

A Comparison Of Environmental Impact Assessment Processes Of Turkey With European Union

A. Celikbilek¹, G. Sapmaz²

¹ Department of City and Regional Planning, Istanbul Medeniyet University, TURKEY.

(E-mail: ayca.celikbilek@medeniyet.edu.tr)

² The Department of Geological Engineering, Istanbul University, TURKEY.

(E-mail: gokhansapmaz@hotmail.com)

ABSTRACT

The main purpose of this study is making a comparison of Environmental Impact Assessment (EIA) system applied in Turkey with EU that applies EIA to provide conformity with environmental regulations of member states and to eliminate economical and trading imbalances. The sources that are used for analyzes are based on the legislations in force. The study examines the key components of the EIA process for both legislative systems in view of the fact that the EIA processes basically involve the same steps although different rules have been adopted within the legislation of different countries or institutions. In this context, the study compares these following issues for both systems: the general characteristics of each EIA systems, project types subject to EIA, screening processes, people or authorities that are responsible for preparing EIA, payers of the EIA reports, initiating the EIA process, scoping processes, types of impacts considered, evaluation of alternatives, mitigation measures, completion and evaluation periods of the EIA reports, final decisions, decisions about the most environmentally friendly alternative, existence and features of monitoring processes and public participation.

Keywords: Directive, EIA Regulations, Environmental Impact Assessment, European Union, Turkey

1. INTRODUCTION

Environmental Impact Assessment (EIA) in Turkey was discussed at the legislative level as first in Environmental Law in 1983, in a time that earlier than many countries. Ten years later, in 1993, the EIA Regulation that discusses reports in more detail was enacted and this regulation has been amended many times. The European Union (EU) Directive has become a framework law especially after the EU accession process became a current issue and the start of negotiations for Turkey. Therefore, Turkey has started to make various arrangements in order to provide conformity with EU in political, economical and legal issues. However, although the years have passed, the full conformity with EU Directive has not been achieved as stated in the Progress Report published in 2016^[1].

This study aims to make a comparison of EIA system of Turkey with EU in terms of the main stages of EIA process in general. Analyses which are done in the study are based on the legislations in force. The study also benefited from other official documents such as guidebooks and manuals to examine each process stage in detail. There are some other tools which regulate the subjects throughout the study. However, analyses don't evaluate these tools which are independent from EIA.

In this context, the study compares these following issues for both systems: the general characteristics of each EIA systems, project types subject to EIA, screening processes, people or authorities that are responsible for preparing EIA, payers of the EIA reports, initiating the EIA process, scoping processes, types of impacts considered, evaluation of alternatives, mitigation measures, completion and evaluation periods of the EIA reports, final decisions, decisions about the most environmentally friendly alternative, existence and features of monitoring processes and public participation.

2. DEVELOPMENT OF LEGISLATIVE SYSTEMS ON ENVIRONMENTAL IMPACT ASSESSMENT IN EUROPEAN UNION AND TURKEY

The European Union issued a directive that classifies both public and private projects according to their potential impacts on the environment and leads all member states to establish their own EIA processes in 1985^[2]. The aim of this directive is to provide the conformity with each country and mitigate any economical or trade imbalance that may arise from member states' acceptance of their own independent EIA legislation. The directive has been amended three times in 1997, 2003 and 2009. The Directive that enacted in 1985 and its three amendments have been codified in 2011 and the Directive of 2011 has been amended in 2014. The amendment in 1997 has widened the scope of the directive by increasing the types of projects which are subjected to EIA. In addition, new screening criteria (Annex-III) and minimum information criteria were determined

for the projects in Annex-II. The amendment in 2003 aimed the conformity of the provisions on public participation with the Aarhus Convention on the public participation in decision making and access to justice in environmental issues. The amendment in 2009 has updated both annexes of the directive by adding projects related to the transport, capture and storage of carbon dioxide (CO₂)^[3].

