
Questionnaire for the report of FINLAND on the implementation of the Convention on Environmental Impact Assessment in a Transboundary Context in the period 2013–2015

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Part one

Current legal and administrative framework for the implementation of the Convention

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

Please do not reproduce the text of the legislation itself but summarize and explicitly refer to the relevant provisions transposing the Convention text (e.g., EIA Law of the Republic of ..., art. 5, para. 3, of Government Resolution No. ..., para. ... item...)

Article 1

Definitions

I.1. Is the definition of impact for the purpose of the Convention the same in your legislation as in article 1?

- (a) Yes
- (b) Yes, with some differences (please provide details): Also biological diversity, urban structure, townscape and utilization of natural resources are included.
- (c) No (please provide the definition):
- (d) There are no definitions of impact in the legislation

Your comments:

I.2. Is the definition of transboundary impact for the purpose of the Convention the same in your legislation as in article 1? Please specify each below.

- (a) Yes
- (b) Yes, with some differences (please provide details):
- (c) No (please provide the definition):
- (d) There are no definitions of transboundary impact in the legislation

Your comments:

I.3. Please specify how major change is defined in your national legislation:

The mandatory list of projects include also alterations to projects equivalent in size to projects included in the list. A change to an activity is always considered "major", when the threshold of the mandatory list is exceeded. These changes are included in the mandatory list of projects.

Additionally screening through case-by-case examination of those projects not included in the mandatory list of projects include material alteration to a completed project that will likely have significant adverse environmental impact, also taking into account the cumulative impacts of different projects. Screening decisions are in principle made by the regional environmental authorities according to the screening criteria. Therefore if any other change is considered major with having significant adverse impact, the competent authority makes a decision to apply the assessment procedure to this individual activity.

I.4. How do you identify the public concerned? Please specify (more than one option may apply):

(a) Based on the geographical location of the proposed project

(b) By making the information available to all members of the public and letting them identify themselves as the public concerned

(c) By other means (please specify):

Your comments: The area where the like significant impacts occur are notified.

Article 2 General provisions

I.5. Provide legislative, regulatory, administrative and other measures taken in your country to implement the provisions of the Convention (art. 2, para. 2):

(a) Law on EIA: - Act on Environmental Impact Assessment Procedure (1994, amended 1999 and 2006)

(b) EIA provisions are transposed into another law(s) (please specify):

The permitting legislation include provisions on taking the EIA into account in decision making (e.g. Environmental Protection Act, Water Act, Land Use and Building Act, Nuclear Energy Act, Act on the Safety of the Handling of Dangerous Chemicals and Explosives, Highway Act, Railway Act, Aviation Act, Act on the Redemption of Immoveable Property and Special rights, Mining Act)

(c) Regulation (please indicate number/year/name): Government Decree on Environmental Impact Assessment Procedure (2006, amended 2011) (original decree enacted in 1994)

(d) Administrative (please indicate number/year/name):

(e) Other (please specify):

Your comments:

I.6. Please describe any differences between the list of activities in your national legislation and appendix I to the Convention, if any:

(a) There is no difference, all activities are transposed in the national legislation as is

(b) It differs slightly (please specify): The Finnish list of EIA projects includes all the projects mentioned in appendix I to the Convention. Additionally it includes the amended list of projects of the second amendment.

Your comments:

I.7. Identify the competent authority/authorities responsible for carrying out the EIA procedure in your country (please specify):

(a) There are different authorities at national, regional, local levels

(b) They are different for domestic and transboundary procedures

(c) Please name the responsible authority/authorities:

Centres for Economic Development, Transport and the Environment are the competent authorities for the domestic EIA procedure. In nuclear energy projects, the competent authority is the Ministry of Employment and the Economy.

The Ministry of the Environment is in charge of the transboundary part of the EIA procedure (Point of Contact).

(d) There is no single authority responsible for the entire EIA procedure:

Your comments:

I.8. Is there an authority in your country that collects information on all the transboundary EIA cases? If so, please name it:

(a) No

(b) Yes (please specify): The Ministry of the Environment

Your comments:

I.9. How does your country, as Party of origin and as affected Party, ensure that the opportunity given to the public of the affected Party is equivalent to the one given to the Party of origin's public, as required in article 2, paragraph 6 (please explain):

The process of public participation can be discussed with the Point of Contact of the affected Party before the notification is sent if the procedure is not already a common practice due to several transboundary procedures. The principle is to provide the affected Party with the same length of public hearing period as that of the Party of origin. Relevant material on the project and its transboundary impact is provided to the affected Party for public comment in the language of the affected Party.

