ACTIVE CIVIL SOCIETY FOR SUSTAINABLE DEVELOPMENT

EIA – Environmental Impact Assessment and Non-Governmental Organizations
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DOÇEV - NATURE AND ENVIRONMENT FOUNDATION

Founded in 1996 in Denizli, DOÇEV-Nature and Environment Foundation carries out activities in the fields of forestation, waste management and environmental education and develops projects.

Within this scope, DOÇEV

- Makes memorial forests and contributes to the forestation of public spaces.
- Implements best practices regarding recycling of waste paper and other recoverable wastes.
- Contributes to the collecting of waste batteries nation-wide.
- Supports recycling of waste electrical equipment.
- Provides environmental education.
- Contributes to raising of environmental consciousness in society by means of its publications and environmental presentations.
- Raises the awareness of public and create a public opinion with materials such as posters, brochures and films.
- Hangs bird nests on trees and feed the birds during cold winter period in order to support wildlife.
- DOÇEV projects are supported by environmental funds of national and international institutions.
PAMUKKALE UNIVERSITY
DEPARTMENT OF ENVIRONMENTAL ENGINEERING

Pamukkale University Department of Environmental Engineering was founded in 1994 under the Engineering Faculty of Pamukkale University. The department has provided training in the undergraduate and graduate levels since 2008.

In the department, laboratory education in undergraduate level as well as many graduate and undergraduate thesis and research project has been carried out with the laboratory infrastructure obtained from Environmental Engineering Research, Laboratory of Solid Waste, Environmental Chemistry, Environmental Microbiology, Wastewater Research, and Biotechnology Laboratory.

The department contributed to the literature review, questionnaire and the preparation of the reports in the EIA applications which attended during this project.

CHAMBER OF ENVIRONMENTAL ENGINEERING
DENIZLI AGENCY

In the beginning of 1980s, the members of environmental engineering were gathered under the roof of Chamber of Civil Engineers. The Association of Environmental Engineering was founded in 1986. Union of Chambers of Turkish Engineers and Architects (TMMOB) accepted the establishment of Chamber of Environmental Engineers (ÇMO) at the 32nd regular general assembly dd 23.05.1992. Chamber of Environmental Engineering Denizli Agency was founded in 1996.

The agency supported the evaluation of EIA reports and field research regarding EIAs which attended within the scope of the project.
EIA AND SEA PRACTICES / CIVIL SOCIETY

Since the main target in the developing countries is industrialization and development in a very short period, the possible damages of this rapid industrialization and growth to the environment cannot be discussed sufficiently. Therefore, ensuring the effectiveness of Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) has high level of importance in developing countries like Turkey which has a wide geography and crowded population.

According to the EIA regulation, which was first published in 1993 and has been amended several times during this period, the EIA definition is as follows:

“The EIA is the studies to determine the positive and negative impacts of the planned projects on the environment, to prevent negative impacts or to minimize the environmental impacts, to evaluate the selected place and technology alternatives and to monitor and control the implementation of the projects.”

The aim of the Strategic Environmental Assessment Regulation (SEA), which was first published in 2017, is to create a strategy by integrating environmental elements in the preparation and approval of plans / programs that are expected to have significant impacts on the environment in line with the principle of sustainable development in order to ensure the protection of the environment.

Both the EIA and the SEA use the public participation meeting as a method, since decisions on livable environment should be
taken together with the common will of the public administration.

However, the people living in rural areas where such investments are made cannot express the possible environmental impacts of the projects in these meetings due to their capacity to express their opinions and their educational level.

On the other hand, the majority of the people living in rural areas see the public participation meeting as a means of demanding investment for their villages and in these meetings a healthy opinion on the environmental impact of the projects cannot be declared (1).

In addition, people in rural areas often find it insignificant to assess the potential environmental impact of projects, either by ignoring environmental values in the region or by keeping them in secondary priorities.

These facts diminish the effectiveness of public participation in EIA processes and prevent an effective, healthy assessment between the investor, the people affected by the investment and the public administration. This situation makes it difficult for EIA processes to reach the expected target. In the process of public participation, there are often no mechanisms to provide information-based dialogue between stakeholders or current dialogue is not used efficiently (2).

According to one of the definitions made by the European Commission, non-governmental organizations (NGOs), which play an important role in voicing citizens' concerns, are candidates to ensure that public participation meetings are a process in which environmental impacts are evaluated and solutions are proposed in this direction. The NGOs which have strong institutional infrastructure can be more effective and stronger stakeholders in EIA processes.

