

**REPORT OF DENMARK FOR 2003-2005
ON THE IMPLEMENTATION OF THE ESPOO
CONVENTION ON ENVIRONMENTAL IMPACT
ASSESSMENT IN A TRANSBOUNDARY CONTEXT**

for the period mid-2003 to end of 2005

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

Please provide the information requested below in Part I, 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 not be used to describe your experience of applying the Convention, i.e. just the framework for its implementation.

Article 2

General Provisions

DOMESTIC IMPLEMENTATION OF THE CONVENTION

1. *List the general legal, administrative and other measures taken in your country to implement the provisions of the Convention (Art. 2.2).*

The Planning Act, Consilidated Act No 883 of 18 August 2004.

The Raw Material Act, Consilidated Act No. 886 of August 2004.

The Law on the use of Danish subsoil, Concilidated Act No 526 of 11 June 2002.

The Law of the Continental Shelf, Consilidated Act No 1101 of November 2005

Ministrerial Order on the environmental assesment (EIA) of certain projects in the territorial sea, No 809 of 22 August 2005

TRANSBOUNDARY EIA PROCEDURE

2. *Describe your national and transboundary EIA procedures and authorities (Art. 2.2):*

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

The EIA process in Denmark provides for public participation in two stages. First before the EIA documentation is prepared, in the scoping phase, the public is given the opportunity to make suggestion for the project-specific guidelines for the content of the EIA documentation. Secondly, once the EIA documentation has been prepared, the public has opportunity to comment both in writing and orally at a public hearing.

- b. *Describe how the different steps of the transboundary EIA procedure mentioned in the Convention fit into your national EIA procedure.*

The procedure fits in the natual procedure.

- c. *List the different authorities that are named responsible for different steps of the transboundary EIA procedure. Also list the authorities responsible for the domestic EIA procedure, if they are different.*

The Ministry of Environment. The ministry of Transport and Energy

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

Yes, Forest and Nature Agency collects information.

3. *Do you have special provisions for joint cross-border projects (e.g. roads, pipelines)?*

Denmark do not have special provisions for joint cross-border projects. In the few cases known yet common procedure has been created.

IDENTIFICATION OF A PROPOSED ACTIVITY REQUIRING EIA UNDER THE CONVENTION

4. *Is your country's list of activities subject to the transboundary EIA procedure equivalent to that in Appendix I to the Convention?*

Yes

5. *Please describe:*

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

The Planning Act provides the EIA procedure. The Planning Act, together with a Ministerial Order, describes the procedure. Activities listed in Appendix I to the Convention fall within the scope of the Danish EIA legislation.

For activities not listed in Appendix I, the procedure will be the same as for those listed. The Convention will be applied if an activity not listed in Appendix I is likely to cause a significant adverse transboundary impact.

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

The Planning Act and the Ministerial Order describe which changes to activities must be subject to EIA. The competent authority may consider whether an EIA is necessary given the potential environmental impact.

For activities not listed in Appendix I, the procedure will be the same as for those listed. The Convention will be applied if an activity not listed in Appendix I is likely to cause a significant adverse transboundary impact.

- c. *How such an activity, or such a change to an activity, is considered likely to have a "significant" adverse transboundary impact (Art. 2.5, Guidelines in Appendix III); and*

The competent authority decides whether an activity is likely to have a significant adverse transboundary impact. If a proposed activity in Denmark is likely to have a significant adverse environmental impact on the environment of another Party, the competent authority will send the notification to the point of contact in the Affected Party and will have to publish the information in the areas of the affected country that are likely to be affected. The competent authority takes a case-by-case decision, taking into consideration the specific situation, type of activity, type of effects and distance to the border.

The same procedure is applied as for Appendix I.

- d. *How you would decide whether it is "likely" to have such an impact. (Art. 2.3)*

The competent authority will decide whether it is "likely" to have an impact. If an activity have an impact in Denmark and this activity is "close" to another country,

the project will naturally fall under the convention. There could also be cases, where the impact would be greater in affected party, than in the party of origin..

