEA pilot project and to outline national SEA capacity development strategy.

Following the results of SEA capacity-building needs assessments developed by national consultant in the first stage of the project representatives of Belarus have identified SEA pilot project as the highest-priority capacity building tool for implementing the SEA Protocol and bringing SEA into practice. Participants of the National kick-off workshop in Belarus (11-13.10.2004) have reconfirmed the need and interest in pilot project implementation and provided suggestions for its preparation, which have been taken into account in preparation of this ToR.

Focus of pilot SEA

SEA will be carried out for a national programme.

Objectives of pilot SEA

The overall objective of the project (the pilot SEA) is to support Belarus to achieve sustainable development through supporting participatory approach in integration of environmental (including health) concerns into the national development framework. The specific objectives of the pilot SEA is to:

- Test and demonstrate opportunities for practical application of the UNECE SEA Protocol in Belarus taking into account its public participation and consultations requirement; and
- Provide recommendation for environmental optimizing and modifications of the *Programme*.

Legal basis

The pilot SEA will be based on all relevant legal acts and draft acts of the country, which are:

- The Law on Environmental Protection (1992, amended in 2002),
- The Law on State Environmental Expert Review (1993, amended in 2000),
 - Instruction On the Procedure for Environmental Impact Assessment of Economic and Other Activities in the Republic of Belarus (2001),
- Instruction On the Procedure for State Environmental Expert Review (2001).

The pilot SEA will also try to adhere – to the extent possible - to provisions of the SEA Protocol of the UNECE Espoo Convention on EIA in a Transboundary Context.

Key tasks in SEA

SEA team will:

- Prepare detailed pilot SEA implementation plan, including milestones of interaction with the team of planners, and of consultation with relevant authorities and public;
- Evaluate the analytical part of P/P¹ – whether it addresses all relevant environmental trends and problems and suggest any relevant modifications of the P/P;
- Choose relevant environmental objectives for P/P, evaluate how the proposed objectives of the P/P and proposed actions in the P/P relate to relevant environmental objectives and suggest any relevant modifications of the P/P;
- Evaluate specific environmental/health impacts of the proposed activities in the P/P and suggest any relevant modifications of the P/P;
- Evaluate of adequacy of implementation arrangements and suggest any relevant modifications of the P/P;
- Evaluate adequacy of monitoring plan – whether it provides for a realistic monitoring and analysis of key environmental impacts during implementation of the P/P and suggest any relevant modifications of the P/P;
- Prepare draft SEA report based on the findings of the evaluations and assessments listed above;
- Organize consultations on draft SEA report with key authorities and the public;

¹ P/P – plan and programme – refers in this document to a national programme that has been chosen as subject to the pilot SEA.

- Compile final SEA reports of SEA and present it to the planning team and/or to the MoNREP and to the planning authority in charge of the P/P;
- Analyse experience gained in this pilot SEA and provide recommendations for future SEA practices in the country.

Approach and methodology

Mainly qualitative methods will be used for evaluation because both priorities and measures of P/P involve uncertainty. Experts will also try to address cumulative impacts, especially in case of natural resources or sensitive ecosystems. The methodology of SEA will be adjusted according to the suggestions of UNDP, the REC and the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus (MoNREP).

SEA expert team members and their responsibilities

All expert team members are obliged to follow and to accomplish the pilot SEA process stages described in Annex 1 to the ToR.

Expert team is comprised of a main group and a group of short-term experts. The main group includes national SEA team coordinator, expert on environmental assessment, expert from the planning team, expert on public participation and expert on human health.

Environmental assessment expert

- has a good knowledge of the current environmental assessment system in the country is also familiar with the SEA Protocol requirements. He/she will work on the parts on environmental assessment methodologies and techniques, conducts environmental assessment of the Programme, suggest recommendations for improving the programme and prepare draft and final SEA report. *Input expected: 30 days.*

Planning expert

- has a deep knowledge on either sectoral or spatial planning systems (related to the character of the *programme – subject to the pilot SEA*) and is knowledgeable with SEA therefore will assist the expert team on integration possibilities of the SEA into the planning process of the P/P development. The expert suggests how to integrate SEA into the planning process, facilitates interaction between the SEA and planning teams. *Input expected: 15 days.*

Public participation expert

- responsible for adding the consultation and public participation components into the pilot SEA implementation plan while suggesting the timing and way of consultations. He/she will be responsible for organizing the activities related to consultations with relevant authorities and the public, together with a team coordinator. He/she is an expert on public participation and awareness rising on environmental issues. Prepares the part on public participation in SEA report. *Input expected: 15 days.*

Human health expert

- has a deep knowledge in the field of human health. Conduct assessment of the programme with respect to impact on human health. Prepares written materials containing the results of assessment and recommendations for programme modification.. *Input expected: 20 days*

The group of short-term experts includes specialists acting in the field of environmental protection. The following specialists will constitute the group: expert on water resources and pollution (*expected input 8 days*), expert on air pollution (*expected input 8 days*), expert on waste management (*expected input 8 days*), expert on land degradation (*expected input 8 days*), expert on biodiversity (*expected input 8 days*).

The short-term experts evaluate possible consequences of programme implementation to the environment and prepare written materials containing the results of this evaluation and recommendations for programme optimization.

Steering/selection committee will agree on the final number of SEA team members (advised 5 or 6), their expertise and on distribution of working days amount among them. The whole expert team (excluding the SEA team coordinator) will spend maximum 120 working days on the accomplishment of the assignment.

