



Quality Analysis of the Environmental Assessment Report for the Romanian Forestry Development Program

Contents

SUMMARY	2
1. INTRODUCTION	3
2. GOALS AND OBJECTIVES	3
3. METHODOLOGY.....	3
4. QUALITY ASSESSMENT OF THE REPORT	3
4.1 PART I: ENVIRONMENTAL ASSESSMENT OF THE FOREST DEVELOPMENT PROGRAM.....	3
4.1.1 <i>Screening and Scoping</i>	4
4.1.2 <i>Description of the Program</i>	4
4.1.3 <i>Program Alternatives</i>	5
4.1.4 <i>Baseline Environmental Conditions</i>	5
4.1.5 <i>Environmental Impacts</i>	6
4.1.6 <i>Mitigation Measures, Environmental Management Plan</i>	7
4.1.7 <i>Consultation and Public Participation</i>	7
4.1.8 <i>Institutional and Policy Framework</i>	8
4.2 INITIAL REPORT ON ENVIRONMENTAL ASPECTS OF THE FOREST ROADS COMPONENT OF FDP	8
4.3 PART II: ENVIRONMENTAL ASSESSMENT PROCESS FOR FOREST ROADING	9
4.4 TWO [EXAMPLE] ENVIRONMENTAL ASSESSMENTS OF FOREST ROAD PROJECTS.....	10
4.4.1 <i>Description of the development</i>	11
4.4.2 <i>Local Environment and the Baseline Conditions</i>	11
4.4.4 <i>Project Alternatives Mitigation measures, Environmental Management Plan</i>	12
4.4.5 <i>Consultation and Public Participation</i>	12
5. REFERENCES.....	13

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Summary¹

The Forestry Development Program (FDP) for Romania Environmental Assessment (EA) shows deficiencies mostly in the segments of screening and scoping, impact identification timing, and public participation.

The EA accent is put only on the forest road component, while the other components of the FDP (Institutional Support for Sustainable Forest Management, Forest Sector Development, Public Awareness, and Management and Implementation) are not dealt with sufficiently.

Due to screening and scoping omissions, the impacts of increased forest harvesting as a consequence of the implementation of the FDP is not discussed at all, neither at the strategic, nor at the project level. Without forest harvesting estimations for different alternatives, it is impossible to make any sound environmental impact level and significance prediction, nor to compare program alternatives. The descriptions of the alternatives are unclear and biased, there is no comparison between them, nor justification for the chosen one.

Public and NGOs were not adequately involved in the EA process and the EA documentation was not available in Romanian language, which is in contradiction with the World Bank Procedures.

Most of the measures and actions are assigned to Romanian forestry authorities, without providing appropriate initial training. Considering the lack of institutional capacity in those institutions and the level of corruption in the country, it is difficult to predict how successfully will they perform these actions.

¹ The analysis was prepared by Dusan Sevic (Central European University, Budapest) for the CEE Bankwatch Network

1. Introduction

The present Analysis examines the quality of the environmental assessment report titled: “Final Report - Forestry Development Program: Environmental Assessment for Project Preparation”, (in further text: Report, or Final Report) prepared by Environmental Resources Management (ERM) for the Romanian Ministry of Agriculture, Food and Forests (MAFF).

2. Goals and Objectives

The goal of this Analysis is to assess the quality of the Report and the respective Environmental Assessment (EA) Procedure carried out, outline their main deficiencies, and give recommendations for improvements. This goal is achieved by quality analysis of the Report’s subcomponents describing the different stages of the EA procedure, applying relevant methodologies of EA quality assessment.

3. Methodology

A choice of relevant and/or modified criteria from several EA quality assessment methodologies (Lee et al. 1999, Bonde and Simpson 1999, Bonde and Cherp 2000), good practice guides (Scott et al. 2000) was applied to assess the quality of the different aspects of the EA process/documentation. The main reason for combining several methodologies was that the Report main parts involve different levels of EA, from project level EA (Environmental Impact Assessment - EIA), to plan and program level EA (Strategic Environmental Assessment – SEA).

Along with the use of the EA quality assessment criteria, the Report was compared to the recommendations from the World Bank’s Environmental Assessment Operational Policy OP 4.01 (World Bank 1999a) and Environmental Assessment Bank Procedure BP 4.01 (World Bank 1999a), and from the Council of European Union EIA and SEA Directives (Council of European Union 1997, 2001).