Environmental Impact Assessment studies started with the Environmental Law enacted on 11.08.1983 in Turkey. Article 10 of this law defines the EIA requirement as follows: "Institutions, organizations and enterprises whose activities that are planned to carry out can lead consequent environmental problems prepare an Environmental Impact Assessment Report. By taking into consideration all possible impacts on environment, this report will define how render this waste/wastes that can cause environmental pollution can be harmless and measures to be taken on this issue"^[4]. On the basis of this article in the Environmental Law, the first Environmental Impact Assessment Regulation was enacted in 07.02.1993. This regulation was revised in several times and has taken its final form by the amendment enacted in February, 2016.

3. COMPARISON OF ENVIRONMENTAL IMPACT ASSESSMENT PROCESSES IN TURKEY WITH EUROPEAN UNION

3.1. The Project Types Subject To Environmental Impact Assessment

The EU Directive states that EIA will be applied to "public and private projects which have possible significant effects on the environment"^[4]. The first version of the Directive doesn't require the implementation of EIA in policies and programs. The projects included by the Directive are divided into two Annexes. Annex-I which contains 24 articles lists the activities require EIA. These are large infrastructural projects that are known to create significant environmental impacts. Annex-II which contains 13 articles includes the types of projects left to discretion of member states. Member states may exempt certain projects "in exceptional circumstances". If such an exemption for a project is concerned, the member state should inform the Council and public about the reasons of the exemption. The projects whose details are adopted by a specific national act and national defense projects are not covered by the EU Directive.

Although it is not explicitly stated, the EIA regulation in Turkey is applied to public and private sector projects as in the EU Directive. The EIA process is defined like a permit to be taken before starting the project by the regulation and EIA is used for the activities to be built. Therefore, a system that requires the implementation of EIA hasn't developed.

The EIA regulation in Turkey includes 2 Annexes as EU Directive. While the projects subject to selection and elimination criteria are listed in Annex-II, the projects subject to EIA are listed in Annex-I. The Annex-I of the regulation in force has 46 articles and includes all of the articles listed in Annex-I of the EU Directive. It also includes activities which are not included by the Annex-I of the EU Directive such as yeast factories, solar power plants, and tourism facilities. Annex-II has 56 articles and doesn't include all the activities included by the Annex-II of the EU Directive. On the other hand, it includes the activities that are not included by the EU Directive such as mass housing projects, golf courses, logistics centers, cigarette factories, installations for food production such as vinegar, turnip, gravy and beverage factories, extraction of geothermal resources.

3.2. Screening

The screening process is the pre-evaluation period for determining whether or not the planned activity requires an EIA due to its impacts on the environment.

Both the EU Directive and the Regulation in Turkey screen the projects according to categories. In both systems, the project types listed in Annex-I require EIA. The types of projects included in Annex-II of the EU Directive require EIA if the member state decides that the characteristics of the project require EIA. Member states screen the projects in Annex-II by category or by determining thresholds and criteria. In this context, Turkey has created a list of projects that includes many projects listed Annex-II of the EU Directive and more for the projects subject to selection and elimination criteria. However, when these lists are compared, it is seen that some activities have inconsistencies between capacity thresholds and the capacity thresholds of regulation of Turkey are higher.

The regulation in Turkey makes EIA reports obligatory for the projects listed in Annex-I, projects that the decision of "EIA is required" is given to and capacity changes that exceed the thresholds determined in Annex-I. For the other projects, Project Description Files are prepared and decision of "EIA is required" or "No EIA is required" is given by examining these files in terms of the criteria given in Annex-IV within 15 days. The regulation also provides legislations on sensitive areas but doesn't give any information on how an EIA study will be done in these areas.

3.3. People/Institutions Responsible For The Preparation Of The Environmental Impact Assessment

The EU Directive requires the developer to prepare the EIA. The developer is defined as "The applicant for authorization for a private project or the public authority which initiates a project" in the Directive^[4].

Project owner(private/corporate) is responsible for having authorized institutions and organizations prepared the EIA reports, ensure submission to the relevant institutions and implementation of the commitments given in the report in Turkey.

3.4. Payer Of The Environmental Impact Assessment Report

In most systems the costs of the EIA process are paid by the projects owner. Although funding of private projects from the public funds is not seen as right in principle, it is seen that the costs of big scaled projects of private sector are paid by state institutions or the costs of management, licensing and supervision are not taken from these projects in many countries.

The EU Directive don't mention who will pay for the EIA preparations. This decision has left to member states.

