

# **UNDP/REC**

## **COUNTRY REVIEW**

### **Capacity Building Needs Assessment for the Implementation of the UN/ECE Strategic Environmental Assessment Protocol**

#### **Armenia**

Note: preparation of this review forms the first stage of the regional project ‘SEA – Promotion and Capacity Building’ implemented by the UNDP Regional Centre for Europe and CIS and the Regional Environmental Centre for Central and Eastern Europe. It has been prepared by the national consultant and represents the opinions and views of the country representatives involved in the national environmental assessment process. It is the working document, purpose of which is to provide brief information on the capacity building needs for the UNECE SEA Protocol implementation, thus outlining the focus of the next stages of the regional project mentioned above.

If the project gets expanded, the national review will form an input to the final regional report developed at last stage of the respective regional project.

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Content of the review reflects the Terms of Reference for assessment needs reviews prepared by REC, outlining the focus on:

- Identification of plans and programs that fall under the scope of the SEA Protocol
- Analysis of current environmental assessment provisions
- Analysis of the priority issues for the effective implementation of the UNECE SEA Protocol
- Key players in SEA reforms
- Past, ongoing and planned initiatives to build SEA capacity in the country:
- Recommendations for the most effective focus of the UNDP/REC project
- Analysis of the level of consultations with the environmental and health authorities and with the public during the planning and SEA process

## **I. Identification of plans and projects subject to the Strategic Environmental Assessment Protocol**

The Republic of Armenia (RA) has ratified the UNECE Convention on Environmental Impact Assessment in a Transboundary Context (ESPOO) on February 21, 1997 and signed its Protocol on Strategic Environmental Assessment Protocol (SEA Protocol) on May 21, 2003.

### **I.1 The notion of program or plan in Armenian legislation**

Currently in Armenia, there are no normative-legal acts regulating the processes of strategic environmental assessment (SEA). However, the process is indirectly and partially regulated by the RA *Law on Environmental Impact Assessment* (further Law), adopted by the National Assembly of RA on November 20, 1995. Further by-laws adopted also do not address SEA procedures and regulate only some elements related to the process of the state environmental review.

The Law refers in its Article 1.2. to the term “concept”, covering proposals, programs, complex designs and master plans. In addition, documents on regional planning and design of complex use of natural resources are also considered as concepts (Article 15.1). Strategic documents, which would be subject to the SEA Protocol, are stated in the Article 1 – ‘General Provisions’, and in the Article 15 – ‘Review of Environmental Impact of Concepts’. Evidently, the legislation, policy and other strategies are not considered as strategic documents in the law.

### **I.2. Strategies, plans and programs that fall under the scope of the SEA Protocol**

Analysis revealed that during the last five years about 540 objects were submitted to environmental expertise, from which the 81 % represent construction or reconstruction activities, and 19% represent strategic documents, i.e. plans, programs or schemes. More detailed analysis reveals that most of them were small size business projects, requiring bank credits (e.g. recreation objects on the bank of the lake Sevan, larger-scale purchase of fruits and vegetables for further processing, or design of small communication and other local facilities). Actually, only 14 (2.6%) of the all assessed objects would fall under the scope of the SEA Protocol, referring to the definition of plans and programmes (Article 2.5).

Pursuant to the Article 15.1 of the Law, concepts of the following sectors are subject to state environmental expertise: socio-economic, energy, spatial planning, transport, communications, agriculture, fishery, mining, industry, healthcare, social sector, nature protection, recreation, tourism, and service sector. The Armenian Law fails to cover such important sectors as forestry, waste management, water management, regional development, sustainable development, etc.

Within the period of last 5 years larger amount of strategic documents has been developed. However, due to various reasons, including the inefficiency of the Law, the most of them were not submitted for environmental expertise. The list of developed and adopted strategic documents is presented in the Table 1 below. The data needed for preparing the list were provided by the Ministry of Nature Protection (MoNP), Department of International Cooperation, and other sectoral ministries and departments.