4. Quality Assessment of the Report

The Report as a whole does not have a Table of contents, which makes it cumbersome for users to efficiently cross-examine different parts of the document, and also obscures the relationship between the main levels as well as stages of the EA process.

In addition to that, some of the important sub-documents, are attached as Annexes, rather than being independent parts of the Report, which unjustly diminishes their importance.

The most important parts of the Report are given below (original labeling in the Report given in parentheses), and each of these parts will be assessed separately in this article, in the same order.

- Environmental Assessment of the Forest Development Program, Romania, October 2001 (Part I)
- Initial Report on Environmental Aspects of the Forest Roads Component, March 2001 (Annex IIA)
- Environmental Assessment Process for Forest Roding, October 2001 (Part II)
- Two [example] Environmental Assessments of Forest Road Projects, May 2001 (Annex II C)

4.1 Part I: Environmental Assessment of the Forest Development Program

First of all, the title of the Report is unclear and self-contradicting: The first part of the title (“Final Report, Forestry Development Program”) suggests a full-scale, and strategic (sectoral type program in this case) level EA. The second part of the title (“Environmental Assessment for Project Preparation”), suggests a preliminary stage, and project level EA.

The fact is that the Report contains different sub-documents that deal with either project or strategic levels. Some of the sub-documents encompass even both levels. However, the Final Report should be clearly labelled as Environmental Assessment of the Forestry Development Program as whole. Without this, the scope of the EA is unclear and subject to different interpretations. On one hand the Report can and will be

officially submitted as EA for the whole Forestry Development Program. On the other hand, when the quality and scope of the Report is questioned (as it will be, in this and further sections of this Analysis), it can be defended as being merely an EA for “project preparation”.

Furthermore, the title does not specify which projects are subject to EA, implying that all relevant/significant projects within the FDP would be assessed. As the matter of fact, only the forest road component projects were subject to EA in the Report. The opinion of the author of this Analysis is that the forest development and forest management components’ projects/activities should have been subject to EA, since forest harvesting activities induce greater environmental impacts, than forest roads alone. Again, this is an indication of serious screening and scoping omissions, which will be further discussed below.

4.1.1 Screening and Scoping

The scope of the environmental assessment is given in section 1.3. Due to the “*sectoral and strategic nature of the FDP*”, a Sectoral Environmental Assessment form has been chosen. However, the Romanian Ministry of Agriculture, Food and Forests (MAFF) has also ordered a project level EA for the forest road component of the FDP, which has been included in the Report, in Part II. It is therefore, surprising that project level EA has not been conducted for the forest development and management components of the FDP, since wood harvesting creates much greater environmental impacts, than the roading component. Being declared insignificant, the forest harvesting impacts are neither discussed at the strategic level (Part I) nor at the project level (Part II). It is also surprising that other components of the FDP (Institutional Support for Sustainable Forest Management, Forest Sector Development /other than the road subcomponent/, Public Awareness, and Management and Implementation) did not receive at least preliminary project level EA. Without this, Part I of the EA of the FDP is limited to non-justified impact predictions, and non-specific recommendations for mitigation measures and a not specific enough environmental management plan, as it will be discussed in further text.

The argument that was used to justify the decision to carry out project level EA only for the Forest Roding sub-component, was that it takes up most of the FDP investments (69%). However, the screening and scoping decisions should be drawn upon the significance of the potential impacts, and not on the level of investments. For example, if the Institutional Support for Sustainable Forest Management FDP component is not properly designed, it could have much more intensive and significant negative impacts than the improperly designed Forest Roding subcomponent alone, even though the former requires three times less investments than the latter one. The same applies to the Forest Sector Development, and Management and Implementation components.

In conclusion, the scope for the project level (i.e. detailed) EA was unjustly limited to only one of the many significant sub-components of the FDP.

4.1.2 Description of the Program

The description of the FDP is given in section 2. The sector issues to be addressed and the anticipated benefits of the FDP are presented in Tables 2.1 and 2.2. The overview of the FDP and its components is graphically presented in Figures 2.1 to 2.5. These diagrams give the funding sums, for the main components and for the first-level subcomponents of the FDP. However, there are no sums for the second and further level subcomponents. For example, within the Forest Management Information and Monitoring System (USD 2.55million), it is not evident which proportion will be spent for e.g. Private Forest Management and which for Forest Inspection (Fig. 2.2b). Furthermore, these diagrams describe what are the main goals to be achieved, but not how and when. There are no methodologies for carrying out the goals described, nor timeframes given. Also, there are no aimed thresholds proposed, no criteria that would determine whether the goals would be achieved or not.