Although the EIA Regulation in Turkey doesn't explicitly state who will pay for the report, it is understood that the project owner is responsible for paying as well as for ensuring the necessary steps to be taken by the competent authority. In addition to payment given to the authorized institutions for preparing the report, it is seen that payments such as format setting fee, application fee are paid in according to the wage scale determined for the year concerned by the Ministry.

3.5. Initiating The EIA Process

The EIA process should be initiated as soon as possible and incorporated into physical planning studies so that both the planned project can be designed in ecological approach from the first step and this process can be carried out most efficiently. While this process seen as an additional cost by many investors, evaluating environmental issues earlier and effectively can prevent future costs, project delays and even the cancellation of projects.

EU Directive doesn't specify when the EIA process will start.

According to the EIA system in Turkey, to initiate the EIA process the authorized institution/organization first submits the Application File to the Ministry. The Ministry shall examine the information and documents submitted in terms of conformity within 5 days and in the case of finding them appropriate, a commission that consist of representatives of the relevant public institutions and organizations, Ministry officials, project owner and institutions and organizations authorized by the Ministry is established. In this way EIA process starts and the information of the Application File has been opened to the public consultation and the opinions and suggestions about the project can be present to the Governorate or to the Ministry

until the completion of the EIA process is announced via announcements, internet etc.

3.6. Scoping

Scoping is the process of identifying issues, project alternatives and project impacts on environment. Decision of the issues should be examined in more detail is given at this stage. This avoids the expense and time spent on secondary or less important issues. Scoping is also an opportunity for job assignments, scheduling the process at the different stages, setting time or page limits for the EIA reports and planning rest of the EIA process in general^[5]. The entire process must be open to the public to get information from the local community as well as to ensure dealing the issues related to the public concerned together.

Although the EU Directive doesn't embraced scoping process in detail, it gives some clues about the expected scope of the EIA. It is stated that the research should include a description of project that includes description of the project location, design and size of the project, the measures designed to reduce or improve significant adverse impacts on environment and the data required to identify and evaluate the main environmental impacts of the project. Additional information that may be required may include the main alternatives worked by the developer, developer's choice, a detailed description of the impacts on the population, flora, fauna, soil, air, water, climate, landscape and architecture, usage of natural resources, pollutants, discomfort and wastes. The EIA should also include a non-technical summary of the information provided.

In order to be taken as basis in the preparation of the EIA report, a special format which defines the issues to be addressed under the main headings stated in the general format of EIA report is set with considering the important environmental features of the project evaluated by the Commission and the views taken at the public participation meeting in Turkey.

3.7. Types of Impacts Considered

Accurate evaluation of all the possible impacts has great importance for a successful EIA implementation. In this context, 3 types of impacts are evaluated for each alternative in EIA process in general: direct impacts, indirect impacts and cumulative impacts.

Within the framework of the rules set by EU Directive, the EIA reports examine direct and indirect impact on humanity, flora, fauna, soil, water, air, climate, landscape, cultural heritage.

The EIA regulations in Turkey don't contain detailed information on the effects should be examined in the reports. However, the environmental impacts of the project in the construction and operation phases and measures to be taken against them are stated in the Annex-III that states the general format of the EIA report as follow:

- a) Identification of possible problems that may affect the environment, amount of pollutants, interaction with the receiving environment, determination of cumulative impacts
- b) Determining the amount of greenhouse gas emissions and measures to be taken to reduce emissions
- c) Measures to be taken to reduce the potential adverse impacts of the project
- d) Monitoring plan (construction period)

3.8. Evaluation of Alternatives

The evaluation of alternatives is one of the most important parts of EIA studies because of evaluating and classifying the options for decision makers. Alternatives can be created by the owner of the activity, the institutions that control the process or even the public. Evaluating of alternatives should include project offer, alternative activities and "no action". This evaluation should also provide different ways of implementing the suggested activity (such as different site selection, different size or timing options) as well as the different ways of achieving the goal and need of the suggested project^[5].

The member states decide whether or not alternatives will be included in the EIA process. If the member state decides to include alternatives, the EIA should include "the basic lines of the main alternatives studied by the developer and an explanation of the choice made by taking into account environmental impacts"^[4].

