OECD/ECMT Conference on
Strategic Environmental Assessment for Transport

WARSAW
14-15 October 1999

Recent Developments of SEA in Central and Eastern Europe

Nenad Mikulic
State Directorate for Environment and Nature Protection (Croatia)

Jiri Dusik
Regional Environmental Center for Central and Eastern Europe
I. National Legal Frameworks for EIA/SEA in CEECs

National EIA Systems in CEECs

Most of the CEE countries (except Yugoslavia, Bosnia and Herzegovina, FYR of Macedonia and Albania) have adopted the first generation of their EIA laws or regulations. These legal provisions:

- partially meet the requirements of the amended Directive 97/11/EEC (especially new screening and scoping provisions, public participation),
- generally do not comply with the requirements of the Aarhus Convention (UN/ECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters) - especially in the scoping requirements and access to formal review of citizen appeals against the outcomes of the EIA process.

Main positive feature of EIA laws and regulations in CEE is the fact that they established ground base for development of EIA - they initiated number of national EIA cases and thus enabled emergence of national expert capacity for EIA practice. Their weakness lays in the fact that they are largely modeled after the first EU EIA Directive (that did not request scoping and early public participation) and they thus do not enable early and effective assessment of development interventions. In this respect, one can highlight the following main problems in EIA practices within transport planning in CEECs:

- lack of strategic environmental assessment of national transport policies, regional transport programs,
- lack of coordination between EIA and land-use planning - especially insufficient environmental assessment of regional territorial (land-use) plans that often pre-determine location of all transport projects,
- lack of adequate public participation in environmental assessment - late and inadequate public participation in EIA (poor notification, poor practices of public hearings and treatment of public comments) rather stimulates development of public conflicts then it contributes to their rational...
resolution. EIA on transport projects may thus become subject of political debate instead of being subject to rational expert evaluation,

- lack of systematic and generally applicable methodologies for assessment of cumulative and synergistic environmental impacts of transport development schemes,

- lack of systematic and generally applicable methodologies for assessment of socio-economic impacts of transport projects (even though arguments about positive impacts of transport project on “social and economic cohesion” are often questioned within EIA procedures, practical methodologies for assessment of socio-economic impacts of transport schemes are not used in general EIA practice).

The above mentioned deficiencies can be partially overcome by introduction of proper SEA systems in CEE. In that respect one specific feature of the CEE region can be of interest - former social countries with their centrally planned economies in most cases established sophisticated land-use planning systems which required environmental assessment of land-use plans. These planning frameworks have largely not been touched by the transition to market economies, in some cases their environmental requirements have even been enhanced. In addition to this, some newly established EIA systems in CEE required assessment of programs, policies, as well as assessment of land-use plans.

**SEA Application within National EIA Systems in CEECs**

In 1998, the Sofia EIA Initiative reviewed in its report “SEA in Transitional Countries: Emerging Practices” state of SEA applications within EIA and land-use planning systems in CEECs. Of the countries surveyed only the laws of the Czech Republic, Slovakia, and Bulgaria required environmental assessment of programs, plans and policies. The laws of several other countries, such as Lithuania, Slovenia, and Poland have more narrow strategic environmental assessment provisions relating specifically to land use planning, such as physical or territorial plans.

Legislatively, Slovakia has a comprehensive approach to strategic environmental assessment. The Slovak Act on Environmental Impact Assessment (EIA Act, No. 127/1994) contains the requirement to assess development policies and proposals on legislation in relation to their assumed impact on the environment. Part 4 of the EIA Act (Article 35) presents a brief procedure for environmental assessment which is obligatory for proposals of basic development policies, especially in the areas of energy supply, mining, industry, transport, agriculture, forestry and water management, waste management, and tourism. In addition, the Act covers territorial planning documentation for regional and residential settlement in selected areas and any legislative proposal that may have an adverse impact on the environment. Slovakia is preparing draft regulations specifically for implementation of the SEA requirements.
<table>
<thead>
<tr>
<th>Countries</th>
<th>EIA Law</th>
<th>EIA in Other Law</th>
<th>EIA of Programs, Plans and Policies</th>
<th>EIA of Land Use Plans only</th>
<th>EIA Regulation, Decree or Ordinance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slovakia</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Not Yet</td>
<td></td>
</tr>
<tr>
<td>Croatia</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Bulgaria</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Latvia</td>
<td>No</td>
<td>(Ecological Expertise Law)</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Lithuania</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Macedonia</td>
<td>No</td>
<td>Some</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Slovenia</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Montenegro</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Czech Republic</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Estonia</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Hungary</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Poland</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>