Other consultants may be involved in expert team to evaluate specific issues as deemed necessary.

Involvement of relevant authorities

SEA expert team will consult at least with the following institutions:

- Ministry of Natural Resources and Environmental Protection of Belarus
- Ministry responsible for plan/programme
- Other ministries and institutions identified by the SEA expert team in the implementation plan

SEA expert team will also consult with UNDP (Regional Centre and CO), the REC and the MoNREP at their request. UNDP (Regional Centre and CO) and REC will be informed about all key meetings of the SEA expert team with the above authorities and can participate at these meetings.

Selection criteria for experts and selection process

The experts will be selected based on their expertise (from the CVs) by the Steering or Selection Committee (representative of UNDP Regional Centre, UNDP Country Office Belarus, MoNREP of Belarus, and institution responsible for P/P development). The short list of the experts will be collected by the UNDP and will be selected based on the following criteria:

- expertise in the topic that he/she is applying to
- demonstrated knowledge of the topic/area of expertise
- demonstrated knowledge of computer skills (typed applications accepted, e-mail preferred)
- availability for the task (contract can be signed with a company the consultant represent or by a consultant itself)
- possession of the tools needed to implement the task (office space and access to a computer and internet (personal e-mail address))

Expert team should be created from a good mix of experts from different sectors.

Management and support

The work of the SEA expert team will be overseen by the Steering Committee to the project invited and chaired by the representative of the MoNREP of Belarus. The financial side of the project will be managed by UNDP Regional Centre through the UNDP Country Office in Belarus. International expertise will be provided by the REC for CEE.

The expert team will submit all deliverables to the Steering Committee, including UNDP (Regional Centre and Country Office), and REC for CEE.

Duration of assignment: December 2004 – August 2005. It will be a part time assignment and experts are not required to be placed in Bratislava.

How to apply?

Please send your application letter with clear statement which position are you applying to and from which sector), CV, and references by *December 20th, 2004* to the address below by mail:

Room 201, Slavinskogo Str., 1-2, Minsk,

fax –in Minsk – 264 0241

or by e-mail:seaundp@yahoo.co.uk

STAGES OF SEA

	Tasks	Deadline
1.	SEA Work plan – draft document sent for internal review by UNDP and REC ... – official document presented to the MoE and P/P planning team
2.	Evaluation of treatment of env. issues in analytical part of P/P. Suggested changes in the P/P – draft document sent for internal review by UNDP and REC ... – official document presented to the MoE and P/P planning team
3.	Choice of relevant environmental objectives for P/P and evaluation how the proposed objectives of the P/P and proposed actions in the P/P relate to relevant environmental objectives Suggested changes in the P/P – draft document sent for internal review by UNDP and REC ... – official document presented to the MoE and P/P planning team
4.	Evaluation of specific env./health impact of the proposed activities in the P/P + formulation of suggestions for modifications of the P/P Suggested changes in the P/P – draft document sent for internal review by UNDP and REC ... – official document presented to the MoE and P/P planning team
5.	Evaluation of adequacy of implementation arrangements – whether they incorporate conditions for env. supervisions plan + formulation of suggestions for modifications of the P/P Suggested changes in the P/P – draft document sent for internal review by UNDP and REC ... – official document presented to the MoE and P/P planning team
6.	Evaluation of adequacy of monitoring plan – whether it provides for a realistic monitoring and analysis of key env. impacts during implementation of the P/P Suggested changes in the P/P – draft document sent for internal review by UNDP and REC ... – official document presented to the MoE and P/P planning team
7.	Draft SEA – all above analyses compiled into draft SEA Report
8.	Review of SEA Report with public and key authorities	- draft SEA Report sent to key authorities and stakeholders ... – public workshop to review draft SEA Report
9.	Final SEA Report – SEA report finalised, based on obtained comments – SEA report and proposed changes in the P/P sent to MoE and the planning authority and decision-making for P/P
10.	Closure and evaluation - Internally evaluate the whole process and develop the following recommendations – draft document ready for internal review with the UNDP and REC ... – official document presented to the MoE and P/P planning team

Deadlines will be added by the SEA expert team in the implementation plan and will be approved by UNDP, REC and Steering Committee.