The main problem is that there is no concrete description of the Forestry Management component. Forestry Management, in technical terms, should have been outlined as one of the main components of the

FDP, along with the existing “Institutional Support for Sustainable Forest Management” component and other components. In this component there should be a detailed description of the technical forestry management measures, as well as planned and/or estimated legal/illegal harvest rates (overall, and within each region) for each year of the FDP application, as well as estimations for the following period. Even if forestry sector development and management was not part of the FDP, increased (both legal and illegal) harvesting rates will be a direct consequence of the forest road network improvement, and should be taken into account as a source of the major environmental impacts of the FDP.

Without forest harvesting estimations for different alternatives, it is impossible to make any sound environmental impact level and significance prediction, nor to compare program alternatives, as it will be further elaborated in the respective sections of this Analysis.

4.1.3 Program Alternatives

Program alternatives are discussed in Section 3. The proposed program is compared to the Status quo scenario (zero alternative), and to the Investment Finance for Wood Industries Alternative. There is also a discussion on different alternatives for the Forest Road Network sub-component.

The comparison between the proposed program and the zero alternative, is lacking numbers (sub-section 3.4.1). There should be a textual and graphical presentation and comparison of estimated future rates and trends of legal and illegal forest harvesting in both Protection and Production Forests. These estimations, together with quantified impact magnitude and significance predictions for both alternatives would be the only sound basis for comparison of the alternatives. Without this, there is no scientific justification of the selected alternative.

The alternatives for the Forest Road Network are described in sub-section 3.4.2. The descriptions of the alternatives are unclear, there is no comparison between the alternatives, nor justification of the chosen alternative.

The Investment Finance for Wood Industries Alternative is discussed in sub-section 3.4.3. Even though this alternative would clearly have more positive environmental and socio-economic impacts (the higher prices of finalized wood products compared to raw timber, would increase the country’s export revenues and at the same time decrease wood harvesting rates, and consequent negative environmental impacts), in the Report it is dismissed due to “The inability of small and medium sized... processing firms to raise loans...”. An alternative in which the FDP would provide a significant financing element for such firms (and less funding for the forest roads network), should have been explored, quantified in economic and environmental terms, and compared with other main alternatives. Instead, this alternative is only mentioned as an unlikely option, subject to “further economic analysis”, without timeframe/deadline for such an analysis given. This approach is in contradiction with the Romanian National Forestry Policy and Strategy (NFPS): “The better utilization of wood resources through the integration of logging and wood processing activities within the concept of sustainable management of the natural resource”, with which the FDP claims to be in compliance with.

4.1.4 Baseline Environmental Conditions

Baseline environmental conditions are given in section 4. The description is limited only to tree types, from an economic point of view, rather than ecological. Table 4.1 gives an overview of Romanian forests, where some data are not identical to those in the text (e.g. annual allowable cut and percentage of production forests). There is no data on protected areas in the Table. Values such as forest stock, annual growth and annual allowable cut should have been given separately for different categories i.e. different forest types and forest functions, and not only total sums.

There are no maps in this section. The Report should have incorporated a series of larger and smaller scale maps/GIS applications, indicating different forest types and functions, virgin forests and other protected

areas, distribution of important flora and fauna species, migration routes, dynamic representation of past, existing and planned forest harvesting, hydrological systems, industry, existing and planned roading, settlements and cultural heritage.

Figure 4.1 is a graph representing total annual timber harvesting in Romania compared to annual allowable cut, as well as giving harvesting amounts for different tree types, for the period 1994 – 1999. The graph should have given the estimates for the FDP implementation period (and comparisons for other alternatives considered) as well, either in this section or in section 5 (Environmental Impacts).

Annex IA gives a list of protection forests with functional categories and assigned permissible felling systems. There are four permissible felling systems (TI to TIV). The description of allowed practices and permissible felling rates for each system are missing. Also, all protection forests should have been presented on a map or a set of maps. Without these two elements (description/quantification of felling systems, and maps), the list does not provide useful information. Annex IB gives a list of protected virgin forests in Romania. Virgin forests should also have been presented on maps.

