Subject: Memorandum concerning supplementary consultation of the river basin management plans December 2011 - Comments from the Municipality of Kolding

[...]

As we have ascertained that material changes have been made to the documents presented, changes which have not been brought about by the Municipality of Kolding, we are of the opinion that we should be consulted.

On the basis of the extremely short consultation period, it has not been possible to handle the matter politically. This memorandum has therefore been prepared by the administration based on the consultation response delivered by the Municipality of Kolding in connection with the public consultation in the period October 2010 to April 2011.

[...]

We have ascertained that some of the changes made from the public consultation request to the supplementary consultation request stem from proposals submitted by us as early as in connection with the consultation of the river basin management plans in the period January to March 2010. However, we cannot seem to find some of the proposals we submitted in connection with the public consultation.

The Municipality of Kolding finds this deeply problematic. Considerable, qualified efforts were made to produce a number of factually well-founded proposals for changes to the river basin management plans on the basis of our local knowledge. We have established that the Ministry of the Environment has chosen to ignore our professionalism in the documents presented and the situation is now that we feel our work in relation to the consultation response to the public consultation was completely in vain.

At the same time, the result is that the river basin management plans now include initiatives that would be pointless whereas other valuable efforts have been excluded from the said plans. Some watercourses ought to change status in the river basin management plan and others should be deleted entirely. Others again should be included.

We strongly encourage the Ministry of the Environment to read the consultation response we submitted in connection with the public consultation. If the Ministry of the Environment had consulted our response, several of the pointless initiatives could have been deleted and erroneous classifications of some of the river basin management plans could have been avoided before this supplementary consultation. The Municipality of Kolding does not find it reasonable that it is to summarise the previously submitted response, and reference is instead made to it on our website: