

**Evaluating National Strategic Reference Frameworks with
regards to preserving biodiversity and maintaining
favourable conservation status of species and habitat types
of European importance**

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CEEWEB is an international network of non-governmental organizations in the Central and Eastern European (CEE) region. The mission of the network is the conservation of the biodiversity through the promotion of sustainable development.

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The views expressed in this publication are those of the authors and do not necessarily represent those of CEEWEB.

I. Introduction

The present document is a joined effort of the CEEWEB network to scrutinize National Development Plans and respective other planning documents (Operational Programs, Rural Development Plans and Regional Operational Programs) of seven Central and East European countries with regards to their consideration of conservation objectives. Special focus was given to the integration of objectives of EU conservation legislation (the Birds and Habitat Directives).

Most of the assessed countries had to begin with the implementation of these Directives in 2004 when they joined the EU. It is clear from the assessments that NATURA 2000 has high priority in the conservation politics of the new member countries and accession countries. This is a positive sign which let us hope that proper implementation of the directives in the coming period is possible.

On the other hand, the main message of the country assessments is that biodiversity objectives do not have a high priority in national development planning *in general*. The integration of conservation into other sectors' planning is not taking place. The assessment concludes that conservation and environmental protection is still not dealt with as a horizontal issue, but rather as a separate objective. It is not a question that conservation cannot be successful with such little support from other sectors.

Integration of conservation is especially difficult for sectors with conflicting interests. But we also see some positive examples if we look into the assessments. Agriculture and conservation now have to work together to achieve European conservation objectives. This kind of cooperation is not easy and several countries face difficulties putting it into practice. But we also see some positive examples to achieve NATURA 2000 objectives through rural development planning. Unfortunately the assessment also shows that these efforts are too few to achieve the European biodiversity targets.

If we compare this assessment with the respective CEEWEB report¹ analyzing NDPs of the 2004-2006 period of the same region we see that the main message is similar. The report stated:

“The results of the project shows, that the pattern of development which the accession countries are likely to follow is the same as of present member states of the European Union. This is the development which has lead to the deterioration of the natural environment. Thus it can be predicted, that nature will not be sufficiently taken care of the accession countries either, should they follow this pattern.”

Unfortunately, this sentence is still relevant today, almost three years after EU accession and the second time CEE countries have the chance to decide on EU financial assistance. The main outcome of this assessment is still that national development plans of CEE countries are not providing enough incentives to achieve European conservation targets, especially the target of halting the loss of biodiversity until 2010.

¹ Safeguarding biodiversity in National Development Plans, CEEWEB 2003

II. Methodology

The evaluators involved in the project were provided with a strategic assessment methodology specifically for evaluating NDPs from nature conservation point of view with a focus on implementation of the EU Birds and Habitat Directives. The methodology builds upon a questionnaire with different topics (situation analysis, nature conservation, agriculture, forestry, etc.), for which scores are to be given. After evaluating each topic with scores short written comments explained the evaluators' assessment.

Despite this uniform methodology it could not be avoided that some degree of subjectivity affects the results, consequently they cannot be regarded as precise, indisputable evaluation of the different issues. For more precise picture the questionnaire should not be considered alone but only together with the narrative comments.

Additionally to the questionnaire the evaluators had to complete a list of "Main threats for biodiversity & Natura 2000" for their respective country. The lists present the problems arising from the realisation of development which will most likely have a negative impact on biodiversity and the NATURA 2000 network. These lists present the subjective opinion of the evaluators but are a good tool to stress the main biodiversity concerns in a country. This possibility was also used by some contributors to highlight specific examples and concrete development plans and projects with foreseeable perils. A compiled list with the most important pressure from each country can be found in chapter V.

Nevertheless as the outcomes typically show that the documents do not meet biodiversity expectations, we do think that the general picture is very much revealing and provides information on the expected tendencies, threats or just the opposite, opportunities resulting from the NDPs.

III. Main findings

Consistency with EU policies and targets

Despite the European Council in 2001 adopted the target to halt biodiversity loss by 2010, and it became part of the 6th Environmental Action Programme and the EU Sustainable Development Strategy, **this target has not been integrated into the NDPs**. It is considered and mentioned in only one of the assessed plans!

In some countries (Latvia, Poland, Romania) Water Framework Directive objectives are clearly not integrated into development planning either. Water related planning in these countries still focuses only on traditional water management issues (water supply, sewage treatment, flood prevention) and does not consider wetland ecosystems. Fisheries and marine parts of development plans do not deal with marine Natura 2000 although marine sites have been designed in all countries with coastal parts (Poland, Romania, Estonia, Latvia).

Species and habitats protection outside the network

Despite the threats existent for the Natura 2000 areas itself, the assessments clearly show the threat for Natura 2000 species and habitats *outside* the network. Because these areas are not

protected by law, intensification of economic activities will probably lead to the decrease of biodiversity in these areas.

Sectoral integration

There is sectoral integration on the "verbal" and general level, but real integration is missing from more detailed planning. **Biodiversity considerations** are present in the situation analysis of different sectors but **are hardly mentioned in more operational parts of plans**. Ecological factors are mostly not included in investment evaluation and selection criteria.

There is normally a well established „conservation part” in development plans (mostly the Environment OP), which seems to be an excuse for not integrating conservation interests in planning documents of other sectors. Environmental integration into ROPs is very occasionally. In this respect, there is no coherency between sectoral planning.

Tourism

The value of nature for tourism is generally acknowledged in most national development plans. Because of this, protection and enhancement of nature and the natural environment is sometimes targeted as part of tourism development. On the other hand, **carrying capacity of natural areas** and potential threats to natural resources created by intensive tourism **are not considered in most cases**.

Also, in many countries **large tourism development projects are planned in areas with high biodiversity values**. In all assessed countries with high mountain regions there are plans to develop ski infrastructures in biodiversity rich areas and also in protected areas and proposed Natura 2000 sites (see Romania, Slovakia, Poland).

Agriculture

Traditional land-use sustained high biodiversity on large areas in Central and Eastern European countries. This sector faces/will face gradual, but important changes according to EU accession. There are two major types of threats to this arising from the change of agriculture methods:

1. The **intensification of agriculture** encouraged by European subsidies will have a negative effect on many Natura 2000 sites, by losing the mosaic-type landscape and intensive use of chemicals. NDPs and RDPs do not maintain to exclude those provisions which aim at the creation of large agricultural fields and monocultural farming.
2. European policies (e.g. the requested milk quality) make the actual farming financially unsustainable, so **more and more people will abandon farming**. The decreasing number of livestock in Natura 2000 sites will inevitably lead to loss of hay-making fields and pastures, which are semi-natural areas with high biodiversity.

These changes are slowly taking effect in the new MSs and the NDPs of the accession countries will inevitably lead to the same processes, too. The general consideration is that structural changes applied will probably overweight positive effects of agri-environmental measures. As a result, agro-biodiversity loss will probably not be stopped, even till 2013.

Biomass production

Production of biomass for energy purposes is a clear and ambitious target in most countries' national development plans and in agricultural rural development plans. There is a clear

commitment in all assessed NDPs to increase biomass production. Unfortunately this will be **most likely realised through large monocultural plantations** which could add to the intensification of agriculture and be a threat for biodiversity. Agricultural areas with low productivity, in many cases important habitats, are especially under threat as potential areas for biomass related afforestation (Latvia). The need for more timber for energetic purposes will probably lead to intensification in forestry, as well.

Development of infrastructure

Development of infrastructure will have major impact on biodiversity in the CEE countries in the coming planning period. Considering the high number of planned developments (on all levels of development planning (NSRFs, OPs, ROPs)) that affect protected areas and the Natura 2000 network, it is not a question that conservation will suffer in many cases from EU support. The **development of road infrastructure is assessed to be a major threat** in all assessed countries. The weak system of EIA in some countries makes these threats very realistic.

Wetlands could also significantly be affected by hydrological investments. According to national documents, water related planning could be used both for river renaturalisation and river regulation, dam and reservoir building. But because there is no clear mechanism to prevent environmentally damaging water development, **financial resources might be used for destroy rather than to restore wetlands.**

Secondary effects of infrastructural development on other sectors should be considered as well.

Environmental education and awareness

Environmental education and awareness raising about conservation and biodiversity has a very low priority in most countries. Public awareness raising is not focused on nature conservation (Natura 2000 or 2010 target) but on general environmental aspects.

Neglecting the information of stakeholders is another problem in development planning. This will probably contribute to less effective implementation of EU environmental legislation. The lack of knowledge of farmers working in Natura 2000 areas about the subventions and the lack of capacity to apply for the subventions can lead to a general opposition towards protected areas.

Institutional capacity

Weak institutional management (central and/or local) can lead towards the fast degradation of the quality of the Natura 2000 sites, thus losing the original potential/value why they were designated. In some countries the **lack of a well working managing administration** seems to be a real threat (Romania, Poland)

Disorganized protected areas can suffer by illegal logging, illegal/not controlled hunting, uncontrolled tourism, inefficient monitoring system, etc.

IV. Conclusions of the assessment

The goal of this assessment is to evaluate how far National Strategic Reference Frameworks (“National Development Plans”) for 2007-2013 will affect biological diversity with special focus on maintaining the conservation status of species and habitats of European importance in the CEE region.

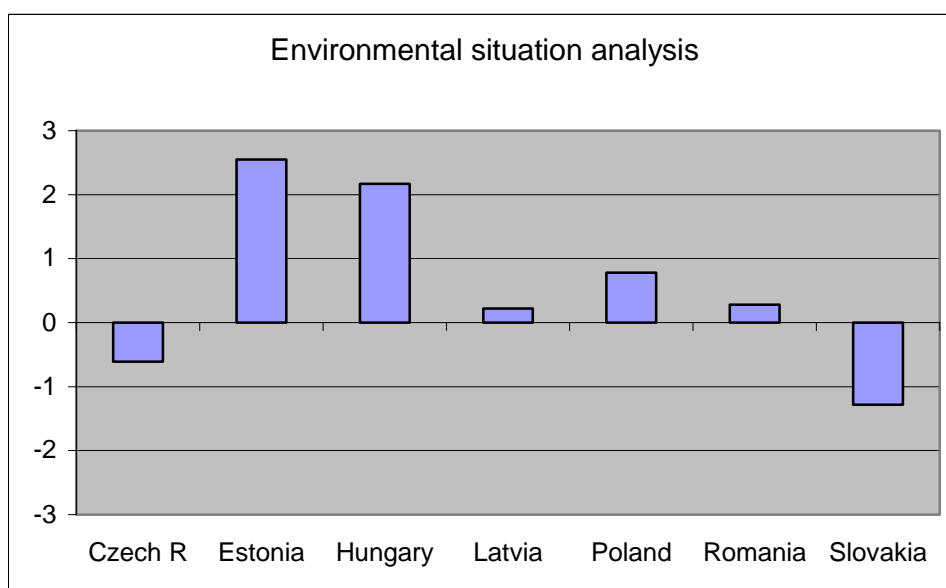
For evaluating this, five categories are determined with the following scores:

<i>The opposite of the statement is true</i>	<i>-3 scores</i>
<i>Entire lack of meeting the statement</i>	<i>-1.5 scores</i>
<i>Meeting the statement is far too general</i>	<i>1 score</i>
<i>Partial realisation of the statement</i>	<i>2 scores</i>
<i>Full realisation of the statement</i>	<i>3 scores</i>

An average of scores above +1.5 generally means that the NDP is acceptable.

IV.1. Assessing to what extent the plan is well established - Environmental situation analysis

The plan completed an environmental problem map (SWOT analysis).
The plan examined the state of each environmental element.
The plan examines the conservation status of species and habitats of Community importance.
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.
The plan examined the level of environmental awareness of the affected people.
The plan explored the situation and efficiency of the institutional system of environmental protection.
The plan explored the situation and efficiency of the institutional system of environmental education.
Has the opportunity for public participation been ensured during the planning process of environmental issues?
Was strategic environmental assessment completed for the plan?



According to the methodology the plan is established environmentally if the scores are above the 50% of the maximum (i.e. 1.5 point). Thus it can be stated that only two NDPs (from Estonia and Hungary) are acceptable from this respect. In other counties, the situation analysis of the environment is far from providing solid environmental basis for such a comprehensive document and may lead to severe environmental and nature conservation consequences through the implementation of the developments.

The plans are focused rather on general environmental aspects and general environment elements. (water, air, forests, biodiversity) The conservation status of "European" species and habitats is not considered.

IV.2. Assessing the integration of nature conservation in the planning

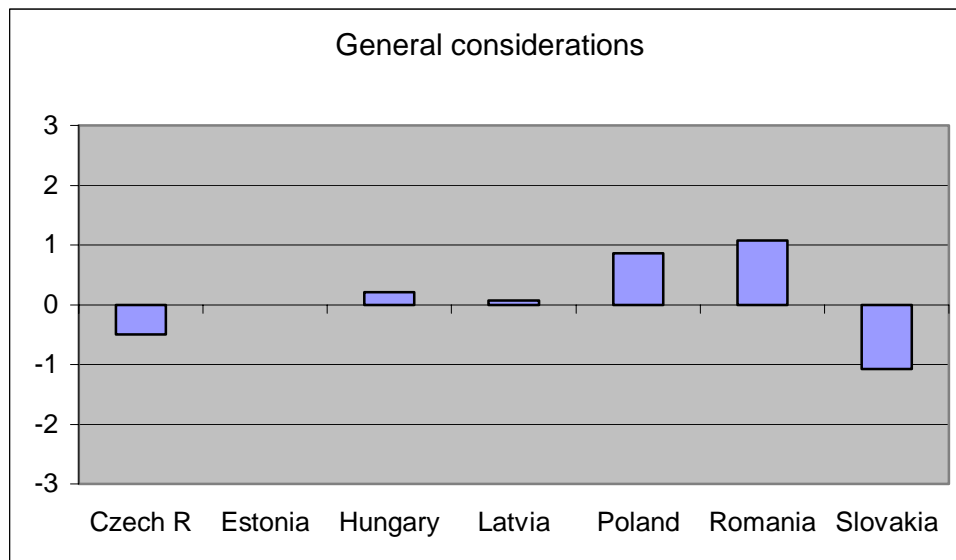
IV.2.1. General considerations

The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly from an environmental point of view.
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.
The plan complies with the environmental legislation.

Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).

The plan doesn't list investments which mean a potential danger for Natura species, habitats or sites.

Environmental considerations are included in the projects / investments evaluation criteria.



The assessment of the integration of environmental considerations into other sector shows a rather negative picture in all countries. There is no country where sectoral integration would be satisfying, the average results are all under half of the maximum (1.5 points).

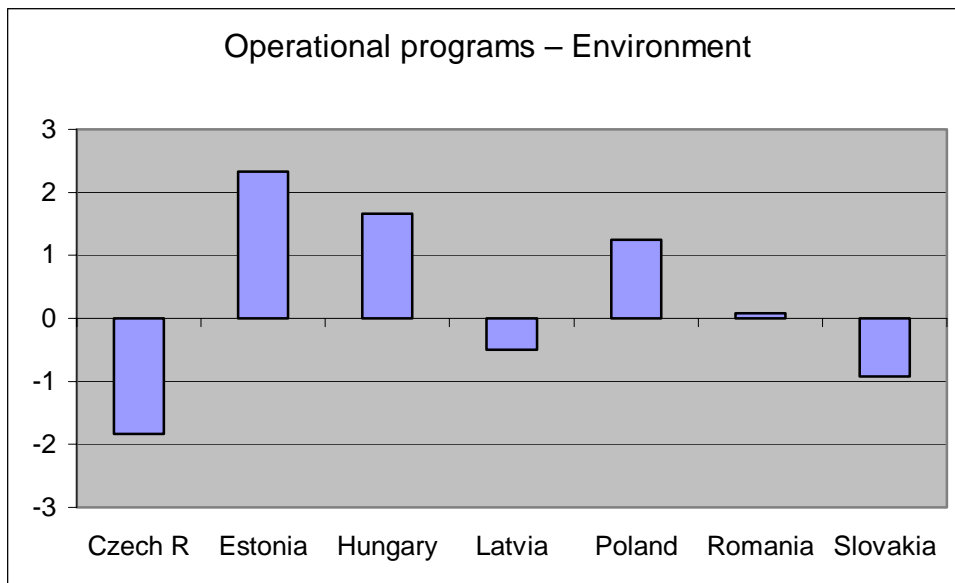
Description of the situation in different sectors often (but not always) contains description of environmental aspects, and the impact of the sectors on the environment. Unfortunately, the descriptions are often too simplified. They normally focus on general environmental issues, but not on biodiversity. While environmental aspects are considered on this general descriptive level, *real integration is missing from more detailed planning*.