(1) Participatory Environmental Assessment in Turkey and the Case of Uşak Province – Assistant Professor Fatih Demir

(2) Ministry of Environment and Urbanization International EIA Congress 8-10 November 2013 Proceedings Book
CIVIL SOCIETY ACTS FOR ENVIRONMENTALLY SOUND SOCIO-ECONOMIC DEVELOPMENT (CO-SEED)

The program is carried out by WWF-Turkey (World Wildlife Foundation) in five countries including Albania, Bosnia and Herzegovina, Serbia, Montenegro and Turkey with the European Union's financial support.

CO-SEED aims to contribute to the sustainable management of natural resources by ensuring the development of legislative frameworks and more participatory and transparent decision-making processes in the Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) practices.

The project also aims to cooperate with non-governmental organizations, public institutions and investor organizations in decision-making processes for sustainable and eco-friendly development by establishing a civil society network in the region and increasing the interest of the media on the subject.
ACTIVE CIVIL SOCIETY FOR SUSTAINABLE DEVELOPMENT

The project, which was developed by DOÇEV- Nature and Environment Foundation in collaboration with Pamukkale University Department of Environmental Engineering and Chamber of Environmental Engineering Denizli Agency, is one of the five projects in Turkey supported by the CO-SEED Program. With its stakeholders, DOÇEV aimed to increase its capacity to evaluate the possible environmental impacts of projects, plans and programs in the EIA and SEA processes, to determine the opinions and suggestions of the local people and to voice their opinions in public participation meetings.

Within the framework of the project implemented in 2017-2018;
- The reports prepared from the field research and questionnaire study conducted during the two EIA processes in the region were shared with the participants at the public participation meetings.
- Conferences were organized at Pamukkale University (Denizli) Department of Environmental Engineering and Selçuk University (Konya) Department of Environmental Engineering.
- The EIA Literacy event was organized for the members of Denizli Bar Association and Denizli Journalists Association.
- A workshop was held with the participation of NGOs from nearby cities to create a sharing environment on EIA practices.
- The capacity building meetings were participated in Albania, Serbia, Montenegro and Turkey organized by WWF-Turkey.
- The proposed amendment for the EIA Regulation was given to the public authority to establish the legal basis for the active participation of civil society organizations in EIA processes.

Project Team
- Bahtiyar Aksoy - Project Coordinator (DOÇEV-Nature and Environment Foundation)
- Gül Şahin – Project Manager (DOÇEV- Nature and Environment Foundation)
- Professor Doctor Osman Nuri Ağdağ – Project Team Member (PAÜ-Faculty of Engineering – Department of Environmental Engineering, Head of Department)
- Research Assistant Yağmur Meltem Aydın – Project Team Member (PAÜ- Faculty of Engineering – Department of Environmental Engineering, Lecturer)
- Certified Environmental Engineer Tevfik Basmacı – Project Team Member (Chamber of Environmental Engineers Denizli Delegate)
A- PUBLIC PARTICIPATIONS

Within the scope of the project, two EIA processes were participated and the issues, opinions and reports were presented to the related parties.

(A / a) PUBLIC PARTICIPATION MEETING AND EIA REPORT OF GÜZELPINAR LIMESTONE QUARRY CAPACITY INCREASE AND FIELD ENLARGEMENT PROJECT

Project Summary

Limestone quarry has been operated by ICC Group Mining Inc. Since 2011 in Denizli, Pamukkale Güzelpınar District.

The followings are planned at the project:
- increasing the production capacity from 850,000 tons / year to 3,500,000 tons / year.
- expanding the project area from 17,96 hectares to 99,88 hectares.
- increasing the crushing-screening plant's capacity from 395,000 tons / year to 3,500,000 tons / year.

There is 0.32 hectares of construction site including offices, guest houses etc. and 0.88 hectares of finished product stock area about 700 meters away from the project area and these are operated by the limestone quarry.

The facility is in forestland, and the crushing-screening plant will be working on two shifts of 12 months per year, 26 days per month and 16 hours per day according to the seasonal conditions. A total of 15 personnel are employed in quarry and facility areas, and a total of 45 personnel will be employed after the capacity increase.
The license area is located in Güzelpınar district and the nearest building is approximately 2,700 meters northeast of Kaplanlar Neighbourhood.