The process of evaluating alternatives, one of the most important steps of the EIA process, has been embraced in different ways in different periods in Turkey. For example, while the first regulation enacted in 1993 included alternatives, the amendment enacted in 1997 excluded the provision of evaluating the alternatives. There is no detailed provision on how alternatives should be assessed and how the evaluations should be done in the regulation in force. However, the definition of EIA in the regulation gives clues that EIA reports include the evaluation of alternatives. Likewise, within the General Format defined in Annex-III there is a statement that indicate which topics need to be examined as: "location and technology alternatives of the project, coordinates of the selected site for the project"^[6]. This statement also provides a clue that alternatives will be evaluated within in the scope of the EIA reports. However, there is no explanations about alternatives other than the statement "environmental plan, master building plan, application development plan, site plan or plan change proposals of determined location and its alternatives should be added to the annex of the report, if exist"^[6] within the full text of the regulation.

3.9. Mitigation Measures

Adverse effects of the suggested activity can often be reduced by measures such as limiting the size of the project, rehabilitate the affected area, maintenance of activities throughout the life of the project, making arrangements or changes on the affected environment or avoiding harmful actions in particular.

The EIA should include an explanation of the measures to prevent, reduce and, if possible, avoid adverse effects according to the EU Directive.

There is no explicit provision in the EIA Regulation in Turkey for the necessity of preparing the measures to be taken in order to reduce the environmental damages, the people prepare the mitigation measures. However, the heading “measures to be taken to reduce the potential adverse effects of the project” in the Chapter III of Annex-III in which the general format of EIA provides clues as to the need of working on this issue.

3.10. Finishing The EIA Report

It is important that the EIA document is defined before the decisions on the projects are made and before the actions that could have adverse environmental impacts or limit the choice of reasonable alternatives. Otherwise, the EIA process will become a legalization of the projects that are already decided.

The EU Directive does not specify when the EIA document will be completed, but indicates that the project must be subject to EIA before it is allowed to continue.

Institutions /organizations that have proficiency given by the Ministry are obliged to submit the EIA Report to the Ministry within eighteen (18) months from the date of issuance of the Special Format. If the EIA Report is not submitted within this time, the EIA process is finished. In addition, unless the decision of “EIA is positive” or “No EIA is required” is given incentives, approvals, permits, building licences and building use permits can not be granted, investments can not be started and can not be tendered for the projects subject to this regulation.

3.11. Evaluation Of The EIA Reports

The EU Directive requires to be sure that opportunity of explaining the views is provide to the institutions with certain environmental responsibilities. However, it is not clear whether these view means that comments should be taken after completing the EIA report. Likewise, the public should be informed about the project and

provide opportunity to comment. But if it is done when the EIA process finish this kind of participation won't be so important.

In Turkey, after the competent institution has submitted the EIA report to the Ministry, the Ministry examines the conformity of the report and whether it is prepared by the relevant experts within 5 days. If it is determined that conformity is not achieved, it is returned for the correction. The returned reports should be regulated and submitted to the Ministry within 3 months. The process is finished for the EIA reports that are qualified as inappropriate for the second time.

For the EIA reports prepared in conformity with the format, the commission review process begins and it is announced to the public that EIA report is opened for the public opinion. People want to review the report may present their views to the Ministry or Governorate until the report is finalized. These opinions are evaluated by the commission and reflected in the EIA report. The Commission evaluates the report within 10 working days from the first evaluation meeting. The Commission may request more extensive information and studies such as tests, field studies from the institution that prepared the report for the evaluation.

During the evaluation meetings reviews and evaluations are made by the commission such as:

- a) Whether the EIA report and its annexes are adequate and appropriate
- b) Whether the environmental impact of the project has been thoroughly examined
- c) Whether the necessary measures are taken to eliminate the negative impacts on the environment
- d) Whether solutions for the opinions and suggestions coming in the process and during the public participation ^[6].

3.12. Final Decision

EU Directive doesn't specify who gives the final decision. However, it states that the information provided from the EIA and the decisions of the state institutions and public should be taken into consideration by the competent authority for giving decision. The competent authority should inform the public about the decision and provisions that are stipulated for the activity.