Currently, there are 44 Important Birds Areas (IBA) established by the Romanian Ornithological Society. Also, there are 884 protected areas published in "Monitorul Oficial al Romaniei", Anul XII - Nr. 152, April 2000. Any areas from these lists as well as any other existing lists, that overlap with the FDP areas should have been included and outlined on maps.

4.1.5 Environmental Impacts

Critical Environmental Impacts and Mitigation Measures are outlined in section 5. In fact, section 5 assesses social, economic and institutional as well as environmental impacts. Both impacts and mitigation measures are further elaborated in Annex IC (Table AI-C).

Significant impacts of the whole FDP are presented in Table 5.1 and further elaborated in Table AI-C (Annex IC). Both tables assign high, medium, and low values for positive and negative impacts for different combinations of FDP components and receiving media. There is no description of methodology used to assign those values. For example, how it was determined that the negative impact of increased illegal harvesting would be of medium magnitude, or that disturbance of wildlife through logging and transport activities would have low magnitude? In further text there should have been an explanation/justification for the assigned value in each cell of Table 5.1. Instead, there are general observations for two columns (Impacts of Road Rehabilitation and Construction, and Impacts of Business Development Service) and one row (Social Impacts Area) in the table.

The environmental impacts of the forest roading component are unsatisfactorily addressed in Part II (EA for Forest Roding) – see respective sections (4.3 and 4.4) of this Analysis. Due to previously described screening and scoping omissions, the impacts of increased forest harvesting as a consequence of the implementation of the FDP is not discussed at all, neither at the strategic, nor at the project level.

Section 5 (Critical Environmental Impacts...) is eight pages long. However, if non-environmental subsections are not taken into account (social impacts, business development public consultation) there is actually no discussion on environmental impacts on the strategic level, in textual form. However, impacts identified in Table 5.1 are subdivided and further elaborated in Table AI-C. As stated above, there is no justification on decisions about the magnitude of impacts, and there seems to exist a tendency to minimize the magnitude and importance of certain negative impacts. Furthermore, there is no discussion on cumulative impacts and interaction with other plans/projects, such as additional forest roading to be funded by SAPARD.

4.1.6 Mitigation Measures, Environmental Management Plan

The mitigation measures are outlined in section 5 and further elaborated in Table AI-C (Annex I-C), and within the Environmental Management Plan, given in section 7.

Mitigation measures outlined in Table AI-C are too general, such as: “public awareness raising”, “visible presence of Forest Inspectors in forest areas”, etc. There are no specific provisions on which bodies will perform the measures, with what means, timeframes, nor the estimations of the effectiveness of the proposed mitigation measures, nor cross-references to Part II.

Recommended mitigation measures for the forest roading component of the FDP include the “application of a Best Practice Manual (BPM) for the siting, design and construction off all FDP’s roads... [to be] developed during Year 1 of the FDP”. This is one example of the timing problems recurring in this EA. Since most of the roads have been already sited, the BPM should have been already devised and incorporated in the Environmental Management Plan (EMP), with a binding character. It is also recommended that “all new roads... will require an individual EA...”, however this has not been performed within Part II, and leaving this for the first year of the implementation of FDP, is another example of inadequate timing in the (integration of) EA and FDP design processes. A second, cumulative impact screen is also recommended, but this has not been performed/discussed within Part II, where it should be.

The Environmental Management Plan (Table 7.2) does assign responsibilities for carrying out measures including training and capacity building. However, most of the measures/actions are assigned to Romanian authorities, mainly the National Forest Administration (NFA), the Department of Forests (DoF) and the Forest Inspectorate (FI). Considering lack of institutional capacity in those organizations and the level of corruption in the country, it is difficult to predict how successfully will those institutions perform these actions. As discussed in sub-section 4.1.8 of this Analysis, these institutions should receive at least initial training, in order to be able to carry out further capacity building and other actions.

4.1.7 Consultation and Public Participation

Consultation and public participation is described in section 5.4, with additional information on public participation in the context of the forest roading subcomponent provided in Annex I D.

The “Key Results from Public Participation” are presented in Table 5.2. It comprises 5 stages: 1) Preparation and discussion of WB Program Concept; 2) Preparation of NFPS; 3) Preparation of Terms of Reference (ToR) for Sectoral EA; 4) Informal consultation as part of Social Study during FDP preparation; and 5) Development of Public Awareness Strategy and Program to be incorporated into FDP preparation.