Annex 5 :List of key policies and legislation analyzed by the experts

1. Constitution of the Republic of Belarus (1996)
2. Water Code of the Republic of Belarus (1998).
3. Land Code of the Republic of Belarus (1999)
4. Environmental Protection Act of the Republic of Belarus (2002)
5. Act on Specially Protected Areas and Sites of the Republic of Belarus (2000)
6. Plant Act of the Republic of Belarus (2003)
7. Animal Protection and Use Act of the Republic of Belarus (1996)
8. Waste Act of the Republic of Belarus (2000)
9. Atmospheric Air Protection Act of the Republic of Belarus (1997).
10. Architecture, Urban Development and Construction Act of the Republic of Belarus (2004)
11. Ozone Layer Protection Act of the Republic of Belarus (2001).
12. Tourism Act of the Republic of Belarus (2003)
13. Health Care Act of the Republic of Belarus (2002)
14. Public Sanitary and Epidemiological Wellbeing Act of the Republic of Belarus (2000)
15. Convention on Biological Diversity (1992).
16. UN Framework Convention on Climate Change (1992)
17. Vienna Convention on the Protection of Ozone Layer (1985)
18. Convention on Long-Range Transboundary Air Pollution (1979).
19. National Sustainable Development Strategy of the Republic of Belarus for the period to 2020 (2004)
20. 2004-2005 National Programme of Land Improvement and Community Aesthetics.
21. 2005-2010 State Programme “Rural Revival and Development”
22. 1999-2005 State Programme “People’s Health”.
23. 2002-2006 State Healthy Lifestyles Development Programme.
24. National Strategy and Action Plan for the Conservation and Sustainable Use of Biodiversity of the Republic of Belarus. Approved by the Council of Ministers’ Resolution No 789 of 26/06/1997.
25. State Spatial Development Plan of the Republic of Belarus (2001)
26. 2004-2006 Sectoral Municipal Waste Management (2004)
27. Regulations on Water Protection Zones and Coastlines of Large and Medium-sized Rivers (2002)
28. Regulations on the Procedure of Performing Surface Water Monitoring and Using its Data within the National Environmental Monitoring System of the Republic of Belarus. Approved by Council of Ministers’ Resolution No482 of 28/04/2004.
29. Regulations on the Procedure of Performing Underground Water Monitoring and Using its Data within the National Environmental Monitoring System of the Republic of Belarus. Approved by Council of Ministers’ Resolution No 482 of 28/04/2004.
30. Regulations on the Procedure of Performing Local Environmental Monitoring and Using its Data within the National Environmental Monitoring System of the Republic of Belarus. Approved by Council of Ministers’ Resolution No 482 of 28/04/2004.
31. Guidelines on Local Environmental Monitoring by Legal Entities Engaged in the Use of Sources of Harmful Environmental Impact. Approved by MoE Resolution No 20 of 22/07/2004.
32. Regulations on the Socio-Hygienic Monitoring System. Approved by Council of Ministers Resolution No82 of 27.01.2004.
33. Resolution No 269 of the Council of Ministers of the Republic of Belarus “On the Improvement of the System for Collecting (Processing) and Using Certain Recycled Products” (2003)
34. Declaration of the Fourth Conference of Ministers of Environment and Health. Budapest, 2004.
35. Hague Tourism Declaration
36. Global Tourism Code of Ethics

Annex 6: Environmental and health impact risk assessment matrix for Programme's proposed activities

The following symbols were used for assessing Programme's activities:

++ very positive impact

+ positive impact

0 neutral impact

- negative impact

-- very negative impact

Activities	Air	Natural landscapes	Surface water	Ground water	Land degradation	Land pollution	Animal world	Plant world	Monuments of nature, history and culture	Local health	Tourist health
1.Establishment of tourism areas with approved development plans	-	-	-	-	?	?	+	+	+	0	0
2. Tourism route development	0	-	0	0	?	?	+	+	+	+	+
3.Creation of a state cadastre of tourism resources	0	0	0	0	0	0	+	+	0	0	0
4.Agrotourism Plan development	0	-	0	0	+	-		+	0	0	0
5.Taking inventory of benefits of estates and agrotourism facilities linked to agrotowns	0	0	0	0	+	-	0	+	+	0	0
6.Introduction of a state certification of guides and interpreters	0	0	0	0	0	0	+	+	0	0	+
7.Elaboration of СТБ "Qualification and certification of staff in the field of sightseeing services. General requirements"	0	0	0	0	0	0	+	+	0	0	0
8.Development of Tourism Services Rules	0	0	0	0	0	0	+	+	+	0	0
9. Construction of tourism villages and facilities	-	-	-	-	--	-	0	0	0	+-	++
10. Construction of health, sport and entertainment centres	-	0	-	-	-	-	0	0	0	+	++
11.Construction of a youth camp near the Lake Vulkovskoe, Ivatsevichi District	0	-	-	0	-	-	-	-	0	+-	+
12.Car camping development	--	-	-	0	-	-	0	0	0	+-	++
13.Gas station construction	--	-	-	-	-	--	0	0	-	+-	++
14.Construction of cafes, restaurants, retail outlets	-	-	-	-	--	-	0	0	0	+	++
15. Construction of churches, monasteries, hotels	-	0	0	0	0	0	0	0	++	0	+
16.Restoration and renovation of historical and cultural monuments (estates, palace-and-park ensembles, historical sites, etc.)	0	0	0	0	+	0	0	0	++	0	+
17.Reconstruction of sport and health facilities, tourism centres	-	0	-	0	0	0	0	0	0	+	++
18.Reconstruction of hotels, tourism facilities	-	0	-	-	0	0	0	0	0	0	++
19.Reconstruction of the Dnieper-Boug Canal	0	-	+	0	+	0	-	0	0	0	+
20.Reconstruction of the Avgustovsky Canal	0	-	-	-	+	0	-	0	+	0	+
21.Restoration of the 'Swiss Valley' through riverbed improvement of the Gorodnichanka River	0	-	+	0	+	+	-	0	0	0	+
22.Creation and expansion of hunting farms (lodges)	0	-	-	0	-	0	0	0	0	0	+
23.Creation of pedestrian precincts within towns	+	0	0	0	+	+	0	0	0	+	+

