

Secretary to the Aarhus Convention
United Nations Economic Commission for Europe
Environment and Human Settlement Division
Room 332, Palais des Nations
CH-1211 Geneva 10
Switzerland

Håkun Djurhuus
Partner

Our ref. 052030-0002 djur/gsc

T +45 72 27 33 44
djur@bechbruun.com

23 February 2012

Communication to the Aarhus Convention's Compliance Committee

On behalf of the Danish Agriculture & Food Council, I hereby submit a communication regarding the Danish process aiming to implement the Water Framework Directive passed by the European Union.

1. Information on correspondent submitting the communication

The Danish Agriculture & Food Council represents the farming and food industry of Denmark including businesses and trade and farmers' associations.

Agriculture and food are Denmark's largest industry and innovation grouping, employing some 145,000 people and exporting agricultural products, food and equipment of an annual value of approx. EUR 10 billion.

The Danish Agriculture & Food Council is the result of a merger of five organisations: Danish Agriculture, the Danish Bacon and Meat Council, the Danish Agricultural Council, the Danish Dairy Board and the Danish Pig Production

The Danish Agriculture & Food Council implements research and development programmes within food safety and veterinary issues, animal health and productivity, animal welfare, environment and energy.

The Danish Agriculture & Food Council handles the professional interests of its members, including:

- Environmental and energy policies
- Overall industrial policy and regulatory framework
- Research and innovation policy
- Trade and market policy and the EU Common Agricultural Policy (CAP)

BECH-BRUUN

- Animal welfare
- Food safety

Contact information:

Danish Agriculture & Food Council
Axelborg, Axeltorv 3
1609 Copenhagen V
Denmark

Any contact regarding this communication should be made to:

Håkun Djurhuus
Lawyer, partner
Bech-Bruun
Langelinie Alle 35
2100 Copenhagen Ø
Denmark

2. Party concerned

This communication concerns the Danish implementation of the Water Framework Directive passed by the European Union.¹

The relevant party to the Convention is Denmark.

3. Summary

On 22 December 2011 the Danish Government passed and published the 23 Danish river basin management plans that implement the Water Framework Directive passed by the European Union. This date marks an exact two years' overrun of the deadline for the implementation.

The Danish Government was in a hurry and due to this hurry and in the process of passing the river basin management plans, the Danish Government failed to comply with the requirements for public participation set out in article 6, paragraph 3, and 7 of the Aarhus Convention.

The Danish Government initially published 23 river basin management plans filled with wrong facts and wrong application of the relevant law. The initial consultation of these plans led to fundamental changes and according to Danish law, a new consultation process must be carried out in such cases.

However, the Danish Government chose to carry out only a short limited supplementary consultation. This new supplementary consultation process relating to the revised plans was carried out in a manner which gave the relevant parties no real chance of participation. Some of

¹ Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy

the changes meant that farmers not included in the initial draft plans were suddenly to be affected by the revised river basin management plans. The farmers included in the initial draft plans were given six months to consider the implication to their properties and operation of their farms. The farmers included only in the revised draft plans were given only five working days for the same manoeuvre.

The supplementary consultation process only consisted of maps published on a website for seven days. During the first two to three days, the website did not have the capacity to meet the interest of the public and the system went "down" leaving the relevant parties with no real chance of checking whether their comments and arguments from the first consultation were taken into account or whether their river basins not included in the initial plans were included in the revised river basin management plans.

The supplementary consultation was carried out from Saturday 3 to Saturday 10 December 2011 leaving the relevant parties with only 5 working days to go through the consultation material, hire consultants for technical assistance and provide comments and arguments to heavily revised the material included in the supplementary consultation.

The supplementary consultation of the 23 Danish river basin management plans was carried out in a manner that brings Denmark in non-compliance with article 6, paragraph 3, and article 7 of the Aarhus Convention.

Notification of the supplementary consultation was not made individually but through advertisement in some newspapers. Many farmers did not notice that there was a supplementary consultation-process regarding their properties.

4. Facts of the communication

The Water Framework Directive ("WFD") passed by the European Union is under implementation in the EU member states.

According to article 1 of the Directive, the purpose is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. This purpose is to be achieved by different measures and a central instrument in this regard is the river basin management plans regulated primarily in article 13 of the WFD.

The river basin management plan sets out the environmental and ecologic goals for each river basin in the member state.