As there is mostly one OP especially for environmental investments the essential integration of environmental aspect into other sector is mostly too weak. Protection and enhancement of the Natura 2000 network is normally not considered in development plans other than the Environmental OPs and RDPs. **The 2010 target is mentioned** in all plans (NDPs, OPs, RDPs) **only in one of the assessed plans** (Estonian environmental OP). Without substantial support from national planning the realisation of the 2010 target is very questionable.

IV.2.2. Environment

The plan deals with the rehabilitation and preservation of the damaged ecological systems.

The plan deals with the provisions for establishing the coherence of habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.
The plan deals with the provisions for the prevention of the invading species from further spread.
In the plan there are possibilities of financing habitat restoration, species conservation, and ecological corridors restoration.
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favourable conservation status of Natura 2000 species and habitats.



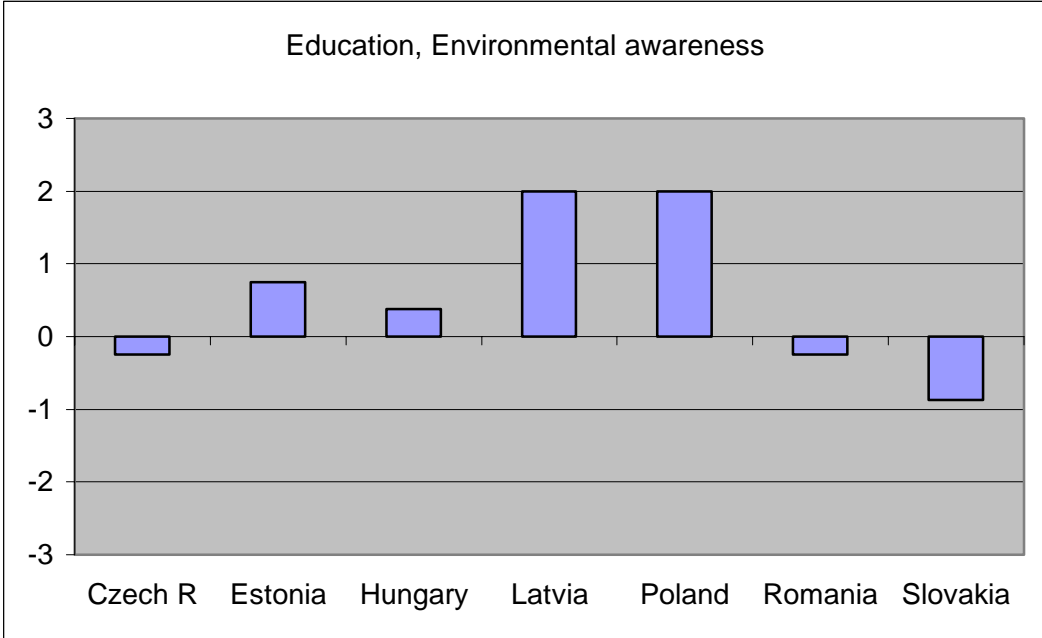
In general, Environmental OPs deal with the rehabilitation and preservation of the damaged ecological systems. Also, there are good possibilities of financing habitat restoration and species conservation. Unfortunately, the importance of preserving or restoring ecological networks and limiting the impact of isolation is neglected in a number of countries. Also other important factors, such as the spread of invasive alien species is not considered in all cases.

It is often claimed that nature protection is restricted to protected areas and the Natura 2000 network. According to the operational programs all effort will be concentrated on these areas and there are no provisions for managing or preserving nature elsewhere.

There are some possibilities for financing Natura 2000 related actions, but it is possible that not all necessary actions will be financed. Only the Estonian ‘OP for the Human Environment Development’ provides financing for a wide range of important management related issues. The amount of financial support reserved for these actions is regarded generally as insufficient for maintaining the favourable conservation status of Natura 2000 species and habitats.

IV.2.3. Education, Environmental awareness

The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.
The plan contains elements, which target the raising of environmental awareness.
The plan contains elements, which target the raising of awareness about the Natura 2000 network.
The plan contains elements that target the raising of awareness about Natura of affected people (e.g. farmers, foresters, fishers).



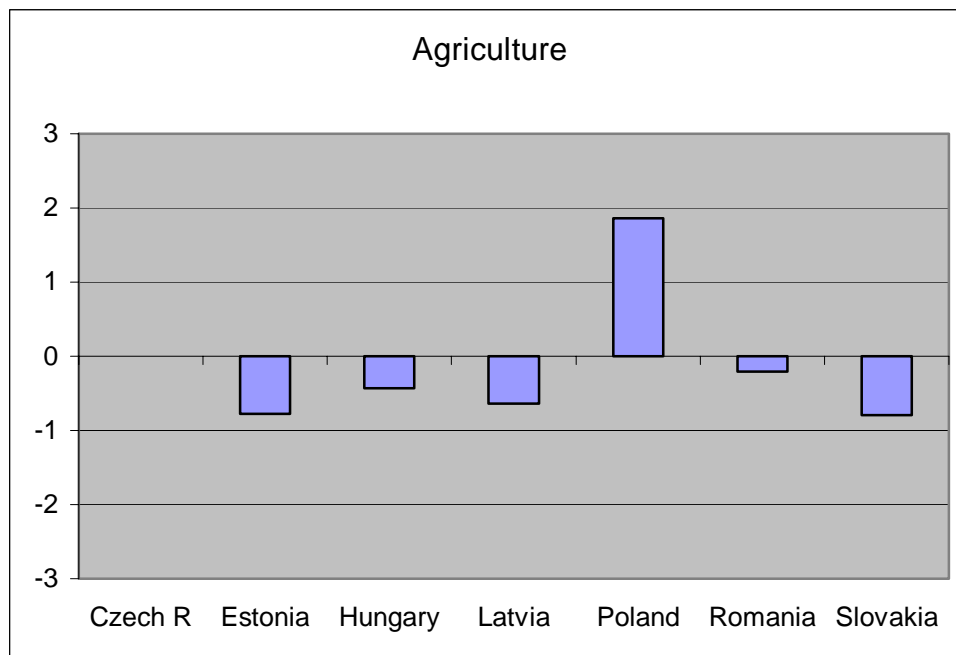
The plans differ widely in how they deal with environmental education and awareness raising. In Latvia, Poland and Estonia the level of environmental awareness is well examined and special programs deal with this subject. This is in contrast to other countries where support for environmental education and awareness raising can be very limited.

In most countries, environmental education and awareness raising is focused on general environmental issues like accessibility of environmental information for all, sustainable consumption etc. but not on biodiversity in special. Also, there is a tendency to focus only on school children through supporting nature schools (Estonia, Hungary) while neglecting communication with the grown-up population and in special with stakeholders.

Special actions targeting awareness raising of stakeholders about the Natura 2000 network are not mentioned in any of the plans. This is very inappropriate because the network can only function with active involvement of affected people. Neglecting the information needs of stakeholders will inevitably lead to the mismanagement of sites.

IV.2.4. Agriculture

The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.
The plan cares for the preservation of the traditional extensive farming.
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.
The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.
The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.
The plan promotes and enhances the active involvement of local stakeholders into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.



In most countries the assessments of Rural Development Plans have led to negative average results. This means that these plans fail to support an agriculture that maintains biodiversity. The only country with acceptable result is Poland where support is given for traditional, small-scale farming. Even here, agri-environmental schemes and Natura 2000 agricultural payments are too simplified and financial allocation is too small to make these schemes really effective.

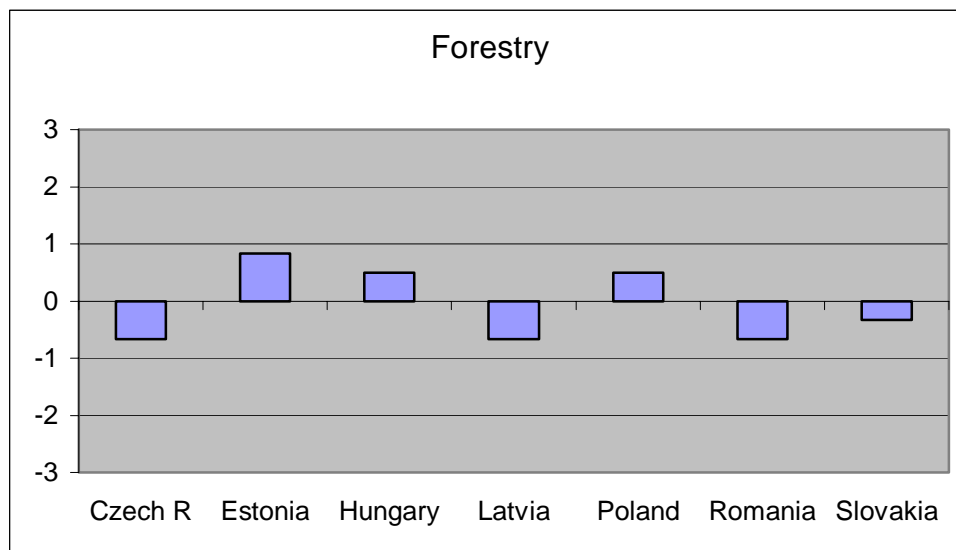
In some countries environmentally friendly farming measures are in line with big producers' interests. This could lead to use of agri-environmental money for purposes without real environmental effect. This could lead to use of agri-environmental money which is opposite to its purposes.

In contrast to European Union recommendations Natura 2000 payments for farmers are still a question in a number of countries. In Estonia, Hungary and Slovakia there is strong pressure on Ministries of Agriculture not to start with this payments in 2007. Because the negotiations about these payments are still under way the outcome is uncertain. In the moment it is real threat that in some countries the compensations will be postponed or has an insufficient and inadequate level.

Agriculture is regarded as one of the main threats or the most important threat to biodiversity in the assessments. RDPs fail to prevent the creation of large agricultural fields, monocultural farming and the intensification of agriculture. The general expectation, that structural changes applied will probably overweight positive effects of agri-environmental measures seems to become reality through current RDP planning. According to the assessments, RDPs will be probably not enough to achieve the 2010 target for agro-biodiversity. We can expect that agro-biodiversity loss won't be stopped even till 2013.

IV.2.5. Forestry

The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.
The plan promotes the conservation of forest species and habitats through protection measures and sustainable forestry.
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.



The immaterial values provided by forests are not normally considered in the plans; the approach is rather an economical one. Also, the preservation of continuous forests is not a priority objective. In some countries, where natural disasters (forest fires, big flood events) took place in recent years the role of forests in prevention is acknowledged. The low scores given to the forest sector in all countries make it obvious that sustainable forestry is no priority objective in development plans. Support is given to improve road infrastructure, which could lead to significant disturbance and fragmentation of forest habitats.

The increased use of existing forest as biomass resources could lead to the intensification of forestry. The probable expansion of monocultural energy-plantations with low species diversity is another threat. Support for afforestation will probably induce negative changes in landscape structure (afforestation of important meadow and pasture habitats). Financial support for afforestation is provided not only for native species, therefore the use of invasive alien species for this reason is likely.

In some RDPs, forest Natura payments are not obvious or will be postponed for years.

IV.2.6. Water regulation, water management, fishery

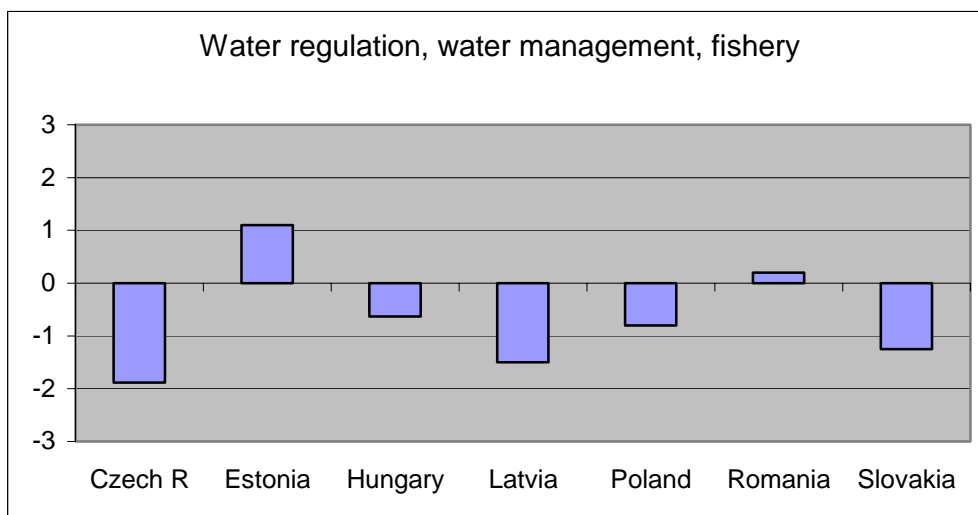
The plan adopts the catchment-centric approach of the EU Water Framework Directive and provides the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.

The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.

The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.

In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species.

The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.



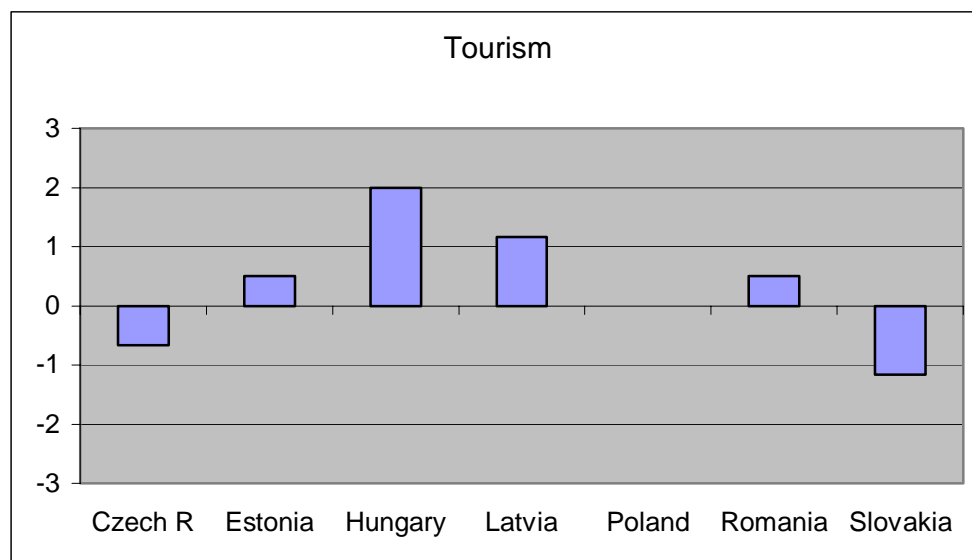
Average results in most countries are negative. Water management is regarded as one of the most important threats or the most important threat to biodiversity and Natura 2000 in the assessments. Additionally, a number of development plans are not consistent with WFD objectives (Poland, Romania)!

Wetland biodiversity could significantly be affected by hydrological investments. Water related planning in some countries could be used for both river renaturalisation and river regulation, dam and reservoir building. But because there is no clear mechanism to prevent environmentally damaging water development financial resources might be used for destroy rather than to restore wetlands. Plans for water-related developments critically endangering wetland ecosystems are listed in a number of countries (Poland, Czech Republic)

Protection measures for marine Natura 2000 sites are not mentioned in any of the countries with marine sites. Also, negative effects of fishery are not dealt with properly.