Activities	Air	Natural landscapes	Surface water	Ground water	Land degradation	Land pollution	Animal world	Plant world	Monuments of nature, history and culture	Local health	Tourist health
24.Pitching zoological gardens in the village of Buinichi, Mogilev Region	0	0	-	-	-	0	0	0	+	+	+
25.Construction of the 19-century Belarusian ethnographic village in Buinichi	0	0	-	-	-	-	0	0	+	0	+
26. Reconstruction of a crafts centre in Vitebsk	0	0	0	-	0	0	0	0	+	0	+
27.Construction of a mansion hotel distinguished by the national flavor on the premises of the historical area 'Prudok' in Gomel	-	-	0	0	0	0	0	0	+	0	+
28.Research of tourism development problems on the domestic and foreign tourism markets	0	0	0	0	0	0	+	+	0	0	0
29.Development and maintenance of a common tourism information network in Belarus	0	0	0	0	0	0	+	+	0	0	0
30.Preparation and production of promotional materials by area and type of tourism, and about regional tourism potential	0	0	0	0	0	0	+	+	0	0	+
31. Organization of international tourism exhibitions, national capacity demonstration seminars and presentations	0	0	0	0	0	0	0	0	0	0	0
32.International activities through participation in the World Tourism Organization, intergovernmental cooperation agreements	0	0	0	0	0	0	0	0	0	0	0
33.Basic skills upgrading for managers and specialists working in the field of tourism, hospitality, recreation and sightseeing art	0	0	0	0	0	0	+	+	0	0	+
34.Development of out-of-school tourism and area study training centres at district and town levels	0	+	0	0	0	0	+	+	0	0	0
35. Development and production of teaching materials, methodological documents to support tours and tourism routes	0	+	0	0	0	0	+	+	0	0	0
36.Development of tourism road service infrastructure	-	-	-	-	0	-	0	0	0	+-	++
37.Camping in the unspoiled nature, making food on a fire	0	-	-	0	-	-	--	--	0	0	++
38. Using specially protected areas which have conservation units for the benefit of ecotourism	0	0	-	0	0	-	+	+	0	0	++
40. Mire tours	0	-	0	0	0	-	-	-	-	0	+
41. Using the Belovezhskaya Pushcha National Park as an ecotourism centre of international importance	0	0	0	0	0	-	0	0	+	0	++
42. Using the Berezinsky Biosphere Reserve as an ecotourism centre of international importance	0	-	--	0	0	-	--	--	-	0	++

Annex 7: A roundtable to discuss a draft SEA report of the 2006-2010 National Tourism Development Programme of the Republic of Belarus with the public.

Date – 12 August, 2005

Venue – Conference Hall of the Planeta Hotel, Minsk

Purpose – to discuss a draft SEA report of the 2006-2010 National Tourism Development Programme of the Republic of Belarus with the public.

Participation list:

	NAME	INSTITUTION	Contact phone and e-mail
1.	M. Kalinin	SEA team	264-05-23
2.	E. Loginova	SEA team	209-54-97
3.	F. Avdei	NGO, Grodno Region	3454614 avdzei@rambler.ru
4.	I. Tchoulba	UNDP Regional Project	
5.	A. Birukov	Ecological Movement, NGO	359-93-05 birukov@fenex.com
6.	A. Yatsukhno	SEA team	2095489
7.	A. Tarasenok	SEA team	2095493
8.	A. Vinchevsky	BirdLife Belarus, NGO	apb@tut.by
9.	V. Zuev	Nerush, NGO	nerush@solo.by
10.	E. Vakhromeeva	Belarusian Radio	239-58-02 eleni@tut.by
11.	E. Laevskaya	EcoLaw, NGO	ecopravo@solo.by
12.	I. Sukhiy	SEA team	aarhus@tut.by
13.	D. Chertkov	EcaScop	ecaskop@tut.by
14.	G. Fedorov	BeliuPushcha -21 st Century, Ecodom	572-62-97 ecology@date.by
15.	E. Shirokov	International Academy of Ecology, Belarusian Department	iaebe@tut.by
16.	I. Zastenskaya	SEA team	zastenskaya@hotmail.com
17.	V. Misiuchenko	SEA team	misiuch@mail.ru

At first, the SEA national experts presented a draft SEA Report followed by discussions.

Practically all the participants of the roundtable provided their personal inputs regarding the draft SEA Report. See comments below.

The following comments were made to the question “What is the right way to organize public consultations?”:

- The public need more time to work with documents
- Involvement of local residents
- Regional mass media
- Government authorities should have a clear mechanism and timeframe for consultations.

A. Birukov, Ecological Movement, NGO

How will a tourist cover environmental damage? The SEA Report does not say anything about taxes and duties.

Discussion on the subject of eco-payments.

Elena Laevskaya, EcoLaw. The questions are contained in Annex 8.

Evgeny Shirokov - International Academy of Ecology, Belarusian Department.

1. Belarus, regrettably, does not have sea and mountain tourism resources. However, it is my view that they could be well substituted by the national product, arts and crafts. The SEA Report does not have anything on that. More so, the President issued an edict on the development of folk crafts. It is possible to develop straw braiding, weaving, pottery. Everything builds itself on the Western standards: consumption is above all, but what about developing the national idea and creative arts?

2. Regarding the collection of eco-payments and duties, it is a good idea, but there has to be a mechanism to use the money collected for environmental harm done.

A. Vinchevsky, BirdLife Belarus

1. The number of protected bird species in Belarus is 30-32, not 24-25 as listed in the SEA Report.

2. My personal remark is to replace “the Republic of Belarus” with “the country”. Our Republic is an independent, sufficiently large state.

3. The term “wise nature use” be replaced with “sustainable”.

4. A few words about the development of waterways in Belarus. I propose to ban any construction of waterways within the Berezinsky Reserve. First they need to finish the Avgustovsky Canal in the Grodno Region and make a feasibility study of such a project. Any planning of water development in other sites should be held until then.

5. The SEA Report does not contain references to foreign tourism experiences. It would be good to describe which mechanisms worked and which didn't in different countries.

