

## PROJECT SUMMARY

PROJECT IDENTIFIERS	
1. Project name:  <i>Building Environmental Citizenship to Support Transboundary Pollution Reduction in the Danube: A Pilot Project in Hungary and Slovenia</i>	5. GEF Implementing Agency:  <i>UNDP</i>
2. Country or countries in which the project is being implemented: <i>Hungary, Slovenia</i>	6. Country eligibility:  <i>Eligible under para. 9(b) of GEF instrument.</i>
3. GEF focal area(s):  <i>International Waters</i>	7. Operational program/Short-term measure:  <i>This project falls under Operational Program 8, which covers the Danube GEF program, as well as other GEF operational programs, which call for public participation through consultations, involvement of local stakeholders and partnerships among relevant stakeholders in addressing sources of transboundary water pollution; it is specifically directed to two demonstration sites: Hungary and Slovenia.</i>
4. Project linkage to national priorities, Strategic Action Plans, and programs:  <i>The current project is closely linked both to the national environmental priorities of the pilot countries and to key regional programs designed to reduce transboundary pollution of the Danube, including the Danube Pollution Reduction Programme and the revised Strategic Action Plan for the Danube River Basin. The Strategic Action Plan recognizes the essentiality of public awareness and public participation in Danube restoration activities and supports the development of public involvement mechanisms that will support the objectives of the Plan. Further, Hungary and Slovenia, the two Danubian pilot project countries, have made parallel commitments to implement public involvement programs in the Convention on Cooperation for the Protection and Sustainable Use of the River Danube ("the Danube River Protection Convention"), their National Environmental Action Plans, their Environmental Accession Strategies for integration with the European Union, Agenda 21, the UN-ECE Espoo Convention on Environmental Impact Assessment in a Transboundary Context, and the UN-ECE Convention on Access to Information and Public Participation in Decisionmaking and Access to Justice in Environmental Matters recently signed by the Danube countries (and others) at Aarhus, Denmark ("Aarhus Convention"). The project's linkages with national and regional efforts to restore the Danube are further described in Annex 2.</i>	
8. GEF national operational focal point and date of country endorsement:  <i>Slovenia: Emil Ferjancic, Head, International Relations, Ministry of the Environment, 27 September 1999</i> <i>Hungary: Dr. Nando Vass, Deputy State Secretary, Ministry for Environment, 30 September 1999</i>	
PROJECT OBJECTIVES AND ACTIVITIES	
9. Project rationale and objectives:  <i>Goal: to enhance opportunities for meaningful citizen awareness and participation in order to promote effective implementation of the pollution reduction goals of the Strategic Action Plan for the Danube and the Danube Pollution Reduction Programme..</i> <i>Objectives: to help Hungary and Slovenia operationalize information access and public participation in a manner that advances the goals of reducing toxics and nutrients discharges to the Danube River Basin. The activities conducted in Hungary and Slovenia will serve as a pilot for future efforts to operationalize public involvement in support</i>	Indicators:  <i>Existing arrangements for public involvement in CEE countries whose actions are important to the success of the SAP and Danube Pollution Reduction Programme are inadequate and not linked to reducing point and non-point source discharges of nutrients and toxics to the Danube with transboundary implications. Hungary and Slovenia are two of the most advanced Danubian countries in CEE with respect to establishing mechanisms for public access to environmental information. They have committed to serve as pilot countries in developing legal, regulatory and institutional</i>

<i>of pollution reduction in the Danube in other countries in the Danube River basin.</i>	<i>measures for public involvement that can further transboundary pollution reduction goals for the Danube River Basin.</i>
<p>10. Project outcomes:</p> <p><i>This project would develop effective and replicable mechanisms for institutionalizing and operationalizing environmental public participation in two leading countries of Central Europe that are part of the Danube restoration process. By assisting Hungary and Slovenia in the development of practical and appropriate mechanisms to provide meaningful public access to environmental information and increase public involvement in decisionmaking relating to transboundary pollution reduction in the Danube, the project will increase the overall effectiveness of and public support for programs to reduce toxics and nutrients discharged to the Danube. The project will demonstrate the positive interaction between increased public involvement and transboundary pollution reduction goals and lead the way for creating similar enabling institutional mechanisms to promote sustainable development in the other countries in transition that are engaged in the Danube process.</i></p>	<p>Indicators:</p> <p><i>Needs Assessment prepared and disseminated to all relevant actors</i></p> <p><i>Training provided in-region, in Western Europe, and in United States for key environmental and water officials of pilot countries</i></p> <p><i>Mechanisms for public involvement in decisionmaking to reduce transboundary pollution of the Danube developed and field tested in pilot countries</i></p> <p><i>Where indicated by Needs Assessment, draft laws/regulations/policies prepared by pilot country participants and measures to improve practices and reform institutions in order to implement public involvement mechanisms developed through pilot project</i></p> <p><i>Final Report on lessons learned from pilot project and recommending further action in pilot countries and other Danube CEE countries prepared and disseminated to all relevant actors</i></p>
<p>11. Project activities to achieve outcomes (including cost in US\$ or local currency of each activity):</p> <p><i>Needs Assessment and Selection of Case Studies at a cost of US \$105,134</i></p> <p><i>In-Region Training at a cost of US \$ 238,861</i></p> <p><i>Technical Assistance at a cost of US \$199,650</i></p> <p><i>Western European and U.S. Study Tour at a cost of US \$114,439</i></p> <p><i>Final Report on Results of Pilot Project and Recommendations for Replication in Other CEE Danube Countries at a cost of US \$61,918</i></p>	<p>Indicators:</p> <p><i>Report on Needs Assessment and Case Study</i></p> <p><i>Three capacity-building workshops completed for key officials of pilot countries</i></p> <p><i>Laws/regulations/policies drafted during the technical assistance phase to facilitate public involvement in Danube efforts</i></p> <p><i>Study tour completed by key officials and NGO representatives of pilot countries; Report on Study Tour</i></p> <p><i>Final Report completed/disseminated on lessons learned and recommendations for replication in other Danube CEE countries</i></p>

<p>12. Estimated budget (in US\$):</p> <p><i>PDF: 0</i></p> <p><i>GEF: \$750,000</i></p> <p><i>Co-financing: \$832,995</i></p> <p><i>TOTAL: \$1,582,995</i></p>
INFORMATION ON INSTITUTION SUBMITTING PROJECT BRIEF
13. Information on project proposers:

<i>The project has been developed jointly by the Regional Environmental Center for Central and Eastern Europe (the REC) in Szentendre, Hungary, Resources for the Future in Washington, D.C. (RFF) and The Center for Environmental and Land Use Law at NYU School of Law in New York City (NYU). The project is an outgrowth of ongoing REC efforts since 1990 supporting implementation of access to environmental information, public participation and access to justice requirements in Central Europe in order to promote environmental protection and sustainable development. NYU and RFF have closely collaborated with REC on environmental law and policy reform initiatives in the CEE region and have substantial expertise and experience in assisting governments in Central/Eastern Europe and other regions in developing legal, regulatory, institutional and practical measures for ensuring public involvement.</i>
14. Information on proposed executing agency (if different from above): <i>The Regional Environmental Centre for Central and Eastern Europe (REC)</i>
15. Date of initial submission of project concept: <i>November 11, 1998 (to UNDP)</i>
INFORMATION TO BE COMPLETED BY IMPLEMENTING AGENCY:
16. Project identification number:
17. Implementing Agency contact person: <i>Christopher Briggs, RBEC-GEF Regional Coordinator, 1 United Nations Plaza, New York, NY 10017 Tel. 212 906 5460, fax 212 906 5102, email: christopher.briggs@undp.org</i>
18. Project linkage to Implementing Agency program(s): <i>The project supports the UNDP-GEF Danube Pollution Reduction Program, the anticipated GEF Regional Danube project, and the GEF Black Sea Basin programmatic approach to reduction of transboundary pollution in the Black Sea basin. Extensive consultations on project design were held with the UNDP-GEF Danube project and the ICPDR Secretariat.</i>

## PROJECT DESCRIPTION

### 1. PROJECT RATIONALE AND OBJECTIVES

The project's objective is to assist Hungary and Slovenia, two key participants in the Danube Strategic Action Plan (SAP), to operationalize and institutionalize public access to environmental information and public participation measures in support of reducing transboundary pollution from the discharge of nutrients and toxics into the Danube River. The global environmental objective is to demonstrate how these measures can help Central and Eastern European countries in transition to achieve the important global environmental goals of the Danube SAP and the Aarhus Convention, as well as parallel commitments made by Hungary, Slovenia and other countries of the Danube River basin, notably in the Danube River Protection Convention .

#### Background

The Danube SAP, developed under the auspices of UNDP/GEF and coordinated by the Danube Program Coordination Unit ("PCU"), provides for a concerted region-wide attack on the deterioration of water quality in the Danube River. Increased human activity and polluted effluents discharged into the Danube have produced high loads of nutrients and toxins that, in turn, contribute to eutrophication in the Danube and the Black Sea. The sources of these high levels of nutrients and toxins include chemical fertilizers and manure from intensive, large-scale livestock and other agricultural operations, municipal wastes, and discharges from various industrial sources. Hungary and Slovenia discharge significant amounts of these pollutants, which contribute to transboundary pollution of the Danube and ultimately, the Black Sea.