The Czech Act on Environmental Impact Assessment (No. 244/1922) specifically refers to "development concepts and programs" as being subject to EIA regulation. The basic EIA procedures apply equally to concepts and programs as to projects. Article 14 deals specifically with assessment of concepts. The Article defines "concept" as one submitted and approved at the level of the central authorities of State Administration in the field of energy, transport, agriculture, waste treatment, mining and processing of minerals, recreation and tourism. Territorial planning documentation and the General Water Management Plan are also concepts under the law. The submitted of a concept must ensure that environmental impact assessment is a part of the concept. The concept proposal must be sent for public comments and to the competent authority for an opinion statement.

The Bulgarian EIA system is based on Chapter 4 of the Environmental Protection Act from 1991. The stipulations of the Act are elaborated and the procedures on EIA are defined by Regulation No. 1 of 1995. The application of EIA is related to a final decision-making process, such as approval of a plan or program, or a specific project. Under the law, EIA must be carried out for national development programs, territorial development and urban development plans, as well as specific projects.
SEA within National Land-use Planning Systems in CEECs

In contrary to limited legislative base for SEA application in national policy-making, the land use planning process, as opposed to other sectoral policy-making or program development, seems to carry natural elements of strategic environmental assessment in Central and Eastern Europe. The legal requirements for land use planning in many countries in Central and Eastern Europe include some elements of environmental impact assessment, yet only a few countries require a process that meets most of the elements of environmental impact assessment.

For example, the Lithuania Environmental Impact Assessment Law of 1996 requires initial environmental impact assessment of all territorial planning. The EIA Law, together with the Territorial Planning Law of 1995 regulates the EIA process for development. The law defines the development process as beginning with planning and continuing to a full EIA on technical projects.

In Slovenia, environmental impact assessment is regulated under the Environmental Protection Act (No. 801-01/90-2/107, 1993). Under this law, EIA is required for physical plans under Articles 53 and 54. Specific regulations for EIA of the physical plans have not yet been adopted. Under Article 51, planning, programming and designing of activities shall be based on an environmental vulnerability study. The environmental vulnerability study shall also serve as the basis for physical planning documents and sector plans for the management of natural resources (Article 53.1). Under Article 54.2, a comprehensive environmental impact assessment study must be prepared by the body responsible for the preparation of the physical planning document or sector plan.

In Poland, the 1994 Law on Land Use Development requires preparation of an EIA for local land use plans. This obligation is set out in detail in the Ordinance defining requirements with which the EIA for local land use plan should comply. The EIAs for local land use plans regulated by this Ordinance are the first legally binding category of strategic environmental assessment in Poland. In Croatia, although the law does not explicitly require strategic environmental assessment, some elements of environmental assessment are implemented in the preparation of land use, general master, and physical plans. Only the land use planning process, as opposed to other sectoral policy-making or program development seems to carry natural elements of environmental assessment in Central and Eastern Europe. For example, in Croatia, although the law does not explicitly require strategic environmental assessment, some elements of environmental assessment are implemented in the preparation of land use, general master, and physical plans. Only the land use planning process, as opposed to other sectoral policy-making or program development seems to carry natural elements of environmental assessment in Central and Eastern Europe. For example, in Croatia, although the law does not explicitly require strategic environmental assessment, some elements of environmental assessment are implemented in the preparation of land use, general master, and physical plans.