From the table it is evident that there were no NGOs nor general public present for the preparation of the ToR for Sectoral EA, which is the only one stage strictly related to environmental issues. According to the table, during this stage, the importance of the forest roads component was identified, and an agreement on the focus of the EA. The absence of the public during this stage may partly explain screening and scoping omissions described in previous sections, the most important of which is the neglect of the increased forest harvesting environmental impacts.

NGOs were allegedly present, but only in the “Development of Public Awareness Strategy and Program” stage. Table 5.2 does not specify how many nor which NGOs were present nor how many meetings were held. Furthermore, local communities (unspecified) were allegedly participating, but only at the Informal Consultation as part of the Social Study.

Annex I D contains two questionnaires. Both questionnaires are related to the forestry roading component. Annex I D also contains two tables giving participants at two public consultation meetings related to the forest roading component. There is no data about representatives of NGOs or general public.

Considering the availability of the EA documents for public, it must be said that at the time of the writing of this Analysis, the English version of the whole Report was available on the World Bank's web site, however, it had to be downloaded as separate picture files for each page of the Report. This means that, after a cumbersome login/password procedure, several hundreds of PDF files had to be downloaded. Also, there was no Romanian language version of the whole Report, which is in contradiction with paragraph 17 from the WB's EA operational procedure OP4.01. The absence of a Romanian version is even more surprising if taken into account that a Romanian consultancy (Intergru Engineering SRL) was participating in the EA process.

4.1.8 Institutional and Policy Framework

Institutional and Policy Framework is described in section 6.

All the bodies within the Romanian forestry sector are within one, centralized authority, the Ministry of Agriculture, Food and Forests (MAFF), and it is difficult to envisage how will various stakeholders benefit from the project in this set up. Other parties, e.g. NGOs and local population, should be included in project preparation and implementation.

The MAFF holds all the information about forestry in Romania and there is no independent body which could perform evaluation of the data published by the Ministry. Year after year, the Ministry is promising to take measures, which would stop corruption and illegal logging. Nothing has happened yet.

The main aims of the program are institutional strengthening and capacity building. Therefore, the EA recommended extensive training programs and measures, which would support the Department of Forestry to carry out its responsibility for integration of environmental and social issues. However, there is a lack of expertise and money within responsible institutions and extensive reforms are needed prior to the program implementation.

The capacity building and training programs should have been already developed and described. Such programs should rely not on Romanian institutions alone, but rather provide initial training from relevant consultancies/training centers, where selected members from those Romanian Institutions would receive appropriate environmental/management/policy courses which would enable them not only to carry out the reforms and tasks, but also to further train their subordinates.

Before the collapse of communist regime, forests were almost entirely owned by the state. Now, approximately 50 percent of the forestland is in the process of restitution to its former owners. However, the process has not been clearly planned and defined yet. Therefore, it is impossible to predict potential impacts. Previous experience has shown that inadequate restitution measures led to immediate harvesting with serious environmental consequences. Without clear rules and procedures, the danger of clear cutting remains.

4.2 Initial Report on Environmental Aspects of the Forest Roads Component of FDP

This document represents the first step in the EA procedure, and it has been devised by FORTECH (UK) and Project Management (Ireland) consultancies, and submitted in March 2001. It is given in Annex II-B. Since these two companies are responsible for preparing the FDP on behalf of the Romanian Ministry of Agriculture, Food and Forests, they are not mandated to prepare the full EA for the reasons of objectivity, in accordance with World Bank's OP 4.01. The main purpose of this document was to give guidelines and recommendations for the entire EA process.

This is the highest quality document within the whole Report, yet unfortunately, of a non-binding character. This document gives a number of good practice recommendations, which should have been used in all subsequent stages of the EA process, and in the FDP design process as a whole. However, most of the

recommendations have been neglected, or applied in an unsatisfactory way, as it will be discussed in respective sections. The most important recommendations that were not, or not satisfactorily addressed in further EA stages relate to screening, scoping, assessment of cumulative impacts (both within the FDP, and in combination with other projects and programs), impacts of forest harvesting, biodiversity issues and sensitive receptors (environmental media).