The SAP identifies a variety of tools to achieve the goal of ecological restoration and conservation. One is public participation and awareness raising to stimulate SAP success through interest group participation and changes in consumer behavior. The SAP recognizes that a large number of non-governmental actors must be mobilized in order to reach the goals set out in the Plan. To this end, the GEF has supported the Danube Environmental Forum (DEF) and other regional activities to assure the participation of NGOs in planning and plan implementation activities.

Hungary and Slovenia each have a strong stake in the environmental health of the Danube River. Each is an active participant in the SAP and supports the aims of the Danube Pollution Reduction Programme, a linked Danube restoration program. Each has a demonstrated commitment to increasing public involvement in environmental decisionmaking. Each has recently signed the United Nations Economic Commission for Europe (UN-ECE)-sponsored Aarhus Convention by which they committed to institute measures to ensure public access to environmental information and public participation in environmental decisionmaking. Both countries are currently in the process of accession to the European Union, which will require them to meet the standards for public involvement adopted by the EU. These commitments connect with the growth in recent years of the environmental NGO sector in these countries. Citizen groups and NGO organizations in both countries have participated in or are concerned about efforts to restore the Danube.

The pilot project will develop effective and replicable mechanisms for institutionalizing and operationalizing environmental public participation in Hungary and Slovenia in support of the goals of the SAP and Danube Pollution Reduction Programme, as well as of parallel efforts to protect the Black Sea. In coordination with the Danube PCU and the International Commission for the Protection of the Danube River (ICPDR), the project will integrate the mutually reinforcing goals of the SAP and the Aarhus Convention to reduce discharges into the Danube that have national and transboundary effects.

## 2. CURRENT SITUATION

Hungary and Slovenia contribute significantly to transboundary pollution of the Danube and are committed to play an active role in addressing the problem. Only about 28% of total Hungarian wastewater receives adequate treatment, and less than half of total Slovenian wastewater is adequately treated. The majority of untreated domestic effluent in Hungary is released from Budapest and downstream into the Danube and three sites located along the Tisza. While not itself a riparian Danube country, Slovenia is drained by major Danube tributaries, the Drava and the Sava, and over half of its land area and 80% of the total Slovenian population is in the Danube catchment area. Portions of both the Drava and the Sava are seriously contaminated with pollutants, including heavy metals and agricultural wastes. These discharges, stemming from both point and non-point sources, contribute significantly to transboundary pollution in the Danube.

These discharges to the Danube also have a profound impact on the Black Sea. A survey of total nitrogen and total phosphorous in the Black Sea reveals that 58% of the total nitrogen and 68% of the total phosphorous load is brought by the Danube River. Nutrients characterized by total nitrogen and total phosphorous are of special concern since they are directly responsible for significant water quality problems in the form of eutrophication. Thus, efforts to reduce nutrients and toxins loading in Hungary and Slovenia will have a substantial impact not only on the success of the SAP, but also on parallel efforts to restore the Black Sea.

Hungary and Slovenia have agreed to involve a variety of governmental and non-governmental actors in reducing transboundary pollution of the Danube. However, meaningful public involvement is still an elusive goal. The obstacles which must be overcome are rooted in unique domestic issues in each country. Difficulties operationalizing international and domestic commitments to citizen access to environmental information include inadequate legal and institutional frameworks for public participation; inadequate guidance to and training for public employees implementing the existing laws and requirements; inadequate or unworkable laws governing confidential business information, official and state secrets; and limited practical experience with establishing and maintaining cost-effective systems for assembling and disseminating relevant environmental information to NGOs and the public.

Moreover, the pilot countries' efforts to establish public involvement programs to date have focused largely on securing public involvement in addressing *domestic* environmental problems. Far less attention has been given to the development of public involvement measures that can also work to produce *transboundary* benefits.

The pilot project will help build capacity in the governments of Hungary and Slovenia to establish the legal, institutional, social and practical infrastructure that is a prerequisite to informed and meaningful public participation to support efforts to protect the Danube from nutrient and toxic discharges with transboundary implications. The development of this infrastructure will also reinforce the role of non-

governmental actors and enable them to be actively and constructively involved in efforts to reduce these discharges. The results of the pilot project are expected to lead the way for creating similar enabling conditions for sustainable development in the other countries in transition that are engaged in the Danube process.

At the end of the 18-month pilot project the following specific outcomes are expected :

- Assessment of legal, institutional and practical barriers to and opportunities for implementation of public involvement measures in Hungary and Slovenia that will lead to reductions in discharges of point and non-point discharges of transboundary nutrient and toxic pollutants to the Danube River pollution;
- Identification of “best practice” legal, institutional and practical options in the EU and elsewhere and development of specific national legislation, regulations and/or policies, for addressing these barriers and seizing these opportunities, through capacity developed in training workshops, field study, and technical assistance activities;
- Field testing of specific, replicable public involvement measures to address actual point and non-point discharges of pollutants to the Danube in Hungary and Slovenia through a case study that will concretely demonstrate how public involvement measures can further the goals of the SAP;
- Recommendations for follow-up actions to ensure the transfer of pilot project lessons learned and replicable elements to other Danube countries in CEE, thus leveraging potentially greater reductions in point and non-point transboundary pollution throughout the Danube region;
- Strengthened inter-governmental and government-to-NGO cooperation and partnerships to enable joint learning on viable approaches to public participation in the context of control and prevention of point and non-point transboundary water pollution;

#### **ACTIVITIES AND FINANCIAL INPUTS NEEDED TO ENABLE CHANGES (INCREMENTAL)**

In order to increase opportunities in Hungary and Slovenia for public involvement in support of the Danube SAP and Danube Pollution Reduction Programme, the pilot project will conduct an 18-month capacity building and technical assistance program for key Hungarian and Slovenian government officials and NGOs. The program will begin with an assessment of the barriers to, and opportunities for, operationalizing public involvement in support of reducing discharges of nutrients, toxins and other transboundary pollutants to the Danube. The project will build capacity through seminars, workshops, technical assistance activities and a study tour in an EU country and the United States, using a case study approach. The participants will identify and develop new institutions and mechanisms to promote public involvement in support of reducing transboundary pollution in the Danube, including drafting legislation, administrative regulations, and other specific measures to implement this objective. Case studies will assure that the workshops and technical assistance are practical and meet the needs of officials who seek to address transboundary discharges.

In-region teams, consisting of 3-4 key government officials and an NGO lawyer from each of the two pilot countries, will work with the project proposers to ensure that each element of the pilot program is consistent with the circumstances in and goals of the pilot countries and will meet the needs of the participants. In addition, to ensure consistency with the pilot countries’ efforts towards EU accession, an EU legal expert will be engaged by the project, the project will consult and coordinate with EU accession units in each pilot country, and participants will visit an EU country during the study tour. In addition, REC will apply its own substantial expertise on EU approximation to the pilot project.

In order to achieve project objectives and based on the priorities identified by UNDP and the consultation with Hungarian and Slovenian project participants held in Szentendre, Hungary in November 1998 and March 1999, the following specific activities will be implemented:

#### **Needs Assessment and Selection of Case Study at a cost of US \$105,134**

The project will commence with a needs assessment that will identify legal, institutional, programmatic, and practical barriers to as well as opportunities for public access to information and public participation that will support the transboundary pollution reduction goals of the SAP. The needs assessment will draw

upon and supplement existing research and analysis conducted by REC and NGOs, as well as by the Hungarian and Slovenian governments, with respect to the implementation of the Aarhus Convention. Existing analyses do not focus on the adequacy of public involvement measures in Slovenia and Hungary to reduce transboundary pollution of the Danube. The needs assessment will focus on additional public involvement measures that are needed to achieve transboundary results.

The needs assessment will also identify one or more case studies in both Hungary and Slovenia involving sources of transboundary nutrients and/or toxic substances discharged to the Danube as the focus of the training and technical assistance activities of the project. These case studies will focus on “hot spots” identified through the Danube GEF Program and thus will provide a concrete set of circumstances in response to which public involvement measures will be developed and “field tested.” Because agricultural sources are significant contributors to transboundary nutrient pollution, the project will carefully consider using a case study which addresses agricultural point and non-point source pollution, such as Slovenian pig-farms.

### **In-Region Training at a cost of US \$238,861**

Seminars and workshops to build capacity and develop specific measures :

The project will conduct seminars and workshops for water and environment ministry officials of Hungary and Slovenia to build capacity in and develop specific legal and institutional mechanisms for establishing and maintaining effective public participation and access to environmental information that will support the goal of reducing nutrient and toxins discharges to the Danube. The training will involve the participants in drafting legislation, administrative regulations, and other specific measures to implement this objective. The training will be conducted through a series of three in-region workshops during the 18-month period. Using the case study approach, the workshops will bring into focus specific and concrete opportunities for public access to information and public participation that can reduce discharges with transboundary impacts. The specific issues to be addressed could include: (1) how to balance the need for protection of confidential or government secret information with the goal of providing public access to relevant information; (2) overcoming practical barriers to making data available to members of the public in a timely fashion; (3) public involvement mechanisms that can augment government enforcement capacity; (4) legal and institutional mechanisms for ensuring public involvement.