**Table 1. National and regional strategic documents in Armenia, which will fall under the scope of the SEA Protocol<sup>1</sup>**

Sector	Type of strategic document (subject to adoption by public authorities according to national legislation)	Number of plans and programs adopted during last five years <sup>2</sup>
Socio-economic	program, concept	1, 1
Energy	program	2
Urban construction	plan, concept, feasibility study, program, scheme	1, 1, 1, 2, 1
Transport and communication		
Rural development	program, concept, strategy	30, 3, 1
Fishery		
Mining		
Industry		
Health	plan,	1
Nature protection (combating desertification, protected areas, biodiversity)	programme, strategy, assessment, plan, strategy	7, 1, 1, 1, 1
Tourism and recreation	concept	1
Consumers service		
Forestry	assessment	1
Waste management	action plan,	1
Water management	program, plan	1, 1
Spatial planning	concept,	2
Other strategic documents	law, normative acts, land shot	2, 9, 1
<i>Total</i>		<i>71</i>

Table 2 below presents the strategic initiatives that were submitted for environmental expertise and were approved by it.

**Table 2. List of strategic documents approved by state environmental expertise**

1	Master Plan on RA Settling
2	Development of Irrigation Systems of RA
3	Feasibility Study on “ Development of “Zvartnots” International Airport”
4	National Action Plan on Combating Desertification in Armenia
5	Natural Resources Management and Poverty Reduction
6	"Environmental Management" in the Framework of “ Municipal Water Supply and Drainage” Project
7	“Clean Sevan” Environmental Project
8	Development of RA Law “On Energy Efficiency and Renewable Energy “
9	Rehabilitation of Arzni-Shamiram, Talin, Armabir, Shirak, Vayots Dsor Ducts and Vorotan Irrigation System
10	Water-Eco-99-01-03-12-02 "Construction of Biogas Station in the Gegarkunik Marz "
11	Concept on Construction of Block Apartments for Refugees in Silikyan Block of Yerevan City
12	Concept on Spatial Planning of Lake Sevan Catchment
13	Concept on Rehabilitation of Degraded Lands of Garni Village of Kotayk Marz.
14	Concept on Spatial Zoning for Immediate Building Up in Lake Sevan Catchment.

## II. Analysis of current environmental assessment provisions in Armenia

### II.1. Overview of existing environmental assessment procedures in the country

As it is mentioned above, environmental assessment in Armenia is indirectly and partially covered by RA *Law on Environmental Impact Assessment*, according to which two types of documents are being assessed:

<sup>1</sup> To identify the national and regional strategic documents – subject to the SEA Protocol the a circular letter has been sent to 16 Ministries and departments of the republic on behalf of the Minister of Nature Protection Mr. V Ayzvazyan, requesting the lists of developed or being developed strategic documents for last 5 years. Unfortunately, the feedback was delayed, due to this reason the table below is not fully completed yet and will be updated as new information becomes available.

<sup>2</sup> The numbers and order in the column correspond with the order of the listed types of strategic document in the column on the left.

- Proposals of concrete projects (in case of constructions or reconstructions of facilities, temporary closing down and demolition of particular facilities); the list of those activities with determination of threshold value (capacity, rating, and output) is given in the Article 4 of the Law.
- Strategic documents, e.g. concepts (described in the part I.1);

Pursuant to the Espoo Convention and the SEA Protocol the listed activities require OVOS procedure and strategic documents require SEA. Obligation to conduct SEA is expressed in the Articles 12 and 15.6 of the Law, saying that proposed activity and/or concept is rejected without the positive conclusion/authorization of the state environmental review.