IV.2.7. Tourism

The plan considers the touristic carrying capacity of the areas and avoids the novel environmental tourist load of those areas that have already reached or exceeded it.
The plan supports ecologically friendly tourism.
The plan considers the positive effect of conservation and Natura 2000 on tourism development.



The value of nature for tourism is generally acknowledged in most national development plans. Because of this, protection and enhancement of nature and the natural environment is sometimes targeted as part of tourism development. On the other hand, carrying capacity of natural areas and potential threats to natural resources created by intensive tourism are not considered in most cases.

Also, in many countries large tourism development projects are planned in areas with high biodiversity values. In a number of countries, these plans affect designed Natura 2000 sites or other protected areas. In all assessed countries with high mountain regions there are plans to develop ski infrastructure in biodiversity rich areas and also in protected areas and designed Natura 2000 sites (for example Romania, Slovakia, Poland).

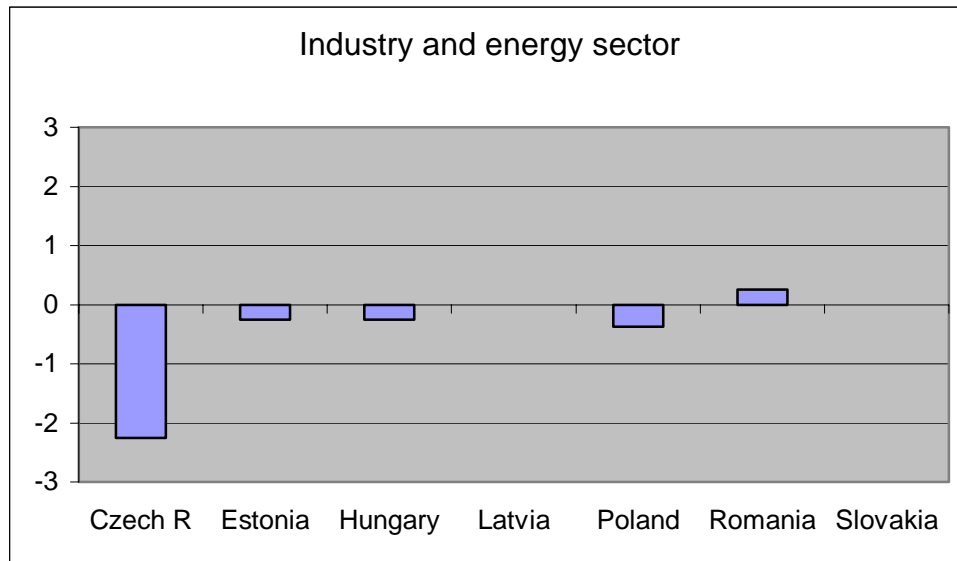
IV.2.8. Industry and energy sector

The plan avoids and prohibits green field investments.
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The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.

The plan doesn't include industry development that harm designed Natura 2000 sites, species and habitats.

In the plan, environmental considerations are included in the projects / investments evaluation criteria.



The plans do not provide for any restrictions or incentives to avoid green field investments. On the opposite, in Poland the increasing percentage of "green field investments" is considered a positive feature!

In a number of countries (Latvia, Estonia) industrial development clearly targets innovative types of businesses that do not require intensive use of natural and energy resources and reduce pollution. In other countries the establishment of new polluting industries and increasing pressure on the environment cannot be excluded and is a likely future aspect. Because concrete investments plans are not known at this stage in most countries, direct impacts on nature and biodiversity are not clear yet.

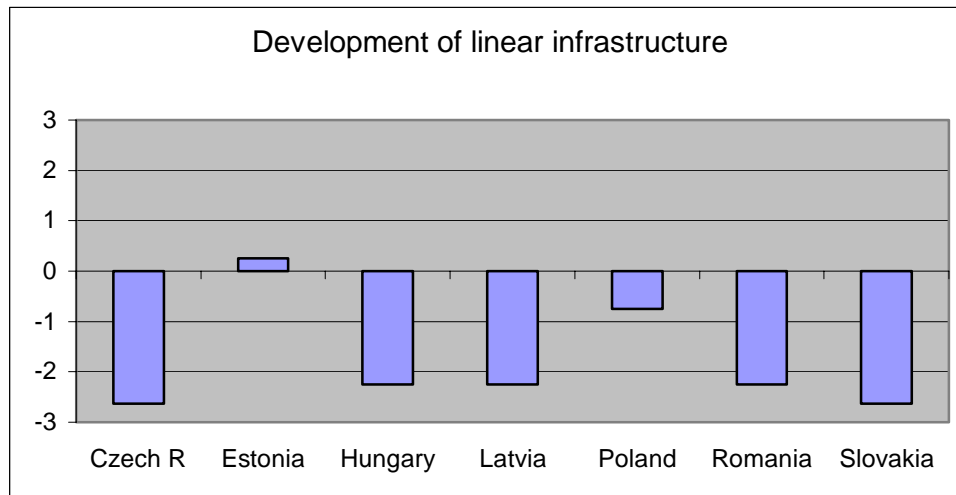
IV.2.9. Development of linear infrastructure

The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.

During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.

Planned development of linear infrastructure doesn't negatively affect the conservation of species and habitats.

When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects.



Development of linear infrastructure will have a major effect on biodiversity and the Natura 2000 network in CEE countries. The assessment of this sector delivered only negative results except for one country. With the increased number of protected areas on one side and the increasing EU support for structural investments on the other the conflicts between conservation and development will definitely increase.

Preservation of ecological networks and the isolation of habitats are considered only superficially during the planning of new transport infrastructure. On the other hand mitigation measures are considered in a number of countries (but not everywhere). This is a positive aspect although it would be more favourable to focus on the selection of the best alternative solution with respect for ecological networks.

Transport development plans exist on the national level. Existing investment list contain planned projects with major environmental effect on biodiversity but also the Natura 2000 network is affected. The development of the TEN network is affecting Natura 2000 sites in a number of cases. Also the effect of numerous smaller regional investments could be important.

V. Main threats for biodiversity & Natura 2000 – Country comparison

THE CZECH REPUBLIC

Conservation outside protected areas

The preservation of biological diversity on Natura 2000 sites and other specially protected areas is provided by legislation. Thus the main threats caused by the implementation of NDP to biological diversity refer to species and habitats outside the specially protected areas or the Natura 2000 sites.

ESTONIA

Ceasing management of semi-natural communities: the Ministries of Agriculture and Environment have still not concluded how the payments to farmers will be made to ensure the management of semi-natural meadows in Natura2000 areas.

HUNGARY

Nature friendly land use methods on Natura 2000 sites by *free will*

If restrictions of land management on Natura 2000 sites are not obligatory, favourable conservation status of Natura 2000 species could not be maintained sufficiently.

LATVIA

Agriculture/Bioenergy crops

NDP (Chapter 2.5, task 4) promotes use of agricultural land for the production of the raw materials for heating and transport fuel (biofuel). This development will change traditional crop structure (areas of traditional crops will decrease), larger monoculture fields will be introduced to increase efficiency. This will put significant pressure on biological diversity and traditional farming methods and might create decrease of biodiversity.

POLAND

Hydrological investments

A lot of small, dispersed but for nature dangerous hydrological investments will probably be supported. Support is provided by the "Environment and Infrastructure" OP, the Rural Development Plan and all 16 regional Operational Programs. Theoretically, all these mechanisms could be used for good and sustainable water management and water ecosystems renaturalisation, but it is much more likely that they will be used for river regulation, building water reservoirs and agricultural drainage. Paradoxically, all these measures are described as "pro-environmental actions", as "building ecological safety" or "water management improvement".

ROMANIA

Infrastructure development

Major infrastructural developments will take place according to the NDP in the transport network of the country. Priorities in the development are part of the Trans European Network plan (TEN-T) - three highways, one railway and improving the transport efficiency on the Danube river. Main threats are considered the investments in road network, especially highways. As Romania possesses only two highways with a total of 211 km, important cross country highways are planned to be built. The currently planned highways are crossing at least 7 from the proposed Natura 2000 sites.

SLOVAKIA

Water management

One of the 4 priority axes within the OP Environment is “Integrated protection and wise use of water resources and flood protection - Although „traditional” methods of flood control (e.g. river regulations, straightening and deepening of the river bed, chanelisation of natural river courses, concrete embankments, etc.) are not explicitly mentioned, these are still commonly used in Slovakia. These methods are threatening the river habitats and their biodiversity. Therefore the implementation of specific flood control projects under this priority axis could negatively affect wetland habitats.

VI. Appendix - Country assessments

The Czech Republic

1. Assessing to what extent the plan is well established

Environmental situation analysis	-3	-1.5	1	2	3
The plan completed an environmental problem map (SWOT analysis).		X			
The plan examined the state of each environmental element.		X			
The plan examines the conservation status of species and habitats of Community importance.		X			
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.		X			
The plan examined the level of environmental awareness of the affected people.			X		
The plan explored the situation and efficiency of the institutional system of environmental protection.		X			
The plan explored the situation and efficiency of the institutional system of environmental education.			X		
Has the opportunity for public participation been ensured during the planning process of environmental issues?	X				
Was strategic environmental assessment completed for the plan?					X

2. Assessing the integration of nature conservation in the plan

General considerations	-3	-1.5	1	2	3
The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly from an environmental point of view.				X	
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.			X		
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.		X			
The plan complies with the environmental legislation.		X			
Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).		X			
The plan doesn't list potential investments which mean a potential danger for Natura species, habitats or sites.	X				
Environmental considerations are included in the projects / investments evaluation criteria.			X		

Conservation	-3	-1.5	1	2	3
The plan deals with the rehabilitation and preservation of the damaged ecological systems.			X		

The plan deals with the provisions for establishing the coherence of habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.	x				
The plan deals with the provisions for the prevention of the invading species from further spread.		x			
In the plan there are possibilities of financing habitat restoration, species conservation, ecological corridors restoration.	x				
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.		x			
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favourable conservation status of Natura 2000 species and habitats.	x				

Education, Environmental awareness	-3	-1.5	1	2	3
The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.			x		
The plan contains elements, that target the raising of environmental awareness.			x		
The plan contain elements, that target the raising of awareness about the Natura 2000 network.		x			
The plan contain elements that target the raising of awareness about Natura of affected people(e.g. farmers, foresters, fishers).		x			

Agriculture	-3	-1.5	1	2	3
The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.		x			
The plan cares for the preservation of the traditional extensive farming.		x			
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.			x		
The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.	x				
The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.	x				
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.		x			
The plan promotes and enhance the active involvement of local stakeholders into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.		x			

Comments:

There is a chapter entitled as “Agriculture and countryside development“ within the NDP of a very general nature. The strategic environmental assessment (SEA) contains a recommendation for completing an analysis of environmental aspects of agriculture development. This analysis, however, is still missing. SEA thus concluded that the main impact of agriculture to biodiversity is the use of pesticides. There is OP Countryside development and multifunctional agriculture ,version March 2004 (in Czech “Rozvoj

venkova a multifunkční zemědělství (Březen 2004”) - but this is for the period 2004-2006. There is no new one yet.

Forestry	-3	-1.5	1	2	3
The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.			X		
The plan promotes the conservation of forest species and habitats through protection measures and sustainable forestry.		X			
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.		X			

Comments:

There is no a special chapter “Forestry“ in the NDP. There is a sub-chapter included in chapter 1.3.5 Environment, but only of half page and with a very general description. Nothing is mentioned about the influence of forestry development during the period of 2007-2013

Water regulation, water management, fishery	-3	-1.5	1	2	3
The plan adopts the catchment-centric approach of the EU Water Framework Directive and provide the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.		X			
The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.	X				
The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.		X			
In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species .	-	-	-	-	-
The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.		X			

Comments:

There is no a special chapter “Water” in the NDP, but only a notion in a sub-chapter of the paragraph 1.3.5 Environment. Once again, the text covers only a half page of very general explanations. There is nothing said about the influence of water management development during the period of 2007 to 2013. In addition to the NDP there exists also the “Plan of main watersheds”(put together by Water Framework Direction) that intends the erection of at least 201 dams. 78 of them will exert a distinguished impact on the Natura 2000 network.

Tourism	-3	-1.5	1	2	3
The plan considers the touristic carrying capacity of the areas and avoid the novel environmental touristic load of those areas that have already reached or exceeded it.			X		
The plan supports ecologically friendly tourism.		X			
The plan considers the positive effect of conservation and Natura 2000 on tourism development.		X			

Comments:

The ecological principles of tourism are described by this lackadaisical sentence: "...it is necessary to maintain nature attractivity for tourists" - that is all. There are no other environmental aspects of tourism described in the NDP. There is no OP Tourism for respective period; tourism is described in 7 regional OPs.

Industry and energy sector	-3	-1.5	1	2	3
The plan avoids and prohibit green field investments.	x				
The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.	x				
The plan doesn't include industry development that harm designed Natura 2000 sites, species and habitats.		x			
In the plan, environmental considerations are included in the projects / investments evaluation criteria.		x			

Comments

There is OP Business and innovations 2007-2013(in Czech :Operační program Podnikání a inovace 2007-2013, verze 30.10.2006) which I used for this assessment.

Development of linear infrastructure	-3	-1.5	1	2	3
The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.	x				
During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.	x				
Planned development of linear infrastructure doesn't negatively affects the conservation of species and habitats.	x				
When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects.		x			

Comments:

The strategic environmental assessment (SEA) of OP Transport (version June 21, 2006) encompasses a recommendation on how to reduce the influence of transport and infrastructure building objects to the Natura 2000 network (according to Act No. 114/1992 Coll.). The result of this assessment is that OP Transport will not have a significant impact on the Natura 2000 network in the Czech Republic (providing the listed conditions will be fulfilled), which is basically not true. Especially the highways and motorways will have a very significant impact (Brno – Wiena, Prague – České Budějovice etc.) There is also a plan for the erection of two sluices to boost up water transport along the Elbe river. This plan contravenes heavily the principles of the Natura 2000 network. The problem is, that it is not always clear, what is and what is not proposed SCI.

Main threats for biodiversity & Natura 2000 – the Czech Republic

1. The preservation of biological diversity at the Natura 2000 sites and other specially protected areas is provided by legislation. (It is also not always clear what is a proposed SCI and what is not.) Thus the **main threats caused by the implementation of NDP to**

biological diversity refer to species and habitats outside the specially protected areas or the Natura 2000 sites.

2. The NDP has more than 200 pages but the **description of environment issues is very general or shallow**. Its articulation is that it doesn't fit to the questioner (see scores). **The impact of NDP on the biodiversity and Natura 2000 is unclear (not described) in almost all its chapters** except for the Transport and Infrastructure chapter. There is no description (or very poor description) of negative impacts on the environment caused by the implementation of NDP. In the transport (1.3.4.1) chapter the description is very general and focused on human health only.

3. The strategic environmental assessment (SEA) of OP Transport (version from June 21, 2006) encompasses a recommendation on how to reduce the influence of transport and infrastructure building objects to the Natura 2000 network (according to Act No. 114/1992 Coll.). The result of this assessment is that OP Transport will not have a significant impact on the Natura 2000 network in the Czech Republic (providing the listed conditions will be fulfilled), which is not true. Especially the **highways and motorways will have a very significant impact (Brno – Wiena, Prague – České Budějovice etc.)** There is also a plan for the erection of **two sluices to boost up water transport along the Elbe river**. This plan contravenes heavily the principles of the Natura 2000 network.

4. There are few aspects in the SEA NDP- for example the **influence of tourism onto the Natura 2000 network is obvious by the construction of new ski slopes, ski lifts and resorts**.

5. In addition to the NDP there exists also the **“Plan of main watersheds”**(put together by Water Framework Direction) that intends the erection of at least 201 dams. 78 of them will exert a distinguished impact on the Natura 2000 network.