The options and strategies presented at the workshops will draw upon relevant experience from the CEE region, Western Europe and the United States. Public involvement measures have been particularly successfully in reducing nutrient and toxic discharges in the United States. The workshops will be conducted with members of the in-region teams and other government officials from each country who have responsibility for controlling pollution of the Danube and for implementing public involvement programs. Representatives from business and from NGOs will also be invited to participate. These capacity building efforts and workshops will be tailored to the practical needs of participants and the circumstances in the two pilot countries, and will include the full involvement of in-regional experts, as well as international and EU expertise. Careful planning for and conducting of training sessions, preparation of useful analyses and other written materials for participants, as well as the provision of technical assistance throughout the project (as described below), are labor-intensive activities which will engage the full energies of REC, NYU, and RFF personnel, and of the in-region and EU law consultants engaged by the project, throughout the 18-month period.

### **Technical Assistance at a cost of US\$ 199,650**

Technical Assistance to Improve Legal and Institutional Framework

The project will also provide ongoing technical assistance to officials with environmental responsibilities to strengthen the institutional and legal framework for environmental public involvement in Hungary and Slovenia. Technical Assistance activities will be directly linked to the other project activities and coordinated with them.<sup>1</sup>

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<sup>1</sup> A more comprehensive discussion of the training and technical assistance components of the project is provided in Annex 2.

The aim of the Technical Assistance is both to support and draw on the results in the workshops by providing assistance in developing legislation, regulation, and/or policies in Hungary and Slovenia that address key issues, based on the priorities identified in the needs assessment, the case study or studies selected for the pilot project, and the potential for replicability of this project element in other CEE/Danube countries. The technical assistance will be supported and coordinated by REC, NYU and RFF, but will involve a collaborative effort of all parties, in particular the country partners and NGOs. An electronic group address system has been established to facilitate the exchange of information. Interdisciplinary research, identification of best practices, and other assistance from project participants and international experts will feed into the collaborative process of assistance.

Specific tasks to ensure provision of relevant information and public involvement in decision-making relating to discharges of point and non-point transboundary pollutants under this activity could include the discussion, development, and drafting of:

- Public access to information legislation
- Related legal/regulatory measures
- Improved practices at local, district or national levels
- Institutional reform measures at local, district or national levels
- Strengthening the public information elements of existing multilateral mechanisms to address transboundary pollution of the Danube

#### **Western European and United States Study Tour at a cost of US \$114,439**

A study tour will be conducted in Month 12 of the pilot project. It will enable four Hungarian and four Slovenian participants to consult directly with public participation and environmental information specialists and water pollution control experts in the United States and the European Union, to review legislative/regulatory/policy measures that have been drafted in the prior workshops and the technical assistance, and to obtain practical knowledge and advice from U.S. and EU counterparts.

The U.S. portion of the study tour will take place in New York and Washington, D.C, based on successful study tour models developed by NYU and RFF in close consultation with REC and the regional partners.<sup>2</sup> The U.S. was also chosen for a major portion of the study tour since public involvement programs are mature and well-functioning and have a strong track record of helping to combat point and non-point source transboundary water pollution. The Aarhus Convention was in large part based on the U.S. model. The U.S. portion of the study tour will give CEE participants an opportunity to learn first-hand from individuals and organizations who have been closely involved in the success of public involvement programs, including federal, state, inter-state, and local authorities, and at NGOs and business organizations. The study tour sessions will focus on the kinds of systems, procedures, legal instruments, and personnel that have made public involvement programs work effectively and how these programs can help governments combat point and non-point source transboundary water pollution problems. This portion of the study tour will include examples of successful U.S. programs to control interstate releases of nutrients and toxins, such as coordinated efforts by five jurisdictions that impact the Chesapeake Bay.

The study tour will also include a European visit to ensure full consideration of current EU models and best practices for provision of public access to information and public participation, including their relevance to accession. Because the Netherlands has a well developed public access to information program, it is being considered as a potential venue for the European portion of the study tour. It is anticipated that an EU visit in the study tour will provide invaluable information about European practices in achieving the goals of the Aarhus Convention.

#### **Final Report on Results of Pilot Project and Recommendations for Replication in Other CEE Danube Countries, at a cost of US \$61,918**

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<sup>2</sup> A portion of international travel costs has been co-financed by a grant from the Trust for Mutual Understanding.

The pilot project Final Report will synthesize the lessons learned in Hungary and Slovenia and disseminate them to leverage change both in these countries, and in other CEE countries that are contributing to transboundary pollution of the Danube. It will identify successful, replicable elements of the pilot program and recommend public involvement measures, including legislation, administrative regulations, and institutional arrangements and strategies in support of point and non-point source pollution reduction that could be applied to other Danube countries in the CEE region in future projects. In particular, the project will outline and recommend additional training and technical assistance programs that might serve as useful follow-on projects in such countries.

The Final Report will be disseminated to governments, NGOs, businesses and other stakeholders throughout CEE through the network of independent experts convened by REC to monitor implementation of the Aarhus Convention; the Danube PCU; the ICPDR; the network of NGOs participating in the Danube SAP process; REC's Szentendre, Hungary headquarters and its local offices located throughout Central and Eastern Europe; and through future Meetings of Signatories to the Aarhus Convention. The REC will use a variety of tools such as the World-Wide Web to distribute information. Targets will include NGOs, other civil-society organizations, water and environmental ministry officials and other parties interested in the goals of the SAP, the Danube Pollution Reduction Programme, and the Aarhus Convention. A Pilot Project Advisory Committee will also assist in the dissemination of this information. The Slovenian and Hungarian governments will ensure wide dissemination of the project results domestically. NYU and RFF will disseminate the Report to their networks of government officials, NGOs, academics, and others who might help promote the Danube restoration effort. Finally, UNDP will be considered a resource in the dissemination of information. Support will be sought to translate the Final Report into local languages in the region.

<b>Activities</b>	<b>Locations</b>	<b>Index measurement</b>	<b>Outputs</b>
Needs Assessment And Case Study Selection	Hungary, Slovenia	Report prepared on Needs Assessment and Case Study	Identification of legal, institutional, practical and other barriers to and opportunities for public involvement in Hungary and Slovenia that will support Danube transboundary pollution reduction goals
In-Region Capacity Building Training	Hungary, Slovenia	Three capacity building workshops for approximately 25-30 participants, including members of the project's in-region teams, other key Hungarian and Slovenian government and NGO representatives, and representatives of other Danubian countries in CEE.	Capacity built within appropriate Hungarian and Slovenian ministries to provide public access to relevant environmental information and opportunities for public participation in support of reducing discharges of transboundary pollutants to Danube.
Technical Assistance	Hungary, Slovenia and electronic connections to Washington, D.C., New York	Draft Hungarian and Slovenian laws/regulations/practices and/or identify institutional changes needed to address key obstacles to public involvement in reducing transboundary pollution of Danube	Key elements of institutional and legal framework for public involvement identified; and key legislation/regulations/practices relevant to case study prepared or drafted

Study Tour			
Europe	The Netherlands	Study tour completed by 3 Hungarian and 3 Slovenian government officials and 1 Hungarian and 1 Slovenian NGO representative; Report on Study Tour.	Hungarian and Slovenian capacity developed through structured communications with counterparts and experience with well-functioning public involvement programs in EU and or local, regional, national agencies in U.S.; networks established for information exchange and mutual learning among CEE and U.S and EU counterparts.
United States	New York, Washington, D.C. (With planning conducted also in Hungary, Slovenia)		
Final Report on Project Results and Dissemination	New York, Washington, D.C., Hungary, Slovenia	Final Report completed and disseminated to all relevant actors and interested parties	Replicable elements of pilot program that could leverage transboundary pollution reduction in other Danubian countries in transition identified and disseminated; follow-on training/technical assistance programs recommended for additional Danubian countries in CEE; groundwork laid for future efforts to operationalize public involvement in support of Danube SAP in these countries.

## **SUSTAINABILITY ANALYSIS AND RISK ASSESSMENT**

The project will be designed and implemented in close partnership with key government officials and ministries in Hungary and Slovenia, and leading environmental NGOs. A project planning task force has already been formed; it includes key government officials and NGOs from Hungary and Slovenia, who have already made commitments toward the success of the project. Inclusive efforts will be complemented by substantial outreach toward other NGOs and other stakeholders. REC's strong working relationships and collaborative programs with environmental officials throughout the CEE region, and its region-wide local offices and contacts with NGOs, will also help to ensure that the progress achieved through the pilot project is sustained over the long-term.

There is a risk that public involvement measures developed through the pilot project will encounter political or other obstacles in one or both of the pilot countries that will prevent their adoption or implementation. In addition, differences between the two pilot countries' laws, institutional arrangements, and political and social realities may increase the challenges of developing common approaches to public involvement. An additional project risk could be failure to receive adequate government commitment beyond environment ministries. The pilot project will work to minimize these risks by carefully considering from the outset the unique objectives and circumstances of each pilot country, and the differences between them. Pilot country participants will include government representatives in addition to those from the Hungarian and Slovenian environmental ministries, as well as such as regional or local water management experts to increase the likelihood of follow-through after conclusion of the project.

## **STAKEHOLDER INVOLVEMENT AND SOCIAL ASSESSMENT**

Stakeholder involvement is a key element of the success of this project, and indeed what the entire project is all about. A major objective of this project is to build capacity in the governments of Hungary and Slovenia to involve interested members of the public and NGOs in efforts to reduce discharges to the Danube of point and non point source transboundary pollutants. The major stakeholders in the pilot countries, including water and environment ministry officials of Hungary and Slovenia and NGOs and representatives of municipal government and agricultural and industrial concerns that generate point and

non-point sources of pollution, will be involved at all relevant stages of project planning and implementation and will play a central role in designing and carrying out the project activities.