Information and data on the following issues will be included in the EIA-Environmental Impact Assessment report to be prepared:

- Solid and liquid wastes due to personnel to be employed.
- Solid and liquid wastes due to project itself.
- Waste oils, hazardous waste, noise and gas emissions due to machinery and equipment to be used.
- Dust emissions caused by production and transport.
- Noise, vibration, rock ejection, etc caused by explosion.

The environmental impacts of the project will be determined by making calculations on all these issues and the measures to be taken against the environmental impacts will be evaluated in detail.

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**Project Area**

Location of the project site was investigated in terms of national parks, flora, fauna, cultural values, etc. Also, Denizli Forestry Regional Directorate, Denizli Forestry and Water Affairs Branch Directorate and Denizli Provincial Culture and Tourism Directorate were interviewed.

Two academicians and a graduate student from the University (PAÜ, Faculty of Engineering, Department of Environmental Engineering) and one engineer from Chamber of Environmental Engineers Denizli Agency observed the field together. According to the field research;
- No residential areas were found near the facility.
- No agricultural land was found near the facility.
- No visible water source was found near the facility.
- The site is not within the national park and protected area boundaries.
- The site is located within the forest land, and there are old pine trees.
- There is no historical and cultural value in and around the site.

Crushing And Screening Plant

Two academicians and a graduate student from the University (PAÜ, Faculty of Engineering, Department of Environmental Engineering) and one engineer from Chamber of Environmental Engineers Denizli Agency examined on site together. According to this work;

- As the crushing and screening plant was not active during the visit, no noise pollution and dust formation was observed in the environment.
- It was determined that the conveyor belts and bunker were covered.
- It was observed that the most important measures required for occupational safety were taken.
- Hazardous waste temporary storage areas in the crushing-screening plant were found to be duly performed.
Opinions and Status of Local People

A questionnaire was applied to take the opinions of the local people about this project, to determine the impacts of the project on the region and to present the results at the public participation meeting. The survey consisting of 20 questions was carried out in Güzelpınar Neighbourhood and Kaplanlar Neighbourhood where the nearest buildings were located.

According to the field survey, the opinions and evaluations of the people living in the region were as follows:

- None of the respondents were informed about EIA—Environmental Impact Assessment.
- It was determined that the majority of the participants were not aware of the existence, activities and location of the facility.
- It was determined that the respondents were not aware of the fact that the public participation meeting would be held in order to get the opinions and suggestions of the public about the environmental impacts of the activities of the quarry.
- It was stated that the quarry has no economic contribution to the region until now.
- There are no residents residing in the facility area.
- The general view of the public was that there was no noise problem in the neighbourhood's current working capacity.
- 60% of the respondents reported that dust damaged the trees and the crops and that it adhered to the vegetable leaves and dried the products.
- It is emphasized that there were continuous power cuts especially in winter because of using electricity from their own quarters and this posed a problem for the people who had livestock (milking).
- While 57% of the participants thought that the capacity increase and expansion of the facility would have a negative impact on the region, 30% of people stated that they had no knowledge of whether this situation had a positive or negative impact on the environment.

- Participants stated that with increasing capacity, dust emissions would be too high, dust would damage their products, forests would be destroyed as a result of blasting and wild animals would have to leave the area.

- It was stated that the positive effect of capacity and area increase will contribute to the country's economy and provide employment opportunities for young people residing in the neighbourhood.

- In addition, there were people who did not believe that reforestation would be carried out in the region and people believed that the trucks working in the region had broken the roads.
Public Participation Meeting and Presentation

A significant number of local residents attended the meeting held in Güzelpınar coffee house on August 3, 2017. The representative of the Ministry, the representatives of the project company and the representatives of other public institutions participated in the meeting held in the organization of Denizli Provincial Directorate of Environment and Urbanization. The meeting was attended by 5 people as DOÇEV, Pamukkale University and Chamber of Environmental Engineers Denizli Agency.

After the speech of the representative of the project company, the people of the neighbourhood expressed their opinions, concerns and demands about the quarry facility and capacity increase. On behalf of the project team, DOÇEV provided information on the findings obtained from the survey.

DOÇEV also stated that the local people were worried that the emissions after the capacity increase would harm the agricultural products. In addition, it was explained with some examples that the information and data in the project introductory file were inconsistent and was given the following findings and questions:
- Page 14: Project capacity information is different. The unit value in the data in 700 cubic meters per hour is in cubic meters, while the unit value in the table is in tons.