After the evaluation of the commissions, The EIA report which was finalized is going to have 10 day public display period to receive public comments. After this process, the Ministry should give the decision of "EIA is positive" or "EIA is negative" with taking into account the comments of public and the studies of the commission and notify this decision to the members of the commission. The

decision of “EIA is positive” or “EIA is negative” is announced by the Ministry or by the Governorate via public display and internet.

If the investment for the projects that “EIA is positive” decision is given is not started without coercive reasons in 7 years, the decision of “EIA is positive” is invalid. If there is a change in the conditions causing the decision of “EIA is negative” reapplication is possible. EIA applications related to military projects are determined based on the opinion of the Ministry of National Defense by the Ministry.

3.13. Choosing The Most Environmentally-Friendly Alternative

Although the decision making body doesn't have to choose the most environmentally preferable one, it may be necessary to discuss all the alternatives defined in the EIA and explain why they choose this alternative in many countries' EIA system.

The competent authority doesn't have to choose the most sensitive alternative to the environment according to the EU Directive. The reasons for the decision of the competent authority are only clarified if the member state's legislation requires.

There is no provision that requires choosing the most environmentally-friendly alternative in the regulation of Turkey.

3.14. Monitoring

The monitoring stage is one of the weakest stages of the implementation of the EIA. The regulations of most countries don't require monitoring. Monitoring activities are carrying out at the initial stage of the project, during the operation and after completion of the project. If there is no monitoring, no guarantee can be given whether the conditions imposed by the decision-making body on the suggested project are applied by the project owner. Monitoring also contributes to future project designs by assessing the effectiveness of the impact estimates and the suggested mitigation measures and enables the development of the suggested mitigation measures.

The EU Directive doesn't require monitoring after decision. However, it requires member states and the commission to exchange information on the experience gained in the implementation. This indicates that a number of monitoring activities.

For the projects that “EIA is positive” or “No EIA is required” decision is given, it is checked whether the obligations committed to the report have been implemented by the Ministry in Turkey. When it is necessary, the Ministry can cooperate with relevant institutions and organizations. If it is determined that undertakings are not complied with it, a period that is not more than a year may be granted for the purpose of complying with the commitments by the Ministry or the Governorate. Rescission of the suspension decision is not done unless obligations are met.

3.15. Public Participation

The public participation process is one of the most important stages of the EIA process. Especially for scoping and evaluating stages the public participation is critical. Also, providing an opportunity to disclosing comments of public is as important as informing. Public should have the opportunity to question the EIA if they believe that the EIA can't achieve its aims.

The EU Directive states that citizens should be informed about the suggested project that requires EIA. But it has also been left to member states to decide on the timing of this notification. While citizens are given the right to access the entire EIA document, the information that citizens can obtain is limited to information provided by the project developer as part of the EIA document. While it is stated that it is necessary to give the public an opportunity to comment before launching the project, it has been left to the member states how this process will be carried out. The directive doesn't require responding to public comments by the project owner or the institution. Also the reasons of the decision are only explained to public if the regulation of member state requires. Significant issues such as public participation in scoping process, public hearings, how and when citizens can receive the information about the EIA and the right of citizens for debating the EIA report has been left to the discretion of member states.

Significant improvements of public participation in the EIA system have been made over the time in Turkey. Important developments are especially being made at this point in order to make the EIA system compatible with the EU. Although the public participation has been spreading to entire process, it is seen that public participation process can't actively be provided in practice. The regulation states that EIA reports are opened to the public when the EIA process starts with taking the application file and comments related to projects can be submitted until the EIA process is completed.

In order to ensure the public participation, the institution/organization that will prepare the EIA report holds a meeting that project owner will also participate in a public place where accessible for the public concerned on the date specified by the Ministry. This meeting to be held must be announced via publishing in gazette at least 10 days before. Activities such as brochures, surveys and seminars can also be carried out in public participation activities.

4. KEY FINDINGS AND CONCLUSION

Although different timings and characteristics are determined by different institutions/ countries for EIA systems, the steps followed by the systems are similar. Especially the international agreements, the multinational institutions like the EU and international credit institutions such as the World Bank, the European Bank for Reconstruction and Development (EBRD) have influenced the compliance of the countries' EIA legislation on certain issues. In this context, it can be seen that the most effective role in shaping the legal legislation in Turkey is the EU due to the integration process carried out with the EU. Turkey has made many changes in its regulations in order to ensure compliance with EU provisions in the process.