4.3 Part II: Environmental Assessment Process for Forest Roading

This document is Part II of the FDP EA Report, and it was devised also by ERM, with a “significant operational contribution” from Intergroup Engineering SRL (Romania). The main purpose of this document is to describe the EA process for the FDP Road component. It also includes the Initial Report on Environmental Aspects of the Forest Road Component devised by Fortech (UK) and Project Management (Ireland) in Annex II-A, and the two example EAs on two Forest Roads to be rehabilitated, by Intergroup Engineering SRL (Romania), given in Annex II-C.

The main goal of Part II is to justify the need for rehabilitation and new roads, and to explain the screening procedure that was applied for road rehabilitation projects, in order to determine which roads would be subject to project level EA.

The plan is to rehabilitate 66 and build 25 (later in text it is stated 30) new roads (91 in total), of a total length of 596.6 km. Part of the rationale for rehabilitation and building of new roads is to “reduce the total length of skidding roads” which cause negative impacts mainly due to increased erosion. However, the new roads will be “extensions of existing roads”. Therefore, their purpose is not to eliminate skidding roads, but to increase accessible forest areas. Due to improvement and elongation of existing roads, which will facilitate access to harvesting areas, the total length of skidding roads will be increased (due to increased total surface of wood harvesting areas), and not reduced.

Part II does not contain any maps. The new and to be rehabilitated roads should have been presented on a map or series of maps/GIS applications.

4.3.1 Screening

The screening process is described in subsection 1.3. It is recommended, both here and in Part I that “all new road projects should be the subject of an [project level] EA”. However, there is no single EA on new roads in this Report, nor is it specified whether and when would this be performed. Furthermore, there is no list, let alone description of new roads, their location and main characteristics.

The “Trial Screening Procedure” is described in subsection 1.3.2 and outlined in Table 1.3 and the Table in Appendix IIB. The procedure was developed by Intergroup Engineering and ERM. It has two categories, Environmental and Social. The Environmental Category consists of four elements and 11 sub-elements. The Social Category consists of three elements and eight sub-elements. There are a total of 29 sub-elements or questions to be addressed for screening in Table 1.3. Due to some modifications of the questions, there are only 26 questions that were actually used during screening (Table with results, in Appendix IIB). According to this screening system each of the questions is applied to each of the 91 roads. It is not clear why are new roads included in this list, if they are stated to be all subject to project level EA.

Each question was supposed to be answered with (+) potential environmental and social issues (PI) very well solved; (x) PI partially resolved; (-) PI not resolved; and (NA) not applicable. However, for some roads, many of the questions in table (App. IIB) are left unanswered. There is no justification for answers provided in the table. Allegedly the answers were obtained through telephone from National Forest authority (NFA) district offices. This is an example of excluding independent local experts, NGOs and general public from the screening process. It is admitted: “there was no independent examination of

feasibility studies nor field verification”. It is also admitted in the text that there is a possibility that the responses [of the NFA staff] are biased”. In such a situation it is hard to give any credibility to the screening system applied and its results. A suggestion is given that “a more neutral and objective body carry out the [second round] screening process... during project [Program] implementation”.

The suggested selection system for projects to be subject to EA is the following:

- Score of 4 or more (x);
- Score of 2 or more (-);
- A combination score of 4 or more of the two (e.g. 3(x) and 1(-), 2(x) and 2(-) etc.)

There is no explication why exactly those thresholds were chosen. Furthermore, this system does not take into account the fact that some types of impacts are more significant than others. Therefore in some cases only one (-) should be enough to assign a project to EA. An example of such a criterion is: Slope $>60^\circ$, in this case 18 projects should be subject to EA, instead of currently selected nine projects (data from Table 1.4a). Another example is Water Quality (34 projects).

Moreover, not even this “Trial [Screening] Procedure” was applied, and the Report contains only two [example] project level EAs. It is not clear why exactly these two projects have been selected. It is stated that one “easier” and one “more difficult” projects were chosen as examples. Allegedly the Valea Mare-Crizbav belongs to projects with relatively less significant impacts. In fact, according to the suggested selection system and the results in the Table Annex II-B, this project should not be subject to EA at all (no (-) and “only” 3(x)). The other project Paltinoasa, to “more difficult” projects. However, Table in Annex II-B shows that there are even more significant projects, such as the Vulpasa project.