II. Pan-European Promotion of SEA: An Overview

The limited development of sound SEA frameworks in CEECs is often attributed to slow development of EU SEA Directive which would constitute the main reference for development of national systems in CEECs. This argument is only partially valid since governmental environmental debate in the past two years extensively stimulated development of national SEA systems – both within pan-European processes (Environment for Europe, Environment and Health, etc.) as well as within the EU accession process.
Fourth Ministerial Conference Environment for Europe (Aarhus 1998)

The need for coordinated pan-European effort for development of SEA systems was articulated at the Aarhus Conference Ministerial Conference Environment for Europe, where Ministers of Environment concluded in the Article 20 of their Declaration that they: “… recognize that strategic environmental assessment facilitates the systematic analyses of the environmental impacts of proposed policies, plans and programmes and invite countries and international finance institutions to introduce and/or carry out strategic environmental assessments with the appropriate participation of NGOs and citizens. We emphasize that - with a view to the integration of environmental considerations in the decision-making process in other policies - assessments of international sectoral policies, plans and programmes in the UN/ECE region in areas such as transport, energy and agriculture should be undertaken as a matter of priority.”

The above declaration opened an intensive debate on the promotion of SEA in CEECs. Implementation of pilot SEA projects became one of priorities of the Environmental Action Programme for CEE – pilot projects were coordinated by the REC, OECD and Republic of Croatia within the framework of the Sofia EIA Initiative. Sofia EIA Initiative organised in March 1999 and May 1999 regional workshops that defined basic principles of SEA applications in CEECs.

Third Ministerial Conference on Environment and Health (London, 1999)

Another extensive discussion on SEA took place at the London Ministerial Conference on Environment and Health. Czech Minister of Environment, being supported by Slovak and Polish delegation, asked the Conference to consider initiation of the pan-European protocol on SEA – this protocol could be developed under the Aarhus Convention (UN/ECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters) or Espoo Convention (UN/ECE Convention of EIA in Transboundary Context). Even though the London Conference did not take any decision on this intervention, the Ministers in their Declaration from the Conference, Article 7, maintained that they: “… will carry out environmental impact assessments fully covering impacts on human health and safety. We invite countries to introduce and/or carry out strategic assessments of the environment and health impacts of proposed policies, plans, programmes and general rules. We invite international financial institutions also to apply these procedures. There will be appropriate participation of non-governmental organizations (NGOs) and members of the public in the procedures set out in this paragraph.”

London Conference further promoted SEA agenda in its Charter on Transport, Environment and Health which proposed integration of SEA into transport policies and land-use plans and supported coordination among transport, environment and health sectors in carrying SEA.

Prospective Development of pan-European SEA Instrument

The UN/ECE Committee on Environment Policy in its session in September 1999 discussed at length potential initiation of the pan-European SEA instrument. Within these discussions, two options emerged:

- SEA protocol under the UN/ECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters – it was suggested that the protocol elaborates requirements of the Article 7 of the Convention (Public Participation in Preparation of Programmes, Policies and Plans) to include SEA as a viable means of securing public input in preparation of policies, programs and plans relating to the environment,

- SEA protocol under the UN/ECE Convention of EIA in Transboundary Context.
Even through the CEP did not take the final decision on the above issue, it is very likely that SEA application may be supported under both conventions.

III.  SEA promotion within EU Accession Process

Very strong promotion of SEA application in CEECs takes place within the EU Accession Process – especially within the pre-accession activities related to EU Structural Funds.

All PHARE countries began in 1998-99 preparations of their first Regional Development Plans (RDPs). RDPs are drafted in PHARE countries with two primary goals: i) to provide comprehensive framework for the use EU pre-accession assistance (PHARE II, SAPARD and partially also ISPA) and ii) to prepare accession countries for future use of EU Structural Funds (accession countries will, once becoming EU-member states, be eligible for financial assistance under Objective 1 of the EU Structural Funds).

Elaboration of RDPs is within EU governed by the framework regulation no. 1260/1999 laying out the general provisions on the use of Structural Funds in 2000-2006. The Article 41 of the regulation requests applicant countries to provide, along with RDPs, also their *Ex Ante* evaluation which analyzes their likely environmental impacts. The general requirements for this assessment in the Article 41 of the regulation are further developed in:

- Vademecum "Plans and Programming Documents for Structural Funds 2000-2006" (DG XVI, 1999) which request countries to fully integrate outcomes of the environment assessment into RDPs, and
- Handbook on Environmental Assessment of Regional Development Plans and EU Structural Funds, (DG XI, 1998) which provides the general procedural and methodological guidance for SEA of RDPs in EU member states.