- Page 14: It is stated that only additions to the crushing and screening plant will be made, and the additional crushing and screening plant is not considered in the project file. Production capacity increases by 3 times, project area increases by 4 times, crushing and screening plant capacity increases by about 8 times. The capacity report of the facility is 395,000 tons. Is it possible to increase the capacity of the same facility 8 times without adding an additional crushing and screening plant?

- Page 16: It is said that construction and infrastructure works in the region (highway, railway, etc.) need to have raw materials in large capacities and the capacity of the quarry production has to be increased and expansion has to be made since the existing capacity is not sufficient. The reason for capacity increase is based on the needs of investments in the region. At the public participation meeting, for the question of the reason for the expansion of the area, the facility official said that the existing project site is a very difficult area; working in the current environment is very expensive to maintain, and there need more space for trucks. This information is not included in the project introductory file.

- Page 22: In the project file, it is stated that a total of 15 personnel are employed in quarries and facilities, and 45 personnel are planned to be employed after the capacity increase. In addition, it is stated that, as soon as the project is implemented, additional financial resources will be provided directly or indirectly to the settlements in the vicinity. What are the qualifications of the staff to be employed? If the local people do not have these qualifications, what is your plan?
- Page 23: In the project report, it is informed that flora vegetation has disappeared and it will be the same for new area and fauna will leave the area. It is stated that measures to be taken will be discussed in detail in the EIA-Environmental Impact Assessment report. What are these?

- Page 25: The report states that the natural conditions of dry stream will be preserved.
  
  In the field survey, when the production waste was found in the dry stream bed, the plant attendant stated that production waste could slip into the dry stream bed. While the actual situation is like this how you will protect the natural state of the dry stream?

- Page 29: The report states that a rehabilitation plan will be prepared for forest lands in the area and will be given in the EIA-Environmental Impact Assessment report. Is there such a plan for the existing facility? If so, what is this rehabilitation plan?

- Page 41: In the report it is stated that the effects of dust emissions on the environment and the measures to be taken are given in Chapter III. c.7. However, Chapter III. c.7. provides information about end-of-life tires?

- Page 46: The amount of water is different. There is confusion in tons and cubic meters.
  
  The report states that 0,5 litre of water is needed for 1 ton of product. However, during the field survey the staff at the plant gave information that 1 litre of water is used in a ton.
(A / b) KIZILDERE-V GEOTHERMAL ELECTRICITY POWER PLANT PROJECT PUBLIC PARTICIPATION MEETING AND ENVIRONMENTAL IMPACT ASSESSMENT REPORT

Project Summary

Zorlu Natural Power Generation Inc. plans to invest in Kızıldere-V Geothermal Power Plant in Köprübaşı, Karataş and Sazak neighbourhoods in Sarayköy district of Denizli.

The project area is included in the Geothermal Welding Operation License No. 48. The total installed capacity of Kızıldere-V Geothermal Power Plant is 50 MW. It is planned to obtain the installed power with Binary System (*) technology.

The maximum amount of geothermal fluid planned to be used during the operation of the power plant is 2,600 tons / hour. The annual energy amount to be produced at the geothermal power plant is 350 GWh / year. The energy to be produced is planned to be supplied to the interconnected system with the 154 kW voltage transmission line.

The plant area will be deployed on an area of 50,673 square meter.

A total of 14 geothermal wells are planned to be excavated in order to bring back the geothermal resource to be used as raw material in the operation of the power plant.

(*) In the Binary System, the geothermal fluid is sent directly to the heat exchanger to generate electricity before it is separated from the steam, gas and water, and the energy of the fluid is transferred to the secondary fluid and goes directly to the re-injection.
In 2016, EIA Exemption was obtained for 8 production wells and 2 re-injection wells of the project. The EIA report was also included 4 (ZK21-22-23-24) re-injection wells which are not in EIA Exemption. The wells that will feed the plant and provide re-injection will be opened by drilling method. Drilling wells will be excavated from the ground level to a depth of about 2,000 – 3,500 meters and the geothermal fluid flowing from the ground to the earth will be provided.

The pre-operational period of Kızıldere-V GPP Project is planned to be completed in 60 months. The economic life of the project is 30 years. It is planned to employ 300 people during the construction phase and 40 people during the operation phase.