According to Table 1.2, no road works will be implemented in Year 1 of the program. During that time the Best Practice Manual (BPM), that will allegedly incorporate environmental considerations, will be designed. New and road rehabilitation projects will be redesigned according to the BPM. Also, it is planned to implement a second round of screening (“Recommended Forest Road Screening Procedure” – subsection 1.3.3), where some of the nine roads currently selected for EA will be screened out, due to “design improvements following the recommendations from the BPM”. This secondary screening will make the final number of project level EAs even lesser, since nine EAs would be “...a substantial EA burden, both in terms of cost and time”.

One of the proposed mitigation measures in Part I (sub-section 5.3.1, recommendation 4) was to apply a “...cumulative impact screen... [that] would involve mapping the planned FDP road projects at county level to determine when more than one project will occur in a river basin... to minimize cumulative impacts”. No such screen is applied in this part.

To summarize, only nine (or even less, if the “secondary” screen is applied as planned) out of 66 roads to be rehabilitated, will be subject to EA. It is planned to carry out these EAs during FDP Year 1, which is too late for a sound EA procedure.

4.4 Two [example] Environmental Assessments of Forest Road Projects

As described above, only two EAs are provided as examples for the future total of nine road EAs. The two examples are for the VALEA Mare-Crizbav road and for the Paltinoasa road. Only the Paltinoasa road (the more difficult case) EA will be analyzed since the two EAs are similar. The example EAs have been devised by the Romanian environmental consultancy, Intergroup Engineering SRL, which also made contributions in the main parts of the FDP EA Report .

4.4.1 Description of the development

The black-and-white map (a photocopy of a colored original) given in Figure 2 (“Relief in the zone of Prahova County”) has a scale of 1 : 500,000. From this map, the most information that can be derived, is the approximate location of the road. The elevations are not given even for the start and end points of the road. At this scale, nothing about the relief on the location itself, nor about the characteristics of the road can be inferred. The Geology map in Fig. 1 is even of a larger scale (not indicated). On this map, not even the location of the road is indicated. The sources of the maps are not referred. The maps should have been of smaller scale in order to indicate relief and geology conditions/changes on the road site and possible difficult/critical sections.

The description of the development (Section 4 - “Proposed Project Works”) is based largely on quotations from the Feasibility Study for the reconstruction of Paltinoasa Road (INL 2000). The text was not modified for an EA purpose, but rather left in its original form, which makes it rather un-useful in the EA context. The total volume of trees that will have to be removed for the creation of the corridor is not given. The required amounts of raw materials for road construction are fragmented between different road sections and elements, instead of giving total required amounts for each material in a form of e.g. Table. Furthermore, some of the required raw materials are not even taken into account, such as water and cement required for prefab concrete road elements. The estimation of the duration of the construction and operation phases is not given. There is no estimation of numbers of workers or visitors entering the road site during the construction and operation phases, nor of the types and amounts of wastes to be produced during the construction and operation phases.

4.4.2 Local Environment and the Baseline Conditions

The Local Environment and Baseline conditions are described in Section 3 (“Existing Conditions: Key Environmental Parameters”). Maps given in Figures 1 and 2 (Geology and Topography) are not useful, as described in the previous section. Topography, Geology, Soil, Water, and Flora and Fauna sub-sections are taken from INL 2000, Cucu and Stefan 1974, Ujvari 1972, and Posea et al. 1982 and have little relevance for the road site itself, since these are general descriptions for the whole County of Prahova. There are no maps depicting flora and fauna distribution on the road site and the possibly affected wider area. Among sources used, there are only geographical publications referred above, no biological studies of actual or analogue eco-systems. Flora and fauna is described in only several sentences, where within the fauna, only game species or the region are listed. There is no data about populations’ numbers, nor about potential population corridors intersecting the road.

There is no discussion of possible existence of endangered and/or protected species. There is no reference to whether or not the road site and the affected area intersect with any protection areas. In absence of previous relevant studies, it is recommended to carry out at least a basic study on the local ecosystem. However, this has not been performed.

4.4.3 Identification and Evaluation of Key Impacts

Impacts are identified and evaluated in Section 6 (“Identification of Possible Impacts”). Key construction phase impacts are given in Table 6.1 and in Table 6.2 for the operation phase.