6. The indicator proposed in the SEA Report's section “Analysis of Programme Implementation Mechanisms and Monitoring” to register imported infections is not indicative for monitoring the health impact of the Programme, for if infections are imported, hence sanitary services do not do their work well.

7. It is necessary to take inventory of SPAs and make assessment of their potential international status, and reflect that in the Programme.

8. I suggest deleting “Hunting Tourism” as a section from the SEA Report. Its further development in Belarus might lead to a total loss of certain animal species.

Tourism develops at the cost of private business the world over. It is easier to control the private sector. State tourism means a complete and utter mismanagement and abuse of power.

If there are no animals on a hunting farm near the protected area, they will bring hunters to the protected area. Trophy hunting destroys the best males, there are only females left in the Belovezhskaya Pushcha.

9. The risk assessment matrix is completely unclear. They should add “+ -“ to show if it is generally good or bad. Land degradation, land pollution should be reworded and again it is unclear if it is good or bad.

Zmiter Chertkov, EcaScop

My recommendation is to transfer hunting tourism from under the Presidential Administration.

Remove the development of a hunting farm in the Verkhnedvinsky Forestry, there are a lot of persistent organic pollutants there and dirty area.

Vladimir Zuev, Nerush

1. The Programme (in its activity plan) does not mention the development of regional/district tourism programmes. This is an important point given specifics of each administrative unit of Belarus, it would reflect approaches of the government, business and local communities to tourism development.

2. We find it relevant that experts make changes to paragraph 4.3. ‘Ecological Tourism’.

3. We suggest deleting from the text any references to tourist villages and agrotourism facilities. These notions (in the vein of the Programme) totally obliterate global approaches to agrotourism. Agrotourism is nothing but individual rest.

4. Add bicycle and ski tourism to paragraph 4.5. as one of the cleanest types of active recreation. To this end, the state should foster rental services.

5. We support the opinion of experts not to establish ecotourism centres within reserves.
6. Not only towns, but also other communities should be considered as tourism centres.
7. The Programme makes no provision of the need to increase tourism staff in the local authorities. Often these functions are performed by the only deputy head of the sport and tourism department at district executive committees.
8. The Programme (particularly, the section on public relations) does not reflect public participation through NGOs in the activities to implement the Programme.

Annex 8: Comments and remarks of Elena Laevskaya regarding the 2006-2010 National Tourism Development Programme SEA

Elena Laevskaya,
PhD in Law, Assistant Professor of the Law Department, Belarusian State University
EcoLaw Board Director

Projects designed to conduct SEA of programmes in Belarus should be welcomed. Such initiatives pave the way for respective legislative changes and similar assessments with regard to other policies on a larger scale. So the analysis has been undoubtedly a positive development. At the same time, the developers of the first SEA in Belarus have a lot of responsibility to bear. First of all, their analysis will objectively become a reference point for SEAs that will follow. Besides, SEA findings and conclusions concern programmes, which are normally approved as normative legal acts, so these conclusions have to be adequate in legal terms.

By no means calling into question the competence of the project experts, we still regret to say that SEA conclusions and recommendations are legally inaccurate, superficial, and in some cases eclectic. In our opinion, the absence of legal experts on the developing team explains all that. Some of the SEA proposals are not tenable given the current state and development trends of the national legal system. I wish to dwell upon some of the most obvious remarks illustrating the point made above. We wish to stress that we have forwarded our Programme improvement proposals, so we won't concentrate on those here.

1. There is a sentence on page 3 (and in some places later in the text) which reads:

1. "Vest local tourism authorities with power to monitor and supervise, with the right to adjust the Programme".

2. "Provide for the development of sectoral legislative acts with proper emphasis on the issues of environmental protection and health".

The first sentence is legally weak and absurd: SEA developers apparently have no idea which government authorities manage the tourism sector, including on a local level, and what functions they perform. Let it be noted that pursuant to the legislation on local government of the Republic of Belarus, these functions are performed by local authorities, that do not have the right to adjust this or any programme, for that matter, because it will be approved by a superior government body in a legal act (the Council of Ministers).

The second sentence is too loose and general to be implemented.

2. Page 10 says "the analysis covered the following components: public health, waste management, water and land resources, air protection and biodiversity conservation". While characterizing the scope of analysis, this phrase is incorrect in legal terms. In accordance with the Waste Act, there is management in the field of waste disposal in Belarus, but not "waste management".

3. The title of the section "Analysis and evaluation of the Programme's links to certain legislative acts and policies of the Republic of Belarus in the field of environmental protection, health and sustainable development" is not completely correct either.

I wish to emphasize that the Law on Normative Legal Acts of the Republic of Belarus subsumes the Constitution, decrees and edicts of the President, laws, codes to legislative acts. This list is not open-ended. Resolutions of the Council of Ministers and other acts do not qualify to be legislative acts. And yet Annex 5 lists other acts of legislation, that are not legislative, whereas acts of the President of the Republic of Belarus on this subject are not provided, hence not analyzed. The question is which criteria drove the selection of acts to be analyzed? Besides, Annex 5 lists some documents that are not part of the legislation whatsoever: Hague Tourism Declaration, Global Tourism Code of Ethics.

The analysis offered by this chapter is eclectic and very perfunctory touching upon just few provisions of the laws, yet the developers claim they analyzed quite a few normative acts specified in Annex 5. To take one example, there has been virtually no analysis of the Forest Code (it is not even listed), the Act on Specially Protected Areas is narrowed down to Article 22, whereas the Programme affects all the specially protected areas.