The relevant officials from Hungary and Slovenia have already made significant commitments to the pilot project. Two prominent environmental NGOs, EMLA in Hungary and Labeco in Slovenia, have also been included in planning, and have indicated their strong interest in participating in the pilot project. In addition, the pilot project will have close links to a concurrent, related project being managed by REC, in which NGOs and other interested experts from throughout the CEE region and NIS countries have formed a network to monitor implementation of the Aarhus Convention. In addition, there will be a regular link with the DEF, whose representatives will be invited to the major project events and who will receive regular information about the project results.

The project executing team will also closely coordinate and consult with the Danube PCU and ICPDR, another major stakeholder. The proposed project has already benefited from input received from the PCU on project design and implementation. Regular consultation and cooperation will guarantee that this project is complementary to the projects and programs run by the ICPDR.

## **INCREMENTAL COST ASSESSMENT**

The proposed project is complementary for purposes of incremental costs assessment. The project complements and builds on baseline activities to promote public involvement in environmental protection that are being conducted in the two pilot countries, Hungary and Slovenia. Without additional GEF funding, the activities proposed by the project are unlikely to be conducted. The funding requested from the GEF is additional, because no bilateral funding has been provided for the proposed project activities; nor does the GEF Danube program currently include funding for the pilot project activities. The baseline is estimated at U.S. \$627,368. No change to the baseline is envisaged. The cost of the alternative to achieve global environmental benefits is U.S.\$2,210,363, and the incremental cost requested from the GEF is U.S.\$750,000 (co-financing from non-GEF sources: U.S.\$ 832,995).

There is substantial co-financing for this pilot project. The ratio of co-financing to funding requested from the GEF is approximately 1:1. Hungary and Slovenia will contribute significant in-kind contributions of staff time, facilities, and equipment to facilitate the training and technical assistance portions of the project. The three proposing organizations have already contributed substantial in-kind and out-of-pocket resources in planning this project. A private U.S.-based foundation, the Trust for Mutual Understanding, has committed to fund a portion of the international travel costs of the project.

### INCREMENTAL COST MATRIX

Activity Number	Baseline	Alternative	Increment(Alt- Base)
1: Needs Assessment and Selection of Case Study			
Global Benefits	Existing arrangements for public access to environmental information and public participation in environmental decisionmaking, are inadequate and are insufficiently linked to reducing transboundary nutrient and toxics pollution of the Danube	Link established between public access to environmental information and public participation in environmental decisionmaking, and benefits for reducing transboundary nutrient and toxic pollution of the Danube	Understanding of legal, institutional, programmatic and practical barriers to, and identification of specific, concrete opportunities for, public access to information and public participation in support of the goals of the SAP
Domestic Benefits	No roadmap for operationalizing public participation to reduce transboundary pollution of Danube; no case study.	Roadmap for operationalizing public participation in support of SAP established for pilot countries; case study selected.	Roadmap for operationalizing public participation in support of SAP Action plan available to pilot and non-pilot countries; pilot countries committed to developing and “field testing” specific public involvement measures through case study selected for pilot project.
Costs	0	U.S.\$216,056	(GEF) U.S.\$105,134 (Non-GEF) U.S. \$ 110,922
2. Training			
Global Benefits	Public access to information and public participation capacity building not associated with the specific challenges of Danube-transboundary nutrient and toxic pollution reduction	Public access to information and public participation capacity building directly associated with specific challenges of Danube transboundary nutrient and toxic pollution reduction	Capacity built and specific legal/institutional measures developed to operationalize public involvement in support of Danube transboundary nutrient and toxic reduction
Domestic Benefits	Limited application of public access to information and public participation skills to achieve Danube water benefits	Direct application of public access to information and public participation skills and capacity building to achieve Danube water benefits	Key government officials trained to draft legal and institutional measures to operationalize public involvement to achieve Danube water benefits in pilot countries.
Costs	\$313,684	\$767,996	(GEF) \$238,861 (Non-GEF) \$ 215,451
3. Technical Assistance			
Global Benefits	Public access to information and public participation capacity building not incorporated into the mechanisms addressing point and non-point source transboundary nutrient and toxic pollution reduction.	Public access to information and public participation capacity building directly applied to the specific challenges of point and non-point source transboundary nutrient and toxic pollution reduction.	Specific legal/institutional measures drafted/prepared to operationalize public involvement to achieve Danube water benefits in pilot countries.

Domestic Benefits	Absence of, or limited legislation and policy measures addressing public access to information and public participation capacity building which incorporates mechanisms addressing point and non-point source transboundary pollution.	Legislation and policy measures addressing public access to information and public participation capacity building which incorporates mechanisms addressing point and non-point source transboundary pollution.	Specific legal/institutional measures drafted/prepared to operationalize public involvement to achieve Danube water benefits in pilot countries.
Cost	\$313,684	\$726,550	(GEF) \$199,650 (Non-GEF) \$213,216
<b>4. Study Tour</b>			
Global Benefits	Limited availability to Danube/pilot country context of relevant U.S. and EU experience/knowledge on development/implementation of effective legal/institutional measures for public involvement to reduce discharges of nutrients and toxic to transboundary waters	Relevant U.S. and EU experience/knowledge available for developing/implementing effective legal/institutional measures for public involvement to reduce discharges of nutrients and toxic to Danube.	Relevant U.S. and EU experience/knowledge gained on study tour incorporated into development/implementation of effective legal/institutional measures to operationalize public involvement in support of SAP and Danube Pollution Reduction Programme goals; U.S./CEE counterparts network established for long-term information exchange.
Domestic Benefits	Limited opportunity for pilot country officials to obtain first-hand knowledge/experience from U.S and EU counterparts on successful public involvement measures/ programs that have achieved substantial reductions in nutrient and toxic discharges to transboundary waters.	Opportunity for key pilot country officials to obtain first-hand knowledge/experience directly from U.S. and EU counterparts on development/implementation of effective measures for reducing nutrient and toxic discharges to Danube	Development/refinement of effective domestic legal/institutional public involvement measures to reduce nutrient and toxic discharges to Danube, through knowledge/experience gained on study tour
Costs	-0-	\$261,142	(GEF) \$114,439 (Non-GEF) \$146,703
<b>4: Final Report and Dissemination of Results of Pilot Project and Recommendations for Replication in other CEE Danube Countries</b>			
Global Benefits	No targeted efforts and results/recommendations for integrating and disseminating public access to information and public participation capacity building with the specific issues and problems of Danube-transboundary pollution reduction and the SAP and Danube Pollution Reduction Programme	Generation and dissemination of results/recommendations specifically targeted to operationalizing public involvement in support of transboundary pollution reduction goals of SAP and Danube Pollution Reduction Programme	Model/recommendations for operationalizing public participation in support of transboundary pollution reduction goals of SAP and Danube Pollution Reduction Programme developed for future use in pilot and other CEE countries and widely disseminated
Domestic Benefits	Efforts and plans for public	Concrete results and	Planning of follow-up and

	involvement not targeted to goals of reducing nutrient and toxic discharges to the Danube	recommendations for follow-up and future actions to operationalize public involvement in support of reducing nutrient and toxic pollution of Danube available for planning future actions	future actions can build on results and recommendations of pilot project
Costs	-0-	\$208,621	(GEF) \$61,918 (Non-GEF) \$146,703
Total Project: Global Environmental Benefits	Limited public involvement in support of reduction of nutrient and toxic discharges to Danube with transboundary implications due to lack of capacity/legal and institutional measures promoting public awareness and involvement	Enlarged opportunities for public involvement in support of reduction of nutrient and toxic discharges to Danube with transboundary implications	Model established and recommendations made for actions to achieve similar results in other Danubian countries in CEE.
Domestic Benefits	Limited public involvement in support of reduction of nutrient and toxic discharges to Danube with transboundary implications due to lack of capacity/legal and institutional measures promoting public awareness and involvement	Potential for greater reductions in nutrient and toxic discharges with transboundary implications in pilot countries	Capacity built and concrete legal/institutional measures developed in pilot countries to operationalize public involvement in support of reducing transboundary nutrient and toxic discharges to Danube
<u>Costs</u>	\$627,368	\$2,210,363	(GEF) \$750,000* (Non-GEF) \$832,995

- INCLUDES INDEPENDENT EVALUATION (\$25,000) AND UNDP ADMINISTRATION (\$5,000)

## PROJECT BUDGET

	GEF	Other Sources	Project Total
Project Preparation		532,908	532,908
Personnel		108,844	667,689
1. Needs Assessment	90,877		
2. In region Training	192,046		
3. Technical Assistance	166,754		
4. Study Tour	58,584		
5. Dissemination	50,584		
Subcontract			
Training	80,341	145,360	225,701
Travel	8,312	21,500	29,812
Equipment	2,200	2,682	4,882
Independent Project Evaluation	25,000		25,000
Miscellaneous	75,302	21,701	97,003
Project Total (PDF+ Costs)	750,000	832,996	1,582,996

NOTE: Other Sources (TMU), \$21,500 allocated under Travel, must be applied to International Travel Costs only.

The budget has been allocated to the co-implementing agencies in the following manner:

New York University: \$220,547 (29% of the total budget including TMU)

Resources for the Future: \$206,335 (27% of the total budget including TMU)

Regional Environment Center: \$314,617 (41% of the total budget including TMU)

Independent Evaluation: \$25,000

UNDP Administration: \$5,000

### • Roles of the co-implementing agencies

Executing the training, technical assistance, study tour and other aspects of the project will demand a high level of cooperation among and effort by each of the co-implementing agencies. Responsibility for managing the administrative and organizational aspects of each of the project activities will be shared according to each agency's experience, expertise and location. The three organizations will work together to ensure that each project element meets the participants' needs and that the pilot project as a whole accomplishes its stated goals.