The Danish implementation is widely based on general compulsory standards and goals to the river basins. These heavy burdens are put on the land owners mostly without any compensation. Depending on the current state of the river basin and the goals set out, the achievement of the goals can cause severe drainage problems to fields depending on sufficient drainage to river basins followed by equally severe economic losses due to lost opportunities

and lost crops. It is estimated that up until 15-25 % of the farming fields will be heavily negatively effected.

Thus, it is of great importance that the process leading to the final river basin management plan is carried out with the participation of the affected land owners. Of course, such participation calls for reasonable time frames for the said land owners when given the opportunity to comment on the draft river basin management plans.

According to article 13, paragraph 6, the river basin management plan must be passed no later than 9 years after the entry into force of the WFD. The WFD entered into force on 22 December 2000.

The 23 Danish river basin management plans were passed on 22 December 2011.²

The preamble to the WFD clearly states the importance of the proper involvement of the public: *"The success of this Directive relies on close cooperation and coherent action at Community, Member State and local level as well as on information, consultation and involvement of the public, including users."*

Specific rules are set out in article 14 of the WFD:

"Member States shall encourage the active involvement of all interested parties in the implementation of this Directive, in particular in the production, review and updating of the river basin management plans. Member States shall ensure that, for each river basin district, they publish and make available for comments to the public, including users:

(a) a timetable and work programme for the production of the plan, including a statement of the consultation measures to be taken, at least three years before the beginning of the period to which the plan refers;

(b) an interim overview of the significant water management issues identified in the river basin, at least two years before the beginning of the period to which the plan refers;

(c) draft copies of the river basin management plan, at least one year before the beginning of the period to which the plan refers.

On request, access shall be given to background documents and information used for the development of the draft river basin management plan.

2. Member States shall allow at least six months to comment in writing on those documents in order to allow active involvement and consultation.

3. Paragraphs 1 and 2 shall apply equally to updated river basin management plans."
[Underlining added].

The WFD has in Denmark mainly been implemented by the act known as the Act on Environmental Objectives (*miljømålsloven*).³

² The Danish river basin management plans are available at this link: <http://www.naturstyrelsen.dk/Vandet/Vandplaner/>

³ Act no. 1150 of 17 December 2003 as changed by later laws.

The rules on procurement, including involvement of the public, publication of finally adopted documents, etc., are laid down in Chapter 10, §§ 27a-31 of the Act on Environmental Objectives.

The river basin management plans must be prepared in accordance with § 4 of the Act on Environmental Objectives as well as part A of appendix 2 to the Act. In accordance with § 4(2) of the Act, "any revision" must be in accordance with part B of appendix 2 to the Act.

In accordance with § 28(1)(v) of the Act on Environmental Objectives, the Minister for the Environment must for each water district prepare a river basin management plan.

Following a consultation with the public authorities in accordance with § 28(2) of the Act, the Minister must adopt a proposal for a river basin management plan, see § 28(3).

The adopted proposal is subsequently submitted for public consultation in accordance with § 29 of the Act on Environmental Objectives. Such consultation is carried out by public notification.

Upon expiry of the public notification period, the Minister for the Environment adopts the proposals, see § 29(5).

This initial part of the process on passing the Danish river basin management plans have been carried out in accordance with the WFD and the Act on Environmental Objectives.

The problems, however, occurred when the draft river basin management plans showed to be based on massive wrong facts, wrongful application of the law, etc. and the Ministry of the Environment received more than 4,000 responses to their consultation request.

The many responses led to fundamental changes of the river basin management plans.

According to the Act on Environmental Objectives, such changes must lead to a renewed public consultation.

It follows from § 30, third sentence, of the Act on Environmental Objectives that:

"Where the change is substantial to the extent that it in fact constitutes a new proposal to the river basin management plans, the procedures laid down by §§ 28, 29 and 31 must be followed."

In our opinion, substantial changes to all 23 river basin management plans have been implemented in the period from the adoption of the river basin management plans under § 28(3) (the original draft consultation paper) and the final river basin management plans published on 22 December 2011 and against which this complaint has been filed.

In our opinion, this entails that a new basic consultation process should be conducted in accordance with §§ 28, 29 and 31 of the Act on Environmental Objectives.