Article 3 Notification

I.10. As Party of origin, when do you notify the affected Party (art. 3, para. 1)? Please specify:

- (a) During scoping
- (b) When the EIA report has been prepared and the domestic procedure started
- (c) After finishing the domestic procedure
- (d) At other times (please specify):

Your comments:

I.11. Please define the format of notification:

- (a) It is the format as decided by the first meeting of the Parties in its decision I/4 (ECE/MP.EIA/2, annex IV, appendix)
- (b) The country has its own format (please attach a copy)
- (c) No official format used

Your comments: It is more common to use a combination of a notification letter with scoping document (EIA Programme), which together contain the content covered in article 3 of the Convention.

I.12. As a Party of origin, what information do you include in the notification (art. 3, para. 2)? Please specify (more than one options may apply):

- (a) The information required by article 3, paragraph 2
- (b) The information required by article 3, paragraph 5
- (c) Additional information (please specify):

Your comments:

I.13. As a Party of origin, does your national legislation contain any provision on receiving a response to the notification from the affected Party in a reasonable time frame (art. 3, para. 3, “within the time specified in the notification”)? Please specify:

- (a) National legislation does not cover the time frame
- (b) Yes, it is indicated in the national legislation (please indicate the time frame):
- (c) It is determined and agreed with each affected Party case by case in the beginning of the transboundary consultations (please indicate the average length in weeks):

Your comments: The time frames have to be set according to the EIA Act, where specific time frame for the national EIA has been set (30-60 days for public and authorities to comment and after that 1 month for the authority to give a statement on the scoping document and 2 months for EIA documentation). Usually the answer is requested one to two weeks after the end of the public hearing period to give the affected Party time to collect the submitted comments and prepare a summary of these comments.

Please specify the consequence if a notified affected Party does not comply with the time frame, and the possibility of extending a deadline:

Responses have usually been received on time. If no answer is given within deadline, a request is always sent to find out if not giving an answer really means not participating in the transboundary procedure .

If an affected Party asks for an extension of a deadline, it is usually granted within the time frame of the national procedure. The competent authority's statements are stipulated by legislation so there is a limit for extending the deadline.

I.14. How do you inform the public and authorities of the affected Party (art. 3, para 8)? Please specify:

(a) By informing the point of contact to the Convention listed on the Convention website¹

(b) Other (please specify):

Your comments:

I.15. On what basis is the decision made to participate (or not) in the transboundary EIA procedure as affected Party (art. 3, para. 3)? Please specify:

(a) Notified ministry/authority of the affected Party responsible for EIA decides on its own based on the documentation provided by Party of origin

(b) Based on the opinions of the competent authorities of the affected Party

(c) Based on the opinions of the competent authorities and that of public of the affected Party

(d) Other (please specify):

According to the EIA Act the Ministry of the Environment is the competent authority in Convention's transboundary procedure. In principle the Ministry decides on participation based on views expressed in the opinions and statements of the public and the authorities.

Your comments:

I.16. If the affected Party has indicated that it intends to participate in the EIA procedure, how are the details for such participation agreed, including the time frame for consultations and the deadline for commenting (art. 5)? Please specify:

(a) Following the rules and procedures of the Party of origin

(b) Following the rules and procedures of the affected Party

(c) Other (please specify):

Your comments:

Article 4

Preparation of the environmental impact assessment documentation

I.17. How do you ensure sufficient quality of the EIA documentation as Party of origin? Please specify:

(a) The competent authority checks the information provided and ensures it includes all information required under appendix II as a minimum before making it available for comments

(b) By using quality checklists

(c) There are no specific procedures or mechanisms

(d) Other (please specify):

Your comments:

¹ List available from http://www.unece.org/env/eia/points_of_contact.htm.

