

## **3.2 INSTITUTIONS WITH KEY ENVIRONMENTAL RESPONSIBILITIES IN RELATION TO THE REMP**

### **3.2.1 SLOVAK ENVIRONMENTAL AGENCY (SAZP)**

#### **(1) General Responsibilities and Activities**

Under the Ministry of Environment, the Slovak Environmental Agency (SAZP) was established in 1993, bringing together a number of (previously) separate organisations. The SAZP is charged with a mixture of policy, scientific and administrative tasks, which include national territorial planning strategy, the provision of environmental education and the collation of environmental information and statistics. It also has responsibility for the management of Slovakia's Protected Landscape Areas and network of smaller nature reserves and, since 1999, for Slovakia's World Heritage Sites through the Centre for the Protection of Natural and Cultural Heritage. The structure of the SAZP is shown in Figure 3.1-2, while its role in specific activities is described in later sections eg Environmental Education in section 3.5. One programme of the SAZP that is relevant to implementation of the REMP in rural areas is mentioned below.

#### **(2) Programme of Village Renewal**

The Centre for Territorial Planning and Environmental Regionalisation (CUPER) of the Slovak Environment Agency and the Agency for Rural Development (Ministry of Soil Management/Agriculture) are leading this Programme, especially its methodology, which started in January 1998. The objective is to conserve the valuable attributes of the villages of Slovakia, both physical and their traditions and culture. The first phase is intended to focus on protecting existing features, the second phase on their (sustainable) development. The Agencies will obtain information on and monitor 'problems' in villages, ascertain how villages would like to develop in future and provide specialists to work with the villages to help them achieve agreed development objectives. Thus, with the help of the two Agencies, the villages will prepare documents setting out prioritised programmes of action, while the villages themselves will be responsible for implementing individual projects such as sewerage schemes and the repair of cultural monuments. The programme should help the villages (and the government) by facilitating the preparation and submission of co-ordinated applications to funding bodies, including the State Funds such as the Environment Fund and the European Union (SAPARD, Special Accession Programme for Agriculture and Rural Development – see Chapter 7).

In particular the Village Renewal Programme hopes to encourage villages to benefit from co-operating with each other through the establishment of 'micro-regions' and 'regional

associations' of Municipalities. Nationwide, 787 out of 2,878 Municipalities were taking part in the first year of the programme; 86 of these were in the Study Area. The numbers are broken down according to *Okres* in Table 3.2 - 1.

Table 3.2 - 1 Villages (Municipalities) Participating in the Village Renewal Programme.

<b>OKRES</b>	<b>No. of Villages Participating</b>
Banska Bystrica	19
Brezno	25
Detva	11
Revuca	1
Ziar nad Hronom	1
Zvolen	7
<b>Sub-total Banska Bystrica Kraj</b>	<b>64</b>
Levice	17
Nove Zamky	5
<b>Sub-total, Nitra Kraj</b>	<b>22</b>
<b>GRAND TOTAL</b>	<b>86</b>

Source: CUPER (SAZP), 1998

A questionnaire was sent to all Municipalities at the beginning of the Programme, and the responses contain large amounts of data on the social, economic and environmental infrastructure of the villages. However, only the basic data (name, address, reference number etc) have been entered onto CUPER's digital database. It was by responding to the questionnaire that the villages expressed their interest in joining the scheme and nearly all those that applied were accepted.

Since linkages between these Municipalities, the SAZP and the Ministry of Agriculture have now been established in the Study Area, the Village Renewal Programme represents a possible vehicle for implementing some of the REMP proposals, especially those relating to ecology and biodiversity (Chapter 5.5.4) and heritage and tourism (Chapter 5.6.4), while SAPARD represents a potential source of funding.

### 3.2.2 INSTITUTES ON THE REMP STEERING COMMITTEE

Excluding the SAZP, the four institutes originally represented on the REMP Steering Committee have important environmental roles in terms of gathering and analysing environmental data, much of it on a regular basis ie in the form of monitoring programmes (see section 3.6). The original Steering Committee institutes are as follows:-

- Slovak Hydrometeorological Institute (SHMU) - Ministry of Environment
- Geological Survey of the Slovak Republic (GSSR) - Ministry of Environment
- Soil Science and Conservation Research Institute (VUPOP) - Ministry of Agriculture (previously Soil Fertility Research Institute (VUPU))
- Forest Research Institute (LVU) - Ministry of Agriculture

They were joined later by representatives of the Banska Bystrica and Nitra *Kraj* offices and

of *Povodie Hrona* – the Hron River Basin Authority, which is an agency of the Water Economy/Management Institute of the Ministry of Agriculture. The **Hron Basin Authority** is responsible for the management of the water resources of the Hron River itself, including water abstractions and discharges and the construction of dams and reservoirs for hydro-power, irrigation and water supply. It is therefore a major ‘Environmental Manager’ in the basin and should be closely involved with REMP development and implementation. It is responsible for the preparation of a Hydro-ecological Plan and a Water Management Plan for the basin; the latter contains important digital data and maps - and recommendations on the management of the Basin’s water resources.