This is corroborated by the memorandum published by the Danish Nature Agency (*Naturstyrelsen*) on 22 December 2011 on "*Summary of the Danish Nature Agency's memorandum on overall and general responses to the consultation of the draft river basin management plans*" of the same date. The memorandum is enclosed as **Annex 1**. In addition, the Nature Agency under the Danish Ministry of Environment has prepared a memorandum on the consultation of as much as 391 pages, which illustrates the scope and intensity of the river basin management plan regulations.⁴

It appears from page 27 of the very extensive memo (full version) on the consultation process, that the initial river basin management plans sent out for consultation have been changed significantly in scope as the final river basin management plans completely omitted river basins smaller than 10 km² where the rivers are not of high value to the nature or good ecological status has already been achieved.

In addition, according to its own consultation memos, the Nature Agency has made changes due to the regions different practices in relation to the characterisation of the rivers, on which the initial river basin management plans sent out for consultation were based. The Nature Agency has stated that the changes imply that approx. 6,000 km of rivers has been omitted from the river basin management plans, see summarised consultation memo page 6 (reduction of rivers included from approx. 28,000 km to approx. 22,000 km).

From page 7 of this summarised memo, it appears that there has been a significant reduction with respect to rivers where the physical conditions are in need of repair.

In comparison to the original draft consultation paper, the Nature Agency has in its final river basin management plans reduced the total stretch subject to requirements for measures to be taken until 2015 from approx. 7,300 km to approx. 5,300 km. This is in itself a significant change.

Moreover, a vast number of rivers have been re-categorised, and many new rivers have also been included in the river basin management plans. In addition to those stated herein, a great number of other less significant changes to the river basin management plans have been implemented.

4.1 The short supplementary consultation

Due to the many responses to the original consultation request and the fundamental changes to the river basin management plans, the Ministry of the Environment chose to carry out only a short supplementary consultation.

⁴ The full version of the memorandum on the result on the initial consultation is available at this link: http://www.naturstyrelsen.dk/NR/rdonlyres/74C2ED27-9300-431D-A679-FEBE86506BE3/0/Hoeringsnotat_endeligversion221211.pdf

The Minister was obliged to do so due to the unique Danish implementation demanding a "mini-consultation" in certain situations, see in this connection § 30 of the Act on Environmental Objectives.

§ 30 refers to a mandatory consultation requirement characterised by covering, among others, individual land owners whose properties have been subject to specific change and thus not the public at large.

The provision reads as follows:

"If, in connection with the adoption of the final river basin management plans, changes are made to the published proposal which fundamentally affect other authorities or citizens than those who caused the change by way of objection, the river basin management plan may not be adopted until the parties concerned have been given the opportunity to make a statement. The Ministry of Environmental Affairs will fix a deadline therefore. Where the change is substantial to the extent that it in fact constitutes a new proposal to the river basin management plan, the procedures laid down by §§ 28, 29 and 31 must be followed."

During the period from 4 October 2010 to 6 April 2011, the Ministry of the Environment submitted 23 river basin management plans for public consultation. The highly serious consequences of the river basin management plans to the farmer profession were reflected in the fact that the Ministry received more than 4,000 responses in connection with the consultation process. On 6 April 2011, the farmers' profession, represented by the Danish Agriculture & Food Council, submitted a comprehensive consultation response, containing a large number of relevant references of environmental and legal nature.

As mentioned above, the consultation responses caused the Nature Agency to make changes, which, at any rate, necessitated the commencement of at least a supplementary consultation process under § 30 of the Act on Environmental Objectives.

The supplementary consultation process was in fact conducted as a "cosmetic quick consultation". The consultation process lasted only five business days and individual notice was not given to the parties of whom the conditions were significantly changed in comparison to the original draft consultation paper and the consultation required special IT knowledge. Such pseudo consultation process is contrary to good administration practice and well-established procedures for the completion of public consultations within planning and nature protection issues. In this connection, it is, however, more important to establish that such process is contrary to the Aarhus Convention, which we will account for below.

In daily newspaper advertisements, the Nature Agency published that under § 30 of the Act on Environmental Objectives, the consultation process would be conducted in the period from Saturday 3 December to Saturday 10 December 2011, which in fact meant that there were only five business days to discover the existence of such consultation process, to obtain one's own information among the very extensive data material and to submit a proper response.

No letters were sent to the individual parties specifically concerned, i.e. the land owners with consultation status, the conditions of whom had been changed significantly compared to the original consultation paper, notifying them of the possibility to comment on the matter in the form of a response. Hence, it could not be taken for granted that the land owners in question would even become aware of the existence of the consultation process, of its duration of five days and of the availability of the consultation material which could solely be accessed through a somewhat difficult search process that required special IT knowledge. Any land owners on holiday in that particular week could not act either.