PUBLIC PARTICIPATION

6. *Do you have your own definition of “the public” in your national legislation, compared to Article 1(x)? How do you, together with the affected Party, ensure that the opportunity given to the public of the affected Party is equivalent to the one given to your own public as required in Article 2, paragraph 6?*

The EIA process in Denmark provides for public participation in two stages. First, before the EIA documentation is prepared, in the scoping phase, the public is given the opportunity to make suggestions for the project-specific guidelines for the content of the EIA documentation. Secondly, once the EIA documentation has been prepared, there is the opportunity for the public to comment both in writing and orally at a public hearing. The publication in the affected Party would take place at the same time as the domestic public is informed.

Article 3

Notification

QUESTIONS TO PARTY OF ORIGIN

7. *Describe how you determine when to send the notification to the affected Party, which is to occur “as early as possible and no later than when informing its own public”? At what stage in the EIA procedure do you usually notify the affected Party? (Art. 3.1)*

In principle, the notification is sent at the same time as the publication of the “notification of intent” takes place domestically.

8. *Describe how you determine the content of the notification? (Art. 3.2)*

The content of the notification should contain all the information necessarily to identify possible impact. This should be described in an understandable way for both competent authorities and the affected public.

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

In principle the time frame is the same as for the domestic responses.

If the time frame is not complied with, the whole procedure will suffer from delays.

In most cases a short extension of the deadline is considered

10. *Describe when you provide relevant information regarding the EIA procedure and proposed activity and its possible significant adverse transboundary impact as referred to in Article 3, paragraph 5. Already with the notification or later in the procedure?*

Normally the information should already be submitted with the notification.

11. *How do you determine whether you should request information from the affected Party (Art. 3.6)? When do you normally request information from the affected Party? What kind of information do you normally request? How do you determine the time frame for a response from the affected Party to a request for information, which should be “prompt” (Art. 3.6)?*

Normally a request would normally be at an early stage.

12. *How do you consult with the authorities of the affected Party on public participation (Art. 3.8)? How do you identify, in cooperation with the affected Party, the “public” in the affected area? How is the public in the affected Party notified (what kinds of media, etc are usually used)? What is normally the content of the public notification? Does the notification to the public of the affected Party have the same content as the notification to your own public? If not, describe why not. At what stage in the EIA procedure do you normally notify the public of the affected Party?*

How the public is identified depends on the type of activity, the likely impact, the location (distance from the border), etc. The competent authority and the point of contact in the affected Party together can best identify the public to be informed. Denmark would first use the same criteria to identify the ‘public’ in the affected area as are used to identify the domestic ‘public’. However, it is important that the public in the affected area feel that they are the right people to be asked about their opinion. This can be done through dialogue between the authorities in both countries.

The public is notified by a public announcement in relevant newspapers or by any other means. The point of contact in the affected Party may advise how best this is done. The announcement contains the name and address of the proponent, the competent authority, a description of the proposed activity (type and size), the location of the proposed activity, and the decision or decisions for which the EIA is being carried out. Furthermore, the announcement should include information on the timing and the way suggestions for the content of the EIA documentation can be delivered to the competent authority. If the competent authority is to organize an information meeting, the public announcement should also contain information on this meeting.

Yes, the two notifications contain the same information.

In principle, the public in the affected Party is informed at the same time as the Danish public is first informed.

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

Yes

14. *Do you provide any information to supplement that required by Article 3, paragraph 2? Do you, furthermore, follow the proposed guidelines in the report of the first meeting of the Parties (ECE/MP/2, decision I/4)? If not, in what format do you normally present the notification?*

It depends on the case, but there have been cases where it has been necessary to provide more information.

No, the proposed guidelines are not followed.

The competent authority sends the (translated) ‘notification of intent’, together with an accompanying letter, to the affected Party.

QUESTIONS TO AFFECTED PARTY

15. *Describe the process of how you decide whether or not you want to participate in the EIA procedure (Art. 3.3)? Who participates in the decision-making, for example: central authorities, local competent authorities, the public and environmental authorities? Describe the criteria or reasons you use to decide?*

In general the central and local authorities, which also include environmental authorities decide whatever or not to take part in the EIA. In case a project is of great interest for the

public, Denmark would always participate in the EIA. Denmark would participate if it is to be 'severely affected' by an activity.

16. *When the Party of origin requests you to provide information relating potentially affected environment: (a) how do you determine what is "reasonably obtainable" information to include in your response; and (b) describe the procedures and, where appropriate, the legislation you would apply to determine the meaning of "promptly" in the context of responding to a request for information? (Art. 3.6)*

All kind of existing information are considered "reasonable obtainable". Additional analysis may be carried out if time allows.