For example, the three agencies will jointly conduct the in-region plenary and training sessions, in coordination with other experts retained by the project. REC will provide logistical support for and will host these meetings and training sessions at its conference facilities in Hungary and Slovenia. RFF and NYU will develop study materials and law and policy analyses to support these meetings and training sessions and will share responsibility with REC for performing other preparatory and follow-up tasks relating to these meetings/training sessions. Expert consultants will be retained for training in EU legislation and models for policy changes in Hungary and Slovenia.

Similarly, as part of the technical assistance program, REC, NYU and RFF, in coordination with the expert consultants, will do on-site consultation with ministry officials to assist with law drafting and formulation of institutional and policy options for public involvement. In addition, at their home bases in the U.S., NYU and RFF will conduct legal, institutional and policy-related research and prepare options

papers needed to support these law drafting and policy/institutional development efforts in the pilot countries.

Preparation for and implementation of the study tour will also be coordinated among the three agencies. NYU will administer and host the New York leg of the study tour, RFF will administer and host the Washington, D.C. leg of the study tour, and REC will administer the E.U. portion of the study tour in conjunction with Dutch experts.

A similar sharing of responsibility among the co-implementing agencies has been built into the other project activities, as well. This division of labor is reflected in the budget allocation to each agency. (See Project Budget, above.)

### PROJECT IMPLEMENTATION PLAN

DURATION OF PROJECT (IN MONTHS):	
ACTIVITIES	PROJECT-MONTHS
Completion of project activities	
1. Needs Assessment/Case Study Selection	Months 2-5 Months 3, 8, 14
2. In-Region Training	
3. Technical Assistance	Months 3-16
4. Study Tour	Month 12
5. Final Report and Recommendations	Months 16-18

### PUBLIC INVOLVEMENT PLAN

- *Stakeholder identification*

Key stakeholders in the pilot project are:

- Governments of Hungary and Slovenia and other governments throughout CEE that have signed the SAP and the Aarhus Convention;
- CEE, Danube-country-based organizations that support environmental and civil society goals. These include environmental, women and youth groups, private sector groups, political parties, labor and academic organizations (including, but not limited to the independent network of experts convened by REC who are monitoring implementation of the Aarhus Convention, and NGOs participating in the SAP process, e.g., through the DEF);
- local communities in the pilot countries who will benefit from or could be potentially affected by the project activities;
- farmers and agricultural entities, including large-scale livestock operations, industrial dischargers and municipal dischargers;
- all persons interested in the outcome of project activities who are involved throughout project implementation;
- The Danube PCU and ICPDR

- *Information dissemination and consultation*

The project proposers (REC, NYU, and RFF) have consulted with Hungarian and Slovenian government and NGO participants in the pilot project and the Danube PCU to ensure that the design of the project meets their needs. Ongoing consultation with stakeholders is also incorporated directly into the project activities, including through four plenary meetings (three of which are linked to the in-region capacity building workshops). These plenary sessions will convene a broad cross-section of interested stakeholders, including local government officials, NGOs, private sector representatives, and representatives from other CEE/Danube countries. Additional consultations during project implementation will take place with UNDP/GEF and the Danube PCU and ICPDR. In addition, through a Pilot Project Advisory Committee, the project executing team will reach out to solicit the views of a broader group of interested parties.

Key project documents, including the Needs Assessment and final Report and Recommendations, and other relevant information learned through the pilot project, will be disseminated as set out above in the description of project activities.

- Participation in training activities

The training activities are being designed to maximize public participation. There will be 35 participants attending the plenary sessions and 30 participants in the training sessions. Approximately two-thirds of the participants will be government officials. The remainder of the participants will be composed of national and regional NGOs, representatives of the private sector, and stakeholders from the region. (See below for a more detailed explanation of stakeholder participation.)

The plenary sessions will focus on a comparative analysis of the legislation, institutional frameworks and practical measures in Hungary and Slovenia in light of experience in the E.U. and U.S. implementing successful public involvement programs designed to reduce transboundary releases of pollutants. The goal of the plenary sessions is to identify and develop recommendations for addressing priority issues. The participants invited to join the plenary sessions will generally be stakeholders involved in the development and promulgation of environmental, water and agricultural legislation and policies that are relevant to nutrient and toxic releases to transboundary waters.

The specific focus of the plenary sessions will depend on the stakeholders' identification of priority issues. However, three broad subjects are likely to be addressed in these sessions: (1) gaps in existing measures in Hungary and Slovenia that impede public involvement in efforts to reduce releases of transboundary pollutants to the Danube; (2) E.U., U.S. and Western European domestic environmental legislation, institutions and policies, as well as "best practices" from other CEE countries, that might serve as models for more effective public involvement measures in the two pilot countries; and (3) obligations undertaken by the pilot countries under relevant international environmental instruments, including the Aarhus Convention.

Each aspect of the capacity building workshops will be designed in conjunction with the regional and local NGOs and the government officials in order to ensure that key issues are properly identified and addressed. Case studies which address hot-spot coastal issues will be chosen and developed in co-operation with all of the main stakeholders. For example, one case study being considered is the problem of nitrate run-off from hog farms. The workshop activities will focus on the practical issues involved in addressing the case studies, which will be used as a framework for analysis and problem-solving. The results and lessons learned from the case studies will be presented in the final report, which will be disseminated to a wide audience of government officials, private parties, and NGOs.

The training program is an iterative process. The results, recommendations and key issues arising out of the training activities will direct the focus of the technical assistance and study tour. In addition, lessons learned through the training program will also inform the process of evaluating elements that might be replicated or modified in follow-on projects in other Danubian countries in CEE and the recommendations in the final report.

- Stakeholder participation

As the principal target stakeholders for the project, government officials of the pilot countries will be involved in every aspect of the project. The choice of case studies, the focus of the plenary meetings and training sessions, and the direction of the technical assistance will be primarily guided by the key issues that are identified by key Hungarian and Slovenian government officials participating in the project. Government officials of the pilot countries who will be invited to participate in the project will include national level officials of environmental, water and agricultural ministries, as well as regional, municipal and local level officials with relevant experience or a significant connection to the case study. The workshops will address the day-to-day obstacles these stakeholders face in the practical tasks related to access to environmental information and public participation in environmental decision-making. Additionally, government officials from other CEE countries will also be included in the plenary meetings and training sessions to ensure that the project will yield lessons applicable or useful to these countries.

As both expert consultants to the project and representatives of the NGO community, EMLA (Hungary) and Labeco (Slovenia) will play a significant role in preparing the needs assessment, choosing an appropriate case study, identifying legislative, institutional and policy measures that can provide meaningful public access to environmental information, and helping to shape the recommendations

contained in the project's final report. As environmental law experts, these NGOs will serve as indispensable resources in the analysis of Hungarian and Slovenian legislation and of the legal implications for the pilot countries of the Aarhus Convention and harmonization of national laws for accession to the European Union; they will prepare country-specific legal analyses and other written materials for, and will present their expertise and experience at, the plenary meetings and training sessions. As key stakeholders and likely users of environmental information systems in the pilot countries, and as organizations closely linked to the region's broader NGO community, these NGO experts will help ensure that the pilot project's outputs are disseminated to, and relevant to the concerns of, interested citizens and NGO organizations both in the pilot countries and other Danube countries in CEE. Other NGOs of the pilot countries, regional NGOs, such as the Danube Environmental Forum, consumer interest organizations, and environmental NGOs from other CEE countries along the Danube will also be invited to attend appropriate plenary sessions and/or training workshops to ensure that the project is closely coordinated with other ongoing public involvement efforts and programs to protect the Danube.

In order to gain the perspective of private sector entities that will be users of or affected by public involvement programs and to broaden the scope of public participation in the project, members of the pilot countries' private sector will be invited to participate in plenary sessions and key training workshops. Participants from the private sector may include representatives from key industrial and agricultural dischargers to the Danube, chambers of commerce, and industry and farmers' associations. Private sector participants may also include industrial or agricultural industry representatives from other countries where successful water discharge reduction programs have been implemented.

## **MONITORING AND EVALUATION PLAN**

An Annual Project Report (APR) will be prepared for the pilot project. In addition, a Tripartite Review will be conducted with UNDP, the executing agency and the participating governments. The project will also participate in the GEF Project Implementation Review (PIR). Finally, an independent (external) evaluation will be conducted upon completion of the pilot project. These measures will ensure that the project is monitored and evaluated in accordance with relevant UNDP and GEF procedures.