I.18. How do you determine the relevant information to be included in the EIA documentation in accordance with article 4, paragraph 1? Please specify (more than one option may apply):

- (a) By using appendix II
- (b) By using the comments received from the authorities concerned during the scoping phase, if applicable
- (c) By using the comments from members of the public during the scoping phase, if applicable
- (d) As determined by the proponent based on its own expertise ?
- (e) By using other means (please specify):

Your comments: The content needs to comply with competent authority statement on EIA scoping document. That statements takes into account the comments received from the authorities and the public.

I.19. How do you determine “reasonable alternatives” in accordance with appendix II, paragraph (b)?

- (a) On a case-by-case basis
- (b) As defined in the national legislation (please specify):

EIA Decree stipulates the inclusion of alternatives in the following way: alternatives to carrying out the project, one of which is the no-action alternative.

- (c) Other (please specify):

Your comments:

Article 5

Consultations on the basis of the environmental impact assessment documentation

(a) Public participation

I.20. How can the public concerned express its opinion on the EIA documentation of the proposed project (art. 5)? Please specify (more than one option may apply):

As Party of origin

- (a) By sending comments to the competent authority/focal point
- (b) By taking part in a public hearing
- (c) Other (please specify):

As affected Party

- (d) By sending comments to the competent authority/focal point
- (e) By taking part in a public hearing
- (f) Other (please specify):

Your comments:

I.21. Please indicate whether your national EIA legislation requires the organization of a public hearing on the territory of the affected Party in cases where your country is the country of origin:

- (a) Yes
- (b) No

Your comments: Such hearings (or rather information meetings) have been arranged by the request of affected Party.

I.22. Please indicate whether your national EIA legislation requires the organization of public hearings in cases where your country is the affected Party:

- (a) Yes
- (b) No

Your comments:

(b) Consultations

I.23. Does your national EIA legislation have any provision on the organization of transboundary consultations (expert, joint bodies, etc.) between the authorities of the concerned Parties? Please specify:

- (a) Yes, it is obligatory
- (b) No, it does not have any provision on that
- (c) It is optional (please specify):

Your comments:

**Article 6
Final decision**

I.24. Please indicate all points below that are covered in a final decision related to the implementation of the planned activity (art. 6, para. 1):

- (a) Conclusions of the EIA documentation
- (b) Comments received in accordance with article 3, paragraph 8, and article 4, paragraph 2
- (c) Outcome of the consultations as referred to in article 5
- (d) Outcomes of the transboundary consultations
- (e) Comments received from the affected Party
- (f) Mitigation measures
- (g) Other (please specify):

I.25. Are the comments of the authorities and the public of the affected Party and the outcome of the consultations taken into consideration in the same way as the comments from the authorities and the public in your country (art. 6, para. 1):

- (a) Yes
- (b) No

Your comments:

I.26. Is there any regulation in the national legislation of your country that ensures the implementation of the provisions of article 6, paragraph 3?:

- (a) No
- (b) Yes (please specify):

Your comments: General provisions are stipulated in the Administrative Judicial Procedure Act.

I.27. Do all activities listed in appendix I (items 1-22) require a final decision to authorize or undertake such an activity?:

- (a) Yes
- (b) No (please specify those that do not):

Your comments:

I.28. For each type of activity listed in appendix I that does require a final decision, please indicate the legal requirements in your country that identify what is regarded as the "final decision" to authorize or undertake such an activity (art. 6 in conjunction with art. 2, para. 3), and the term used in the national legislation to indicate the final decision in the original language:

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

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

-environmental permit* in accordance with the Environmental Protection Act
(*=*ympäristölupa*)

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

-environmental permit* in accordance with the Environmental Protection Act

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

-permitting procedure in accordance with Nuclear Energy Act (*ydinenergialain mukainen lupamenettely*)

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

-permitting procedure in accordance with the Nuclear Energy Act (*ydinenergialain mukainen lupamenettely*)