4. Page 11 mentions a discrepancy between Article 22 of the Act on Specially Protected Areas and Sites and the provisions of the Programme. Unfortunately, the way the law is currently worded does not prohibit “environmental and educational work”, including excursions. So this argument is very weak. One could talk about the improvement of the law per se based on the experience of legislation development in other countries.

5. The developers write on page 12 “does not comply with the requirements of **The Environmental Protection Act** where it concerns the definition of allowable anthropogenic loads on the environment, because it has no provisions on the forecasting of environmental impact of the Programme and taking into account the allowable recreational pressure on the environment”.

They should have provided a specific link to make it clear which provisions the Programme should be reconciled with. I also wish to point out that if the Programme does not contain a provision on allowable recreational pressure on the environment, it does not mean that Article 26, for example, is superseded by the Programme once it is adopted. There is another problem here: the provision itself is declarative where it concerns the existence of regulatory standards of anthropogenic pressure resulting from tourism in specific territories. They need to be developed and appropriately approved.

The same reason makes a remark of the SEA developers about local monitoring just as superficial.

Concerning the critical remark about lack of the provision on the forecasting of environmental impact of the Programme, I personally believe this remark is not well-grounded from the viewpoint of the national legislation. Such forecasting should be made at the stage of the state environmental expert review under the Law on State Environmental Expert Review: Article 6 says that programmes, among other things, are a subject of expert review.

6. On page 13, the developers claim “there is not a single special area within Belarus where tourism would take priority in terms of nature use vis-à-vis other types of activities”.

I wish to caution the SEA developers against freely using the terms that are not used in the legislation, otherwise the point gets lost. In particular, they don’t use the term “tourism land use”. What do the SEA developers mean? And how can it “take priority” (“be privileged” in Russian)? And what “special areas” are meant?

7. On page 15, the developers say “activities under the sections “Regulatory, Legislative and Organizational Support of the Programme” and “Tourism Infrastructure Development” can be regarded as exercising positive effects, if they include specific provisions on collection, monitoring, placement, removal of solid household waste”. It seems the introduction of these proposals is not sufficient for the ecological optimization of the Programme.

8. Page 17 says “In section 3 of the Programme “Development of a highly effective management system of the tourism sector”, this activity should be obligatorily reflected with the following wording: **development and maintenance of the state cadastre of tourism resources of the Republic of Belarus**”.

However this provision is contained in Activity 7.

9. On page 19, it is written “Improvement of the tourism-related legislative and policy framework is limited only to the quality of services. There is no provision to elaborate normative and technical legal acts linked to environmental protection needs resulting from the sector development. In order to improve the legislative and regulatory mechanism of the Programme implementation to help prevent negative effects on

the nature, it is recommended to foresee the development of normative and technical legal acts in the field of environmental protection for the tourism sector”.

Unfortunately, it is not clear from such a tautological statement made by the developers, which normative legal and technical acts require developing. We pay special attention to this demagogic statement, because the Programme has a separate distinct section on the improvement of the regulatory framework, so a reference to specific acts to be developed influences its efficiency, including ecological efficiency. But if the SEA developers, giving recommendations, are not completely sure which acts need to be developed, then a question arises: during which stage of the project implementation will it become clear and will it be an ecologically effective programme after all? The same statement is repeated on page 27.

10. On page 20, the SEA developers mention the “mean critical load on recreational sites, person/ha” as one of the indicators, which, as they claim earlier, have been developed. However such a sentence is not sufficiently grounded, because, firstly, such standards have not been approved as a normative legal act, and, secondly, they (the standards) will be different for national parks, its separate zones, other specially protected areas and other natural sites.

11. On page 30, the SEA developers suggest introducing in the legislation new notions, such as landscape parks and recreational reserves. We know the experience of other countries in establishing similar structures. However the current legislation of Belarus does not hamper tourist activities in a specific territory. Limitations may apply only to SPAs and other sites, to which access is restricted for the purpose of protecting state secrets, which is justified. Thus, it is unclear which problems exactly the innovation will be addressing. Besides, it does not make sense to amend the Act on Specially Protected Areas, since this law regulates relations in the field of environmental protection and its separate elements. With the adoption of “landscape parks” and “recreational reserves”, it is suggested that it will regulate recreational relations. In this form, the suggestion itself is legally inaccurate and is in need of serious legal analysis.

12. Item 48 on page 34 suggests drafting the Tourism Code, a proposal which is as ludicrous as the rationale behind it and indicative of lack of understanding on the part of the developers about the substance of a code as a type of a normative legal act.

Annex 9: Answers to remarks and proposals made by the public regarding the first draft of the SEA report for the 2006-2010 National Tourism Development Programme of the Republic of Belarus