The material published in connection with the consultation process provided for by § 30 only consisted of map appendices with no individual text. Thus, there were no textual explanations to the changes that had been made in relation to the original draft consultation paper, the principles applied or other factors that enabled the reader to respond to the material. Even after clicking through the many map appendices, the parties with potential consultation status were not even shown, by way of separate indication or otherwise, what changes had been made regarding their properties. This would require that the party with consultation status had been provided with a "screen dump" showing the original characterisation of the rivers on the property etc. of the said party.

The quick consultation process held pursuant to § 30 resulted in approx. 1,800 new responses. However, according to the information held by the Nature Agency, the majority had merely re-submitted previous objections from previous responses. The Nature Agency stated that only approx. 120 responses concerning the changes that were implemented in specific contrast to the initial consultation. Only 80 of these have led to adjustments of the plans which, with respect to the map appendices, formed the basis for the quick consultation process. This not being a true consultation process offering the parties with consultation status a real possibility to submit their objections and comments is illustrated by the fact that only 80 changes were implemented as a result of the approx. 120 responses, of a total of 1,800, that concerned the changes made.

Provided that the parties concerned were able to navigate on the website of the Ministry of Environment, a *"guidance relating to the supplementary consultation process regarding changes to the draft river basin management plans"* had been made available on the said site. The guidance is enclosed as **Annex 2** hereto.

If the "public" wanted to submit supplementary responses, this had to be done using the Nature Agency's IT system, which described a somewhat complicated process which farmers and other parties with consultation status had to attempt to follow in order to submit a response.

The fact that only approx. 120 responses were submitted indicates that the consultation process was not a workable reality.

When the Danish Agriculture & Food Council became aware of the procedures and the exceptionally short consultation deadline, its environmental director Niels Peter Nørring immediately contacted the Nature Agency at deputy director level and requested an extension

of the consultation deadline to four weeks. On 6 December 2011, the Nature Agency's deputy director general Helle Pilsgaard denied the request, without this being written directly. The consultation deadline was not extended.

The Nature Agency's letter of 6 December 2011 is enclosed as **Annex 3** hereto.

In this connection, it is particularly important to note that certain properties not previously covered by the river basin management plans had been included in the revised river basin management plans and that the owners of said properties only had the above-mentioned five business days to take a position thereon and prepare a response, provided they became aware of the supplementary consultation process before it was over.

Upon expiry of the consultation deadline on 10 December 2011, it was apparently not possible to be granted access to the consultation material relevant to the quick consultation process. The material appeared to have been removed from the website.

By letter of 6 January 2012 to the Nature Agency, I therefore requested to be granted access to the files relevant to the consultation processes in question. The Nature Agency responded to my letter on 16 January 2012. The Nature Agency's letter is enclosed as **Annex 4**. The request for access to files also covered IT reports and other material describing the availability in relation to the consultation material provided in the brief consultation period. The Nature Agency refers in this respect to the National Survey and Cadastre (*Kort & Matrikelstyrelsen*) which assisted the Nature Agency in the consultation process.

As **Annex 5**, please find the National Survey and Cadastre's memorandum of 12 January 2012 on "*The availability of the consultation material for the supplementary consultation process regarding river basin management plans from 2 to 12 December 2011.*"

In its memo, the National Survey and Cadastre confirms the experience of hundreds of farmers, consultants and others when they in the brief consultation period attempted to gain access to the consultation material through the Nature Agency's website.

For long periods at a time, the system was inaccessible due to overload. This means that there were also fundamental, specific technical obstacles preventing statutory consultation access. Said problems entailed that the already exceptionally short consultation deadline was in fact made even shorter.

The enclosed graph shows that hardly any responses were submitted before 5 December 2011.

As **Annex 6**, please find a memorandum by the Knowledge Centre for Agriculture's Planning and Environmental Department, documenting in detail the massive IT problems experienced in relation to the consultation material.

In addition, an office memo of 7 December 2011 from the Municipality of Kolding is enclosed as **Annex 7**.

In the memo, it is, *inter alia*, stated that:

"Due to the extremely short consultation period, a political processing of the matter has not been possible."

The memo also contains general and material criticism of the consultation process. It is emphasised that erroneous classifications were made of the municipal rivers. The objections are made by a municipality with precise local knowledge. The Nature Agency does not seem to possess such detailed insight. The Municipality has established that:

"...all of the nine rivers which the Municipality of Kolding in connection with the public consultation wanted to be excluded from the plan have not been taken out."