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

-environmental permit* in accordance with the Environmental Protection Act

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

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- environmental permit* in accordance with the Environmental Protection Act
6. Integrated chemical installations.
 - permitting procedure in accordance with the Act on the Safety of the Handling of Dangerous Chemicals and Explosives (*vaarallisten kemikaalien ja räjähteiden käsittelyn turvallisuudesta annetun lain mukainen lupamenettely*)
 7. Construction of motorways, express roads and lines for long-distance railway traffic and of airports with a basic runway length of 2,100 metres or more.
 - permitting procedure in accordance with the Highway Act (*maantielain mukainen lupamenettely*)
 - permitting procedure in accordance with the Railway Act (*ratalain mukainen lupamenettely*)
 - permitting procedure in accordance with the Aviation Act (*ilmailulain mukainen lupamenettely*)
 8. Large-diameter oil and gas pipelines.
 - permitting procedure in accordance with the Act on the Redemption of Immoveable Property and Special rights (*lupamenettely, josta on säädetty laissa kiinteän omaisuuden ja erityisten oikeuksien lunastuksesta*)
 9. Trading ports and also inland waterways and ports for inland-waterway traffic which permit the passage of vessels of over 1,350 tonnes.
 - permitting procedure in accordance with the Water Act (*vesilain mukainen lupa*)
 10. Waste-disposal installations for the incineration, chemical treatment or landfill of toxic and dangerous wastes.
 - environmental permit * in accordance with the Environmental Protection Act
 11. Large dams and reservoirs.
 - permitting procedure in accordance with the Water Act (*vesilain mukainen lupa*)
 12. Groundwater abstraction activities in cases where the annual volume of water to be abstracted amounts to 10 million cubic metres or more.
 - permitting procedure in accordance with the Water Act (*vesilain mukainen lupa*)
 13. Pulp and paper manufacturing of 200 air-dried metric tonnes or more per day.
 - environmental permit* in accordance with the Environmental Protection Act
 14. Major mining, on-site extraction and processing of metal ores or coal.
 - permitting procedure in accordance with the Mining Act (*kaivoslain mukainen lupamenettely*)
 15. Offshore hydrocarbon production.
 - permitting procedure in accordance with the Water Act (*vesilain mukainen lupa*)
 16. Major storage facilities for petroleum, petrochemical and chemical products.
 - permitting procedure in accordance with the Act on the Safety of the Handling of Dangerous Chemicals and Explosives (*vaarallisten kemikaalien ja räjähteiden käsittelyn turvallisuudesta annetun lain mukainen lupamenettely*)

17. Deforestation of large areas.

-permit for landscape work according to Land Use and Building Act in areas with land use plans (*maankäyttö- ja rakennuslain mukainen maisematyöluupa*)

Your comments:

Article 7 Post-project analysis

I.29. Is there any provision regarding post-project analysis in your national EIA legislation (art. 7, para. 1)?:

(a) No

(b) Yes (please specify the main steps to be taken and how the results of it are communicated):

Your comments:

Article 8 Bilateral and multilateral cooperation

(a) Agreements

I.30. Does your country have any bilateral or multilateral agreements based on the Convention (art. 8, appendix VI)?:

(a) No

(b) Yes Please specify with which countries: [Estonia](#)

If publicly available, please also attach the texts of such bilateral and multilateral agreements, preferably in English, French or Russian.

Link: https://www.unece.org/fileadmin/DAM/env/eia/documents/database/Estonia-Finland_agreement_2002.pdf

I.31. What issues do these bilateral agreements cover (appendix VI)? (more than one option may apply):

(a) Specific conditions of the subregion concerned

(b) Institutional, administrative and other arrangements

(c) Harmonization of the Parties' policies and measures

(d) Developing, improving, and/or harmonizing methods for the identification, measurement, prediction and assessment of impacts, and for post-project analysis

(e) Developing and/or improving methods and programmes for the collection, analysis, storage and timely dissemination of comparable data regarding environmental quality in order to provide input into the EIA

(f) Establishment of threshold levels and more specified criteria for defining the significance of transboundary impacts related to the location, nature or size of proposed activities

(g) Undertaking joint EIA, development of joint monitoring programmes, intercalibration of monitoring devices and harmonization of methodologies

(h) Other, please specify: Some specific project types included

Your comments:

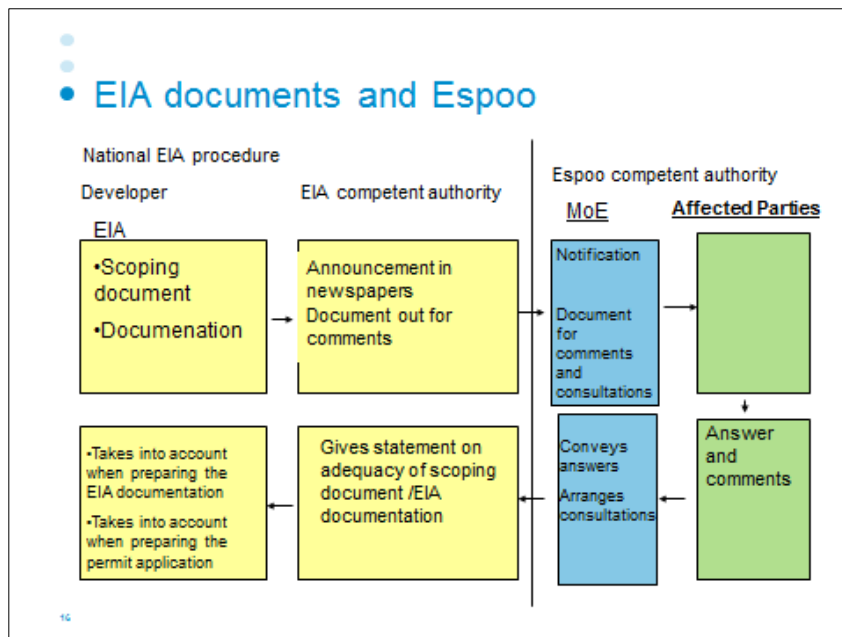
(b) Procedural steps required by the national legislation

I.32. Please describe the steps required in your national legislation for a transboundary EIA procedure:

(a) When EIA in a transboundary context is part of a domestic EIA procedure:

(b) When EIA in a transboundary context is a separate procedure (please provide of how this procedure links to the domestic procedure and whether the steps are different):

Alternatively, this question can be answered or supported by providing a schematic flowchart showing these steps.



Your comments:

I.33. Does your country have special provisions or informal arrangements concerning transboundary EIA procedures for joint cross-border projects (e.g., roads, pipelines)?:

(a) No

(b) Yes (please specify):

(i) Special provisions:

(ii) Informal arrangements: Case by case arrangements agreed with Parties of origin.

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

I.34. Does your country have special provisions or informal arrangements concerning transboundary EIA procedures for nuclear power plants (NPPs)?:

(a) No

(b) Yes (please specify):

(i) Special provisions:

(ii) Informal arrangements: Case by case planning of the transboundary procedure.

Your comments: Generally normal provisions apply to all transboundary EIA procedures.

Part two

Practical application during the period 2013–2015

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

II.1. Does your country object to the information on transboundary EIA procedures that you provide in this section being compiled and made available on the website of the Convention? Please specify (indicate "yes" if you object):

(a) Yes

(b) No

Your comments:

1. Experience in the transboundary environmental impact assessment procedure during the period 2013–2015

Cases during the period 2013–2015

II.2. If your country's national administration has a record of transboundary EIA procedures that were under way during the reporting period, in which your country was Party of origin or affected Party, please list them in the tables II.2 (a) and II.2 (b) below (adding additional rows as needed).

Table II.2 (a)

Transboundary EIA procedures: As Party of origin

Name of case	Starting date (date notification sent)	Length of the main steps in months			Final decision (date of issuing, if information is available)
		Submission of the environmental report	Transboundary consultations (expert), if any	Public participation, including public hearing, if any	
1- 28. In the previous reports					
29. Nord Stream 2, Estonia, Latvia, Poland, Russia, Sweden, Denmark, Germany	8.4.2013				
30. Fennovoima nuclear power plant in	27.9.2013				

Name of case	Starting date (date notification sent)	Length of the main steps in months			Final decision (date of issuing, if information is available)
		Submission of the environmental report	Transboundary consultations (expert), if any	Public participation, including public hearing, if any	
Pyhäjoki Northern Finland) (Sweden, Denmark, Norway, Russia, Estonia, Latvia, Poland, Germany and Austria)					
31. Windfarm Palovaara- Ahkiovaara (Sweden)	7.5.2014				
32. Windfarm Reväsvaara (Sweden)	16.9.2014				
33. Balticconnect or, Offshore gas pipeline between Finland and Estonia, (Estonia and Russia)	6.2.2014				

Your comments: *Not all information on length of procedures could be provided*

Table II.2 (a)