Remark	Result	Comment
<i>By Elena Laevskaya, PhD in Law, Assistant Professor of the Law Department, Belarusian State University, EcoLaw Board Director</i>		
1. “Vest local tourism authorities with power to monitor and supervise, with the right to adjust the Programme”. This sentence is incorrect, because a document approved by the Council of Ministers can be adjusted only by the same or superior body.	Sustained	The final version of the report uses the following wording: “Vest local tourism authorities with power to monitor and supervise, with the right to submit proposals to respective government authorities to adjust the Programme in the course of its implementation”.
2. “Provide for the development of sectoral legislative acts with proper emphasis on the issues of environmental protection and health”. The sentence is too loose and general to be implemented.	Overruled	The aim of the SEA team was to pinpoint the attention of the Programme developers on the compulsory integration of environmental concerns into policy making at different levels, which the sentence stands to cover.
3. “The analysis covered the following components: public health, waste management, water and land resources, air protection and biodiversity conservation”. The phrase is legally incorrect with regard to “waste management”.	Sustained	“Waste management” is a term used in the EU legislation and secured in EU Directive 75/156. It is also widely used in scientific literature. This term covers more ground (it includes collection, transportation, disposal, and supervision of these operations) than the one adopted in the Belarusian legislation which does not involve supervision. In addition, the waste management expert ToR use exact this wording.
4. “The analysis covered the following components: public health, waste management, water and land resources, air (basin) protection and biodiversity conservation”. This phrase is legally incorrect with regard to “air basin protection” (in Russian).	Overruled	This is a pilot research, therefore the use of “air basin protection” is admissible and useful, an expert in the field believes. Especially in the context of protecting the atmosphere against ozone-depleting substances. Thus, this term applies to both protection of the air against regular pollutants and the protection of the Earth’s ozone layer.
5. “The title of the section “Analysis and evaluation of Programme links to legislation and policies of the Republic of Belarus in the field of environmental protection, health and sustainable development” is not completely correct either.	Sustained	The newly worded title of the section is “Analysis and evaluation of the Programme’s links to certain legislative acts and policies of the Republic of Belarus in the field of environmental protection, health and sustainable development”.
6. Annex 5 lists some documents that are not part of the legislation whatsoever: Hague Tourism Declaration, Global Tourism Code of Ethics.	Taken into account in part	It is the opinion of experts that they should have analyzed documents adopted or being developed by the EU in the light of Belarus’ intention to accede to the WTO. The Global Tourism Code of Ethics, for example, contains 9 articles setting out “the rules of the game” for governments, private sector, travel agencies, NGOs, tourism professionals and travelers themselves.
7. The Act on Specially Protected Areas is narrowed down to Article 22, whereas the Programme affects all the specially protected areas. Page 11 mentions a discrepancy between Article 22 of the Act on Specially Protected Areas and Sites and the provisions of the Programme. Unfortunately, the way the law is currently worded does not prohibit “environmental and educational work”, including excursions. So this argument is very weak.	Overruled	The expert made a complete analysis of the SPA Act, however Article 22 is central for tourism development within reserves (there is only one in Belarus – the Berezinsky Biosphere Reserve), that’s why it enjoys special focus in the report. The opponent correctly points out the possibility declared by the SPA Act to “raise ecological awareness and promote environmental protection” (Art. 21), “ecological education” (Art. 22), as well as “tourist excursions”. However they have nothing to do with “camping in the wild “unspoiled” nature (sleeping in tents), tours to mires, making food on fire; taking pictures of rare animals and birds in natural conditions...”. All of the above is allowed by the law in national parks, for which it is in fact one of the areas of activities.
8. They should have provided a specific link to the Environmental Protection Act where it concerns the definition of allowable anthropogenic loads on the environment.	Taken into account	The report now provides references to Art. 21 and 26 of the Environmental Protection Act of the Republic of Belarus.

Remark	Result	Comment
9. <i>The critical remark... about ... lack of the provision on the forecasting of environmental impact of the Programme ...is not well-grounded from the viewpoint of the national legislation.</i>	Overruled	The opponent has dissevered the phrase from the general context. It was only about forecasting the allowable anthropogenic load for the nonce.
10. The developers claim “there is not a single special area within Belarus where tourism would take priority in terms of nature use vis-à-vis other types of activities”. The law does not use the term “tourism land use”. Why should it be “privileged”?	Overruled	Since the SEA report is a research paper containing recommendations and not a normative legal act, it is quite appropriate to use here professional terms which do not have to have their legal counterparts. Privileged tourism land use means that tourism takes priority in terms of nature use over agricultural sector, forestry or industries in a specific area.
11. “The entirety of activities under the sections “Regulatory, Legislative and Organizational Support of the Programme” and “Tourism Infrastructure Development” can be regarded as exercising positive effects, if it includes legal standards of waste management...” <i>The introduction of these proposals is not sufficient for the ecological optimization of the Programme.</i>	Taken into account in part, since a new wording is provided.	The new wording is “the activities under the sections “Regulatory, Legislative and Organizational Support of the Programme” and “Tourism Infrastructure Development” can be regarded as exercising positive effects, if they include specific provisions on collection, monitoring, placement, removal of solid household waste”.
12. In section 3 of the Programme “Development of a highly effective management system of the tourism sector”, this activity should be obligatorily reflected with the following wording: development and maintenance of the state cadastre of tourism resources of the Republic of Belarus”. However this provision is contained in Activity 7.	Sustained	Wording changed to “Activity 7 of the Programme should be reworded as follows: development and maintenance of the state cadastre of tourism resources of the Republic of Belarus”.
13. «Improvement of the tourism-related legislative and policy framework is limited only to the quality of services. There is no provision to elaborate normative and technical legal acts linked to environmental protection needs resulting from the sector development. In order to improve the legislative and regulatory mechanism of the Programme implementation to help prevent negative effects on the nature, it is recommended to foresee the development of normative and technical legal acts in the field of environmental protection for the tourism sector”. <i>It is unclear from such a tautological statement which normative legal and technical acts require developing.</i>	Sustained	However, let it be noted that this proposal of the SEA team was included in the final draft of the Programme. Therefore a proposal to develop normative legal documents was excluded from the final SEA report.
14. <i>The SEA developers mention the “mean critical load on recreational sites, person/ha” as one of the indicators. However such a sentence is not sufficiently grounded, because, firstly, such standards have not been approved as a normative legal act, and, secondly, they (the standards) will be different for national parks, its separate zones, other specially protected areas and other natural sites.</i>	Sustained	A new wording has been suggested: “a ratio of actual recreational load to the mean critical load on recreational sites, persons per hectare”.