The memo may therefore be taken to indicate that even the authorities with their resources and professional expertise were not able to submit the response wanted due to the short consultation period.

4.1.1 Limited participation due to limited time

It appears from § 30 of the Act on Environmental Objectives that the Minister for the Environment fixes the consultation deadline.

However, obviously, this authority provision does not allow the Minister to freely make a statutory consultation process illusory by fixing completely unacceptably short deadlines and by employing procedures which to a great extent prevent the citizens, not individually notified, and authorities concerned, from actually being heard.

The river basin management plans against which this complaint has been filed will undoubtedly force a large number of farmers all over the country, worse in some regions than others, to give up their profession and close down their farms as the soil, *inter alia*, will become hydromorphic to the extent that it is uncultivable. In other words, the regulation is very intense and affects an entire profession's fundamental activities negatively. This effects that the legal basis of a minister's authority, as the one laid down by § 30, second sentence, must be firm and clear.

This is even more relevant when, as is the case here, the matter concerns the use of authority which in all respects conceivable deviates radically from fundamental principles and practices for the execution of a consultation of the citizens and authorities affected. The standard phrased authority provision was evidently communicated by the Danish Parliament on the condition usually implied that the authority provision is to be used by the Minister in compliance with basic consultation principles and rules and in a manner offering the affected citizens and authorities a realistic possibility of contradiction.

On 6 December 2011, the Nature Agency prepared a "*Memorandum on supplementary consultation – process and legal basis*". The memo is enclosed as part of Exhibit 3.

The Nature Agency confirms in this memo that the consultation process was limited to only include a few affected citizens. This circumstance is even used as justification for derogating from the Aarhus Convention and fundamental legal principles for rules and procedures concerning the execution of consultation processes. The Nature Agency thus writes that:

"This means that the total revised draft river basin management plans have not been submitted for public consultation – in which case the Nature Agency would evidently agree that a longer deadline was necessary – but only a focused consultation for the purpose of providing a few authorities and citizens with the opportunity to comment on the changes to the extent that they are affected thereby."

and

"When taken into consideration that, as mentioned, the total revised draft river basin management plans have not been submitted for public consultation, the Nature Agency further finds that the consultation period has not brought about any questions related to compliance with the Aarhus Convention."

The argumentation is remarkably poor. To the individual identifiable citizens provided with consultation status for the consultation process held in accordance with § 30, the number of other parties with consultation status was basically irrelevant. To these affected citizens, the unacceptably short consultation deadline and the unacceptably difficult procedure involved in the establishment of whether the individual citizens were affected or not are equally onerous had the plans been sent out for public consultation.

It could be argued that it was even more difficult for the affected citizens as they had to devote great efforts to clarify whether they did in fact have consultation status. In this connection, I once again emphasise that the GIS maps constituting the consultation basis, without the other text etc. to the river basin management plans, did not contain any indications of the changes made in comparison to the original consultation process.

The memo further states that:

"In practice, this means that the individual land owner should be given the possibility to comment on the changes that will affect his or her property, but, as a starting point, not any other changes, and consequently, the Nature Agency is of the opinion that the consultation period fixed is in compliance with the provision in § 30 of the Act on Environmental Objectives."

However, this was prevented by the generic consultation process.

5. Nature of alleged non-compliance and provisions of relevance

The 23 Danish river basin management plans are all passed as part of a process that does not comply with article 6, paragraph 3, and article 7 of the Aarhus Convention.

5.1 Article 6(3) of the Aarhus Convention

Article 6(3) of the Aarhus Convention reads as follows:

"The public participation procedures shall include reasonable time-frames for the different phases, allowing sufficient time for informing the public in accordance with paragraph 2 above and for the public to prepare and participate effectively during the environmental decision-making." [underlining added]

The Danish Parliament has had reason to believe and assume that the Minister, in this case represented by the Nature Agency, was going to make use of her authority pursuant to § 30 in accordance with applicable rules, including the convention promoted by Denmark, adopted by the EU and implemented by Danish law.

It is obvious that the supplementary consultation does not comply with the provision of Article 6(3) of the Aarhus Convention quoted above. Consequently, "reasonable time-frames" have not been established and no time-frames have been fixed in relation to informing the public to the effect that the public could expect "to participate effectively" in the entire decision-making process.