The strategic environmental impact assessment has been prepared for the NDP by the REC ČR. This document describes the main goals in the field of environment (those that meet the biological diversity goals are underlined):

Lower emissions that cause climate changes and air pollution

Lower pollution of water and soil

Lower exploitation of natural sources

Minimised production of waste

Preservation of biodiversity of fauna , flora and habitats

Preservation and improvent of ecosystem functions

Preservation and improvement of countryside functions

Preservation and improvement of settlement conditions

Improvement of environmentally responsible behaviour of inhabitants

Documents assessed:

“Národní rozvojový plán pro programové období 2007 – 2013, Srpen 2005 “ (“National development plan for program period 2007-2013, August 2005”) - adopted by the government 22.2.2006.

OP Business and innovations 2007-2013(version 30.10.2006), OP Environment (version 20.9.2006) , OP Transport (version 21.6.2006)

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Estonia

1. Assessing to what extent the plan is well established

Environmental situation analysis	-3	-1.5	1	2	3
The plan completed an environmental problem map (SWOT analysis).				X	
The plan examined the state of each environmental element.					X
The plan examines the conservation status of species and habitats of Community importance.					X
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.					X
The plan examined the level of environmental awareness of the affected people.					X
The plan explored the situation and efficiency of the institutional system of environmental protection.				X	
The plan explored the situation and efficiency of the institutional system of environmental education.					X
Has the opportunity for public participation been ensured during the planning process of environmental issues?			X		
Was strategic environmental assessment completed for the plan?					X

Comments: The OP for the Human Environment Development examines quite well the nature conservation, environmental education and monitoring aspects. Although the situation is analysed, it is not formulated as a SWOT-analysis table.

Under the institutional system the problem of conservation planning and management is analysed in general. There is lack of mentioning the problem of environmental inspection. The efficiency of the newly reformed nature conservation system is questionable, as well.

Public participation: for all OP's the two-month-period for giving comments time was announced. The time of public comments was unfortunately set on summer vacation time which negatively affected the activity of public. Also the response to public comments and questions has taken quite a long time and most of the programming seems to go on behind closed doors. Positively, a number of NGOs, including the Estonian Chamber of Environmental NGOs (EKO), are included in the working group of the OP for Human Environment Development.

The last public consultation (after the restructuring of the OP's) will follow in November. Hopefully this will give the public a better opportunity to participate. Public participation during the programming of the Rural Development Plan was very insufficient. Partners were/are not informed in time about important meetings or have out-of-date texts for commenting. The Ministry of Agriculture is mostly accepting comments from farming industry lobby groups and environmental considerations have been significantly weakened during planning process.

2. Assessing the integration of nature conservation in the plan

General considerations	-3	-1.5	1	2	3

The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly) from an environmental point of view.			x		
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.			x		
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.	x				
The plan complies with the environmental legislation.					x
Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).		x			
The plan doesn't list investments which mean a potential danger for Natura species, habitats or sites.			x		
Environmental considerations are included in the projects / investments evaluation criteria.		x			

Comments: In most of the OP's and RDP the impacts of different sectors on the environment are described far too general. As there is one OP especially for environmental investments the essential integration of environmental aspect into other sector has been too weak. No other OP's than the OP for the Human Environment Development mention the Natura 2000 or the 2010 target.

Strictly following Estonian environmental laws the plan complies with the environmental legislation. No fixed lists of infrastructure investments is given in any OP, they only include preliminary indicative lists of major projects. The Ministry of Economy has listed bigger transport-related potential projects. The financing for these projects will be decided upon only after an EIA is completed. Therefore at the moment there is no certainty about whether these projects will be a threat to Natura or not. There are no environmental criteria listed for investments in the OP's.

Environment	-3	-1.5	1	2	3
The plan deals with the rehabilitation and preservation of the damaged ecological systems.					x
The plan deals with the provisions for establishing the coherence of habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.				x	
The plan deals with the provisions for the prevention of the invading species from further spread.				x	
In the plan there are possibilities of financing habitat restoration, species conservation, ecological corridors restoration.					x
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.					x
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favorable conservation status of Natura 2000 species and habitats.			x		

Comments: The OP for the Human Environment Development lists all important management related issues for financing. The amount of investments will of course help to make some

important progress in Natura 2000 management. The isolation of habitats is specifically considered only in case of river dams as a threat to fish species.

The maintenance of many habitats is dependent on agri-environmental payments from RDP. Here, the level of support foreseen for this purpose may not be sufficient due to overplanning of finances in environmental axis of the RDP. The RDP lists several payments and investments under environmental axis, but the measures are not prioritised. As some of measures are easier to administrate, but are not priority actions from habitat maintenance point of view there is a big threat that administratively more difficult but actually more important measures will be left out in the implementation stage (for instance the payments for Natura2000 seminatural meadow management may not be implemented due to lack of administrative capacity).

Education, Environmental awareness	-3	-1.5	1	2	3
The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.					x
The plan contains elements, that target the raising of environmental awareness.					x
The plan contain elements, that target the raising of awareness about the Natura 2000 network.		x			
The plan contain elements that target the raising of awareness about Natura of affected people(e.g. farmers, foresters, fishers).		x			

Comments: Environmental awareness and education development plans rely on analyses made for Estonian Nature Conservation Development Plan. Overall goals are set to realise the concept of education for sustainable development and to make environment-related information accessible for everybody. The most important measure is to improve the network of nature schools. The plan for environmental awareness does not contain any specific actions related to Natura2000, although actions targeting Natura2000 affected people would be necessary.

Agriculture	-3	-1.5	1	2	3
The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.		x			
The plan cares for the preservation of the traditional extensive farming.		x			
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.			x		
The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.		x			
The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.		x			
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.			x		
The plan promotes and enhance the active involvement of local stakeholders into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.		x			

Comments: Estonian RDP is being developed in the moment. One positive aspect is that the plan has strong measures for organic farming. Also there is some support for small scale farmers and alternative rural activities.

On the other side the ‘Environmentally Friendly Farming’ measure is in line with big producers’ interests. Therefore it is possible that there will be no restrictions on using chemicals or having green corridors between fields within this measure. These developments lead to use of agri-environmental money which is opposite to its purposes.

There are plans for making Natura2000 payments for farmers, but recent developments in MoA seem not to favour these measures. There is pressure not to start with Natura2000 seminatural meadows management payments contrary to what has been agreed with conservationists. There is a threat that MoA will make the RDP seem to be Natura2000 friendly with the Natura2000 payment that is made for farmers to compensate reduction of income due to environmental restrictions, but will not actually implement the more important measure for managing seminatural meadows.

Also in the last RDP (2004-2006) a measure for managing seminatural meadows were planned but were not realised due to financial constraints. In is possible that this will happen again and money for agri-environmental measures will be spent on other things and no measures with real nature conservation effect will be realised.

Forestry	-3	-1.5	1	2	3
The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.				X	
The plan promotes the conservation of forest species and habitats through protection measures and sustainable forestry.				X	
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.		X			

Comments: There are measures for sustainable forestry on Natura2000 areas in RDP, but as there are examples of sustainable forestry payments in Estonia that do not assure long-term forest protection, there is not enough assurance how continuously currently planned measures will work. The forestry measures should possibly involve more environmental awareness trainings for foresters and less direct payments.

Water regulation, water management, fishery	-3	-1.5	1	2	3
The plan adopts the catchment-centric approach of the EU Water Framework Directive and provide the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.					X
The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.		X			
The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.			X		
In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species .				X	
The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.			X		

Comments: There is a threat that big melioration projects will be funded from RDP that will negatively affect wetland habitats.

The plan considers floods only in the chapter about prevention of emergencies. There are several marine Natura2000 sites designated but the real protection measures of those are not clear.

The plan considers the problem of negative effects of fishery, but does not give clear indication on how the problems could be solved.

Tourism	-3	-1.5	1	2	3
The plan considers the touristic carrying capacity of the areas and avoid the novel environmental touristic load of those areas that have already reached or exceeded it.			X		
The plan supports ecologically friendly tourism.		X			
The plan considers the positive effect of conservation and Natura 2000 on tourism development.				X	

Comments: The plan does not consider the carrying capacity of sensitive areas yet but a special working group on environmental impacts of tourism development has been set up. In effect, related text will probably be added.

The plan does not mention eco-tourism specifically but targets alternative tourism products. Through this measure eco-tourist farms could get some funding. The plan considers Estonian biodiversity and cultural heritage as a key for tourism development but does not mention Natura 2000 specifically.

Industry and energy sector	-3	-1.5	1	2	3
The plan avoids and prohibit green field investments.		X			
The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.			X		
The plan doesn't include industry development that harm designed Natura 2000 sites, species and habitats.			X		
In the plan, environmental considerations are included in the projects / investments evaluation criteria.		X			

Comments: The plan doesn't list industrial developments, so there is no certainty weather there will be any harmful investments. Environmental considerations are not included in the investment evaluation criteria. The plan mostly targets innovation, R&D and energy efficiency so there is hope for less pollution and investments in cleaner technologies.

Development of linear infrastructure	-3	-1.5	1	2	3
The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.				X	
During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.			X		
Planned development of linear infrastructure doesn't negatively affects the conservation of species and habitats.	X				

When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects.			x		
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Comments: There will be investments for developing old and new motorways and these will affect conservation of habitats and species. As it is not yet clear which roads will be built, it is hard to assess the effects. The plan will consider migration ways of animals and measures are planned to compensate negative effects of developments. The Strategic Environmental Assessment process that is still under way concerning the draft OP's should point out the measures necessary to mitigate the potential negative environmental impacts of the planned investment projects.

Main threats for biodiversity & Natura 2000 - ESTONIA

1. Ceasing management of semi-natural communities: the Ministries of Agriculture and Environment have still not concluded how the payments to farmers will be made to ensure the management of semi-natural meadows in Natura2000 areas.

2. Agricultural intensification leading to a loss of farmland biodiversity: the policy of MoA reflected in RDP is going to concentrate farm production into bigger and more efficient units. Smaller farms are seen more as potential tourist attractions or performing some other functions. In the long term small scale farming does not seem to be interesting for the government.

3. Deterioration of farming and forested land by intensification of melioration: this will negatively affect wetlands and other adjoining habitats. Many are lobbying to install new or restore old ditches in state/private forests and farmlands. State forestry centre (RMK) has made big investment plans for renewing old melioration systems that often actually means developing new systems that threaten wet forest habitats and wetlands in near.

4. Large-scale transportation infrastructure: One of the largest threats in Estonia is the potential bridge connecting the islands of Muhu and Saaremaa to the mainland. The bridge has been in and out of the potential list of transport investments from Structural Funds. The threat for realising the project is not too big in the moment, but the situation is very much depending on the actual political climate. Also the potential new motorway between Tartu and Tallinn will have severe environmental impacts. However, negative effects could be minimised by establishing animal crossings. The motorway and railway near Tallinn will be realised for sure in the near future. Compromises between nature conservation and social impacts need to be sought.

5. Afforestation and growing of biofuel crops: The impacts of such enterprises are not yet known in Estonia. The measures in RDP are not fully finalised yet; therefore the impact on the environment cannot be assessed.

6. Lack of administrative capacity to plan and implement conservation measures: The MoE has not been able to write all the management plans required to establish conservation

measures in Natura2000 areas. Also people affected by Natura2000 (farmers/entrepreneurs) are not always aware of the consequences of owning/managing Natura land.

7. Negative public opinion: Natura2000 (and nature conservation in general) is not always seen positively. There have been incidences that have led to public distrust, such as the land privatisation scandals of autumn 2006. The scandal has received negative media attention and a PR-program is needed to improve the image of the Natura2000 process.

8. Inadequate spatial planning: Natura2000 exists in Estonian legislation according to directives, but in many cases spatial planning does not take all Natura2000 values into account and appropriate EIA is often avoided.

9. Housing in coastal areas: the problem is relevant near Tallinn and in islands of western Estonian coast. Areas that have never before been populated are being built in by summer housing and coastal habitats remain only in very poor and fragmented plots.

10. Extending oil shale mining areas: the current planning of extending mining of oil shale reserves in North-East of Estonia may cause a threat to Natura2000 areas near.

List of documents assessed:

<i>Name in Estonian</i>	<i>Name in English</i>	<i>Date of version</i>
Inimressursi arendamise rakenduskava	Human resources development OP	07.07.06
Elukeskkonna arendamise rakenduskava	Human environment development OP	07.07.06
Hariduse, T&A, tervishoiu ning hoolekande infrastruktuuri arendamise rakenduskava	Educational and scientific activities infrastructure development OP infrastructure development OP	07.07.06
Ettevõtluse, infoühiskonna, transpordi ja energeetika infrastruktuuri arendamise rakenduskava	Business, information society and transport infrastructure development OP	07.07.06
Maaelu Arengukava	Rural Development Plan	23.10.06

Comment on documents: Estonian Government has decided to reorganise these OP's into three OP's but no significant changes in measures are expected. The new versions of OP's should be ready for comments in November.

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Hungary

1. Assessing to what extent the plan is well established

Environmental situation analysis	-3	-1.5	1	2	3
The plan completed an environmental problem map (SWOT analysis).					X
The plan examined the state of each environmental element.					X
The plan examines the conservation status of species and habitats of Community importance.		X			
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.					X
The plan examined the level of environmental awareness of the affected people.					X
The plan explored the situation and efficiency of the institutional system of environmental protection.			X		
The plan explored the situation and efficiency of the institutional system of environmental education.					X
Has the opportunity for public participation been ensured during the planning process of environmental issues?				X	
Was strategic environmental assessment completed for the plan?					X
<p>Comments:</p> <p><i>The situation analysis of the Environment and Energy OP is established properly. The main threats for environment and nature have been considered in the problem map and SWOT analysis. Conservation status of Natura 2000 species and habitats have not been analysed. The importance of environmental awareness and its inefficient standard in Hungary have been realized. In the situation analysis there is a brief summary of the problems and opportunities of nature schools.</i></p> <p><i>Necessity of improvement of the institutional system of nature conservation is briefly mentioned in the plan, as well as the need for co-operation with non-governmental organizations and the public.</i></p> <p><i>During the planning process requirements of public participation have been fulfilled, although opinions of NGOs have not been developed completely into the plan.</i></p> <p><i>Strategic Environmental Assessment had to be made for all OPs because of regulations of legislation acts.</i></p>					

2. Assessing the integration of nature conservation in the plan

General considerations	-3	-1.5	1	2	3
The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly from an environmental point of view.			X		
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.			X		
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.			X		

The plan complies with the environmental legislation.				X	
Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).		X			
The plan doesn't list potential investments which mean a potential danger for Natura species, habitats or sites.	X				
Environmental considerations are included in the projects / investments evaluation criteria.			X		
<p>Comments:</p> <p><i>Most deficiency of the plan is that environmental protection as one of the horizontal politics appears only superficial. Sustainability is interpreted mostly as an economical and social idea. All OPs mention sustainability as an important evaluation criterium of projects, there are even some proposals to integrate ecological considerations into other sectorial programs, but beyond the definition of " sustainability" no factual suggestions have been made.</i></p> <p><i>Usual terminology reckons nature conservation as part of environmental protection, thus does not mention it separately. Explanations of some program elements refer to some undefined ecological requirements. However, these considerations involve needs for decrease of emmissions only, and not preservation of biodiversity and avoidance of habitat fragmentation.</i></p> <p><i>In some OPs (Rural Development Plan, Transportation OP) several actions could endanger Natura 2000 habitats and biodiversity.</i></p>					

Environment	-3	-1.5	1	2	3
The plan deals with the rehabilitation and preservation of the damaged ecological systems.				X	
The plan deals with the provisions for establishing the coherence of habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.				X	
The plan deals with the provisions for the prevention of the invading species from further spread.			X		
In the plan there are possibilities of financing habitat restoration, species conservation, ecological corridors restoration.					X
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.			X		
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favourable conservation status of Natura 2000 species and habitats.			X		
<p>Comments:</p> <p><i>Nature conservation part of Environment and Energy OP lays emphasis on preservation and reconstruction of protected and Natura 2000 habitats. An other important task in the OP is the mitigation of negative effects of linear infrastructure as ecological barriers, such as sewerages, electric power lines and roads.</i></p> <p><i>The Rural Development Plan deals with preservation of ecological potentials of forests in private property. 60% of Hungarian forests are state-owned, and significant part of these are the forests with the highest value from the point of view of biodiversity. Thus supporting</i></p>					

introduction of nature-friendly logging methods on these areas could change the technology-centric approach of state forestries positively.