Although elaboration of RDPs in CEE is not totally governed by the above regulations and other guiding documents in EU, it is highly desirable that all PHARE countries simulate to a maximum possible degree standard operations of the Structural Funds in EU. This general principle is equally valid for requirements related to environmental assessment of RDPs - and indeed, the proposed EU regulation for operations of PHARE II in its section 4.2.1 provides that: RDPs will also contain an assessment of the environmental situation and will over time introduce the environmental impact assessment of the Structural Funds.

All PHARE countries began elaboration of their RDPs by March 1999 (some PHARE countries initiated drafting of RDPs already in early 1998). In May 1999 the Sofia EIA Initiative organised a large regional CEE workshop to review role of environmental assessment within the preparation of RDPs in CEE. The workshop brought together 72 participants from Ministries of Environment, ministries responsible for regional development, environmental NGOs and environmental consultants in 10 CEE countries to discuss:

- state of preparation of RDPs in CEE countries and
- steps taken to apply environmental assessment of RDPs.

The workshop came to the following main conclusion:

- "PHARE SPP Program provides a unique opportunity for development of national systems of strategic environmental assessment in CEE. It is however unclear whether the European Commission will require proper environmental assessment within *Ex Ante* evaluation of National Development Plans and related programming documents (Rural Development Plans and Investment Strategies for ISPA) that are drafted under PHARE SPP Program.”
"The European Commission should clearly state its position on environmental assessment of National Development Plans (and related programming documents). The Commission should in particular state whether or not environmental assessment is a mandatory requirement and what quality standards it should meet. The need for such a statement is evident from the fact that National Development Plans of most CEE countries (except Czech Republic, Estonia and Slovenia) will not be submitted to environmental assessment, unless such requirement is clearly stated."

The full version of the findings of the workshop is attached in Appendix 1 to this text. The workshop initiated discussion on the use of SEA in preparation of RDPs. By the end of September 1999, the Czech Republic (Ministry of Regional Development and Ministry of Environment) has initiated four extensive SEAs related to RDP. Ministries of Environment (EIA Departments) in Slovenia, Slovakia, Hungary and Romania have indicated strong interest in further learning about SEA of RDPs and confirmed that they are strongly interested in applying SEA for RDPs in their respective countries.

IV. Principles for Effective Application of SEA in CEECs

The Sofia EIA Initiative reviews since 1998 experience gained in the pilot SEA application in CEECs. The following SEA applications were (or are being) reviewed:

- SEA of Strategy for Development of Transport Frameworks to 2010 (Czech Republic, completed),
- SEA of Development Strategy of Plzen Region (Czech Republic, completed),
- SEA of Development Strategy of Budejovice Region (Czech Republic, completed).
- SEA of Regional Development Plan of Czech Republic (Czech Republic, undergoing),
- SEA of National Strategy of Regional Development of Czech Republic (Czech Republic, undergoing),
- SEA of Regional Operational Programme for NUTS II South-East (Czech Republic, undergoing),
- SEA of Slovak Energy Policy to 2005 (Slovakia, completed in 1998, now updated)
- SEA of Major Transport Routes (Slovenia, completed in 1995)
- Environmental Assessment of Jurmala Town Development Plan (Lithuania, completed in 1998)
- Environmental Assessment of Naissaar Island Development Plan (Estonia, completed in 1997)

Through the review of above SEA cases, direct involvement in pilot SEAs in Czech Republic and regional workshops, the Initiative identified following principles of successful SEA in CEE region:

1. **SEA should be carried out as soon as possible in the elaboration of the strategy.** It should be carried out **parallel to the planning of the strategy.** SEA should suggest environmentally friendly modifications of the development strategy. This information can be most effectively used during elaboration of the strategy - SEA should therefore, when possible, be undertaken parallel to the planning of the strategy.
2. **SEA should be carried out by a multi-disciplinary and multi-stakeholder team of experts.** This team should work in continuous interaction with the planning team – its goal is to provide independent environmental review of all documents leading to elaboration of the strategy. In order to do, SEA team should be provided with sufficient mandate to access information on materials provided during elaboration of the strategy and must have a mandate to propose changes in their formulation.

3. **SEA should be based on thorough public participation** held at least in the early stage of the assessment (scoping) and in the review of the SEA Report.