"Promptly" is taken to mean "as soon" as possible. It will always take time to collect information.

Article 4

Preparation of the EIA documentation

QUESTIONS TO PARTY OF ORIGIN

17. *What is the legal requirement for the content of the EIA documentation (Art. 4.1)?*

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

18. *Describe your country's procedures for determining the content of the EIA documentation (Art. 4.1).*

The Danish legislation concerning EIA contains procedure for the content of the EIA documentation

19. *How do you identify "reasonable alternatives" in accordance with Appendix II, alinea (b)?*

20. *How do you identify "the environment that is likely to be affected by the proposed activity and its alternatives" in accordance to Appendix II, alinea (c), and the definition of "impact" in Article 1(vii)?*

21. *Do you give the affected Party all of the EIA documentation (Art. 4.2)? If not, which parts of the documentation do you provide?*

Yes,

22. *How is the transfer and reception of the comments from the affected Party organized? How does the competent authority in your country (as the Party of origin) deal with the comments? (Art. 4.2)*

Usually the comments on the EIA documentation are sent directly to the competent authority and to the point of contact

The comments will be taken into account and it would be indicated what consideration has been given to the comments and recommendations submitted concerning the EIA documentation.

23. *Describe the procedures and, where appropriate the legislation you would apply to determine the time frame for comments provided for in the words "within a reasonable time before the final decision" (Art. 4.2)? What is the consequence if the affected Party does not comply with the time frame? If an affected Party asks for an extension of a deadline, how do you react?*

The time frame for comments depends on the specific legislation involved. The time frame will normally be the same as for domestic comments.

If the competent authority does not receive the comments in time they cannot be taken into consideration in the decision making process.

If the decision-making procedure permits, an extension will be granted.

24. *What material do you provide, together with the affected Party, to the public of the affected Party?*

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

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

The EIA process in Denmark provides for public participation in two stages. First, before the EIA documentation is prepared, in the scoping phase, the public is given the opportunity to make suggestions for the project-specific guidelines for the content of the EIA documentation. Secondly, once the EIA documentation has been prepared, there is the opportunity for the public to comment both in writing and orally at a public hearing. The publication in the affected Party would take place at the same time as the domestic public is informed.

Yes, a hearing in Denmark is open and therefore also open to the public of the affected Party, public, authorities and other organizations.

In practice, yes, a public hearing is initiated as a joint hearing in either Party.

QUESTIONS TO AFFECTED PARTY

26. *Describe the procedures and, where appropriate, the legislation you would apply to determine the meaning of the words “within a reasonable time before the final decision”, this being the time frame for comments (Art. 4.2)?*

The time frame for comments depends on the specific legislation involved. The time frame will normally be the same as for domestic comments.

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

Normally, the public participation is organized in accordance with the legislation of Denmark. In the cases known yet Denmark has organized the public participation with the Party of origin.

Article 5

Consultations

QUESTIONS TO PARTY OF ORIGIN

28. *At which step of the EIA procedure does the consultation in accordance with Article 5 generally take place? Describe the procedures and, where appropriate, the legislation you would apply to determine the meaning of “undue delay”, with regard to the timing of entry*

into consultation? Do you normally set the duration for consultations beforehand? If there seems to be no need for consultation, how do you determine not to carry out consultations?

Practical experience is limited, but according to Danish legislation, and the general procedure in such matters, Denmark would avoid 'undue delay'.

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

The consultations are preferably organized in the Party of origin. However, if the situation occurs it may be organized in the affected Party as well. Primarily, consultation will have to be carried out at an expert level. If problems remain unsolved, the national Government level has to be involved as well as the relevant local authorities. If desired, the consultation could also be held in the affected Party.

At first the competent authority in the Party of origin, the point of contact and other relevant levels of government authorities in the affected Party (expert level) usually participate. If no agreement is reached or solution found, the consultation continues involving the national Government level. Until now Denmark has not had such cases.

Communication is usually in a meeting preceded by an exchange of written communications.

QUESTIONS TO AFFECTED PARTY

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

Consultations are normally first held at expert level. If problems remain the national Government level has to be involved as well as the relevant local level. Until now Denmark has not had cases involving its national Government.