One of the biggest threats for Natura 2000 habitats in Hungary is the swift spread of invasive alien species. EEOP does not have exclusive, separate measures against them, only as part of habitat reconstructions. Nevertheless with the introduction of nature friendly agricultural methods on state-owned Natura 2000 sites, as part of measures of EEOP, and agri-environment program, as part of RDP, this goal may get into closer reach.

All measures taken by the conservation part of EEOP lay emphasis on Natura 2000, but this alone will not be sufficient for maintaining the favourable conservation status of the habitats and species of community importance. Financial compensation of farmers using special methods on their lands would be necessary as well. Provisions taken for this in RDP fulfill this requirement only partially.

Education, Environmental awareness	-3	-1.5	1	2	3
The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.			X		
The plan contains elements, that target the raising of environmental awareness.			X		
The plan contain elements, that target the raising of awareness about the Natura 2000 network.			X		
The plan contain elements that target the raising of awareness about Natura of affected people(e.g. farmers, foresters, fishers).		X			
<p>Comments:</p> <p><i>EEOP takes measures to improve the infrastructural conditions of nature schools. This has high importance for environmental awareness raising, and slightly compensates the lack of similar measures in the Human Resources OP. However changing attitude of schoolchildren will have its positive effect only in the long run.</i></p> <p><i>The plan does not includes projects for information campaigns about Natura 2000 network. Orientation of farmers has to be financed by EARDF. There are plans for communicating Natura for farmers in the III. Pillar of EARDF, but this is still in planning.</i></p> <p><i>The Environment OP will support attitude forming campaigns for sustainable consumption and production and introduction of systems for environment protection at SMEs.</i></p> <p><i>Summary: Awareness rasing for general environmental issues will be realized partially, importance of biodiversity is not emphasized sufficiently.</i></p>					

Agriculture	-3	-1.5	1	2	3
The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.	X				
The plan cares for the preservation of the traditional extensive farming.		X			
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.				X	

The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.	X				
The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.					X
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.			X		
The plan promotes and enhance the active involvement of local stakeholders into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.		X			
<p>Comments:</p> <p><i>The Rural Deveopment Strategy gives farmers opportunity to join agri-environment programs and itroduce ecological farming methods, thus biodiversity on agricultural land could be enhanced. At the moment the Strategy is still negotiated. In the current version (accepted by the parliament) the allocation between the pillars is very unfavourable. Because it is unlikely that the situation will change it is very likely that the new Strategy will lead to the intensification of agriculture in big parts of Hungary and agri-environmental measures will not have a significant effect.</i></p> <p><i>On Natura 2000 sites, wich represent the agricultural areas with the highest biodiversity level, sound land management is not compulsory due to the delay with the respective law on land use regulation. The Rural Deveopment Strategy is still in preparation while this assessment is completed, but at the moment it is very likely that Natura 2000 payments will become effective on a large scale only in 2009. Until than only measures on a smaller scale (e.g. payment for Natura 2000 wetlands) will take place to make the plan acceptable for Brussels and national conservasion organisations. This circumstance makes the conservation of species of community importance uncertain.</i></p> <p><i>Incentive to growing plants for engergetic reasons could lead to expansion of monocultures.</i></p>					

Forestry	-3	-1.5	1	2	3
The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.			X		
The plan promotes the conservation of forest species and habitats through protection measures and sustainable forestry.				X	
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.		X			
<p>Comments:</p> <p>Forest-environment program helps privat forest-owners to use their forests nature friendly. The current version of the RDP makes Natura 2000 payments possible for forests only from 2009 (40 Euro/ha-lowest possible payment according to EU regulation). EEOP has a similar objective, it finances infrastructural investments of state-owned forest.</p> <p>Increase of biomass use for energetic reasons is dangerous for two reasons. The first is the overusing of forests, the second is the probable expansion of monocultural energy-plantations with low species diversity. Additional threat is the use of invasive alien species for this reason (e.g. Robinia pseudoacacia)</p> <p>Financial support for afforestation is provided not only for native species.</p>					

Water regulation, water management, fishery	-3	-1.5	1	2	3
The plan adopts the catchment-centric approach of the EU Water Framework Directive and provide the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.				X	
The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.		X			
The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.		X			
In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species .	-	-	-	-	-
The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.		X			
<p>Comments:</p> <p><i>The plan adopts the catchment-centric approach of the Water Framework Directive. Water quality preservation and the need for avoiding pollution is emphasized properly.</i></p> <p><i>Measures for prevention of floods do not consider the fact that the climate in Hungary will be even more dry, thus preservation of water has to be strengthen. Artificial reservoirs will be constructed, but with better use of natural flood plains more water could be preserved. Through this, reconstructions of some degraded wetland habitats could be achieved and new habitats could be created. Artificial reservoirs could have some preferable ecological functions as well, but their efficiency in flood prevention is uncertain.</i></p>					

Tourism	-3	-1.5	1	2	3
The plan considers the touristic carrying capacity of the areas and avoid the novel environmental touristic load of those areas that have already reached or exceeded it.				X	
The plan supports ecologically friendly tourism.				X	
The plan considers the positive effect of conservation and Natura 2000 on tourism development.				X	
<p>Comments:</p> <p><i>Regional OPs support ecotourism, conservation of natural assets is for touristic reasons is important. Mass tourism is expected principally in larger settlements.</i></p> <p><i>South-Transdanubian ROP proposes not to attract too many tourists to protected areas. In the same OP there are suggestion for some green field investment (golf course, sport center), wich endangers several grasslands..</i></p>					

Industry and energy sector	-3	-1.5	1	2	3
The plan avoids and prohibit green field investments.		X			
The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.			X		
The plan doesn't include industry development that harm designed Natura		X			

2000 sites, species and habitats.					
In the plan, environmental considerations are included in the projects / investments evaluation criteria.			X		
<p><i>Comments:</i> The objective of the energy sector is to increase the proportion of renewable energy resources. This is favourable from a general environmental point of view, nevertheless expansion of energy forests and energy plant monocultures can decrease biodiversity. Growing use of timber could negatively effect biodiversity of forests in buffer zones of Natura 2000 sites. Additional danger is the potential use of invasive species for energy plantations. Only small sized wind power plants will be financed, wich means small risk for endangered migrating bird species.</p> <p>Improvement of Economy OP does not prohibit green field investements clearly. Modernization of SMEs do not affect biodiversity directly, though new technologies with lower emmission levels and less demand on natural resources can bring general environmental recovery.</p>					

Development of linear infrastructure	-3	-1.5	1	2	3
The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.	X				
During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.		X			
Planned development of linear infrastructure doesn't negatively affect the conservation of species and habitats.	X				
When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects.		X			
<p><i>Comments:</i> Development of linear infrastructures is one of the most serious danger for Natura 2000 sites. Objective of increasing mobility is declared, wich means construction of new roads and motorways, and thus fragmentation of habitats.</p> <p>The mostly emphasized objective of the Transporation OP is the improvement of the TEN. Both construction of motorways and modernization of railways are included, as well as development of public transport in larger towns (especially in the capital).</p> <p>For emmission reduction and improving the living standard of people living in cities the construction of bypass roads near to settlements is essential. Obvious disadvantage of this is the fragmentation of natural habitats and animal populations.</p> <p>Transportation OP does not point out, whether any measures will be taken to minimize the negative effects of habitat fragmentation.</p>					

Main threats for biodiversity & Natura 2000 - HUNGARY

1. Nature friendly land use methods on Natura 2000 sites by *free will*

If restrictions of land management on Natura 2000 sites are not obligatory, favourable conservation status of Natura 2000 species could not be maintained sufficiently.

2. Energy plantations

Monocultures always have low level of biodiversity. If alien species with invasive features will be used, their rapid spread will damage Natura 2000 habitats.

3. Measures against floods

Some of the planned artificial water reservoirs will be constructed in valuable river vales, even Natura 2000 sites are in danger. Permanent disturbance of vegetation between dams damages native plant associations.

4. Construction of motorways and bypass roads

It may easily happen, that despite of the regulations motorways intersect Natura 2000 habitats. Bypass roads near to settlements have similar danger.

5. Afforestation with alien species

If forests (or tree plantations) composed of alien tree species will be planted, loss of biodiversity will occur, especially by afforestation of unprotected meadows or pastures.

List of documents assessed:

<i>Name in Hungarian</i>	<i>Name in English</i>	<i>Date of version</i>
ÚJ MAGYARORSZÁG FEJLESZTÉSI TERV Foglalkoztatás és növekedés - 2007-2013	NSRF Hungary	25.10.2006
Új Magyarország Vidékfejlesztési Stratégiai Terv (2007-2013)	New Hungary Rural Development Strategic Plan (2007-2013)	14.08.2006
Környezet és Energia Operatív Program (2007- 2013)	Environment and Energy Operational Program (2007- 2013)	16.10.2006
Gazdaságfejlesztés Operatív Program	Economic development Operational Program	16.10.2006
Közlekedési Operatív Program (KözOP) Egyeztetési változat	Transport Operational Program Version for negotiation	October 2006
Dél-dunántúli Operatív Program Egyeztetési változat	South-Transdanubian Operational Program Version for negotiation	16.10.2006

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Latvia

1. Assessing to what extent the plan is well established

Environmental situation analysis	-3	-1.5	1	2	3
The plan completed an environmental problem map (SWOT analysis).			X		
The plan examined the state of each environmental element.		X			
The plan examines the conservation status of species and habitats of Community importance.		X			
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.		X			
The plan examined the level of environmental awareness of the affected people.			X		
The plan explored the situation and efficiency of the institutional system of environmental protection.		X			
The plan explored the situation and efficiency of the institutional system of environmental education.			X		
Has the opportunity for public participation been ensured during the planning process of environmental issues?				X	
Was strategic environmental assessment completed for the plan?					X
<p>Comments:</p> <p><i>Description of the process of elaboration of NDP contain information that SWOT analysis were conducted, but the plan itself does not contain any elements of it.</i></p> <p><i>NDP doesn't contain examination of environmental elements, just short notes about some of elements, the main focus is on description of state of education, industry and technology.</i></p> <p><i>There are no detail (even general) description of status, threatening factors or any information about species and habitats of Community importance in NDP.</i></p> <p><i>Formal opportunity for public participation was provided - two-months long public discussions were commenced.</i></p> <p><i>The SEA was conducted on high level, report contains lot of competent and precise information and gives good evaluation of NDP.</i></p>					

2. Assessing the integration of nature conservation in the plan

General considerations	-3	-1.5	1	2	3
The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly from an environmental point of view.		X			
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.			X		
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.			X		
The plan complies with the environmental legislation.				X	
Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).		X			
The plan doesn't list potential investments which mean a potential danger for Natura species, habitats or sites.		X			

Environmental considerations are included in the projects / investments evaluation criteria.			X		
Comments: <i>The Plan contains only short descriptions of sectors, except education and industry. Chapter 2.5. reads “Use of the land as one of the main natural resources has become extensive, the rate of production has decreased, the natural transformation of agricultural land – overgrowing and bogging-up – has increased.”; and at the same time “Diverse and high quality nature environment is very valuable, and it has to be respected in the development of the country as a whole.”.</i> <i>One of the main sectors that are supported by NDP is improvement and optimization of planning process that enhances the involvement of stakeholders.</i>					

Environment	-3	-1.5	1	2	3
The plan deals with the rehabilitation and preservation of the damaged ecological systems.				X	
The plan deals with the provisions for establishing the coherence of habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.		X			
The plan deals with the provisions for the prevention of the invading species from further spread.		X			
In the plan there are possibilities of financing habitat restoration, species conservation, ecological corridors restoration.		X			
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.			X		
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favourable conservation status of Natura 2000 species and habitats.		X			
Comments: <i>The Plan as one of the tasks mention task “to encourage rehabilitation and recovery of brownfield areas (including polluted areas)”, but in general tasks on conservation of species and habitats are superficial.</i> <i>Indirectly The Plan provides some possibilities for investments mostly involving investments for diversification of business in rural areas (development of tourism industry).</i>					

Education, Environmental awareness	-3	-1.5	1	2	3
The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.					X
The plan contains elements, that target the raising of environmental awareness.					X
The plan contain elements, that target the raising of awareness about the Natura 2000 network.			X		
The plan contain elements that target the raising of awareness about Natura of affected people(e.g. farmers, foresters, fishers).			X		
Comments: <i>As education sector is one of the main targets of NDP, this sector has quite good description</i>					

of situation and targets for this sector are of good quality, among others they mention environmental awareness raising and increase of level of education in environmental and nature sectors, nevertheless tasks are very general. Improvement of nature and environmental education have been mentioned in 6 tasks - (1.1.(1);(7);(8)/1.2.(3)/1.4.(4)/6.3.4.(4).

Agriculture	-3	-1.5	1	2	3
The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.			X		
The plan cares for the preservation of the traditional extensive farming.		X			
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.		X			
The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.	X				
The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.		X			
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.			X		
The plan promotes and enhance the active involvement of local stakeholders into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.			X		
<p>Comments:</p> <p><i>The main goal for use of agricultural land is set “maintenance of agricultural land for the production of agricultural products, as well as to increase the contribution of the agricultural sector in the production of the raw materials for heating fuel and transport fuel”.</i></p> <p><i>The innovations and introduction of medium and high technologies in agriculture obviously will lead to intensification of agriculture.</i></p> <p><i>At the same time one of the tasks mentioned in Chapter 2.5. reads „To stimulate development of innovative types of business that do not require intensive use of natural and energy resources and to reduce pollution of the environment by promoting implementation of the best technical solutions and the latest technologies in manufacturing”.</i></p> <p><i>Tourism (and ecotourism) development is stimulated in the plan, with overall goal to stimulate regional development, it could lead to both – damage or better preservation of natural resources (if used wisely, re-directing tourism pressures and using income for nature resource protection).</i></p> <p><i>Involvement of NGOs and other sectors in decision making is stimulated, but without particular emphasis on conservation of species and habitats.</i></p>					

Forestry	-3	-1.5	1	2	3
The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.			X		
The plan promotes the conservation of forest species and habitats through protection measures and sustainable forestry.		X			
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.		X			

Comments:
NDP promotes increase of the role of forest products in renewable energy resource supply, but doesn't mention the immaterial values of forests. Only indirectly, by emphasising the quality of life.
Plan provides for improvement of road infrastructure, that could lead to significant disturbance and fragmentation of forest habitats.

Water regulation, water management, fishery	-3	-1.5	1	2	3
The plan adopts the catchment-centric approach of the EU Water Framework Directive and provide the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.		X			
The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.		X			
The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.		X			
In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species .		X			
The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.		X			
<i>Plan is not dealing with water management issues on a catchment scale. It provides for preservation of the water quality although.</i>					

Tourism	-3	-1.5	1	2	3
The plan considers the touristic carrying capacity of the areas and avoid the novel environmental touristic load of those areas that have already reached or exceeded it.		X			
The plan supports ecologically friendly tourism.					X
The plan considers the positive effect of conservation and Natura 2000 on tourism development.				X	
<i>Comments:</i> <i>The Plan supports sustainable development of the natural environment for recreation purposes and for ecotourism, without mentioning potential threats to natural resources created by intensive tourism.</i> <i>Ecotourism and velo tourism is supported by the plan.</i>					

Industry and energy sector	-3	-1.5	1	2	3
The plan avoids and prohibit green field investments.		X			
The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.				X	
The plan doesn't include industry development that harm designed Natura 2000 sites, species and habitats.		X			
In the plan, environmental considerations are included in the projects / investments evaluation criteria.			X		

Comments:

NDP foresees to stimulate development of innovative types of business that do not require intensive use of natural and energy resources and to reduce pollution of the environment by promoting implementation of the best technical solutions and the latest technologies in manufacturing.

