

# Harmful project documenting tool

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Complete this form if you've identified a project that's harmful or potentially harmful to nature.

The form is designed to help you gather crucial information about the project, which you can then share with experienced campaigners and other allies. Together, you can work to modify, suspend or prevent the project from going ahead.

Before filling in the questionnaire, please read [How to document nature-damaging projects: A step-by-step guide](#).

Remember to save copies of all official project-related documents as they may be removed from websites and links may change over time!

## 1. Project identification

What's the name of the project?

Which sector does it involve?

- a. Transport infrastructure:
- b. Energy infrastructure: Extraction, transportation, transmission, power generation
- c. Mines or quarries
- d. Agriculture-related activities: Irrigation, land drainage, etc.
- e. Water management: Flood protection infrastructure, construction of barriers on rivers or streams, draining, channelling or redirecting rivers or streams
- f. Urban development: Housing, tourism, commercial sector
- g. Industrial facilities
- h. Other infrastructure
- i. Legislation or policy: Changes to environmental legislation, renewable energy policies, etc.

## 2. Is there a website with information on the project or online articles? If so, provide a link.

## 3. Timeline identification and project status

a. Has the project been announced publicly, such as on a sign or billboard, in newspapers or by other means? If so, when was it announced?

b. Has any public consultation been held on the project?

c. Does the project appear in any local or national spatial plans, or has any process been initiated to include it in such plans?

- d. If so, has a Strategic Environmental Assessment (SEA) been carried out and has a public consultation been held?
- e. Has any decision been taken regarding the need for an Environmental Impact Assessment (EIA), Appropriate Assessment under the Habitats Directive, or an assessment under Article 4.7 of the Water Framework Directive? If so, provide a link to the decision.
- f. Have these assessments, where relevant, been subject to public consultations? If so, provide a link giving information about the consultation and a link to the assessments, including any relevant additional studies.
- g. Have these assessments been approved? If so, provide links to the approval decision(s) and the final versions of the studies incorporating public consultation feedback.
- h. Is there a requirement for a separate environmental permit for the project? If so, has it been issued? If available, provide a link.
- Has a construction permit been issued for the project? If so, provide a link.
  - If the project is EU-funded, has a 'do no significant harm' assessment been conducted?
  - For EU-funded projects, has a call for proposals been released? If so, has the final beneficiary been selected? You can usually find this information on the relevant authority website or funding stream portals.
  - Has construction already started? Describe the current status and what's been done so far.
  - For non-infrastructure projects, how long is the planned activity scheduled to take place?

#### **4. Information about the groups involved and their responsibilities**

- Who's the project developer (company, consortium of several companies, national or regional authority)?
- Which organisation or contractor is responsible for construction?
- Which authority is overseeing the project?
- Which authority is responsible for including the project in the local and/or national spatial plan?
- Which authority is handling the environmental permitting process?
- Which authority is responsible for issuing the construction permit?

#### **5. Location of the project**

- a. Where will the project be implemented? Provide the specific location. Be as precise as possible.
- b. If you don't know, is there any indication of the approximate location? If so, provide details.

- c. Is the project site located in a protected area?      Yes      No
- If the answer is yes, specify the protection status and the type of protected area.
- d. If the project is not located in a protected area, will it still have an impact on a protected area nearby?
- Specify the protection status and the type of protected area. How far is it from the project site?
- e. Is the project likely to have a transboundary or cross-border impact? If so, has a transboundary consultation process taken place or are there plans to do so?

## 6. Financing of the project

- a. Who's financing the project?
- b. In the case of public funding, is the project being funded by the EU? If so, which of the following funding programmes are being used?

Recovery and Resilience Facility

Just Transition Fund

LIFE Programme

European Agricultural Guarantee Fund

Cohesion Fund

European Agricultural Fund for Rural Development

European Regional Development Fund

European Maritime, Fisheries and Aquaculture Fund

InvestEU

Instrument for Pre-Accession Assistance (or other external assistance)

*If construction has already begun, look for an EU flag symbol on signs close to the project site. Information on publicly funded projects must be made available to the public, so you can request this information from the national authorities. Most governments maintain a national EU funding registry, which can usually be found on the website of the ministry responsible for EU funds, rural development, or the economy.*

- c. What's the total cost of the project?
- d. Provide the amounts of funding allocated from the following sources:
- EU funds
  - National funds
  - Commercial banks
  - Public banks (e.g. European Investment Bank)
  - Private investors

## 7. Negative or potentially negative impacts

- Describe the negative or potentially negative impacts of the activity on biodiversity.
- Are there any expert reports or opinions on the project? If so, please attach them to your completed documents.
- Which plants, animal species and habitats are likely to be affected by the project?
- Have any actions already been taken to stop the project? If so, provide details. This might involve contacting institutions, petitions, protests, or reaching out to the media.

## 8. Possible next actions

Here are some potential steps you might consider:

- Participate in public consultations
- File a legal challenge to permits or licences
- Hold an event to get media attention
- Form a coalition
- Notify the environmental inspectorate or relevant agencies

***Share this information with your partners and use it to develop a strategic plan. Regularly updating your plan will help ensure your actions are as effective as possible.***

## Glossary

### Appropriate Assessment

An Appropriate Assessment (AA) is an evaluation of the potential adverse effects of a plan or project – either separately or in combination with other plans or projects – on Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), which are protected by national and European legislation. The AA process is governed by Articles 6(3) and 6(4) of the EU Habitats Directive.

### Assessment under Article 4.7 of the Water Framework Directive

According to Article 4.7 of the Directive, any new modifications to the physical characteristics of a body of surface water that may lead to its deterioration or prevent it from realising good status or potential, or any ‘new sustainable human development activity’ that might lower its status from ‘high’ to ‘good’, can only be permitted if certain conditions are fulfilled.

First, if a project might lead to these outcomes, the expected impacts on the environmental objectives of the affected water bodies must be assessed to determine whether Article 4.7 applies.

Second, if the project is found to potentially harm these objectives, then the project in question can only proceed if it satisfies the criteria outlined in the second part of the Article, which must also be assessed.

### ‘Do no significant harm’ principle

The principle of ‘[do no significant harm](#)’ applies to various EU funding instruments designed to screen for potential harm to the environment. For investments to receive financing, it must be demonstrated that they do not cause harm, evaluated based on six different environmental objectives.

### Environmental Impact Assessment

An Environmental Impact Assessment (EIA) is required before development consent is issued for certain projects that could have significant environmental impacts. In the EU, this process also includes a mandatory public consultation.

### Natura 2000

Stretching over 18 per cent of the EU’s land area and 10 per cent of its marine territory, [Natura 2000](#) is the largest coordinated network of protected areas in the world. Offering a haven for Europe’s most valuable and threatened species and habitats, the network is governed by the Habitats and Birds Directives.

### Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) is a procedure that must be undertaken when assessing plans or programmes that may have significant environmental impacts. The aim of the procedure, which involves the preparation of an SEA study and a public consultation, is to identify potential negative impacts at an early stage and minimise these effects while maximising benefits for the environment.