Process of conducting environmental assessment of proposed activity and/or strategic documents is described below and is based on the state environmental assessment system, covered by the Law. The Law does not regulate environmental assessment of the strategic initiatives to the extent required by the SEA Protocol. It covers only some stages and states some provisions for assessment of those initiatives (conducting OVOS and preparation of OVOS related documentation by developer, publishing the report and a record of strategic decision, organization of public hearings, considering the public opinion and submitting respective documents to environmental expertise). Per se, those provisions are declarative, as relevant normative – legal acts are not adopted yet to regulate the process. Due to the absent detailed provisions for conducting strategic environmental assessment in the Law, OVOS approach is being applied for assessment of strategic initiatives.

### II.1.1 Screening

The Article 6 of the Law covers the scoping mechanism of OVOS documents. The provisions are stated in a rather obscure way. Consequently they are difficult-to-comment and inefficient in practice. According to the Article, developer must inform the authorized body on his intention to carry out proposed activity. The notification should include description of activity, concerned land size, technological proposals, possible environmental impact, as well as the approval of the relevant state authorities. The authorized body should study submitted documents and collect public and other stakeholders' opinions. Unfortunately the Article 6 of the Law does not cover further actions of the authorized body, such as requirement to complete the notification stage by taking decision on advisability of activity implementation, requirement of environmental assessment or refusal to realize the proposed activity.

During the 8 years of the Law being in force about 800 proposed and strategic activities were submitted for assessment and the screening mechanism was never applied. The reason is that the notification stage is missing and the authorized body receives already elaborated documentation.

### II.1.2 Scoping

According to the Article 7 of the Law the content and scope of the documentation for OVOS should be determined by relevant by-law, which is not adopted yet. However, the Article 5 of the Law determines the requirements for OVOS documentation submitted for ecological expertise. These requirements can be identified with the content of environmental assessment documentation. Those requirements are:

- Estimation, description and evaluation of possible direct or indirect impact of proposed activity on:
  - climate, flora and fauna, ecosystems components and their sustainability, protected areas, landscapes, air, surface and underground water, soil;
  - health and welfare of human beings;
  - environment of populated areas,
  - use of natural resources;
  - historical and cultural monuments.
- Alternative solutions, including zero alternative, comparative analysis and selection of most acceptable alternative;
- Proposed measures to eliminate or minimize possible environmental impact of proposed activity;
- Detailed evaluation of the environmental consequences of socio-economic development in case of zero alternative is selected because of the unavoidable negative environmental impact of proposed alternatives.

The overwhelming majority of OVOS/SEA developers are poorly acknowledged with the Law and national normative-legal acts (which are of a rather low quality), and are guided mainly by construction codes and rules and other guiding documents operational in the former Soviet Union. Hence, the projects submitted for expertise usually include a chapter “Environmental Protection”, which is in fact considered as the substitution for OVOS report.

If the insufficient data (initial documents, conclusions, measures and other documents) is received for the environmental review the environmental authority has to issue a negative conclusion – to reject the proposed action since there are no provisions to return documentation to a proponent and ask for additional information.

However in practice, considering the inadequacy of the Law, and in order to create favourable conditions for economic development, as well as in order to meet the environmental requirements, the environmental authority body gives, at the stage of environmental review, the possibility to a proponent to review and modify the documentation. Though specific context of environmental assessment is not set in the country, as well as the methodical guidelines and standards are absent, the authorized body identifies the issues and measures to be completed, based on comments received. If the developer refuses to complete the documents, the authorized body issues a negative conclusion.

### II.1.3 Review requirements

Due to absence of guideline/methodology for development of environmental report, including review requirements, the environmental authority shall take the necessary measures to ensure that the other authorities are given opportunity to express their opinion.

Pursuant to Article 6.2, the notification stage requires the following documents:

- Approval from the municipal authority (local self-government) affected by impact of proposed activity regarding the compliance of the activity with the adopted regional development plans;
- Agreement of municipal authority (local self-government) affected by impact of proposed activity to provide needed territory for a planned activity;
- Agreement from a competent state authority and if necessary, license to realize the proposed type of activity issued by the state authority (e.g. in case of mining, industry, etc.).