Development of linear infrastructure	-3	-1.5	1	2	3
The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.	X				
During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.		X			
Planned development of linear infrastructure doesn't negatively affect the conservation of species and habitats.	X				
When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects.		X			
<p>Comments:</p> <p><i>The Plan foresees improvement and development of the international transportation infrastructure, including modernisation of all major national motorways that obviously will impact coherence of habitats and specially protected nature territories (Natura 2000), but NDP doesn't point specific locations of activities thus the direct impact is not obvious at this stage.</i></p>					

Main threats for biodiversity & Natura 2000 - LATVIA

It has to be underlined that maintenance of biological diversity in Natura 2000 sites is limited by legislation thus preventing destroying of habitats and threats to biological diversity inside protected areas. The main threats posed to biological diversity are related to species and habitats outside protected areas (Natura 2000) sites.

The impact of NDP on natural resources is unclear in following aspects – maintenance of traditional landscape, water quality, transborder pollution and environmental health. It is impossible to measure the impact of NDP (posed by development of different landuse practices) on environment, due to the fact that those practices are very little analysed in NDP.

It remains unclear how identification and removal of negative impacts on environment created by implementation on NDP will take place.

Agriculture:

Bioenergy crops

NDP (Chapter 2.5, task 4) promotes use of agricultural land for the production of the raw materials for heating and transport fuel (biofuel). This development will change traditional crop structure (areas of traditional crops will decrease), larger monoculture fields will be introduced to increase efficiency. This will put significant pressure on biological diversity and traditional farming methods and might create decrease of biodiversity.

Intensification = enlargement of farms, amelioration, infrastructure

NDP (Chapter 2.5, task 1) foresees creation of higher added value, particularly in the forestry and agricultural sectors by efficient and sustainable use of available natural resources. This may lead to intensification of farming, increased use of fertilizers (followed by pollution and increased runoff) and might reduce number of traditional small farms which are ineffective in terms of economy.

Afforestation

Due to low economic productivity agricultural areas on poor soils or on wet soil conditions which are important for biodiversity protection (Crex crex etc.) might be transformed to forest areas that are used as biomass sources for energy supply or wood supply.

Forestry:

Energy sources

To fulfill the task of promoting the use of renewable energy sources for energy production (Chapter 2.5, task 3) and promoting use of biomass will cause removal of it (e.g. stems from clear-cuts) that is important element of biological diversity.

Mono stands, rotation

Production of the raw materials for heating fuel (Chapter 2.5, task 3) will change tree composition of forest stands towards single tree species stands. Rotation of forest will be shortened to make it more productive, that will exclude the existence of large dimension old trees – very important elements of biodiversity.

Forest roads, amelioration

Task that foresees creation of higher added value, particularly in the forestry and agricultural sectors (Chapter 2.5, task 1) to increase productivity of forest stands will lead to intensification of forestry, higher density of forest roads that will create fragmentation, disturbance and amelioration of forests.

Transport, infrastructure:

Fragmentation, disturbance

Development and improvement of transport infrastructure (Chapter 5.2.3) might cause increased fragmentation of habitats and disturbance, some Natura 2000 areas may suffer essentially as EU importance habitats might be destroyed. Modernisation and development of ports and airports might lead to destroying habitats followed by decrease of biological diversity.

Industry:

New industrial territories

Creation of companies, including new innovative companies in traditional sectors, in Latvia's regions will require new land areas for development, it will cause land use changes and some areas of agricultural or forest land important for protection of biodiversity might be destroyed.

Tourism:

Overload = degradation

Improperly managed tourism load can destroy protected habitats and can cause disturbance for species. Stimulating tourism (any types of tourism, even ecotourism) in protected areas that are not ready for tourism (no proper infrastructure to divert tourist flows from fragile habitats and to avoid disturbance to sensitive species) is very dangerous and threatening to biological diversity.

Lack of awareness:

Although NDP supports awareness raising on environmental issues, it is still threatened by lack of understanding – only 14% of Latvian inhabitants regard decrease of biological diversity as problem.

Strategic environmental impact assessment have been prepared for NDP, it underlines 3 main threats to biological diversity and environment:

- Threats to air quality due to increased transport intensity (emissions).
- Threats to biological diversity outside Natura 2000 sites, due to planned intensification in traditional economical activities.
- Increase in total use of natural and energy resources, in spite of planned activities to promote more effective use of those resources.

Documents assessed:

Latvian National Development Plan 2007-2013, adopted by the Cabinet of Ministers on 4 July 2006, Rule of Cabinet of Ministers No. 564.

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Poland

Assessment is based on the full set of related documents (NSRF + Sectoral Operational Programs + Rural Development Plan + Regional Operational Programs). When the author refers to the NSRF document itself than this is stated explicitly. When it is simply referred to “the plan” or the NDP than it means the evidence coming from the NSRF and the other respective documents together.

1. Assessing to what extent the plan is well established

Environmental situation analysis	-3	-1.5	1	2	3
The plan completed an environmental problem map (SWOT analysis).				X	
The plan examined the state of each environmental element.				X	
The plan examines the conservation status of species and habitats of Community importance.		X			
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.		X			
The plan examined the level of environmental awareness of the affected people.				X	
The plan explored the situation and efficiency of the institutional system of environmental protection.	X				
The plan explored the situation and efficiency of the institutional system of environmental education.				X	
Has the opportunity for public participation been ensured during the planning process of environmental issues?					X
Was strategic environmental assessment completed for the plan?				X	

Comment: generally, environmental aspects are missing in the basic NSRF document, but are present in the "executive" documents: (Rural Development Plan, Regional Operational Programs and Operational Program "Infrastructure and Environment").

General SWOT analysis is completed in all documents, but in some of them (especially in the NSRF and more detailed Regional OP) environmental aspects are missing. The plans are focused rather on general environmental aspects and general environment elements. (water, air, forests, biodiversity - the "European targets". The conservation status of "European" species and habitats is not considered.

The efficiency of the institutional system of nature (environment) conservation is probably the most important threat for successful habitats & species conservation. This problem is not analysed at all in the plan. It is also not clear if state nature conservation bodies will be beneficiaries of EU funding or not.

Environmental education is one of the planned activities in the national sectoral plan and in regional plans. The situation of environmental education is rather well analysed.

SEA was completed for each operational program and for NSRF. All documents have undergone a wide public consultation process. Some (but not all important) results of public consultations have been incorporated into the documents (but see also below – the proposed

key investments list attached to the plan has not been consulted nor environmentally assessed).

2. Assessing the integration of nature conservation in the plan

General considerations	-3	-1.5	1	2	3
The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly from an environmental point of view.			X		
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.			X		
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.			X		
The plan complies with the environmental legislation.					X
Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).				X	
The plan doesn't list potential investments which mean a potential danger for Natura species, habitats or sites.	X				
Environmental considerations are included in the projects / investments evaluation criteria.			X		

Comment: Description of the situation in different sectors normally contains description of environmental aspects, but this is often too simplified, too wishful and does not reflect the reality. These description are normally focused on general environmental issues, not on biodiversity. *There is sectoral integration on the "verbal" and general level, but the real integration is missing from the practical details.*

In some, but not in all plans, Natura 2000 is pointed as an important factor – but in most cases only in the descriptive introduction to the plans. Real objectives focused on Natura 2000 are missing (with the exception of Natura 2000 payments in RDP and "Priorite V" in Operational Plan for Infrastructure and Environment.

The plan is in line with the environmental legislation – 'polluters pay' principle is implemented to the same extent as implemented to national law. Future Environmental Liability regulations are not pointed nor used in the plan.

National and Regional plans contain lists of "key investments" – some of the investments will be hazardous for the environment, nature and Natura 2000 (see "more important threats" chapter). Although the plans are publically consulted and environmentally assessed, *the related investments lists has been excluded from the consultations and assessment.* Especially, a lot of hydrological investments, dangerous for the river ecosystems, are expected to be financed. These investments are part of "ecological safety" actions – paradoxically they are a part of "pro-environmental" part of the NDP!

Conservation	-3	-1.5	1	2	3
The plan deals with the rehabilitation and preservation of the damaged ecological systems.				X	
The plan deals with the provisions for establishing the coherence of				X	

habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.					
The plan deals with the provisions for the prevention of the invading species from further spread.			x		
In the plan there are possibilities of financing habitat restoration, species conservation, ecological corridors restoration.				x	
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.				x	
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favourable conservation status of Natura 2000 species and habitats.		x			

Comment: There is a well established "conservation" part in the national program (incl. ecosystems conservation and restoration, species conservation, ecological corridors restoration, investments for Natura 2000), but funding is only available for big projects. Theoretically (according to assumptions in NSRF) parallel actions for smaller projects should be included in the regional programs and in the RDP, but in fact they are included only in a few regional programs and excluded from the RDP – this is no coherency. The alien species prevention is less accentuated.

Although NDP (OP Infrastructure and Environment) provides good possibilities to finance bigger conservation projects, the lack of capacity of the nature conservation actors could become a critically limiting factor for using these possibilities. The planned financial allocation is probably too small from the point of view of conservation needs, but may be too big from the point of view of nature conservation institutional capacity.

Education, Environmental awareness	-3	-1.5	1	2	3
The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.					x
The plan contains elements, that target the raising of environmental awareness.					x
The plan contain elements, that target the raising of awareness about the Natura 2000 network.			x		
The plan contain elements that target the raising of awareness about Natura of affected people(e.g. farmers, foresters, fishers).			x		

Comment: There are good possibilities for financing environmental education (especially bigger education projects under OP "Infrastructure and Environment", but objectives are **not** focused on the "european objectives" (Natura 2000 and 2010 target).

Agriculture	-3	-1.5	1	2	3
The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.			x		
The plan cares for the preservation of the traditional extensive farming.				x	
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.					x
The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.			x		

The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.					x
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.				x	
The plan promotes and enhance the active involvement of local stakeholders into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.			x		

Comment: Generally, the Polish RDP will support rather the traditional, small-scale farming, but this support will be not enough to overweight the economically induced changes of farming structure. There are measures for supporting ecological farming and multifunctional land use. The plan deals with agri-environmental schemes and Natura 2000 agricultural payments, but the schemes are too simplified and financial allocation is too small to make it really effective. Also, "biodiversity targets" (2010 target, species & habitats conservation status target) are not mentioned and pointed out as objectives in the plan.

Altogether, the RDP probably will have positive environmental and conservation effects on agro-biodiversity, but probably not enough to achieve the 2010 target for agro-biodiversity (it is expected that agro-biodiversity loss will not be stopped till 2010 nor even till 2013).

Forestry	-3	-1.5	1	2	3
The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.				x	
The plan promotes the conservation of forest species and habitats through protection measures and sustainable forestry.			x		
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.		x			

Comment: 75% of Polish forests are state-owned and here forestry is generally based on the idea of sustainable management. For these forests, some possibilities to forest conversion (renaturalisation, rehabilitation and protection against forest fire) are provided. But in the Rural Development Plan there are almost no measures for private forests (no forest environmental schemes, no forest Natura 2000 payments) – this is a threat for private forests' biodiversity.

Support for afforestation, provided by the Rural Development Plan, will probably induce negative changes in landscape structure (afforestation of important meadow and pasture habitats!). The RDP supports afforestation everywhere and not only in areas where this is necessary for the landscape structure, ecological corridors or biodiversity.

Water regulation, water management, fishery	-3	-1.5	1	2	3
The plan adopts the catchment-centric approach of the EU Water Framework Directive and provide the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.			x		
The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.	x				

The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.			x		
In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species .		x			
The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.		x			

Comment: The NDP provides good possibilities for water management, but they can be used for river renaturalisation just as good as for technical regulation and building big water reservoirs. Because there is no tradition of "ecologically friendly" water management in Poland there is a danger to use financial resources to destroy, not to restore wetlands and water-related ecosystems.

The NDP in general is **not** focused on the WFD objective (good ecological status of waters and water-related ecosystems) than on sewage treatment and flood-prevention. The flood-prevention measures are based rather on outdated ideas of building big water reservoirs and flood embankments only. The main water management objective in the Polish NDP seems to be building infrastructure, not real water management - proposed indicators are based only on infrastructure parameters, not on the ecological status of waters and water-related ecosystems.

The OP "Infrastructure and Environment", Regional Development Plans and Axis 1 of Rural Development Plan all contain measures supporting water-management investments which may be critically dangerous from a conservation point of view.

The marine part of the plan doesn't contain any objectives directly related to nature conservation. Of course waste water treatment measures will have a positive effect on ecological conditions of the Baltic Sea. On the other hand, support for the "seashore line protection" could negatively affect nature habitats on the seashore.

The Fishery Operational Program doesn't contain objectives related to Natura 2000 or nature conservation at all. It is focused only on conservation and improvement of fish resources. Although "aquaculture-environmental scheme" has been discussed in the first draft of the program, it has been deleted in the final version.

Tourism	-3	-1.5	1	2	3
The plan considers the touristic carrying capacity of the areas and avoid the novel environmental touristic load of those areas that have already reached or exceeded it.	x				
The plan supports ecologically friendly tourism.			x		
The plan considers the positive effect of conservation and Natura 2000 on tourism development.				x	

Comment: Tourism development objectives are present in the plan, especially in Regional Operational Programs. But the objective is rather to increase tourist numbers and the carrying capacity of touristic areas is not considered. The plan will probably support every kind of tourism development, not only environmentally friendly actions. In some areas, possibilities provided by the NDP will induce new conflicts between tourism development and nature conservation (for example supporting ski-resort development and new ski lifts).

In general, natural values are considered as important factor for tourism development. Some (but unfortunately not all) Regional Operation Programs deal with conserving natural values and Natura 2000 sites as a measure for providing good conditions for tourism.

Industry and energy sector	-3	-1.5	1	2	3
The plan avoids and prohibit green field investments.	X				
The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.				X	
The plan doesn't include industry development that harm designed Natura 2000 sites, species and habitats.		X			
In the plan, environmental considerations are included in the projects / investments evaluation criteria.			X		

Comment: Increasing percentage of "green field investments" in Poland is considered a positive feature in the NSRF document!

The plan declares that "development should not destroy environment" and contains a declaration for the sustainability of development. This declaration is made clear and strong on a general level, but is not brought to bear in the details. It is likely that implementation of the sustainability declarations will be weak because ecological factors are generally not included in investment evaluation and selection criteria.

Natura 2000 considerations are present in the situation analysis of different sectors but are hardly mentioned in the more detailed, operational parts of the plan.

Development of linear infrastructure	-3	-1.5	1	2	3
The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.	X				
During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.			X		
Planned development of linear infrastructure doesn't negatively affects the conservation of species and habitats.	X				
When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects.				X	

Comment: The objective of the plan is to increase transport and to develop transport infrastructure, especially road infrastructure. The plan stresses the necessity of avoiding environmental conflicts, but focuses rather on technical solutions (fauna passages, other mitigation and compensation measures) and not on selecting the best alternative location. As a result, some big road investments hazardous for nature are included in the "key investments list" (annexes to the national plan and to regional plans).

Numerous smaller, regional and local roads with possible negative environmental effect will probably be built using regional support. Technical solutions for mitigation and compensation will be taken into consideration in the project evaluation/selection process and will probably be implemented properly. Unfortunately infrastructure projects not disturbing nature are not

prioritised. The fundamental decision about the location of roads is not included in the evaluation criteria and will probably be not enough considered.

Main threats for biodiversity & Natura 2000 - Poland

(most → less important order)

1. A lot of small, dispersed but for nature dangerous hydrological investments will probably be supported. Support is provided by the "Environment and Infrastructure" OP, the Rural Development Plan and all 16 regional Operational Programs. Theoretically, all these mechanisms could be used for good and sustainable water management and water ecosystems renaturalisation, but it is much more likely that they will be used for river regulation, building water reservoirs and agricultural drainage. Paradoxically, all these measures are described as "pro-environmental actions", as "building ecological safety" or "water management improvement".