Since the "Binary Cycle" (Two Fluid Cycle) system will be used during operation, it is foreseen that the effects of gas emission will be minimized. In addition, it is foreseen that all works will be carried out in accordance with the provisions of the Industrial Air Pollution Control Regulations.

Project Area

Although the plans and records of the relevant institutions are taken into consideration while defining the project land, it can be said that the land is in a wide range of characteristics such as agricultural land, field, pasture, meadow, forest area, rocky, stony, conservation area, tourism centre and irrigation area.

It is observed that the production wells and power plant areas have different characteristics such as forest, rocky, pasture, dry farming field while the re-injection wells have fertile fields which are suitable for irrigated farming.
Opinions and Status of Local People

Local people were interviewed in Köprübaşı, Sazak and Karataş neighbourhoods and a survey was conducted. The questionnaire was applied to women and men from different age groups. According to the results of the survey, the opinions of the people living in the region and our evaluations are as follows:

- 92% of the respondents are not aware of EIA-Environmental Impact Assessment.
- 58% of the respondents have no general knowledge about geothermal energy.
- 68% of the participants have information about the geothermal power plant project to be established in their regions.
- 67% of the respondents stated that they did no information about the public participation meeting, and 83% of respondents stated that they had not received any notification about the meeting.
- There are no workers or their relatives in the geothermal power plants operating in the region.
- The respondents stated that the geothermal power plants, which are active in the region, did not make any contributions or economic contributions to their neighbourhoods.
- The respondents stated that geothermal power plant will contribute to the national economy. They also stated that they are hoping the power plant would contribute to employment in their own neighbourhoods.
- The majority of the respondents stated that the crops would be damaged by the gas emissions.
- One participant reported that the trees in his field near the active power plant were damaged and the company paid for this damage.
The participants also stated that the fertile areas would be reduced, the air would be polluted and the underground structure would be affected badly due to well holes, transportation roads and transfer pipes.

**Public Participation Meeting And Opinions**

The public participation meeting was held on June 21, 2018 in Köprübaşi. The representative of the Ministry, the representatives of the project company and the representatives of other public institutions participated in the meeting organized by the Denizli Provincial Directorate of Environment and Urbanization. 3 participants attended the meeting from DOÇEV and Pamukkale University. It can be said that the project company representatives had to give more detailed information on questions.

- **Distance to Residences and Potential Impacts:** The distance of the project plant to the nearest house is approximately 306 mt (Project report "ZK-6 – Köprübaşı Street, residence - 10 mt – page 28"). The report indicated that the distance of the wells was 10 meters. When it was asked about the possible effects of this distance, there was no clear answer.
- Gas Emission and Possible Effects: The project report does not provide detailed information on the possible effects of gas emissions on the environment. On the other hand, in the public participation meeting, it was emphasized that there would be no gas emissions thanks to the technology to be used. However, when the situation and possible effects of carbon dioxide and other gases was asked, it was stated that water vapour was meant. Besides, it was explained that these gases will come out but will not be seen and that the citizens will be compensated if there is any harm. There was no clear answer to how to reduce the potential impacts of gases.

We think that it is important to specify what will be done in order to determine and reduce the possible environmental impacts of the gas emissions and the location of this investment.
B-ORGANIZED AND PARTICIPATED EVENTS

(B/a) ENVIRONMENT CONFERENCE AT KONYA SELÇUK UNIVERSITY

An environmental conference was held with the aim of “discussing environmental problems, proposing solutions with scientific approach and creating environmental awareness especially for university students” by Selçuk University Environmental Club in Konya on 27-28 April 2017.

Environmental communities from Selçuk University, Mersin University and Uludağ University made presentations at the conference and the participants discussed the subject of “non-governmental organizations and the environment”. DOÇEV participated in the conference within the scope of the Civil Society Acts for Environmentally Sound Socio-Economic Development (CO-SEED) program. Bahtiyar Aksoy, DOÇEV Foundation Manager, shared DOÇEV activities and gave information about Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) practices.
(B/b) ENVIRONMENTAL IMPACT ASSESSMENT PRACTICES CONFERENCE AT DENIZLI PAMUKKALE UNIVERSITY

In the conference held in Pamukkale University Department of Environmental Engineering, Environmental Impact Assessment Regulation and its applications were discussed. While research Assistant Yağmur Meltem Aydın making an overall evaluation about EIA-Environmental Impact Assessment and SEA-Strategic Environmental Assessment, DOÇEV Foundation Manager Bahtiyar Aksoy gave information about practical applications in EIA process and civil society organizations in Turkey.