Although the EIA systems of the EU and Turkey seem to be in conformity with each other in general, it is seen that these two systems have different characteristics when they are examined in depth (as seen in Table 1). For example, Turkey has included all of the activities listed in Annex 1 of the EU directive, but also has listed the types of activities that are not included in the EU Directive by its regulations. Also, it is necessary for Turkey to make various arrangements such as adding transboundary impacts in the regulation for full conformation.

The EU Directive attaches more importance to the environmental impacts of the suggested project, which is the main issue of the EIA. This issue has been stated only in the section of general format of the regulation in Turkey. Hereunder, environmental impacts of the project should be explained in general under the heading of the “definition of the project and project aims”. On the other hand, the EU Directive requires that the report should include a detailed description of the potential impacts such as: extent, transfrontier, nature, magnitude, complexity, probability, duration, frequency and reversibility of the project.

The EIA system of Turkey has a positive side in scoping process. If scientific and efficient usage can provide, due to the chance of determining the content of the report to the characteristics of the project, the special formatting can create an opportunity to address potential environmental impacts in a more accurate manner. However, when the reports prepared in Turkey are examined, it is seen that most of them have a duplicate content.

Table 1. Comparison of the main features of the EIA systems applied in European Union and Turkey

	European Union	Turkey
Legal Structure	Assessment of the Effects of Certain Public and Private Projects on the Environment	ByLaw- On Environmental Impact Assessment
Date of First Law	27.06.1985	07.02.1993
Total Number of Amendments	5	17
Enactment Date of the Law in Force	16.04.2014	09.02.2016
Screening	2 Annexes -Annex-1 : includes 24projects subjected to EIA -Annex-2 : includes 13 project types	2 Annexes -Annex-1: includes 46 project types subjected to EIA -Annex-2: includes 56 project types that selection and elimination criteria are applicable
Responsibility for the Preparation of the EIA	Project Developer	Authorized institutions and organizations
Payer of the EIA Report	Unspecified	Project Owner
Starting Point of the EIA Process	Unspecified	After establishing a commission in consequence of the Ministry has found the application file proper
Scoping	-Location -Project description -Impacts -Measures	The Ministry determines a special format under the general format
Impacts Investigated	-Direct effects -Indirect effects	Quantity of pollutants, interaction with the receiving environment, determination of cumulative effects
Alternatives	Left to discretion of member states	Location and technology alternatives of the project
Mitigation Measures	Has suggestions for measures	Has some clues about the need of measure suggestions

Completion Period	Before permitting the project	Within 18 months Before permitting the project
Examination Process	By the institutions with environmental responsibilities and public	-The Ministry examines the appropriateness of the report to the format -The Commission examines the report taking into account public opinion
Final Decision is Given by	Unspecified	The decision of “EIA is positive” or “EIA is negative” is given by the Ministry considering the views of the Commission and public
Selecting the Most Environmental Alternatives	No	No
Monitoring	Do not require	Has monitoring and criminal action against

In both systems, information about alternatives and reasons for selection are embraced in reports. However, it seems that the EU attaches more importance to this issue in terms of the ways in which it is handled. The process of evaluating the alternatives in Turkey is mostly based on the technology alternatives that will be used for the project on the already selected place. Both systems do not contain a "no action" alternative. It is clear that both systems should give more emphasis and detail to the alternatives and mitigation measures that constitute the main objective of the EIA. In particular, it is considered that the EU Directive, which has a framework law feature, should set specific rules on the alternatives stage instead of leaving it to member states' discretion.

Another important stage that the EU Directive leaves to the discretion of member states is monitoring. In Turkey, the monitoring phase requires that monitoring reports on initial, construction, operation and post-operation periods be submitted to the Ministry or the governorate. However, despite of these provisions, implementation of monitoring isn't effective and successful in Turkey.

In addition to all of these, as stated in the EU regular progress reports, it is necessary for Turkey to ensure the proper implementation of the regulation, an active public participation, access to any kind of environmental information and the rule of law principle on court decisions related to the environment.

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