Transboundary EIA procedures: As affected Party

Name of case	Starting date (date notification sent)	Length of the main steps in months			Final decision (date of issuing, if information is available)
		Submission of the environmental report	Transboundary consultations (expert), if any	Public participation, including public hearing, if any	
1.- In previous 20. reports					
21. Balticonnector (Estonia)	6.2.2014				
22. Nord Stream 2 (Russia, Sweden, Denmark, Germany)	8.4.2013				
23. LNG-terminal in Paldinsk (Estonia)	9.1.2013				
24. Offshore wind farm, Baltica-1 (Poland)	3.4.2013				
25. Nuclear power plant (Poland)	7.12.2015				

Your comments: *Not all information on length of procedures could be provided*

Please share with other Parties your country's experience of using the Convention in practice. In response to each of the questions below, either provide one or two practical examples or describe your country's general experience. You might also include examples of lessons learned in order to help others.

II.3. Translation is not addressed in the Convention. How has your country addressed the question of translation? What difficulties has your country as Party of origin and affected Party experienced relating to translation and interpretation, and what solutions has your country applied? (Please specify, among others, the parts and type of the documentation translated, language, costs, etc.):

(a) As Party of origin: Translation is often settled between the Points of Contact. The need for translation varies from case to case. The material provided for public is translated into the language of the affected Party. In some cases the whole EIA report may be translated into English or in the language of the affected Party. As Finland is bilingual, some EIA documents are available in Swedish in addition to Finnish. In the north Sámi is also used. Early cooperation between the Points of Contacts of the affected Party and the Party of origin are important for facilitating translations.

Quality control is important but as translations are provided by the developer it can only be stressed. It is challenging to ensure technical and professional vocabulary translations into the various affected party languages.

Receiving courtesy translation for answers written in national language is highly appreciated.

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- (b) As affected Party: Adequate material in national language should be provided.
For authorities English can be used as lingua franca.

II.4. Describe any difficulties that your country has encountered during transboundary public participation (expert consultation, public hearing, etc.), including on issues of timing, language and the need for additional information: -

II.5. Does your country have successful examples of organizing transboundary EIA procedures for joint cross-border projects or that of an NPP?:

- (a) Yes
- (b) No

II.6. If you answered yes to question II.5, please provide information on your country's experiences describing, for example, means of cooperation (e.g., contact points, joint bodies, bilateral agreements, special and common provisions, etc.), institutional arrangements, and how practical matters are dealt with (e.g., translation, interpretation, transmission of documents, etc.):

- (a) For joint cross-border projects: [Balticconnector –gas pipeline between Finland and Estonia](#)
- (b) For NPPs: [Fennovoima npp](#)

II.7. Name examples of good practice cases, whether complete cases or good practice elements (e.g., notification, consultation or public participation) within cases:

II.8. Would your country like to introduce a case in the form of a Convention “case study fact sheet”?

- (a) No
- (b) Yes (please indicate which cases):

II.9. Has your country carried out post-project analyses in the period 2013–2015:

- (a) No
- (b) Yes (please indicate which projects, along with the challenges in implementation and any lessons learned):

2. Experience in using the guidance in 2013–2015

II.10. Has your country used in practice the following guidance, adopted by the Meeting of the Parties and available online?:

(a) Guidance on Public Participation in Environmental Impact Assessment in a Transboundary Context (ECE/MP.EIA/7):

No

Yes (please provide details): [This document is fairly old and therefore not in “every-day” use anymore.](#)

Your experience with using this guidance:

Your suggestions for improving or supplementing the guidance:

- (b) Guidance on subregional cooperation (ECE/MP.EIA/6, annex V, appendix):
- No

Yes (please provide details): This document is fairly old and therefore not “every-day” use anymore as such.

Your experience with using this guidance:

Your suggestions for improving or supplementing the guidance:

(c) Guidance on the Practical Application of the Espoo Convention (ECE/MP.EIA/8):

No

Yes (please provide details): This document is fairly old and therefore not in “every-day” use, although basically much of content has been put into general practice as goes with the other guidance as well.

Your experience with using this guidance:

Your suggestions for improving or supplementing the guidance:

3. Clarity of the Convention

II.11. Has your country had difficulties implementing the procedures defined in the Convention, either as Party of origin or as affected Party, because of a lack of clarity of the provisions?:

No

Yes (please indicate which provisions and how they are unclear):

4. Suggested improvements to the report

II.12 Please provide suggestions for how this report may be improved.