Besides, the Article 8.1 of the Law states that environmental authority shall immediately submit copies of documentation upon receipt to relevant government authorities. Afterwards, according to Article 8.5 of the Law the government authorities shall send back their opinion to environmental authority within 30 days period. Although this Article does not provide the environmental authority with a power to select the relevant authorities, in practice mainly this authority decides to whom it send the documentation for a review. The Law also states that if no opinion is presented within the determined period, it shall be considered that there is no negative statement on the documentation.

### II.1.4 Public participation provisions

Principle of publicizing decision-making, set in the Article 2.3. of the Law, indirectly sets the principle of public involvement in environmental assessment process. The obligation to involve public at all stages of environmental impact assessment is unambiguously set up in the Article 3 of the Law.

Obligation of environmental authority to inform public about proposed activity in scoping stage is set in the Article 6.3. of the Law. Article 6.4 assigns the responsibility to local authority and the activity/project proponent organization for organizing public hearings. The same Article determines the timetable for hearings and states that procedure of hearings should be developed by RA government (the procedure is not developed yet). The Law assigns, that, if the public opinion is not received during the determined period of time, public status should be considered as positive (Article 6.5).

At the initial stage of expertise environmental authority informs the public when and where it will be possible to obtain documentation and conducts study and public hearings, within 30 days period, jointly with local authorities and proponent of activity (Article 8.1 and 8.2). At the final stage of expertise environmental authority shall conduct public hearings in order to get opinion of external experts, public, local authorities and relevant government bodies. Their comments should be taken into account by experts when drafting conclusion. Environmental authority has to provide public hearings minutes to all participants.

In the case of strategic initiatives, proponent has to make strategic document, as well as OVOS report publicly available, based on the agreement with environmental authority, not later than 30 days prior to public hearings (Article 15.3). Afterwards, according to Article 15.4, proponent shall arrange public hearings and review received comments. Unfortunately, the Law does not cover the process of taking into account environmental report and public comments in the plan or programme making process.

## **II.2 Strengths and weaknesses of the current assessment system**

Strengths of the current assessment system are related to the provisions of the *Law on Environmental Impact Assessment*, requiring the following in the process of OVOS/SEA (Articles 3 and 5.1):

- Analysis of feasibility to implement activity;
- Alternatives development;
- Impact assessment on human health, environmental components, historical and cultural monuments
- Development of measures to prevent, eliminate or minimize the negative impact during construction, exploitation, as well in emergency situations
- Ensuring sustainable use of natural resources

In addition, current system provides some provisions in terms of:

- Information availability and public participation in all the stages of assessment (Articles 4, 8.2, 10.1);
- Participation of the state authorities and local self-government at hearings and consultations (Articles 10.2, 15.4);
- Time determination for some stages of the process (6.3, 6.4, 6.5, 6.6, 8.1, 8.2, 8.3, 8.5, 9.5, 10.1, 10.2, 11.1, 11.8, 15.3, 15.5).

The Law (Article 15.2) also requires from proponent to carry out an adequate research in order to ensure justified assessment.

As for the weaknesses of the current system, both in terms of OVOS and SEA procedures, the practice indicates the following problems:

- Lack of mandatory identification of relevant environmental issues at the early stage of assessment;
- Lack of criteria, parameters, norms, standards, methodologies and guidelines related to environmental assessment and to the state of environment prognosis, what provides the possibility to misinterpret the information, and to take power-driven decision;
- Unclear provisions, in terms of consultation process and consideration of comments;
- Unclear provisions for identification of stakeholders, including public, the assessment and decision making process;
- Absence of screening mechanism, which would enable to classify the project or strategic initiative according to the level of impact on human health and environment;
- Absence of efficient scoping procedure.