2. Strong support for road development will induce numerous conflicts with protected areas, Natura 2000 sites and ecological corridors. Although road builders are prepared for mitigation and compensation measures, ecological aspects probably won't be taken into consideration enough when selecting the location of roads. The weak system of EIA in Poland and common practice of abusing the IROPI (Imperative Reason of Overriding Public Interest) argument make this threat very realistic.

3. Some big investments, critically dangerous for nature, which have been discussed in the past but not built because of financial reasons, are planned to be built with NDP support. On the "strategic investments list", prepared by the Polish government as an appendix to NDP, are for example:

- *water reservoir Nieszawa* on the Vistula river (will destroy important wetland habitats);
- *water reservoir Kąty-Myscowa* on the Wisłoka River (will destroy fragment of Magura National Park and also a Natura 2000 site);
- water reservoirs: Dukla on Jasiołka river, Rudawka Rymanowska on Wisłok river, Młynne on Łosiosina river in Polish Carpathians (will destroy most important fish habitats in this area of Poland);
- water navigation channel crossing the Vistula Belt and connecting Vistula Basin with the Baltic Sea (will change the ecological character of the whole Vistula Basin– will affect of 1150 habitat - biggest example of habitats destruction in Poland!);
- If the finances will be provided by the NDP for these measures ecological arguments might be outweighed by other interests, because there is strong political lobbying for these investments (especially on the regional and local level). The weak system of EIA in Poland and common practice of abusing the IROPI argument make this threat very realistic.

4. Poland still possesses considerable agrobiodiversity and numerous environmental measures are planned in the Rural Development Plan. Nevertheless, important changes in the structure of Polish agriculture are expected as a result of full RDP implementation. Negative effects of

these structural changes will probably overweight positive effects of agrienvironmental measures. As a result, agrobiodiversity loss will probably **not** be stopped, even till 2013.

5. Afforestation of agricultural land, supported by RDP measures (and additionally by the UNFCCC carbon sinking mechanism, which is planned to be implement in Poland) will **decrease, not increase** biodiversity.

6. Supporting regional development will induce small but numerous tourism investments, which are generally not based on the idea of sustainable tourism. Especially a lot of ski resorts and ski lifts are expected to be built in the mountain regions of Poland using the Regional Development Fund.

7. Generally, it is expected that argument of "*necessity of fast utilising the EU money available for investments*" will be often used as argument against the detailed consideration of environmental aspects of investments.

Documents analysed:

- National Cohesion Strategy (National Strategic Reference Frames) – version accepted by the government, 1 August 2006;
- Operational Program "Infrastructure and Environment" - version accepted by the government, 1 August 2006;
- Operational Program of Eastern Poland Development, version 24 July 2006;
- National Strategic Plan of Rural Development – project 1 August 2006;
- Rural Development Plan – project W-06/VII/2006, July 2006;
- Regional Operational Programs for:
 - dolnoslaskie (Lower Silesia) voivodship, version 12 September 2006;
 - kujawskopomorskie voivodship, version 25 May 2006
 - lubuskie voivodship, version July 2006
 - lubelskie voivodship, version 12 May 2006;
 - łódzkie voivodship, version 12 October 2006
 - małopolskie voivodship, version 25 May 2006;
 - mazowieckie voivodship, version 1.6, June 2006;
 - opole voivodship, version 14 July 2006;
 - podkarpackie voivodship, version 10 May 2006;
 - podlaskie voivodship, version 27 October 2006;
 - pomorskie voivodship, version 27 April 2006;
 - śląskie voivodship, version 5, 26 October 2006;
 - świętokrzyskie voivodship, version February 2006;
 - "Warmia i Mazury", version May 2006;
 - wielkopolskie voivodship, version 4.5 13 October 2006;
 - zachodniopomorskie voivodship, version September 2006

For each document, last version available in October 2006 has been analysed. In Poland all NDP documents are available from website <http://www.fundusze-strukturalne.gov.pl/>, with exception of Rural Development Documents available from www.minrol.gov.pl

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Romania

1. Assessing to what extent the plan is well established

Environmental situation analysis	-3	-1.5	1	2	3
The plan completed an environmental problem map (SWOT analysis).		X			
The plan examined the state of each environmental element.				X	
The plan examines the conservation status of species and habitats of Community importance.		X			
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.		X			
The plan examined the level of environmental awareness of the affected people.		X			
The plan explored the situation and efficiency of the institutional system of environmental protection.					X
The plan explored the situation and efficiency of the institutional system of environmental education.		X			
Has the opportunity for public participation been ensured during the planning process of environmental issues?				X	
Was strategic environmental assessment completed for the plan?					X
<p>Comments:</p> <p><i>The SWOT analysis in the NSRF is far too general and doesn't contain precise information regarding environmental problems.</i></p> <p><i>The NDP examines in detailed way the state of each environmental element and also explains threatening factors for most of them. The situation and efficiency of the institutional system of environmental protection is discussed in detail.</i></p> <p><i>No information can be found about species and habitats of Community importance, their status and threatening factors in the NDP.</i></p> <p><i>The NDP and NSRF doesn't examine the level of environmental awareness of the affected people.</i></p> <p><i>The status and responsibilities of the institutional system of environmental protection is well explained but no information can be found regarding the status of environmental education.</i></p> <p><i>According to the EU requirements public participation is necessary in the planning process. Several NGO's were invited to participate but no public announcement was published.</i></p> <p><i>The information in the analysis part of the NDP is fully covered in the SEA, there is a very detailed plan completed.</i></p>					

2. Assessing the integration of nature conservation in the plan

General considerations	-3	-1.5	1	2	3
The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly from an			X		

environmental point of view.					
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.			X		
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.			X		
The plan complies with the environmental legislation.				X	
Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).				X	
The plan doesn't list potential investments which mean a potential danger for Natura species, habitats or sites.		X			
Environmental considerations are included in the projects / investments evaluation criteria.				X	
<p>Comments:</p> <p><i>The environmental approach of several sectors is far too general.</i></p> <p><i>Environmental protection is being emphasised in some of the sectors in the context of sustainable development, prevention of erosion and floods.</i></p> <p><i>Natura 2000 and biodiversity conservation are pointed as important targets but without mentioning their role in development. The 2010 target is not even mentioned in the NSRF or in the NDP.</i></p> <p><i>Not all the environmental legislations/conventions are mentioned properly in the plan, the "polluters pay" principle is mentioned as a target to follow.</i></p> <p><i>There is no comment in any part of the development plan on threats to Natura species/habitats.</i></p> <p><i>Priorities in investments are mainly those regarding water and waste management, improving air quality etc. In the NSRF it is stated that: "Environmental Impact Assessment will be conducted on major infrastructure and investment project proposals to ensure environmental considerations have been taken into account".</i></p>					

Environment	-3	-1.5	1	2	3
The plan deals with the rehabilitation and preservation of the damaged ecological systems.				X	
The plan deals with the provisions for establishing the coherence of habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.		X			
The plan deals with the provisions for the prevention of the invading species from further spread.		X			
In the plan there are possibilities of financing habitat restoration, species conservation, ecological corridors restoration.			X		
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.				X	
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favourable conservation status of Natura 2000 species and		X			

habitats.					
Comments:					
<p><i>The restoration of damaged ecological system is included widely in the plan, mainly in former industrial sites, areas affected by floods, erosion due to deforestation but no information can be found about green corridors, decreasing the impact of isolation or preventing the invading species from further spread.</i></p> <p><i>In the NSRF the rehabilitation of natural areas are mentioned only for areas included in the Natura2000 network. No mentioning of the coherence of habitats, etc.</i></p> <p><i>Further investments in maintaining Natura 2000 sites are mentioned in the OP but no detailed information exists regarding the implementation of the program.</i></p>					

Education, Environmental awareness	-3	-1.5	1	2	3
The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.			X		
The plan contains elements, that target the raising of environmental awareness.			X		
The plan contain elements, that target the raising of awareness about the Natura 2000 network.		X			
The plan contain elements that target the raising of awareness about Natura of affected people(e.g. farmers, foresters, fishers).		X			
Comments:					
<p><i>The Plan contains very superficial information about the overall development of the education system, few information exists about the enviromental education and issues regarding the Natura are completely missing. The Romanian Ministry is realizing an information campagne about Natura 2000 related issues between august-october 2006, but there is no evidence in the plan, that this will be continued.</i></p> <p><i>Public awareness raising is not focused on nature conservation (Natura 2000 or Target 2010) but on general environmental aspects.</i></p>					

Agriculture	-3	-1.5	1	2	3
The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.			X		
The plan cares for the preservation of the traditional extensive farming.					X
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.				X	
The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.	X				
The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.		X			
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.		X			
The plan promotes and enhance the active involvment of local stakeholders		X			

into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.					
<p>Comments:</p> <p><i>The NSRF ensures indirectly the conservation status of species and habitats only on extensive farmland (encourages the maintenance of the traditional landscape, for touristic reasons), but it also encourages the investments in medium and high technologies which will inevitably lead to degradation of the environment.</i></p> <p><i>The preservation of actual “traditional” look of the farmlands is well established in the plan.</i></p> <p><i>The plan provides for the compensation system in the Natura 2000 sites but the implementation structure of this process is not explained in detail. This issue is treated as a duty to do; no proposition exists to enhance the multifunctional use of natural assets.</i></p> <p><i>As many parts of Romania are convenient for intensive farming on large scale, the plan approaches the agricultural issues almost entirely from an economical point of view, thus monocultural farmlands will inevitably continue to exist on large areas of the country (lowland)</i></p> <p><i>Involving stakeholders into the conservation of biodiversity is completely missing from the plan.</i></p>					

Forestry	-3	-1.5	1	2	3
The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.		X			
The plan promotes the conservation of forest species and habitats through protection measures and sustainable forestry.		X			
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.			X		
<p>Comments:</p> <p><i>26,1% of Romania is covered by forest from which 60% is owned by the state and 40% are private forests.</i></p> <p><i>The only immaterial value of forests in the NDP are connected to forest losses which is supposed to contribute to natural disasters such as floods and erosions. It also mentions forest as renewable energy resource.</i></p> <p><i>The biggest problem in forestry is massive exploitation, the plan mentions in many cases the effect of illegal cuttings as well. Forests managed by private companies are often less preserved than the state owned ones.</i></p> <p><i>The plan doesn't promote the conservation of forest species and habitats through sustainable forestry, the approach is mainly an economic one. The preservation of continuous forests is mentioned only in the case of protected area as National and Natural Parks, Natura 2000 sites, Natural Reserves etc.</i></p>					

Water regulation, water management, fishery	-3	-1.5	1	2	3
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The plan adopts the catchment-centric approach of the EU Water Framework Directive and provide the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.				X	
The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.		X			
The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.			X		
In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species.			X		
The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.		X			
<p>Comments:</p> <p><i>There is a detailed description of water management in the catchment area due to the multiple floodings in Romania in the last years. The plan also deals with the actions which will reduce and stop the pollution of water in order to have clean water supply for the population.</i></p> <p><i>The plan ensures developments targeting stability and quality of water courses without mentioning wetland habitats or riverside vegetation.</i></p> <p><i>Although there are designated marine sites, the plan doesn't deal with the management of these.</i></p> <p><i>The plan ensures the development of fishing industry without mentioning its effect on the natural habitats.</i></p>					

Tourism	-3	-1.5	1	2	3
The plan considers the touristic carrying capacity of the areas and avoid the novel environmental touristic load of those areas that have already reached or exceeded it.		X			
The plan supports ecologically friendly tourism.			X		
The plan considers the positive effect of conservation and Natura 2000 on tourism development.				X	
<p>Comments:</p> <p><i>There is no information in the plan regarding the negative effects of intensive tourism or the capacity of different protected areas to support tourism. Ecotourism is encouraged in protected areas, such as the Danube Delta Biosphere Reserve, where ex. leisure time fishing is highly encouraged.</i></p> <p><i>Agro-tourism is mentioned as an alternative way and not a necessary way of development in certain areas.</i></p> <p><i>The plan considers biodiversity and the natural landscape as a value which serves tourism development.</i></p>					

Industry and energy sector	-3	-1.5	1	2	3
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The plan avoids and prohibit green field investments.		X			
The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.				X	
The plan doesn't include industry development that harm designed Natura 2000 sites, species and habitats.		X			
In the plan, environmental considerations are included in the projects / investments evaluation criteria.				X	
<p>Comments:</p> <p><i>The plan stimulates development of technic and quality in energy sector to use renewable and pure energy sources in order to preserve a more healthy environment but nothing is mentioned about species and habitat protection.</i></p> <p><i>Environmental considerations concerning projects/investments evaluation criteria in the NDP industrial and energy sector are mentioned but no concrete information exists regarding the controll mechanism.</i></p> <p><i>In the NSRF it is stated that: "Environmental Impact Assessment will be conducted on major infrastructure and investment project proposals to ensure environmental considerations have been taken into account".</i></p>					

Development of linear infrastructure	-3	-1.5	1	2	3
The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.	X				
During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.		X			
Planned development of linear infrastructure doesn't negatively affects the conservation of species and habitats.	X				
When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects		X			
<p>Comments:</p> <p><i>Due to the fact that the country has a very poor and bad quality road and railway network, the plan has a clear target: massive infrastructural development in Romania. There is a considerence of "reducing the pollution rate by a more efficient way of traffic" but the infrastructural development inevitably will have a strong impact on the Natura 2000 sites (and not only). There is no information about the danger of isolation of habitats.</i></p> <p><i>As the actual road and railway system will change in major way, direct impact are not obvious at this stage.</i></p>					

Main threats for biodiversity & Natura 2000 - Romania

Infrastructure development

Major infrastructural developments will take place according to the NDP in the transport network of the country. Priorities in the development are part of the Trans European Network plan (TEN-T) - three highways, one railway and improving the transport efficiency on the Danube river. Main threats are considered the investments in road network, especially highways. As Romania possesses only two highways with a total of 211 km, important cross country highways are planned to be built. The currently planned highways are crossing at least 7 from the proposed Natura 2000 sites.

There is no information in the plan regarding mitigation measures for the highways crossing a Natura 2000 site.

There is a real threat that polluting factories with strong lobby might be build on/around protected sites and could cause direct impact on these. Hydrological investments (water reservoirs, agricultural drainage) could also be a threat on Natura 2000 sites. Because of the numerous infrastructural investments the related industries are also developing, ex. many new quarries are planned to be open in the near future. Inside the “Macin-Niculitei” proposed Natura 2000 site (and in the immediat vicinity of the Macin National Park) 2 new quarries will be opened very soon.

The NDP encourages the building of wind turbines as alternative energy sources. There is a concern (based on European experience) about the negative effect of these structures built on flyways of migratory birds or areas where a high number of birds concentrate (ex. Dobrogea region) because these structures kill a big number of highly endangered bird species.

Other infrastructural developments, as expanding of urban areas can be also dangerous for the flora and fauna.

Deforestation/Afforestation

In Romania forest exploitation has a huge impact on nature. Romania posses the largest area of virgin forests in Europe but part of this is threatened by forestry activities.

Massive clear-cuts take place even in present times. Cutting trees for both industrial and heating purposes are important in Romania. There is an urgent need to control and make more efficient forestry activities.

The most endangered forests are on low-land and hill-land where natural forests hardly exists anymore. Natural forests with high biodiversity value should be preserved on the long term.

Afforestation for the purpose of renewable energy can also have a negative effect if not indigenus tree species are planted.

Intensification/abandonment of agriculture and traditional farming

Traditional land-use sustaines high biodiverity on large areas mostly in the hilly and mountain regions. There are two major type of threats to this arising from the change of agriculture methods:

1. the intensification of agriculture encouraged by European subsidies will have a negative effect on many Natura 2000 sites, by loosing the mozaic-type landscape and intensive use of chemicals.