At first the competent authority in the Party of origin and the point of contact and other relevant levels of Government authorities in the affected Party discuss or exchange information at an expert level. If no agreement can be reached or solution found, the consultation continues involving national Government levels. Denmark has not had cases involving its national Government.

The usual means are a meeting preceded by an exchange of written communications. Telephone calls can also be used.

Article 6

Final decision

QUESTIONS TO PARTY OF ORIGIN

31. *Describe what is regarded as the "final decision" to authorize or undertake a proposed activity (Art. 2.3). Do all projects listed in Appendix I require such a decision?*

A final decision would be a "permit" according to the legislation.
Yes the projects listed in Appendix I require a decision.

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

Yes, the final decision does contain the reasons and considerations on which the decision is based.

33. *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 public in your country (Art. 6.1)?*

Yes, they are taken into consideration in the same way.

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

Yes, the final decision does contain the reasons and considerations on which the decision is based.

35. *If additional information comes available according to paragraph 3 before the activity commences, how do you consult with the affected Party? If need be, can the decision be revised? (Art. 6.3)*

Denmark have not had any experience yet.

Article 7

Post-Project Analysis

36. *How do you determine whether you should request a post-project analysis to be carried out (Art. 7.1)?*

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

No experience

Article 8

Bilateral and multilateral agreements

38. *Do you have any bilateral or multilateral agreements based on the EIA Convention (Art. 8, Appendix VI)? If so, list them. Briefly describe the nature of these agreements. To what extent are these agreements based on Appendix VI and what issues do they cover? If publicly available, also attach the texts of such bilateral and multilateral agreements, preferably in English, French or Russian.*

No formal written agreement, but annual meetings with Sweden and with Germany on EIA in a transboundary context.

It has been agreed to have regular meetings; An Agenda is prepared before the meetings. Items dealt with are for example: institutional arrangements (contact points); procedural aspects (notification, public participation, consultation, decision); exchange of information on ongoing activities and notifications; exchange of information on new national legislation and procedures. The meetings are useful and are often followed up. The aim is to make things as uncomplicated and transparent as possible.

39. *Have you established any supplementary points of contact pursuant to bilateral or multilateral agreements?*

No

Article 9

Research programmes

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

There has been research and monitoring of the effect of offshore wind farms on benthic communities, fish, mammals and birds, comparing the situations before and after the establishment of two large demonstration offshore wind farms.

Ratification of the amendments to the Convention and of the Protocol on SEA

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

In 2007

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

In 2007

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

In 2007

PART II – PRACTICAL APPLICATION DURING THE PERIOD 2003-2005

Please report on your practical experiences of applying the Convention (not your procedures described in Part I), whether as Party of origin or affected Party. The focus here is on identifying the best practice as well as difficulties Parties encountered in applying the Convention in practice to enable Parties to share solutions. Parties should therefore provide appropriate examples highlighting application of the Convention and innovative approaches to improve application of the Convention.

CASES DURING THE PERIOD 2003-2005

44. *Do you have any practical experience of applying the Convention in this period (yes/no)? If you do not have any such experience, why not?*

Yes

45. *Does your national administration have information on the transboundary EIA procedures that were underway during the period? If so, please list these procedures, clearly identifying for each whether your country was the Party of origin or the affected Party. If you have not provided a list of transboundary EIA procedures in connection with previous reporting, also provide a list of those procedures. If possible, also indicate for each procedure why it was considered necessary to apply the Convention.*

Yes.

Denmark as party of origin has notified in two cases until 2005. One concerning Energy Mills on sea and one case concerning a gaspipeline on sea.

In 2006 Denmark has notified in one case concerning a gaspipeline on sea.

Denmark as affected Party has received a number of notifications from Sweden and Germany fx about Energy Mills on sea. Denmark has received two cases about an Atomic Power Plants.

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

No.

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

It differs very much.

EXPERIENCE OF THE TRANSBOUNDARY EIA PROCEDURE IN 2003-2005

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

Two "Espoo projects" in a neighbour country have been turned down by their national authorities. The EIA showed that there were environmental problems. In one of the cases may be the political reason for turning it down was the reason?