## ANNEX 1: LOGFRAME ANALYSIS

*The logical framework (logframe) matrix*

	(1) Programme or project summary	(2) Indicators	(3) Means of verification	(4) External factors (assumptions and risks)
Development objectives	To improve the performance and impacts of water pollution prevention and control projects and programs in the GEF Danube international waters focal area through the institutionalization and operationalization of public access to information and participation in national and regional actions.	The effectiveness of government and civil society efforts to improve the state of the environment of Danube international waters increases through facilitated public access to information on nutrient and toxics discharges to the Danube and related improvements in public participation.	Hungary and Slovenia develop specific proposals for legislation and administrative regulations, orders, procedures and policies for public access to information	Assumes that public access to information and related improvements in public participation will contribute to reducing the level of discharge into the Danube, and further assumes that this belief is shared by relevant stakeholders. The assumption is reasonable given that public participation is one of the ten basic operational principles for the GEF. The SAP identifies public involvement as a key element in the Plan's success; Hungary and Slovenia have made international and national commitments to foster public participation through access to information and endorse the project as a means of leveraging public access to information to address transboundary pollution of the Danube. Risks are presented by existing institutional and legal obstacles to public access to information.
Immediate objectives	To enable two pilot countries and citizens of the Danube region to have informed and effective public participation in activities related to reduction of	Hungarian and Slovenian partners identify and draft specific proposals for legislation and administrative regulations, orders, procedures,	Drafts of specific proposals for legislation and administrative regulations, orders, procedures, policies and processes to implement public access to	Assumes legal requirements, administrative measures and practical steps, are necessary and effective to facilitate public access to information. A risk is that such

	nutrients and toxics to Danube international waters, by constructing and/or improving the legal and institutional architecture to facilitate public access to environmental information and thereby improve public participation related to these areas.	practices and policies to implement public access to information on nutrients and toxics discharges to the Danube and for implementing relevant parts of the Aarhus Convention	information to facilitate public participation concerning on nutrients and toxic discharges to the Danube and to implement the Aarhus Convention	proposals are not feasible to develop and draft within the timeline of this project. The project acknowledges that the process of institution building is a long one, with revision and learning-by-doing inherent in the process. The project is to support necessary early steps to develop legislation, procedures, administrative policies and processes, and practical steps which will be implemented in-country and revised over time in light of practical in-country experience
Outputs	<p>Assessment of barriers to public access to environmental information concerning releases of nutrients and toxics to the Danube and related impacts on effective public participation</p> <p>Identification of opportunities and development of proposals for replicable legislative and administrative measures and practical steps to implement public access to environmental information held by government bodies and opportunities for field testing such measures</p> <p>Identification of legal and institutional measures (laws, orders or other) necessary to make obligations of the Aarhus Convention practicable through national legal mechanisms, institutional change and practices</p>	<p>National implementing provisions, practices and/or legal requirements are drafted</p> <p>Proposals to strengthen inter-governmental and government-NGO-private sector cooperation and partnerships regarding public access to information for transboundary water pollution and its control are drafted</p> <p>Research products from consultant institutions and experts that provide relevant information and respond to specific questions raised by Hungarian and Slovenian partners concerning efforts to facilitate public access to environmental information</p> <p>Increased communication between government officials</p>	<p>Drafts of legislation and other national implementing requirements</p> <p>Drafts of proposed measures to strengthen inter-governmental and government-NGO-private sector cooperation and partnerships for transboundary water pollution control.</p> <p>Research products developed by consulting institutions and experts</p> <p>Survey of relevant parties as to the magnitude and form of increased communication</p>	<p>Assumption that Hungary and Slovenia are the two best pilot countries with the twin qualifications of (1) being able to make substantive progress with the project and (2) being able to serve as models for other CEE countries. Hungary and Slovenia have signed and ratified the Aarhus Convention and have made government commitments to public access to information and the necessary personnel and legal infrastructure to translate government commitment into practice</p> <p>Assumption that the governments of the pilot countries act in good faith and want to facilitate public access to information. The governments of Hungary and Slovenia have demonstrated their commitment and are the two possible pilot countries that most alleviate risks related to</p>

	<p>in the context of water pollution control</p> <p>Creation of legal and institutional capacity for Hungarian and Slovenian governments effectively to provide environmental information to the public, and in doing so, to serve as models for neighboring Danube countries in transition</p> <p>Development of government measures and practical arrangements that empower NGOs to obtain environmental information and provide models using information to advance the goals of reducing nutrients and toxic releases to the Danube</p> <p>Creation and facilitation of access to practical implementation experience and models in the US and EU regarding legal and institutional mechanisms for public access to environmental information to facilitate public participation, including access to experts at government and non-governmental institutions with extended practical experience implementing access to environmental information provisions</p> <p>Provision of access to NYU's</p>	<p>and NGOs in pilot countries, other CEE countries, EU and US experts during and after the project and with relevant international bodies or where appropriate with projects/programs such as the ICPDR and others dealing with Danube issues</p>		<p>lack of meaningful government commitment and follow-through effort</p> <p>Assumption that environmental information exists in an appropriate form for effective public access and use. If this is not the case, strategies for packaging the information for the public will be identified and developed through the project</p>
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	<p>Center on Environmental and Land Use Law for specific research on legal issues integral to implementing public access to information concerning releases of nutrients and toxics</p> <p>Provision of access to relevant CEE experience and assessment, publications and training materials prepared by the REC concerning access to information</p> <p>Linkage with networks of experts and NGOs in CEE, Western European and US</p> <p>Provision of access to relevant EU and European experience and best practices, particularly with respect to EU accession issues</p>			
Activities	<p>Conduct Needs Assessment to identify country obligations, current barriers to implementation, and appropriate steps to achieve implementation, Months 2-5, all partners</p> <p>Conduct Study Tour to provide thorough comparative assessment of legal provisions and institutional participatory models in Europe and in the US, month 12, all partners</p> <p>Establish intensive electronic and other networking to provide technical assistance and to collect appropriate information,</p>	<p>Complete Needs Assessment</p> <p>Undertake intensive joint efforts using electronic communication (e-mails, phone and fax) between US and EU experts and their CEE counterparts</p> <p>Draft proposals for legislation and administrative regulations, orders, practices, procedures and policies to implement public access to environmental information and relevant parts of the Aarhus Convention, and disseminate and discuss same with governments and civil society</p>	<p>Periodic reports (including Needs Assessment and Final Report) distributed by RFF/NYU/REC to all relevant organizations and governments, and to other groups and organizations, as well as on file and available for others</p> <p>UNDP and GEF presence at the workshops and study tour</p> <p>Drafts of specific proposals and recommendations for legislation and administrative regulations, orders, policies and procedures and practical steps to Hungary and Slovenia to implement public access to environmental</p>	<p>Assumption that Hungary and Slovenia provide best opportunities for substantive progress and as a models for neighboring Danube countries, as countries that have signed and ratified the Aarhus Convention, made government commitments to public access to information and public participation in decision-making and have the necessary personnel and legal infrastructure to translate government commitment into practice</p> <p>Assumption that the governments of the pilot countries act in good faith and want to facilitate public access</p>

	<p>review and examine specific issues and questions, exchange experiences, jointly identify and draft where necessary solutions, and disseminate lessons learned among the project partners, throughout project (18 months), all partners</p> <p>Conduct training and capacity building workshops and provide appropriate training materials to draft specific legislative and administrative measures, develop positive practices, and otherwise develop the institutional capacity of governments and civil society groups to strengthen participation relevant to releases of nutrients and toxics to the Danube, Months 3, 8, 14, all partners</p> <p>Pilot country participants, RFF, NYU and REC develop specific recommendations for, and draft where appropriate specific laws, regulations, orders and/or practices identified in Needs Assessment to implement public involvement and access to environmental information in order to institutionalize appropriate releases of information concerning nutrient and toxic discharges to the Danube, months 3-16, all partners</p> <p>Document and disseminate</p>	<p>Complete and disseminate interim and final reports</p> <p>Develop recommendations for follow-up in other CEE countries including training programs and capacity building workshops</p>	<p>information and the Aarhus Convention</p> <p>Electronic reports on websites of partner institutions</p> <p>Reports in REC's country-offices</p> <p>Periodic reports in relevant publications such as REC Bulletins in English and in local languages, Newsletter of the DEF, and other institutional methods of communication such as RFF "Discussion Papers" and/or other RFF or NYU publications</p>	<p>to information and public participation. Hungary and Slovenia have demonstrated their commitment and are the two possible pilot countries that most alleviate risks related to lack of meaningful government commitment and follow-through effort</p> <p>Assumption that environmental information exists in an appropriate form for effective public access and use – if this is not the case, strategies for packaging the information for the public will be identified and developed through the project</p>
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	<p>information and experiences on existing legal measures, institutional arrangements, and practices that promote and/or secure public participation, months 3-16, all partners</p> <p>Recommendations formulated including dissemination plan for follow-up action to transfer lessons learned and replicable elements from the pilot project to other Danube countries in the CEE, months 16-18, all partners</p>			
Inputs	<p>Funds to carry out the project tasks</p> <p>Facilities to carry out the project tasks</p> <p>Transportation facilities to carry out project tasks</p> <p>CEE, US and EU experts in legal and practical requirements for institutionalization and implementation of public access to environmental information to facilitate public participation with specific concentration on releases of nutrients and toxics to shared water bodies</p> <p>Experts in workshop facilitation</p> <p>Experts in identifying and preparing participants and host experts to achieve effective study tours that respond to the</p>	<p>Disbursement of funds according to schedule by GEF and co-financing sources</p> <p>Conference facilities at NYU, RFF and REC and at cooperating government bodies will be used</p> <p>On-site demonstrations will take place in government facilities in the US, EU, and CEE</p> <p>Involvement at appropriate times of EU legislation and EU accession experts; records specialists; lawyers from the US EPA Office of General Counsel and other institutions; public interest groups and businesses that litigate public access to information issues; representatives from headquarters and regional US</p>	<p>Audit budget expenditures</p> <p>Inspect conference facilities</p> <p>Review reports and project work product</p> <p>Speak with experts involved</p> <p>Speak with government, private sector and NGO officials involved and other stakeholders</p> <p>Regular check-ins with RFF, NYU and REC</p>	<p>Risk: Under-budget for travel and other project tasks.</p>