4. **SEA should address also health and socio-economic impacts** cased by predicted environmental changes. It should address both national and transboundary/global issues. Impacts should be evaluated on the basis of:

   A. their conformity with formally adopted governmental goals in environmental and health protection (e.g. national strategies in field of environment and health, global conventions, transboundary issues and EU standards),

   B. degree of public concern associated with the forecast impact.

5. Pilot SEAs in CEECs should be - given the lack of resources, time and information for elaboration of complex prognostic models - **based especially on the collective expert judgments** by qualified multi-disciplinary and multi-stakeholder team.

6. Findings of assessment should be documented in SEA Report which should made publicly accessible. SEA Report can be then effectively used for monitoring of actual environmental impacts of the strategy and its further amendments.
A. **Role of SEA within Development Planning in CEE**

1. Strategic environmental assessment (SEA) is an important tool for practical implementation of sustainable development. Governments and institutions responsible for strategic policy-making should encourage application of SEA on both formal and informal basis.

2. PHARE SPP Program provides a unique opportunity for development of national SEA systems in Central and Eastern Europe (CEE). It is however unclear whether the European Commission will require proper environmental assessment within *Ex Ante* evaluation of National Development Plans and related programming documents (Rural Development Plans and Investment Strategies for ISPA) that are drafted under PHARE SPP Program.

3. The European Commission should clearly state its position on environmental assessment of National Development Plans (and related programming documents). The Commission should in particular state whether or not environmental assessment is a mandatory requirement and what quality standards it should meet. The need for such a statement is evident from the fact that National Development Plans of most CEE countries (except Czech Republic, Estonia and Slovenia) will not be submitted to environmental assessment, unless such requirement is clearly stated.

B. **Principles for effective SEA of Development Plans in CEE**

4. Relatively-easy and transparent procedures for SEA of National Development Plans and of related programming documents should be introduced, tested and broadly disseminated in CEE countries prior to the elaboration of more sophisticated SEA methodologies.

5. Principles of effective SEA of Development Plans in CEE drafted by the workshop (Annex 1 and Annex 2) should be widely disseminated and their application encouraged.

C. **Capacity building for SEA in Central and Eastern Europe**

4. The quality of SEA is in each given country pre-determined by the presence of methodological know-how, availability of adequate information and capacities of public administration and NGOs. There is a pressing need for capacity-building for SEA among policy-makers and practitioners in CEE.
5. In CEE accession counties, capacity-building for SEA/EIA that meets the EU standards may be facilitated by improved exchange of information between the CEE countries and the European Commission and EU member states. Important aspect of this capacity building is facilitation of experience sharing between CEE countries themselves.

6. In CEE non-accession countries (South-East Europe), capacity-building needs are particularly urgent for both EIA and SEA. Multilateral and bilateral donors are therefore invited to undertake extensive capacity-building for EIA/SEA in South-East Europe as a matter of priority. Direct exchange of experience among South-East countries and other CEE countries should be encouraged.

7. European Commission and multilateral and bilateral donors could play a major role in capacity-building for proper SEA in both EU accession and non-accession CEE countries.
Annex 2

METHODOLOGICAL APPROACH TO SEA OF DEVELOPMENT PLANS IN CEE
Conclusions of 4th Regional EIA Workshop of the Sofia EIA Initiative
Bratislava, May 19-21, 1999

National Development Plans and related programming documents in CEE (Rural Development Plans and Investment Strategies for ISPA) are drafted under considerable financial and time constraints. In order to effectively carry out SEA during preparation of these Development Plans, a relatively-easy and transparent SEA approaches should be used. Within this simplified SEA procedures, the following principles may apply (while it is understood that quality of SEA is largely pre-determined by the capacities of stakeholders taking part in it):

General principles for undertaking of SEA of Development Plans (DPs) in CEE

1. SEA should be carried out by a multi-disciplinary and multi-stakeholder team of experts. SEA team should be provided with sufficient mandate to access information on materials provided during elaboration of DPs and propose changes in their formulation.

2. SEA team should be formed as soon as possible in the elaboration of DP and should work parallel to the planning teams elaborating the DP. The SEA team should work in continuous interaction with the planning team – its goal is to provide independent environmental review of all documents leading to elaboration of DP. In order to do, SEA team needs to be provided with proper mandate, resources and access to materials developed by the planning team.