49. *How have you interpreted in practice the various terms used in the Convention, and what criteria have you used to do this? Key terms include the following: “promptly” (Art. 3.6), “a reasonable time” (Art. 3.2(c), Art. 4.2), “a reasonable time-frame” (Art. 5), and “major change” (Art. 1(v)). If you are experiencing substantial difficulties interpreting particular terms, do you work together with other Parties to find solutions? If not, how do you overcome the problem?*

Normally Denmark work together with other parties to find a solution if any problem accrue.

50. *Share with other Parties your experience of using the Convention. In response to each of the questions below, either provide one or two practical examples or describe your general experience. You might also include examples of ‘lessons learned’ in order to help others.*

a. *How in practice have you identified transboundary EIA activities for notification under the Convention, and determined the significance and likelihood of adverse transboundary impact?*

If an activity have an impact in Denmark and this activity is "close" to another country the project will naturally fall under the convention. There could also be cases, where the impact would be greater in affected party, than in the party of origin.

b. *Indicate whether a separate chapter is provided on transboundary issues in the EIA documentation. How do you determine how much information to include in the EIA documentation?*

There will always be information about transboundary issues, which very often can be the same as the "domestic" issues.

c. *What methodology do you use in impact assessment in the (transboundary) EIA procedure (for example, impact prediction methods and methods to compare alternatives)?*

d. *Translation is not addressed in the Convention. How have you addressed the question of translation? What do you usually translate? What difficulties have you experienced relating to translation and interpretation, and what solutions have you applied?*

Denmark have not experienced problems about translation.

e. *How have you organized transboundary public participation in practice? As Party of origin, have you organized public participation in affected Parties and, if so, how? What has been your experience of the effectiveness of public participation? Have you experienced difficulties with the participation of your public or the public of another Party? (For example, have there been complaints from the public about the procedure?)*

We have organized public participation as a an affected party in cooperation with the party of origin.

We have not had complaints from the public about the procedure.

In some cases it can be difficult to get the public interested in big trandboundary projects. Some of the projects seem too far away. Some of the NGO are interested.

f. *Describe any difficulties that you have encountered during consultations, for example over timing, language and the need for additional information.*

There have been no problems speaking of, but it is always hard work to get everything in place

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

The final decision will be communicated to the affected party in the same way as to the danish relevant authorities and the public.

- h. *Have you carried out post-project analyses and, if so, on what kinds of projects?*

This has not been finished yet.

- i. *Do you have successful examples of organizing transboundary EIA procedures for joint cross-border projects? Please provide information on your experiences describing, for example, any bilateral agreements, institutional arrangements, and how practical matters are dealt with (contact points, translation, interpretation, transmission of documents, etc.).*

Yes.

The notification on Environmental Impact Assessment in a Transboundary Context for a project about a gas pipeline in the Baltic Sea.

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

CO-OPERATION BETWEEN PARTIES IN 2003-2005

51. *Do you have any successful examples of how you have overcome difficulties arising from different legal systems in neighbouring countries?*

Yes.

There have been a case about an atomic power plant in a neighbouring country, where we harmonised the procedure about the hearing.

There has been a project about gas pipelines in the Baltic Sea, where 3 countries also have harmonised the procedure.

EXPERIENCE IN USING THE GUIDANCE IN 2003-2005

52. *Have you used in practice the following guidance, recently adopted by the Meeting of the Parties and available on-line? Describe your experience of using these guidance documents and how they might be improved or supplemented.*

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

Not really

- b. *Guidance on subregional cooperation; and*

Not really

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

Not really

CLARITY OF THE CONVENTION

53. *Have you had difficulties implementing the procedure defined in the Convention, either as Party of origin or as affected Party? Are there provisions in the Convention that are unclear? Describe the transboundary EIA procedure as applied in practice, where this has varied from that described in Part I or in the Convention. Also describe in general the strengths and weaknesses of your country's implementation of the Convention's transboundary EIA procedure, which you encounter when actually applying the Convention.*

No. So far we have not had any difficulties implementing the procedure.

AWARENESS OF THE CONVENTION

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

Normally Authorities, consultants etc. are aware of the Convention. But still is impotent to follow up and to inform about the convention.

55. *Do you see a need to improve the application of the Convention in your country and, if so, how do you intend to do so? What relevant legal or administrative developments are proposed or on-going?*

No

SUGGESTED IMPROVEMENTS TO THE REPORT

56. *Please provide suggestions for how the report may be improved.*

Lesser questions.