Moreover, current law pays much more attention to the OVOS process than to that of SEA. For example, the Law sets the period of 90 days for environmental review of strategic initiatives, while it provides 120-180 days for OVOS. Public hearings during OVOS are required in three stages, while SEA process requires public hearings only at one stage. And last, but not least, participation of external experts in the OVOS expertise is required while this is not the case in SEA process. However, practice has shown that in the environmental assessment of strategic initiatives OVOS requirements are being applied.

### II.3.1 Opportunities for future development and improvement

In order to regulate the process of environmental assessment of strategic initiatives, it is necessary to reformulate the current legislation. The legislation should clearly define “document - subject to strategic environmental assessment”. Law on Environmental Expertise should be improved in a way that it is linked to other environmental laws at national and international level. At the same time it is necessary to develop supporting regulations clearly defining SEA procedures (e.g. screening criteria, impact assessment methodologies based on the type of initiative, scoping, public involvement / hearings at different stages of assessment, adaptation of assessment criteria and parameters defined in the SEA Protocol to the conditions of Armenia, methodologies for long-term impact assessment, integration of environmental and economic assessment, environmental monitoring, etc.).

The institutional framework has to be established (e.g. establishment of the National Environmental Assessment Centre facilitating the process of introduction and improvement of EIA and SEA processes, training of potential (certified) experts for conducting environmental assessment, organization of consultation process, etc.).

Proposed participation of Armenia in the preparation of the long term implementation plan for *Environment Strategy for Countries of Eastern Europe, Caucasus and Central Asia* (EECCA Strategy) provides an opportunity to suggest implementation of measures related to improvement of the current OVOS and SEA system.

### III. Analysis of priorities for the introduction of SEA Protocol

The data in the table below were provided by the staff of the RA Ministry of Nature Protection responsible for the ESPOO Convention implementation.

**Table 2. Analysis of the priority issues for the effective implementation of the UNECE SEA Protocol**

How to effectively:	2-priority, 1-important, 0-not relevant	Specific issues requiring assistance
Undertake SEA in plan and program-making process in accordance with definition of SEA in Art. 2.6 (e.g. how to link SEA to the decision-making process, etc.)	2	Define terms 'plan', 'programme'
Undertake SEA screening in accordance with Art. 4 and 5 (e.g. how to combine mandatory and exclusions lists and when to apply case-by-case examinations, etc.)	2	Providing information on international best practice
Organize SEA scoping in accordance with Art. 6 (e.g. when to undertake scoping, how to select suitable methods for consultations with public and authorities, how to write terms of reference for SEA, etc.)	2	Providing information on international best practice
Elaborate environmental baseline studies in SEA (in accordance with Annex IV - items 2,3 and 4)	1	Providing information on international best practice
Use environmental objectives in SEA (in accordance with Annex IV - item 5)	1	Set up the local priorities
Analyze the likely significant environmental, including health, effects (in accordance with Annex IV - item 6)	1	Conduct appropriate studies
Compare alternatives of the plan or programme (in accordance with Annex IV - item 8)	1	To provide by a law
Prepare post-SEA monitoring plans to meet requirement of the Art. 12 and Annex IV - item 9	1	-/-
Analyze transboundary effects (in accordance with Annex IV - item 10)	2	-/-
Organize public review of the SEA report in accordance with Art. 8 (e.g. how to identify public concerned; how to inform public and collect feedback, how to review public comments, etc.)	2	-/-
Organize consultations with environmental and health authorities in accordance with Art. 9 (e.g. how to identify concerned authorities, how to effectively consult them during SEA, etc.)	1	-/-

How to effectively:	2-priority, 1-important, 0-not relevant	Specific issues requiring assistance
Undertake transboundary consultations in accordance with Art. 10 (e.g. when to notify, what level of document should be exchanged, how to organize effective transboundary consultations)	2	-/-
Explain costs and benefits of SEA to decision-makers	0	Awareness raising within different sectors
Apply SEA to policies and legislation in accordance with Art. 13	2	Define term 'policy'
Draft the law and/or regulations to implement the SEA Protocol	2	Application of international practice

#### IV. Key structures, participating in reforms in regard to SEA

##### IV.1 Key institutions responsible for SEA process

Ministry of Nature Protection (MoNP) is currently the only state environmental institution authorized to conduct review of OVOS and SEA documentation (according to the *Law on Environmental Impact Assessment*, mentioned above). In particular, the expertise itself, including the final conclusion is done by the state non-commercial organization called 'Environmental Expertise', affiliated to the MoNP.