2. European policies (e.g. the requested milk quality) make the actual farming financially unsustainable, so more and more people will abandon farming. The decreasing number of livestock in Natura 2000 sites will inevitably lead to loss of hay-making fields and pastures, which are semi-natural areas with high biodiversity.

The structural changes applied will probably overweight positive effects of agri-environmental measures.

Protected area management problems

The NDP doesn't contain details regarding the institutional management of the Natura 2000 sites. This task will be probably managed by a newly formed institution the National Agency for Protected Natural Areas and Biodiversity Conservation. There are many unclarities about the exact tasks and assumptions of this Agency.

Not clear compensation mechanism could lead to conflict with the local stakeholders.

Weak institutional management (central and/or local) can lead towards the fast degradation of the quality of the Natura 2000 sites, thus loosing the original potential/value why were designated. Most of the Romanian actual protected areas (even the large ones) lack a well working managing administration. As with the Natura 2000 network the surface of the protected areas will increase from around 7% to at least 15-20% the proper management of these areas can be questioned without significant efforts from the Ministry of Environment.

Disorganized protected areas can suffer by illegal logging, illegal/not controlled hunting, uncontrolled turism, unefficient monitoring system, etc.

Intensification of turism

Regional Development Plans support a series of small investments especially in the mountain and Danube Delta region. Their idea is not based on sustainable turism idea. For example there are plans for building numerous ski resorts which are planned in protected areas/proposed Natura 2000 sites (program "Superski in the Carpathians").

Intensification of turism in ceartain areas already has effects in the protected areas of Romania. The fast evolution of the uncontrolled extreme sports (enduros, cross country motorbikes, offroad cars, offroad races, para gliding, rock climbing, etc.) has negative effect on soil and wildlife inside protected areas. A special attention should be payd to this phenomenon to make possible a normal evolution of this kind of turism by controlling the process in this early stage.

There is no information regarding the turist capacity of the protected areas, this could lead towards local negative impact of even eco-turism.

Low environmental education level and low public awareness

There is few information in the NDP about the strategy of environmental education. The lack of knowledge of people in general but especially of local stakeholders will make difficult or impossible the proper management of the Natura 2000 areas. The lack of knowledge of farmers working in Natura 2000 areas about the subventions and the lack of capacity to apply for the subventions can lead to a general opposition towards the protected areas.

Documents assessed:

- Cadrul Strategic National de Referinta (National Strategic Reference Framework), April 2006
- Planul National de Dezvoltare (National Development Plan) December 2005
- Programul Operational Regional (Regional Operation Program) April 20

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Slovakia

1. Assessing to what extent the plan is well established

Environmental situation analysis	-3	-1.5	1	2	3
The plan completed an environmental problem map (SWOT analysis).				X	
The plan examined the state of each environmental element.			X		
The plan examines the conservation status of species and habitats of Community importance.	X				
The plan explores the factors threatening the favourable conservation status of species and habitats of Community importance.	X				
The plan examined the level of environmental awareness of the affected people.	X				
The plan explored the situation and efficiency of the institutional system of environmental protection.		X			
The plan explored the situation and efficiency of the institutional system of environmental education.	X				
Has the opportunity for public participation been ensured during the planning process of environmental issues?				X	
Was strategic environmental assessment completed for the plan?	X				
<p>Comments</p> <p>Environmental considerations are mostly lacking in the basic NSRF document, or they are formulated only at very general level. Some of them are elaborated in more detail in the "executive" documents: (proposal of „Rural Development Plan” for 2007-2013 and Sectoral operational programme - Agriculture and rural development).</p> <p>The whole process of public participation during the planning process of environmental issues was far from being sufficient (see both reports by Friends of the Earth – CEPA and DAPHNE - Institute of Applied Ecology).</p>					

2. Assessing the integration of nature conservation in the plan

General considerations	-3	-1.5	1	2	3
The plan describes the situation in different sectors (e.g. water management, forestry, agriculture, industry, tourism properly from an environmental point of view.		X			
The plan integrates the environmental aspects into other sectors, environmental protection is emphasised in other sectors.	X				
Natura 2000 and biodiversity conservation (2010 target) are pointed and described as an important condition of development.			X		
The plan complies with the environmental legislation.			X		
Beneficiaries of developments have to pay for the use of natural resources ('polluters pay' principle).			X		
The plan doesn't list potential investments which mean a potential danger for Natura species, habitats or sites.	X				
Environmental considerations are included in the projects / investments evaluation criteria.	X				

Comment:

Although some of the environmental aspects are mentioned in the plan, most of these environmental considerations are rather formal. Neither environmental concerns, nor Natura 2000 are among the main underlying topics of the plan. Although there are generally good possibilities for financing environmentally friendly investments, the objectives of the plan are not focused on the environment neither on Natura 2000.

The plan provides for some potentially dangerous investments with negative impacts on Natura 2000.

The principles of sustainable development are mentioned in the plan (as a results of NGO pressure), however this is seen mainly as a formal exercise „painting it green". Although the NSSD is not in evident contradiction with the principles of SD (e.g. the principle of support of the development of human resources, the ecological principle, principle of solidarity, principle of subsidiarity, principle of emancipation and participation), in fact, these principles are not integrated adequately into other parts of the plan, nor into operational programmes.

Conservation	-3	-1.5	1	2	3
The plan deals with the rehabilitation and preservation of the damaged ecological systems.		X			
The plan deals with the provisions for establishing the coherence of habitats, for decreasing the impacts of isolation and for the conservation of the ecological network.		X			
The plan deals with the provisions for the prevention of the invading species from further spread.		X			
In the plan there are possibilities of financing habitat restoration, species conservation, ecological corridors restoration.			X		
In the plan there are possibilities of financing other activities / investments important for Natura 2000 sites management and conservation.			X		
In the plan, the amount of investments in Natura 2000 is adequate to maintaining the favourable conservation status of Natura 2000 species and habitats.	X				

Comments

The NSRF only focuses on the protection of nature within protected areas. The topic of nature conservation *outside* protected areas (Natura 2000) are not mentioned at all. Also “Protection and restoration of nature and landscape” axis of the Environment OP focuses only on Natura 2000 sites, protected areas and critically threatened species.

Conflicts of interests of conservation with other sectors (e.g. transport, agriculture or forestry) are not mentioned in the NSRF.

Education, Environmental awareness	-3	-1.5	1	2	3
The plan deals with institutional development (new institutions, staff, infrastructure, but also training and education) connected to expanding the environmental knowledge.			X		

The plan contains elements, that target the raising of environmental awareness.		x			
The plan contains elements that target the raising of awareness about the Natura 2000 network.		x			
The plan contain elements that target the raising of awareness about Natura of affected people(e.g. farmers, foresters, fishers).		x			
<p>Comments:</p> <p>Although there are good possibilities for financing environmental education and awareness raising activities, this subject is not discussed in the NSRF at all. Education on Natura 2000 is not mentioned, as well.</p>					

Agriculture	-3	-1.5	1	2	3
The plan ensures the maintenance of favourable conservation status of species and habitats on agricultural land.		x			
The plan cares for the preservation of the traditional extensive farming.		x			
The plan deals with agri-environmental programmes for ecologically sensitive areas and Natura 2000 sites.			x		
The plan excludes those provisions which aim at the creation of large agricultural fields or / and monocultural farming.		x			
The plan makes provisions for propagating the biological (poor in or free of chemicals) farming.		x			
The plan helps to enhance the complex ecological land use and the multifunctional use of the natural assets.			x		
The plan promotes and enhances the active involvement of local stakeholders into the conservation of species and habitats through the integrated cooperation and conciliation of the interest.		x			
<p>Comments:</p> <p>Sector operational programme - Agriculture and rural development, 2004 – 2006, deals with agri-environmental schemes for ecologically sensitive areas and Natura 2000 sites. It was already agreed that the funds from the European Agricultural Fund should be used for this purpose.</p> <p>However, the new Slovak government (elected in June 2006) tries to change it. In the newest proposal of “National Strategic Plan of Rural Development for the programming period 2007-2013“ submitted by the Ministry of Land Management of the Slovak Republic in October 2006, the payments for Natura 2000 are cancelled, as well as the already agreed agri-environmental and sylvi-environmental schemes. Also the schemes for the protection of birds on agricultural land and in the forests have been cancelled. SOS/BirdLife Slovakia and some other Slovak NGOs oppose this. SOS/BirdLife Slovakia organises a campaign by using the legal instrument of “common objection” asking its members to support its standpoint.</p>					

Forestry	-3	-1.5	1	2	3
The plan promotes the sustainable and multifunctional use of forests, with special respect of the immaterial value of the forests.			x		
The plan promotes the conservation of forest species and habitats through			x		

protection measures and sustainable forestry.					
The plan provides that the continuous forests remain untouched and also their rehabilitation if needed.	x				
<p>Comments:</p> <p>The investments that are potentially dangerous for Natura 2000 are envisaged in Sectoral operational programme - Agriculture and rural development, 2004 – 2006: intensification of forestry, including new forestry infrastructure, new forest roads, and increased fire protection. In Slovakia the concept of “fire protection” in forests is mainly about building new forest roads in formerly inaccessible areas, and preventive clearcutting of forest areas, that are potentially threatened by fire. Large parts of High Tatra Mts. National Park were clearcut after the heavy storm event 2 years ago, also using the argument of fire prevention. New forest roads represent a big threat for forest biodiversity by fragmentation and increased disturbance including poaching.</p>					

Water regulation, water management, fishery	-3	-1.5	1	2	3
The plan adopts the catchment-centric approach of the EU Water Framework Directive and provide the preservation of the water quality as well as the sustainable water supply management in the whole area of catchment.			x		
The plan protects wetland habitats from water-related developments, which are potentially dangerous for conservation.		x			
The plan provides a flood-plain of an appropriate size together with the rehabilitation of the plant communities along the rivers to avoid floods.	x				
In seaside countries, the plan deals with the establishment of marine Natura 2000 sites and with the protection of marine habitats and species.	-	-	-	-	-
The plan ensures that fishery activity do not negatively affect Natura 2000 species and habitats.		x			
<p>Comments:</p> <p>One of the 4 priority axes within OP Environment is “Integrated protection and wise use of water resources and flood protection - Although „traditional” methods of flood control (e.g. river regulations, straightening and deepening of the river bed, chanelisation of natural river courses, concrete embankments, etc.) are not explicitly mentioned, these are still commonly used in Slovakia. These methods are threatening the river habitats and their biodiversity. Therefore the implementation of specific flood control projects under this priority axis could negatively affect wetland habitats.</p> <p>The investments that could be potentially dangerous for Natura 2000 are envisaged in Sectoral operational programme - Agriculture and rural development, 2004 – 2006: intensification of fresh-water fisheries. On the other hand, support for new fishponds, or reconstruction of existing ones are envisaged which could be beneficial at least for some water fowl.</p>					

Tourism	-3	-1.5	1	2	3
The plan considers the touristic carrying capacity of the areas and avoids the novel environmental touristic load of those areas that have already reached or exceeded it.	x				

The plan supports ecologically friendly tourism.		x			
The plan considers the positive effect of conservation and Natura 2000 on tourism development.			x		
<p>Comments</p> <p>There are 6 priority axes; one of them is “Tourism infrastructure”. New tourism developments within Natura 2000 sites are not explicitly mentioned, however there is a rather common approach in Slovakia to consider these sensitive areas as the most suitable for such developments, mainly because of their natural beauties. Therefore potential future conflicts can be expected especially in the mountain areas where the planned infrastructure related to winter sports (hotels, ski-lifts) overlap with Natura 2000 sites.</p>					

Industry and energy sector	-3	-1.5	1	2	3
The plan avoids and prohibits green field investments.		x			
The plan doesn't intend to implement such industrial development whose manufacturing process or product significantly endangers nature.				x	
The plan doesn't include industry development that harm designed Natura 2000 sites, species and habitats.			x		
In the plan, environmental considerations are included in the projects / investments evaluation criteria.		x			
<p>Comments:</p> <p>Although not explicitly mentioned, there is a potential threat of new green fields investments in the areas with Natura 2000 habitats. (Example: Industrial park “Zahorie” near Malacky in Bratislava region is being built within an area covered with Natura 2000 forest habitats, actually destroying them and threatening nearby Natura 2000 sites).</p>					

Development of linear infrastructure	-3	-1.5	1	2	3
The plan includes measures to decrease transport, thus avoids the necessity of increasing transport capacities.	x				
During the rationalisation the plan considers the cease of habitats' isolation and the functioning of ecological network.	x				
Planned development of linear infrastructure doesn't negatively affects the conservation of species and habitats.	x				
When linear infrastructure development negatively affects the conservation of species and habitats measures are taken to minimise or compensate these effects.		x			
<p>Comments</p> <p>The most dangerous investments from the perspective of Natura 2000 envisaged in the plan are related to OP Transport (Development of linear infrastructure). New first-class roads, speed ways and highways are included as priority axes, without any respect to Natura 2000. Many serious future conflicts can be expected especially in the areas where these planned linear infrastructure overlap with Natura 2000 sites.</p>					

Main threats for biodiversity & Natura 2000 - Slovakia

1. Water management

One of the 4 priority axes within the OP Environment is “**Integrated protection and wise use of water resources and flood protection** - Although „traditional” methods of flood control (e.g. river regulations, straightening and deepening of the river bed, chanelisation of natural river courses, concrete embankments, etc.) are not explicitly mentioned, these are still commonly used in Slovakia. These methods are threatening the river habitats and their biodiversity. Therefore the implementation of specific flood control projects under this priority axis could negatively affect wetland habitats.

2. Protection of Species and Habitats outside protected areas and Natura 2000 sites

The NSRF only focuses on the protection of nature within protected areas. The topic of nature conservation *outside* protected areas (Natura 2000) are not mentioned at all.

“Protection and restoration of nature and landscape” is axis 4 of the Environment OP. Natura 2000 is explicitly mentioned here. But measures are focused only on Natura 2000 sites, protected areas and critically threatened species.

3. Development of road infrastructure

The most dangerous investments from the perspective of Natura 2000 envisaged in the plan are related to OP Transport. New first-class roads, speed ways and highways are included as priority axes, without any respect to Natura 2000. Serious future conflicts can be expected especially in the areas where planned linear infrastructure developments overlap with Natura 2000 sites.

4. Tourism development in Regional OPs

There are 6 priority axes; one of them is “Tourism infrastructure”. New tourism developments within Natura 2000 sites are not explicitly mentioned, however there is rather common approach in Slovakia to consider these sensitive areas as the most suitable for such developments, mainly because of their natural beauties. Therefore potential future conflicts can be expected especially in the mountain areas where the planned infrastructure related to winter sports (hotels, ski-lifts) overlap with Natura 2000 sites. (examples: High Tatras National Park, Mala Fatra National Park, Vihorlat Mts.)

5. Green field investments

Although not explicitly mentioned, there is a potential threat of new green fields investments in the areas with Natura 2000 habitats. (Example in “OP Knowledge Economy”: Industrial park “Zahorie” near Malacky in Bratislava region is being built within an area covered with Natura 2000 forest habitats, actually destroying them and threatening nearby Natura 2000 sites).

6. Intensification of forestry

The investments that are potentially dangerous for Natura 2000 are envisaged in the Sectoral operational programme - Agriculture and rural development, 2004 – 2006: intensification of forestry, including new forestry infrastructure, new forest roads, and increased fire protection (which means even more roads and clearcuts). New forest roads represent large threat for forest biodiversity by fragmentation of forest complexes and increased logging, hunting pressure on threatened species (wolf, lynx), poaching and other kind of disturbance.

Documents assessed:

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Using following documents:

- Friends of the Earth – CEPA, Juraj Zamkovský: „Programming of EU funds for 2007 – 2013” special report prepared for CEE Bankwatch Network
- DAPHNE – Institute of Applied Ecology, Milan Janak: “The national programming documents for EU Regional Funds 2007-13” scorecard examination coordinated by WWF (country chapter for Slovakia)