Pamukkale University Faculty of Engineering Dean, Head of Environmental Engineering Department, Chamber of Environmental Engineers Denizli Agency, faculty members, environmental engineering students and DOÇEV board members attended the conference. In the cocktail, participants and environmental engineer candidates had the opportunity to exchange information on the EIA and general environmental practices.
In the meeting held at the association, DEGIAD members were informed about the Environmental Impact Assessment practices and the participations of NGOs to this process. Industrial investments and general environmental issues were also discussed during the meeting.

Information sharing meeting on “EIA Practices and NGOs” was held in Denizli. Environment and Culture Platform (AYDIN), Environment Recovery Association (IZMIR), Nature and Environment Foundation (DENIZLI), Ecosystem Conservation and Nature Lovers Association (AYDIN), Karşıyaka Social Responsibility and Science Association (IZMIR), Murat Mountain Protection Platform (USAK), Uşak Environmental Volunteers Association (USAK) and Pamukkale University Environmental Engineering Department representative attended to the workshop.
(B/e) ENVIRONMENTAL IMPACT ASSESSMENT LITERACY CONFERENCE AT DENIZLI BAR ASSOCIATION

WWF-Turkey (World Wildlife Foundation) Project Coordinator Aslı Gemciler, Esin Odabaş and Turkey Environmental Engineers Chamber Board Member Tuğba Uçankus were speakers at the conference which was held in Denizli Bar Association on May 10, 2018. Denizli Bar Association and Denizli Journalists Association members participated in the conference. EIA-Environmental Impact Assessment Regulation amendment proposals, difficulties encountered in the implementation of EIA, good public participation meeting examples were discussed and case studies were shared.

Photo: Dr. Müjdat Uzel
(B/f) ALBANIA / REGIONAL TRAINING ON PARTICIPATION IN EIAs AND SEAs

An environmental meeting was held in Tirana, Albania's capital city, on 8-9 December 2016. 23 civil society organizations from Turkey, Albania, Bosnia and Herzegovina, Montenegro and Serbia attended the meeting.

At the training, legislation and practices on the EIA and SEA in participating countries are evaluated and studies that can be carried out jointly on these issues are discussed. Project Manager Gul Sahin, who attended the meeting on behalf of DÖÇEV, gave information about EIA practices and developments on the SEA in Turkey.

(B/g) SERBIA / REGIONAL TRAINING ON EIAs AND SEAs

The training, attended by all NGOs granted by the CO-SEED program, took place in Belgrade, Serbia on 4-5 July 2017.

In the training where detailed technical information was provided on EIA and SEA, the links and differences between EIA and SEA processes were given. The factors affecting a good EIA and SEA and how they affected a successful EIA and SEA process were exemplified.
(B/h) MONTENEGRO / REGIONAL NETWORK MEETING

The meeting was held on 15-16 May 2018 in Podgorica, the capital of Montenegro. The current policies on the EIA and SEA in the CO-SEED stakeholder countries, the impacts of the projects on the political framework and engaging the media on these issues were discussed during the meeting.

NGOs attending the meeting from Turkey agreed on express the opinion for the following topics to the Ministry:
- The acceptance of the participation of all NGOs applying to the ministry for participating in the public participation meeting.
- Publishing of public participation meeting records, audio recordings and reports on the website of the Ministry and making the EIA process accessible to everyone.

(B/i) REGIONAL CONFERENCE ON PUBLIC PARTICIPATION IN ISTANBUL

The international conference organized by WWF-Turkey on the participation of the public and civil society on the Environmental Impact Assessment (EIA) was held on 28-29 June 2018 in Istanbul.

Approximately 50 representatives from 13 countries attended the conference, which focused on the importance of civil society, access to the judiciary, gender equality, the role of media and communication, and the objectives of sustainable development. The program lasted two days and DOÇEV Foundation Manager Bahtiyar Aksoy attended the conference.
(B/i) AMENDMENT PROPOSAL ON ENVIRONMENTAL IMPACT ASSESSMENT REGULATION

Environmental Impact Assessment Regulation section 8, article 7 requires that non-governmental organizations be included in the commissions only if deemed necessary. Section 8 / Article 7: “Where deemed necessary, taking into account the characteristics and the location of the project, the Ministry may call universities, institutes, research and expert institutions, professional chambers, trade unions, unions and non-governmental organizations as members of the Commission meetings.”