Environmental reports for strategic documents are developed by number of sectoral or independent design organizations and associations, most of them working on contractual basis.

**Table 3. MoNP staff responsible for SEA and environmental expertise**

<b>Eleonora Grigoryan</b>	UNECE Espoo Convention national focal point (Yerevan, Governmental building, 3),
<b>Boris Ghazaryan</b>	UNECE Espoo Convention focal point (Yerevan, 29 Komitas str),
<b>Julieta Ghlichyan</b>	Head of the Normative Methodological Department (Yerevan, Governmental building, 3),
<b>Ashot Santrosyan</b>	Director of the <i>Environmental Expertise</i> institution (Yerevan, 29 Komitas str),

##### IV.2 Key stakeholders and networks promoting the SEA/EIA reforms in Ukraine

EIA and SEA reform is in Armenia a very slow and not coordinated process. For example, specialized promotional materials, newsletters, magazines, educational and training centres are missing. However, some NGOs already conducted environmental activities, directly or indirectly addressing EIA and SEA issues (see chapter 5.3.). It is assumed that development of legislative framework and guidance on EIA and SEA procedures will lead to bigger interest and involvement of those organizations.

##### IV.3 Existing and planned OVOS/SEA related educational programs

Though most of the state and private academic education institutions in Armenia cover environmental issues within their curricula, only the following have special courses on OVOS/SEA:

- Yerevan State University (YSU) of Economy, Department of Economy of Natural Resources Utilization covers OVOS and Environmental Audit in its curriculum, 84 credits,
- Yerevan State University, Faculty of Ecology and Nature Protection- . covers EIA 36 credits.
- Yerevan State Engineering University. Department of Chemical Technologies and Environmental Engineering. Curricula – EIA. 36 credits.

The summer university course on Environmental Management, including the OVOS/SEA modules is envisaged to be open at the YSU in June 2004, for participants from the CIS countries. It will be financially supported by the Open Society Institute (OSI).

## **5. Past, ongoing and planned initiatives to build SEA capacity in Armenia**

### **5.1 Key planned activities on the state level**

RA Government *Decree No. 115 on Adopting the Measures for Implementing Commitments of the Republic of Armenia Stated in International Conventions* (25 February, 1998) approved the plan of measures related to the Espoo Convention commitments for the period 1998-2002. The measures were oriented at harmonization of national legislation with the Convention provisions, improvement of the system of EIA expertise, establishment of EIA procedure, procedures for public hearings, and development of SEA principles. However, due to insufficient financial resources, the measures were not fully implemented.

Regional Development Centre has recently initiated (before Armenia signed the SEA Protocol) the process of preparation of the new *Law of the Republic of Armenia in Environmental Review (Environmental Expertise)*, which is currently under development. The new law should take into account requirements of the SEA Protocol. Development of supporting regulations (by-laws) covering procedures at different OVOS/SEA stages is envisaged in the near future.

The following measures will be applied in order to improve SEA process:

- Adaptation of the criteria and parameters, provided in the Annexes I and III to the ESPOO Convention and in the Annexes I and III to the SEA Protocol to national conditions;
- Development of OVOS and SEA guidelines, based on the *OVOS guideline for CIS countries* (developed within the UNEP/Russia project '*Development of suggestions to improve OVOS process in the CIS countries*'), as well as on the basis of international practice;
- Dividing the activities into different categories, based on the relation between the scale of activity and the state of environment in the affected territory;
- Development of OVOS procedures for assessing impacts in a transboundary context;
- Improvement of assessment methodologies in terms of long-term impact assessment, integration of ecological and economic assessment of alternatives, risk assessment, monitoring, etc.
- Development of procedures for environmental assessment of policies, legislation and strategies.