Remark	Result	Comment
15. <i>On the introduction of new notions into the legislation, such as “landscape parks” and “recreational reserves”.</i>	Overruled	One of the primary objectives landscape parks and recreational reserves are called upon to perform is to protect recreational resources, which fits well into the SPA Act of Belarus, which, in the words of the opposing party, “regulates relations in the field of environmental protection and its separate elements”. Recreational resources are one of the elements of the environment and, similar to others, require protection in the present-day context of rapid economic developments”.
16. <i>Item 48 of the Table of Recommendations suggests drafting the Tourism Code, a proposal which is as ludicrous as the rationale behind it and indicative of lack of understanding on the part of the developers about the substance of a code as a type of a normative legal act.</i>	Overruled	For reference: The Table of Recommendations is just an annex to the SEA report. It is a synthesized collection of proposals made by the experts, even those that were not included in the report itself. The experts behind the proposal to draft the Tourism Code did not insist upon incorporating this recommendation in the SEA report which was passed to the Ministry of Tourism.
<i>A. Vinchevsky. BirdLife Belarus</i>		
1. <i>Twice in the text they mention a different number of protected bird species – 24-25, not 30-32 as it is the case in Belarus.</i>	Overruled	The report’s chapter “State of the Environment...” mentions only the number of game bird species 30 and that the fauna of Belarus is represented by 309 bird species. These figures are taken from the official book released by the MoE.
2. <i>To replace “wise nature use” with “sustainable” throughout the text.</i>	Overruled	Both definitions are applicable in the text of the report, so it is pointless to delete either one of them.
3. <i>I propose to ban any construction of waterways within the Berezinsky Reserve. First they need to finish the Avgustovsky Canal in the Grodno Region and make a feasibility study of such a project. Any planning of water development in other sites should be held until then.</i>	Sustained	The SEA Report recommends to remove the Berezinsky Reserve from a list of tourism development centres and not to conduct any economic activities there.
4. <i>The SEA Report does not contain references to foreign tourism experiences.</i>	Overruled	SEA team ToRs did not include the analysis of relevant international experience. But all the experts to the best of their ability considered possible alternative ways to develop tourism using the enormous international experience in this field.
5. <i>The indicator proposed in the SEA Report’s section “Analysis of Programme Implementation Mechanisms and Monitoring” to register imported infections is not indicative for monitoring the health impact of the Programme.</i>	Sustained	Along with “registration of imported infections, suggested by a health expert earlier, other more indicative parameters are proposed, i.e. growing complaints of the population about increased noise pollution and other socially-induced inconveniences (access to medical assistance, water supply, access to public transportation, shops and community services)
6. <i>I suggest deleting “Hunting Tourism” as a section from the SEA Report. Its further development in Belarus might lead to a total loss of certain animal species.</i>	Overruled	Everything depends on how the hunting tourism legal basis is observed and further developed. According to our biodiversity expert, organized hunting tourism is the only civilized way to develop hunting tourism in the country, which will allow exploiting relevant natural resources in a sustainable way.
7. <i>It is necessary to take inventory of SPAs and make assessment of their potential international status, and reflect that in the Programme.</i>	Overruled	SPA inventory falls within the purview of the Ministry of Environment, not the Ministry of Sports and Tourism. Therefore the expert team decided not to place too much focus on that.
<i>A. Birukov “Ecological Movement”, E. Shirokov, IAE, BD</i>		
1. <i>How will a tourist cover environmental damage? The report does not look at economic issues.</i>	Overruled	The SEA team did not have an economic expert, therefore the issues of payments, taxes, duties, calculation of environmental damage were not covered.
<i>V. Zuev, Nerush</i>		
1. <i>The Programme (in its activity plan) does not mention the development of regional/district tourism programmes. This is an</i>	Overruled	The SEA team analyzed the Tourism Development Programme. Tourist zones developed earlier which take into account regional proposals mainly related to the Tourism

Remark	Result	Comment
<i>important point given specifics of each administrative unit of Belarus, it would reflect approaches of the government, business and local communities to tourism development.</i>		Development Concept approved somewhat earlier. That's why the Programme does not mention the development of regional tourism programmes which form a separate document.
<i>2. We suggest deleting from the text any references to tourist villages and agrotourism facilities. These notions (in the vein of the Programme) totally obliterate global approaches to agrotourism. Agrotourism is nothing but individual rest.</i>	Overruled	The Programme did not envisage building agrotowns seeking rural revival and addressing economic problems. The point is about developing agrotourism presupposing individual rest and solely tourism goals.
<i>3. Add bicycle and ski tourism to paragraph 4.5. as one of the cleanest types of active recreation. To this end, the state should foster rental services.</i>	Overruled	All of these areas are included in the Programme, but this document is of a national level and it cannot detail each area. It will be expounded at a project level. It is noteworthy that paragraph 4.5 of the Programme lays the emphasis on environmentally friendly recreational activities – sport tours (by water, foot, horses, bicycles).
<i>4. The Programme (particularly, the section on public relations) does not reflect public participation through NGOs in the activities to implement the Programme.</i>	Overruled	The public participation is well covered in the Aarhus Convention (to which Belarus is a party), by which the public have the broadest possibilities possible to participate in all the state programmes. The public itself should develop and propose a participation mechanism.