Non-governmental organizations, which play an important role for citizens to express their views, can ensure that public participation meetings are a process where environmental impacts are assessed and solutions are proposed. Non-governmental organizations will be a more effective and powerful stakeholder of the EIA processes with their inclusion in the committees as regular members.

The letter containing the proposal for amendment in this direction was submitted to the relevant institutions and organizations, in particular the Ministry of Environment and Urbanization - Directorate General of Environmental Impact Assessment, Permit and Inspection.
THE MINISTRY OF ENVIRONMENT AND URBANIZATION
Directorate General of Environmental Impact Assessment, Permit and Inspection
ANKARA

The issues highlighted in the EIA introductory video of the Ministry of Environment and Urbanization are as follows: The EIA assesses the impacts of the enterprises on the environment and people by taking into account the reports prepared by the experts. During the EIA process, the local community is informed and public participation meetings are used as a method.

However, people living in rural areas where investments are made cannot express environmental impacts of projects in these meetings due to various reasons. On the other hand, the majority of the people living in rural areas see the public participation meeting as a means of demanding investment for their villages and neighbourhoods, and there is no clear opinion about the impact of the projects on the environment. They also find it unnecessary to assess the potential environmental impact of projects by ignoring environmental values in the region or keeping them in secondary priorities. In addition to these, it can be impossible for the local people to examine and evaluate the EIA reports, which are mostly prepared by experts with technical details in hundreds of pages.

These facts reduce the effectiveness of public participation in EIA processes. In addition, it prevents the establishment of an effective assessment between the investor, the people affected by the investment and the public administration. In the process of public participation, mechanisms that provide information-based dialogue among stakeholders cannot be used efficiently. It is difficult for the EIA processes to reach the expected target with these facts.

In the final report of the project named “Technical Assistance for Strengthening the Capacity in the EIA Area”, the local situation was evaluated and it was determined that the level of knowledge and participation of the members in the commissions were insufficient. In addition, it was suggested to make good presentations to the public in the public participation meetings and to organize informal meetings with the public, in particular about EU experiences.

Non-governmental organizations, which play an important role in voicing the views of citizens, can ensure that public participation meetings are a process in which environmental impacts are evaluated and solutions are proposed accordingly. The NGOs which have good institutional infrastructure can
contribute to the EIA process by examining the site, identifying the opinions and suggestions of the local people (survey, face to face interview etc.) and presenting the data they collected at public participation meetings.

However, according to Environmental Impact Assessment Regulation, non-governmental organizations are included in the commissions only if deemed necessary. (Section 8 / Article 7: Where deemed necessary, the Ministry may call universities, institutes, research and expert institutions, professional chambers, trade unions, unions and non-governmental organizations as members of the Commission meetings, taking into account the characteristics and the location of the project.)

Non-governmental organizations will be a more effective and powerful stakeholder of the EIA processes with their inclusion in the committees as regular members.

In this context, we propose a change as follows in section 8 / Article 7 of the Environmental Impact Assessment Regulation: “The Ministry, taking into account the subject and location of the project, calls universities, institutes, research and expert institutions, professional chambers, trade unions, unions and non-governmental organizations that are willing to participate in the EIA process of the projects.”

Active Civil Society For Sustainable Development project, which was developed and implemented in collaboration with DOÇEV - Nature and Environment Foundation, Pamukkale University, Faculty of Engineering, Department of Environmental Engineering and Chamber of Environmental Engineers Denizli Agency, has been supported by Civil Society Acts for Environmentally Sound Socio-Economic Development (CO-SEED) Program.

We believe that local NGOs have contributed to EIA implementation with their activities in the EIA processes they participated in.

In the context of the above explanations, we hereby ask for the amendment of Section 8, Article 7 of the Environmental Impact Assessment Regulation.

Respectfully submitted for your consideration,

Yours sincerely,

DOÇEV-Nature and Environment Foundation

Pamukkale University, Faculty of Engineering
Department of Environmental Engineering

Chamber of Environmental Engineers Denizli Agency
(B/j) INCREASING INTEREST OF THE MEDIA TO THE EIA PROCESS

With the contribution of the public relations company that made a protocol during our project, the media, especially the local media and internet sites, announced the activities of the project to the public. In the end, their interest in the EIA processes increased.
ACTIVE CIVIL SOCIETY FOR SUSTAINABLE DEVELOPMENT

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