### **5.2 Past and ongoing NGO and consultancy initiatives and academic programmes**

So far, all NGOs activities in the OVOS/SEA field have been implemented thanks to donor financial assistance. These activities are listed below:

- Project *SEA of the Water Code of Armenia* was implemented by the Engineering Consulting Centre "JINJ", with financial support of USAID (2002). OVOS for some water supply and drainage units was elaborated.
- Social Ecological Association has conducted *EIA for Gumri Master Plan*, with financial support of USAID (1999). At the same time the association initiated publication of *Kumayri* newspaper, devoted to the issues of environmental expertise. Unfortunately, the newspaper lasted only for one year. Supported by the REC grant the association developed and published the brochure *Database for Conducting Effective Expertise* in 2002.
- In 2003, the NGO *Transparency International Armenia* initiated development of the draft *Law on Environmental Expertise*, with financial support of the British Government and in cooperation with the MoNP, who will be responsible for coordinating the processes of OVOS, and environmental expertise.
- NGO *Eco-Globe* held a three-day SEA capacity building training in Yerevan, financially and substantively supported by the Norwegian Ministry of Foreign Affairs and the Ministry of Environment.

- NGO Ecological Survival conducted the EIA of Yerevan Tannery Reconstruction in 2003.
- Since 2001, the Centre for Legal Protection of Environment has undertaken a series of public hearings related to adoption of 10 Laws of RA and related to the project on genetically modified organisms from the point of view of their impact on environment. The hearings were supported by the Caucasus Regional Environmental Centre (CAREC).

## VI. Recommendations for the most effective focus of the UNDP/REC project

Based on the gaps in the current environmental assessment system described above, the following SEA capacity building activities have been identified as the most needed (they are listed in the order based on prioritisation though this order is not meant to be strictly followed):

- Development of a guideline for EIA and SEA implementation, adapted to the national conditions in Armenia, with a set of necessary provisions and methodologies to be applied at different stages of environmental assessment process (baseline criteria and parameters, screening criteria, impact assessment itself, monitoring, etc.);
- Implementation of a pilot project - SEA of the particular strategic initiative (e.g. in the sectors of industry, energy, agriculture or water industry);
- Further improvement of legislation framework regulating the process of environmental assessment, environmental expertise and environmental audit;
- Establishment of a National Centre for Environmental assessment (in case of sufficient financial resources availability) with focus on training (seminars, trainings, development of educational and methodological documents), advertising campaigns, etc.

## VII. Level of consultations with environmental and health authorities and with the public during the planning and SEA process

Due to absence of regulations addressing the SEA procedures the table below reflects requirements of the *RA Law on Environmental Impact assessment*, currently in force.

The “X” indicates in which SEA stage the consultations are legally required and in which stages they are really applied in practice.

**Table 5. Public participation according to existing norms on environmental assessment**

Stages of environmental assessment	Consultations with environmental and health authorities		Information accessibility and public participation	
	Required by legislation	Applied in practice	Required by legislation	Applied in practice
Initiation	X <i>Only for EIA</i>	Not applied in practice	X <i>Only for EIA</i>	Not applied in practice
EIA/SEA process (report preparation)	-	-	X	X (not in all cases)
EIA/SEA Expertise	X <i>Only for EIA</i>	X <i>EIA and SEA</i>	X <i>Only for EIA</i>	X <i>EIA and SEA</i>
Decision-making	X <i>Only for EIA</i>	X <i>Only for EIA</i>	-	-

Consultations with health authorities, particularly with the sanitary-epidemiological service, are conducted during the environmental expertise process, with special focus on drinking water quality, sewage process, and sanitary cleaning of solid, including construction waste.