Article 6 deals with "public participation in decisions concerning actual activities". The provision quoted above, however, also applies to public participation in connection with plans, programmes and policies in relation to the environment see Article 7 of the Aarhus Convention, which reads as follows:

"Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public. Within this framework, article 6, paragraphs 3, 4 and 8, shall be applied. The public which may participate shall be identified by the relevant public authority, taking into account the objectives of this Convention. To the extent appropriate, each Party shall endeavour to provide opportunities for public participation in the preparation of policies relating to the environment."

On page 89 of the aforesaid implementation guide from the UNECE, it is for example stated as implementation guidance that the implementation rules:

"Must provide enough time for notification, preparation and effective participation by the public." [underlining added]

The supplementary consultation by the Nature Agency obviously does not comply with this principle.

By way of a ruling by the UN/ECE Compliance Committee represented in ECE/MP.PP/2008/5/Add.6, the Committee established that:

"The time frame of only 10 working days ... does not meet the requirement of reasonable time frames in article 6, paragraph 3."

Against this background, it is difficult to reach another conclusion than that the supplementary consultation has been completed in a way which obviously implies a disregard of the Aarhus Convention as ratified and implemented by Denmark.

5.2 Particulars on Article 7 of the Aarhus Convention

As appears from the above, Article 7 of the Aarhus Convention implies that suitable practical measures have to be made in connection with the preparation of a plan and that transparency and reasonable time-frames for participation in the process have to be ensured. In addition, the provision implies that the required information is made available.

As described above, the consultation material was only made available by way of a digital card system on the Internet and the said system did not work during part of the brief consultation period.

In our opinion, this does not fulfil the requirements of Article 7 of the Aarhus Convention on reasonable time-frames and provision of required information.

In our opinion, it is an aggravating fact that the consultation material is only made available in a way which presumes certain IT knowledge when the consultation period is unfairly brief. This should mainly be seen in the light of the fact that the farmers and others affected by the plan do not necessarily possess the required IT knowledge.

6. Use of domestic remedies

It follows directly from § 55(1) of the Act on Environmental Objectives who is entitled to file complaints against the adoption of the river basin management plans, and the Danish Agriculture & Food Council is prevented from complaining against the river basin management plans.

The time-frame within which complaints have to be filed is four weeks pursuant to s. 56(1) of the Act on Environmental Objectives, but the adoption and publication of the river basin management plans on 22 December 2011 implied that the time-frame within which complaints should be filed expired on 19 January 2012 and that the main part of that period ran over the Christmas holidays. This caused considerable difficulties for the members of the Agriculture & Food Council in respect of assessing the consequences and preparing a complaint.

The Agriculture & Food Council chose, however, to file a complaint on behalf of three farmers who are individually affected and who did not succeed in making a response to the supplementary consultation. We hope that this complaint will lead to a decision by the Danish Nature and Environmental Board of Appeal which will make the Nature Agency realise that the completed process implies that all 23 river basin management plans include considerable legal defects and that, consequently, a new process has to be completed.

Reality is, however, that the complaints will probably only have effect for the three river basin management plans against which complaints have been filed and it is therefore of decisive importance that the Compliance Committee will make a decision in principle in respect of the Danish process of involving the public in connection with the adoption of the river basin management plans as such process is similar for all 23 river basin management plans.

Yours sincerely



Håkun Djurhuus
(On behalf of the Danish Agriculture & Food Council)

7. Supporting documentation

The 23 Danish river basin management plans: <http://www.naturstyrelsen.dk/Vandet/Vandplaner/>

The full version of the memorandum on the result on the initial consultation is available at this link: http://www.naturstyrelsen.dk/NR/rdonlyres/74C2ED27-9300-431D-A679-FEBE86506BE3/0/Hoeringsnotat_endeligversion221211.pdf

Annex 1: The Danish Nature Agency's memorandum of 22 December 2011 on "Summary of the Danish Nature Agency's memorandum on overall and general responses to the consultation of the draft river basin management plans"

Annex 2: >> Guidance relating to the supplementary consultation process regarding changes to the draft river basin management plans

Annex 3: The Danish Nature Agency's letter of 6 December 2011

Annex 4: The Danish Nature Agency's letter of 16 January 2012

Annex 5: The National Survey and Cadastre's memorandum of 12 January 2012

Annex 6: The Knowledge Centre for Agriculture's memorandum on IT problems

Annex 7: The Municipality of Kolding's office memo of 7 December 2011