A tendency of diminishing the importance of negative impacts and overestimating the importance of positive impacts of the project is observed. For example, the influence of dust emissions is discussed only in the context of visual impact. There is a tendency of using euphemisms, such as “...positive and less positive answers” (Section 1.2). Also, most of the impacts are being discussed as if the road was not related to logging activities, but rather being a civil transport road.

There are cases of confusion of terms “positive” and “negative”. For example, increased forest harvesting if the project is applied (11400 m³ per annum) is presented as a positive impact, both socially and environmentally (the explanation being that “existing trees...would be depreciated if not extracted in the

proper time”). At the same time, the amount of harvested woods in case of zero alternative, 4900 m³ per annum, is presented as one of the “negative effects”. Also, there is no explanation or reference to the methodology used to calculate these figures, nor to which area these figures refer.

4.4.4 Project Alternatives Mitigation measures, Environmental Management Plan

The mitigation measures (Section 7) are relatively well covered (although not for all impacts described in Section 6). The problem is that there are no concrete provisions (Section 8) as to which organizations will be responsible for carrying out those measures and which for respective monitoring and enforcement, nor are there cross-references to Part I. There are no provisions for environmental monitoring in possibly affected environmental media. There is no Environmental management plan.

4.4.5 Consultation and Public Participation

As stated in 4.3.1, there was no public participation in the screening process. There is no evidence of effective consultation with relevant public agencies, independent experts, special interest groups and general public, in the process of impact identification.

5. References

- Bonde, J. and Cherp, A. 2000. Quality Review Package for Strategic Environmental Assessments of Land-use Plans. In: Impact Assessment and Project Appraisal. Vol 18. No. 2., June 2000. pp 99-110
- Bonde, J. and Simpson, J. 1999. Environmental Appraisal Review package for Development Plans. [Online]
URL: <http://matisse.ceu.hu/departs/envsci/eianetwork/publications/bonde99.html> [cited 2. Feb. 2002.]
- Council of European Union 1997. Council Directive 97/11/EC of 3 March 1997 amending Directive 85/337/EEC on the assessment of the effects of certain public and private sector projects on the environment; Official Journal L73, 14/03/1997 p. 0005-0015
- _____ 2001. Council Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment; Official Journal L197/30, 21/07/2001 p. 0030-0037
- Cucu, V., Stefan, M. 1974. Romania, Ghid-Atlas al Monumentelor Istorice, Editura Stiinifica, Bucuresti.
- Lee, N., Colley, R., Bonde, J. and Simpson, J. 1999. *Reviewing the quality of environmental statements and environmental appraisals*. University of Manchester: EIA Centre
- Scott, P. et al. 2000. *Strategic Environmental Assessment of Development Plans – Training Guide, Section 7. Draft Version*. University of Manchester, EIA Centre, School of Planning and Landscape
- Institut National Al Lemnului (INL) [National Institute of Wood] 2000. “Studiu de Fezabilitate Refacere drum forestier calamitat Platinoasa” [Feasibility Study for the reconstruction of Platinoasa Road]
- Posea, G. et al. 1982. Enciclopedia Geografica a Romaniei. Editura Stiinifica si Enciclopedica, Bucuresti
- Ujvari, I. 1972. Geografia Apelor Romanei, Editura Stiinifica, Bucuresti
- World Bank 1999a. Operational Policies (OP) 4.01, Environmental Assessment, The World Bank Operational Manual, January 1999
- _____ 1999b. Bank Procedures (BP) 4.01, Environmental Assessment, The World Bank Operational Manual, January 1999

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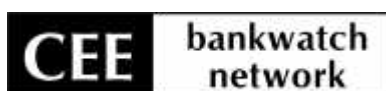
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The CEE Bankwatch Network's mission is to prevent environmentally and socially harmful impacts of international development finance, and to promote alternative solutions and public participation.

The goals of the CEE Bankwatch Network are:

- To create public awareness about International Financial Institutions activities in Central and Eastern European countries and their social and environmental impacts.
- To promote public participation in the decision making process about policies and projects of International Financial Institutions, on the local, national and regional levels.
- To help non-governmental environmental organisations and citizen groups to monitor what the International Financial Institutions are doing in the Central and Eastern Europe.
- To change or stop environmentally and socially destructive policies and projects of International Financial Institutions in Central and Eastern Europe, and promote alternatives.

To cooperate with environmental citizen organisations in stopping destructive activities of Transnational Corporations and to limit their overall impacts on the environment in Central and Eastern Europe.



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