3. SEA should be based on through public participation (see Annex 2 to this document) held in accordance with the partnership principles requested for operations of EU Structural Funds.

Focus of SEA

4. SEA should focus mainly on impacts that have been identified as priority concerns by the affected public administration and concerned public (NGOs, academicians, citizens).

5. SEA should address also health and socio-economic impacts cased by predicted environmental changes.

6. SEA should address both national and trans-boundary/global issues.
Prediction of impact

6. SEA should use - given the lack of resources, time and information for elaboration of complex prognostic models - especially collective expert judgments by qualified multi-disciplinary and multi-stakeholder team (see above Principle 1).

Evaluation of impacts

7. Impacts should be evaluated on the basis of:
   
   A. their conformity with formally adopted governmental goals in environmental and health protection (e.g. national strategies in field of environment and health, global conventions, transboundary issues and EU standards),

   B. degree of public concern associated with the forecast impact.

Outcome of SEA

8. SEA should suggest environmentally friendly modifications of DPs. This information can be most effectively used during elaboration of DPs - SEA should therefore, when possible, be undertaken parallel to the elaboration of DPs (see Principle 3 above).

9. Findings of assessment should be documented in SEA Report which should made publicly accessible. SEA Report can be then effectively used for monitoring of actual environmental impacts of the DP and for elaboration of further programming documents based on it.
Annex 3

EFFECTIVE PUBLIC PARTICIPATION IN SEA OF DEVELOPMENT PLANS IN CEE

Conclusions of 4th Regional EIA Workshop of the Sofia EIA Initiative
Bratislava, May 19-21, 1999

1. SEA of DPs should be carried out on the basis of partnership which is generally requested for operations of the EU Structural Funds.

2. Position of public in “partnerships” needs to be defined on the basis of legal and administrative arrangements in each individual country. In this respect however, one general rule should apply: in partnership there is no distinction between “partners” - all stakeholders involved in the partnership should have the same rights and duties. When respecting this principle, NGOs and public should:
   - be notified at the same time as other parties involved,
   - have the same opportunities for submitting comments,
   - have the same rights to challenge decisions within SEA.

Notification

Effective and active notification is a starting point for effective participation. In order to involve public, the following rules should apply:

3. **Timing of notification.** Public should be notified at the same time as municipalities and other bodies involved in “partnership”. At least 30 days notice should be given before public hearings.

4. **Means of notification.** Notification should - if it is to be effective - use as many means of communication as possible - esp. those which reach out to most people or which are easily accessible for many. The following communication means may be used:
   - of official gazettes for general notification or use of electronic means (networks, WWW Sites),
   - mass media, official notice board of municipalities, etc.
   - individual notification should be possible within certain limits.

3. **Content of notification.** Notification should provide at least the following information:
   - what is going to be assess and why,
   - where to find Development Plan which is being assessed,
   - how the SEA process will be carried (what are the stages of the process, what information will be available and when, when are there opportunities for public comments),
   - who is responsible for gathering comments.
Opportunities commenting and consideration of public comments

4. **Gathering of comments.** Comments should be gathered either through regional workshops or public hearings or through individual submissions.

5. **Consideration of comments.** Each comment has to be recorded, the substance has to be responded. The response document should become an integral part of the SEA Report and should be made public.

6. **Information after decision is made.** Decision should be reasoned. Prompt information should be provided about the outcome of the SEA process.
Annex 4

PRIORITY MEANS OF SEA CAPACITY-BUILDING IN CEE

Conclusions of 4th Regional EIA Workshop of the Sofia EIA Initiative
Bratislava, May 19-21, 1999

Priority means:

A. local SEA/EIA training sessions that respect national circumstances and are targeted at all stakeholders (18 preferences),

B. transfer of already existing SEA/EIA guidelines to CEE (14 preferences),

C. regional networking of SEA/EIA practitioners in CEE (13 preferences),

D. pilot SEA/EIA projects in CEE (12 preferences),

E. national awareness-rising campaigns on need for proper SEA/EIA (11 preferences),

----------

F. regional e-mail/Internet conferences (7 preferences),

G. set-up of national EIA centers (4 preferences),

H. long-term presence of foreign advisors (2 preferences).