	<p>specific needs and requirements of the participants</p> <p>EU expert consultant recruited to ensure compliance with EU accession issues and share experience with relevant EU legislation</p> <p>Staff with financial and management expertise at project partner institutions</p>	<p>EPA offices; congressional and legislative aides; Freedom of Information Act Officers; and organizations and people who ask for and use environmental information obtained from government bodies</p> <p>Involvement of key government and NGO representatives from Hungary and Slovenia, as well as other stakeholder representatives</p> <p>Involvement of RFF, NYU and REC throughout the preparation, implementation and conclusion of the project</p>		
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## **ANNEX 2: Integration of Stakeholder Input in the GEF MSP Project Brief, "Building Environmental Citizenship to Support Transboundary Pollution Reduction in the Danube: A Pilot Project in Hungary and Slovenia."**

This project brief benefited from the input of a number of stakeholders involved in the environmental protection of the Danube, in addition to the ideas and assistance provided by Hungarian and Slovenian government officials and NGOs who are at the same time Danube stakeholders and also participants in the pilot project. The key Danube stakeholders whose input we sought and utilized in preparation of the final project brief included Mr. Joachim Bendow, NDP/GEF Project Manager; Mr. Andy Garner, Environmental Specialist, Danube Programme Coordination Unit; and Mr. Andrew Hudson, Principal Technical Adviser, UNDP, International Waters. In addition, the partners for this project consulted extensively with officials at the Hungarian and Slovenian Environment Ministries who will participate in the project, as well as the Hungarian and Slovenian NGOs who will also be key participants. Hungarian and Slovenian participants/stakeholders include Stefanija Novak, and Mateja Godejsa Simcic, Ministry of the Environment, Slovenia; Nandor Zoltai and Judit Csoka, Ministry of the Environment, Hungary; and Milada Mirkovic, Labeco (Slovenia), and Sandor Fulop, EMLA (Hungary), both prominent environmental NGOs.

Following are five general issues raised by key stakeholders and the steps taken to address and integrate these comments into the project design.

### **1. Importance of links between proposed project and existing institutions and activities in the Danube region such as the International Commission for the Protection of the Danube River (ICPDR), Danube Programme Coordination Unit (PCU), Danube Environmental Forum, and other ongoing activities, and the inclusion of current information from the Danube Pollution Reduction Programme.**

This project will support and contribute to the success of the Danube Pollution Reduction Programme and the revised Strategic Action Plan (SAP) in numerous ways. The links that we identified with the Danube Programme in our preliminary project analysis were based on a review of available Transboundary Analysis (such as the Causal Chain Analysis for the Middle and Lower Danube Countries, 5 March, 1999, based on the results of the Trans-boundary Analysis Workshop held in Hernstein, Austria, 25-31 January, 1999 and prepared as a contribution to the preparation of the Danube Pollution Reduction Programme and to the revision of the SAP of the ICPDR). This country by country analysis of the Middle Danube region indicates that the core problems are agricultural hot spots related to "unsustainable agricultural practices," discharges from "ecologically unfriendly industry," and for the municipal sector, "inadequate management of municipal sewage and waste." The Lower Danube Region, which includes Romania and Bulgaria, also presents core problems of the same nature -- agricultural hot spots based on un-sustainable agriculture, a lack of pollution prevention and pollution abatement from industrial dischargers, and the inefficient management of waste waters and solid waste by municipalities. These nutrient and toxics discharges and the development of public access to information techniques and measures to help address them will be the focus of our case studies and project efforts.

This project will build on other recent studies<sup>3</sup> and workshops<sup>4</sup> prepared in the framework of the Danube Pollution Reduction Programme. Some of these reports are being or have only recently been finalized by the Vienna unit. We will include into our research all these documents as broader context for our project.<sup>5</sup>

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<sup>3</sup> These include Transboundary Socio-Economic Analysis prepared in March 1, 1999; Effects of Water Pollution in the Danube River Basin, March 4, 1999; Analysis of Financial Mechanisms, March 4, 1999; the National Reviews of Hungary and Slovenia and the Danube Information System Planning Survey and Inception Meeting Report, March 1999.

<sup>4</sup> Including the Assessment of Information Needs and Evaluation of Existing and Proposed Information Systems, Baden Workshop, March 1998).

<sup>5</sup> In all of these materials there is little about access to information and public participation. In the survey "Socio-Economic Analysis. Effects of Water Pollution in the Danube River Basin," there is a section on "Adequacy of the legal and institutional framework for sound environmental management of water resources and ecosystems" (pp. 6-1, 6-4) which contains a short analysis of the environmental and water legislation of the Danube countries. It says: "Countries in which the legal framework for environmental

The project will build on additional specific linkages with relevant activities, institutions and actors in the region by inviting representatives from the Danube Environmental Forum and the Slovenian and Hungarian NGOs participating in the Forum to the workshops and training sessions, and disseminating the project training materials, final reports, and other products to them (as well as to others). We can offer to present the findings or the results of the project in the Danube Environmental Forum's workshops, where the REC has a long-time cooperative link.

We are very aware of the important issue of non-point discharges in the context of public access to environmental information in the Danube area. In response, the project will:

- a) Identify and include representatives from agricultural ministries, farmers associations and/or other relevant groups in the full process including workshops, capacity building, mention in final report, and other involvement.
- B) Include as part of the workshop/training conferences special sessions devoted to non-point sources and the experience in the US and Western Europe, in the context of public access to environmental information;
- c) Include in the US study tour a visit to the Chesapeake, which has a big agricultural run-off component, largely dealt with currently by public information techniques, and "hands-on" learning about other practical, successful examples of the development and application of these techniques to strengthen the protection of water quality.
- d) Explore carefully the potential for using Danube "hot spots", such as pig farms in Slovenia, as a possible case study to focus discussion on agricultural point and non-point sources. A case study approach, developed with country partners in the course of the project, can provide concrete examples within which to explore what laws, institutions, procedures, training and other assistance will be necessary to make public access to information on releases of nutrients and toxics a reality.

With the cooperation of the Danube PCU and/or the ICPDR, the project can identify information policies, strategies and actions to improve the Danube Convention and help the ICPDR Information System increase its transparency and legitimate stakeholder access to its documents and data banks. The Danube Convention has information provisions more or less at the level of the current EU Directive on Freedom of Information. The project can make recommendations to improve the Danube Convention to bring its access to information provisions to the level of the Aarhus Convention standards. Although the Danube governing bodies are not government bodies that have signed the Aarhus Convention, their member countries have agreed to implement the Aarhus agreement. The project can provide the ICPDR and others with advice on key issues such as what kinds of information should be available, in what form, to whom, and on what basis documents and information can be declared secret or confidential. This issue can be addressed from the point of view of national legislation, from international legal instruments including the Aarhus Convention, the Danube Convention and the EU legislation, and comparisons will be developed with other best practices (e.g., Aarhus and the US model).

The technical assistance parts of the project will be the vehicle for providing specific recommendations. The results of case studies on access to information and public participation will also focus on how the requirements of Aarhus Convention and other best practices models should be incorporated into the national strategies and policies on pollution reduction in the two countries. Ultimately, these recommendations could serve as a basis for making more general regional recommendations for basin-wide strategies.

## **2. Relationship between this project and efforts to change Danube basin consumer behavior**

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management and water resources and ecosystems has to be considered as adequate and in consistence with international requirements are Germany and Austria and with some reservations Hungary and Czech Republic." The report details the essential deficits and problems which need improvement in other countries. Also, this section enumerates the most relevant international and regional agreements and mentions, among them, the Aarhus Convention.

The proposed project will fill the current gap between government-led efforts to work with the public, and NGO and other advocacy efforts for environmental issues. Since the fall of communism, a number of consumer behavior groups have been formed. This project will help strengthen the instruments available to help them acquire data to inform their campaigns. Our project builds the infrastructure between the government and public for this kind of interaction and complements the work of these other groups. Our project will solidify its link with the advocacy movements by inviting NGO representatives from the region that work on consumer behavior issues to the in-region training workshops. Also, the US study tour will include visits to US NGO advocacy organizations whose work includes building consumer awareness. If the GEF deems this issue of sufficient importance, we can also include it in the needs assessment, and in recommendations in the final report, and include in-region workshop sessions on consumer awareness led by members of these groups, including examining the role of government officials in developing successful strategies for building consumer awareness.

### **3. Study Tour – Comparing US and Western Europe Models: Link to European Union directives and experiences**

We anticipate that questions may be raised about the utility of a US study tour, in view of Hungary and Slovenia's efforts to join the EU and to incorporate EU standards. This was a deliberate choice, made after extensive consultation with our Hungarian and Slovenian NGO and government partners and what they have told us that they need to learn, supplemented by the research and experience of the REC before, during and after the Aarhus negotiation process.

The UN-ECE Aarhus Convention is based on US practices. The EU itself and most European countries only have objectives in place or a limited model. Their actual access to information regimes are generally weak, and most European countries have a lot of work yet to do to reach the Aarhus standards. The US model, by contrast, reflects many years of practical experience operating access to information and public involvement programs at all levels of government. The countries negotiating the Aarhus Convention expressly modeled substantial parts of the agreement on U.S. legislation and practice because the U.S. experience in this realm is perceived in Europe as being both successful and applicable to the circumstances of both Western and Central/Eastern European countries. For these reasons, we and our country partners feel that a US study tour is an essential part of a capacity building pilot program.

