



Netherlands Commission for  
Environmental Assessment

# Comments on REC SEA Manual

Memorandum by the NCEA

8 June 2005



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# Advice of the Secretariat

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**To :** The Regional Environmental Center for Central and Eastern Europe (REC), Hungary

**Attn :** Jiri Dusik, Team Leader, Environmental Assessments

**CC :** Nicholas Bonvoisin, Espoo (EIA) Convention Secretariat, E&HS Div., UNECE Geneva

**From :** Mr. Arend Kolhoff (Technical Secretary - Netherlands Commission for Environmental Impact Assessment)

**Date :** 8 June 2005

**Subject :** Comments on REC SEA Manual

By: Secretariat of the Netherlands Commission for EIA

Advice 2005-010

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1. Congratulations on the monumental effort to draft this SEA manual. I'll provide you with my comments on behalf of the Secretariat of the Netherlands Commission for EIA. I have assessed the manual on headlines and I have listed my comments per module.
2. Module 2:
  - The module aims to provide a complete but rather comprehensive overview of SEA evolution, guiding principles and the application to sustainability.
  - The SEA evolution provides a sufficient description.
  - In the guiding principles reference should be made to the IAIA principles on SEA. They should replace the outdated guiding principles of SEA as presented.
  - Application to sustainability, this section is more an introduction towards sustainability than an application of the concept of sustainability for SEA. Moreover, it seems these are very much the ideas of Sadler while the IAIA Boston conference for example, provides more concrete opportunities for application of sustainability for SEA.
3. Module 3:
  - Information in this module is not easily accessible due to the incorporation of too many boxes. Some sections only consist of boxes and that could confuse the reader (see 2.4). In addition, three to four different types of boxes are used for different purposes.
  - I do have a fundamental comment. I understand that the aim of module 3 is to provide guidance in the implementation of the SEA protocol. This means that module 3 should provide guidance for authorities that want to build an SEA system, consisting of legislation and procedures. However, module 3 provides guidance to build an SEA system as well as guidance

to execute SEA once the SEA legislation and procedures have been established. This information is very confusing. I would recommend focusing on the establishment of an SEA system via legislation and procedures in module 3. I would recommend providing guidance on the execution of SEA in another module.

- In this module the mandatory and optional requirements have been elaborated. In order to establish a more ambitious SEA system the optional requirements should get more attention in the module.
- Another fundamental comment, stage 2 is about scoping and stage 3 is about preparation of the environmental report & consultation. It is well known that investment in adequate scoping is a condition for a good quality environmental report. Therefore, I recommend aiming for a more ambitious scoping stage including optional requirements for consultation and participation, selection of alternatives, use of experts / experts committees to feed the scoping process resulting in approved ToR. Quality assurance mechanisms for scoping have not been elaborated upon.
- In stage 3 section 2.8 the report quality is addressed but no quality assurance mechanisms have been elaborated upon, such as an independent expert body that is reviewing SEA reports in the Netherlands.
- With regards to the establishment of legislation, no reference has been made to the opportunities for inclusion of SEA regulations in existing legislation, for example on territorial planning or planning of linear infrastructure.

4. Module 4:

- The scheme presented in section 3.3 should include consultation, participation and monitoring in order to provide the right message. This scheme should become the heart of the opportunities and necessity to coordinate planning procedures and SEA and should therefore be complete.
- Section 3.2 and 3.3 should be combined into one section.
- How to deal with SEA in countries with weak or almost absent planning procedures? This is for example the situation in Georgia. I recommend including a section about this situation and how to deal with SEA.

5. Module 5 and 8: No comments

6. Module 9:

- I have sent Nicholas Bonvoison an example of a 5 year programme to establish SEA. The ideas and structure elaborated in this programme can be used to complete module 9.

7. Module 10: Is not yet complete and therefore no comments yet.

Finally, I would like to inform you that on request of the Convention on Biodiversity, the Netherlands Commission for EIA in close collaboration with the International Association for Impact Assessment is in the process to draft guidelines for the integration of biodiversity in SEA. Due to the fact that a majority of the SEA protocol signatories have also ratified the

Convention on Biodiversity I recommend including these 'Biodiversity in SEA Guidelines' in the SEA Manual.

At the moment the second draft of the guidelines document is drafted and will be discussed at the IAIA-SEA conference in Prague in September this year. According to the planning these guidelines will be adopted by the Conference of parties of the CBD in March 2006 in Brazil.