We have always believed that EU and European input is an important element of the project, particularly because of the accession and approximation process. EU legislation and good practices of EU countries, along with good practices of CEE countries, and the US and international instruments will be used in our work throughout the whole project, including discussions, technical assistance, training and recommendations. Accordingly, a Western European stop, likely in the Netherlands, will be included in the study tour along with the U.S. components. The analysis of best practices in a Western European context will be an integral part of the project. EU perspectives will also be developed by the EU accession expert as part of the international team working on the project.

In summary:

- the US is the only country where the best practice models actually have been implemented.
- the CEE countries, although they are interested in accession, are also interested in following a model in practice which is close to the US, and is cost-effective; they are actually interested in doing better than their Western European neighbors.
- there is no fully developed Western European model of access to information-- EU Directive 313 lags behind the standards of the Aarhus Convention.
- there are some good practices in some Western European countries (the Netherlands, Denmark, some other Nordic countries), but none are as advanced or have the same level of actual implementation experience as the US.
- the EU itself has committed itself to implement the Aarhus Convention and is planning to revise the Directive based on the Aarhus requirements, but it will take years before this will happen, much less for useful practices to emerge.

### **4. Elements of the project, the study tour, and the technical assistance: assuring a full understanding of the anticipated objectives, activities and outputs**

This section of this Annex provides important details about the objectives and plan of the project study tour, including what is involved in putting on a successful, substantive study tour of the kind that our organizations have considerable experience in preparing, so we have done this in this appendix format.

We start by contrasting what we intend to accomplish with some of the poor models we have observed. In too many ill-prepared study tours, visiting delegations are simply ushered into the offices of local officials and NGOs without any advance preparation of either the participants or the hosts. The US institutions have been on the receiving end of dozens of these ill-prepared study tours. The visitors stay for about 1 hour, but the substantive time is half that if translation is needed. Because the visits have not been adequately prepared, more than half of the visit is used up trying to find out what the visitors really need to learn. By then, there is not adequate time to be responsive to their needs, and sometimes the host is not the appropriate person to provide the relevant information. Still other study tours we have heard about have been organized in lecture form, so that there has not been an opportunity for the free exchange of ideas and real learning among professionals.

In contrast, we intend to use study tour models similar to study tours our institutions have each designed in previous projects. Ruth Bell of RFF created a four city study tour for Polish environmental enforcers in the United States Environmental Protection Agency's compliance schedule project and for Russian environmental law drafters in the environmental law support under the Freedom Support Act; Jane Stewart planned two multiple-city study tours for Chinese environmental law drafters under two ADB contracts. Our experience demonstrates that a successful study tour requires resource intensive efforts to (1) identify the right people to meet with study tour participants; (2) personally prepare those people to understand the needs of the visitors and to appropriately pitch their presentation so that it is meaningful for people who come from different traditions, legal systems, institutional strengths and weaknesses, etc. (in her Polish project, among other things, Ms. Bell wrote and provided memos explaining the differences between the Polish and US legal system and the roles of judges in each system); and, (3) prepare the visitors so that they understand the context of the discussions and how it connects with their own information needs and experience; (4) provide the study tour participants, in advance, with background information and documentation to enhance the value of the study tour sessions. All of these efforts demand a considerable investment of professional time and are essential for the study tour and the entire project to serve as a substantive learning experience.

We envision the study tour as an integrated part of an entire program to identify and develop the issues the in-country participants want to examine and resolve. One important part is the networking that will take place. REC, NYU and RFF will not only establish these connections and prepare the meetings so that they are genuinely useful to the process, but will also expedite the electronic and other connections of participants with resource groups in the US and Europe to support though the entire life of the project and thereafter. In this project, we already have established and are using electronic communication among the partners. This will become more sophisticated and deeper as the project progresses, as a kind of distance learning. The LogFrame analysis in Annex 1 explains these elements in more detail.

The technical assistance, much of which takes place in the periods between workshops and study tours, is also critical to the success of the project. In the technical assistance, RFF, NYU and REC will work with the country partners and NGOs to develop legislation, regulations, practices and/or policies as appropriate, and to address key obstacles to public access to information that have been identified in the needs assessment and that will further public involvement in the actual situation presented in the case study. This is an iterative, collaborative *process* that will take place on both sides of the Atlantic, including interdisciplinary research, identification of best practices, and generation of written materials, and other joint work involving REC, NYU, RFF and other international experts. As mentioned above, we have already set up an electronic group address system. We will take maximum advantage of the opportunities for electronic as well as personal connections in order to work on issues as they are identified.

Through the project, the participants in Hungary and Slovenia will have access to research and support at the NYU legal clinic and to resources in Washington with RFF adding its expertise and acting as the facilitator and expeditor. Before and especially after the study tour, connections will be made between the Central European participants and a number of relevant groups in the US (federal and state government, NGOs and others) and in Europe, who will provide ongoing advice, counsel and support. As much, if not

more, of the real work will take place during the technical assistance part of the project, between formal group meetings.

**5. Choice of Countries: We anticipate that some reviewers might ask why we have selected Hungary and Slovenia, the most advanced Danube-basin countries in transition, rather than some of their neighbors.**

We think the project will be stronger if we work initially with Hungary and Slovenia. In selecting these countries, we considered technical benchmarks such as: commitment and progress toward nutrient pollution reduction; laws and institutions in place; government commitment to expanding public access to information as well as to this project; government commitment to implementation of the Aarhus Convention; and EU accession interest. Hungary and Slovenia have the basic building blocks in place and can serve as effective, cost-efficient pilots, to develop lessons for the broader region. They have 1) the commitment and interest in participating in the project; 2) existing legal framework and practices; 3) planned steps to further develop these; and 4) commitment to implement the Aarhus Convention in legislation and in practice. Al Duda's independent suggestion that we use these two countries seemed to confirm to us that we were using the right criteria.

We have always thought that the countries that are having more difficulty with the economic, political and bureaucratic transition should be part of the process and the eventual targets of assistance, but *not the main focus of this particular effort*. This is why we have characterized this as a pilot or demonstration project. Second tier countries within the Danube basin will be invited to certain sessions and we would hope to do a second part of this project that includes those countries. However, we have not been able to identify countries other than Hungary and Slovenia that are prepared to make a serious commitment to Aarhus Convention implementation, in view of the criteria discussed above. Hungary and Slovenia are the two Danube countries where there is a good chance that we can forge models that will be truly useful to their neighbors.

We do think it is important to have representatives of the lesser developed Danube countries at meetings and to transfer lessons to the other countries of the region. Our plans to do this include: (a) the other countries will be involved in the project, (b) solid recommendations will be made in the Final Report, (c) networks with US and other experts will be developed for all countries in the region, (d) a later project, informed by our pilot effort, can work more intimately with the "behind" countries.

The Danube PCU suggested that the budget include additional training or workshops at the completion of the project in various Danube countries. We agree that there should be more workshops after the pilot project has been completed. We envision this as the next step for increasing public access/participation in the Danube. We will set out specific recommendations for such training in the Final Report. This project is a pilot designed for two countries with the expectation that future projects will be developed in other Danube countries. Even before the completion of the project, we can and will, as noted above also invite representatives from those other countries to our workshops.

MINISTRY FOR ENVIRONMENT  
DEPUTY STATE SECRETARY  
KIMÁ-2807/1999

30.09.1999.

**Mr Christopher Briggs  
Regional Coordinator**

**UNDP GEF RBEC**

**New York**

Subject: Letter of Endorsement for the project proposal: Building Environmental  
Citizenship to Support Transboundary Pollution Reduction in the Danube. A Pilot  
Project in Hungary and Slovenia"

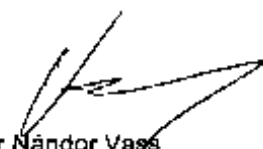
Dear Mr. Briggs,

hereby I would like to inform you that Hungary supports the UNDP-GEF initiative for  
the above mentioned project and we will be glad to participate in its implementation.

As the designated GEF Focal Point for Hungary, I am pleased to endorse the project  
proposal: "Building Environmental Citizenship to Support Transboundary Pollution  
Reduction in the Danube: A Pilot Project in Hungary and Slovenia".

Yours sincerely,

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Dr Nándor Vass  
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Reference: 922-00-19/97  
Date: 27 September, 1999

Mr. Christopher Briggs  
Regional Coordinator  
Global Environment Facility  
Regional Bureau for Europe & the CIS  
New York, NY 10017


Subject: **Letter of Endorsement for the project proposal**  
**"Building Environmental Citizenship to Support Transboundary Pollution Reduction**  
**in the Danube: A Pilot Project in Hungary and Slovenia"**

Dear Mr. Briggs,

hereby I would like to inform you that Slovenia supports the UNDP-GEF initiative for the above mentioned project and we will be glad to participate in its implementation.

As the designated GEF Focal Point for the Slovenia, I am pleased to endorse the project proposal: *"Building Environmental Citizenship to Support Transboundary Pollution Reduction in the Danube: A Pilot Project in Hungary and Slovenia"*.

Yours sincerely,

  
  
Erna Ferjančič  
Head, International Relations,  
Political and Operational Focal Point