### **3.2.3 OTHER STATE INSTITUTIONS WITH ENVIRONMENTAL MANAGEMENT RESPONSIBILITIES**

#### **(1) General**

In addition to the Steering Committee institutions, the following organisations appear to be important for the REMP and its implementation, in that most are directly involved in environmental and/or water ~~management~~ in the Study Area, and not (primarily) research and monitoring (research and monitoring institutions, including those on the Steering Committee, are covered in section 3.6):

- StVak - Central Slovak Water Supply and Wastewater State Company
- ZsVak - Western Slovak Water Supply and Wastewater State Company
- Slovak Environment Inspectorate (SIZP, Ministry of Environment)
- National Parks Administration (Ministry of Environment)
- Slovak Caves Administration (Ministry of Environment)
- Institute of Monuments (Ministry of Culture)

The main organisations responsible for water management, research and monitoring in the Basin, and their relationships are shown in Figure 5.1 - 4.

The role of StVak and ZsVak in environmental management takes on particular significance for the REMP, since bacterial and other pollution from inadequate sewers and wastewater treatment systems are a priority issue in the Basin (Chapter 5.1). Therefore their structure and function are outlined here. This is followed by a brief description of the Slovak Environment Inspectorate (SIZP). The roles of the other three organisations listed above are described in sections 5.5.3 and 5.6.3.

#### **(2) StVak and ZsVak**

StVak has 7 branches (offices) with responsibility for water supply and sewers in 13 Okres. It has 1400 employees and serves 800 000 people. Each *Mesto/Okres* town has a Wastewater

Treatment Plant. Banska Bystrica town has the largest Sewage Treatment Plant (STP) and efforts are being made to extend it. Within the Hron River Basin, STP extensions are also underway at Zvolen. Brezno is the responsibility of the StVaK Banska Bystrica office, Banska Stiavanica of Ziar nad Hronom and Detva of Zvolen.

None of the area of Nitra Kraj is the responsibility of StVaK; for this lower part of the Basin, the Western Slovak State Water Supply and Wastewater Company (**ZsVak**) is responsible. Revuca Okres (a small part of which lies within the basin) is the responsibility of the Eastern Slovak State Water Company, but is likely to be transferred to StVaK.

The following are amongst the Head Office departments of StVak in Banska Bystrica:-

- Economic / Commercial
- Production / Supply and Operations (this includes STPs, septic tanks etc, but branches also deal with these)
- Technical Investment Department, including the Division for Engineering Works (which is responsible for Project Preparation and Implementation)
- Dept. for Central Slovakian Trunk Pipelines (ie long distance water pipelines)

The Division for Engineering Works deals with approvals from beginning to end. This Division is a part of the organisation structure of StVak, but has to be financially independent.

With respect to community participation, StVak liaises with the Kraj and Municipality Offices; contact with local people is therefore made indirectly through these institutions. StVak works quite closely with Municipalities for a number of reasons eg access to land is required for water pipelines and sewers; Municipalities provide funds (according to wealth of Municipality) and labour; municipal staff can facilitate local public relations.

StVak has digital data (probably AUTOCAD) showing the alignment of existing and proposed water pipelines for a few settlements in which they have recently been involved in design and installation activities. Though schematic maps have been prepared using Coreldraw software, digital data do not exist showing the overall water supply and wastewater (sewer) network in the Basin.

### **(3) Slovak Environment Inspectorate (SIZP)**

The SIZP has four departments:-

- Water Protection Inspectorate
- Air Protection Inspectorate
- Waste Management Inspectorate
- Nature Protection Inspectorate

The SIZP is headquartered in Bratislava and is divided into regional offices, of which there are five for water and waste, three for air, and four for nature. Each of these four departments has an office in Banska Bystrica, reporting to a Chief Inspector (for each department) in the SIZP headquarters in Bratislava. Sketch maps of their geographic areas of responsibility exist, but each is different and none correspond to the natural boundaries of the Hron River Basin.

In 1998 the SIZP had about 130 employees in total and the numbers of professional staff assigned to each departmental area, are as follows: 24 in waste; 35 in water; 25 in air; and 10 in nature.

The way in which the SIZP departments interact with polluters and the *Okres* Environment Departments in monitoring pollution, setting and enforcing limits etc is complicated. A description of the legal and associated administrative arrangements for licensing and monitoring of those activities with actual and potential environmental implications, and in which the SIZP and *Okres* Environment Departments are the key players, is provided in section 3.3.

The Water Protection Inspectorate is in the process of establishing a digital database of pollution sources etc which will complement that held by SHMU. The SAZP should consider how this database can best be accessed and used as an element of the national Partial Monitoring System (see section 3.6).

The Air Pollution Inspectorate also has significant amounts of data on actual emissions from their own monitoring/inspection programme, but not in digital format.

Though it is considered that air quality, in general, is not a major environmental issue in the Study Area (Chapter 5.3), it is believed that localised problems related to industry do exist. Therefore the data/information held by the Air Pollution Inspectorate is important to environmental management in the Hron Basin, as is the involvement of the SIZP in dealing with those industries that have high emission levels.

#### **(4) Environmental Departments of *Kraj* and *Okres* Offices**

The organisation of a *Kraj* office (Nitra) is shown in Figure 3.1 - 3. The department most relevant to the REMP is the Department of Environment, but the Departments for Regional Development; Agriculture and Forest Management; Health; Education; Culture; all cover 'environmental' sectors and activities encompassed by the REMP.

A typical *Okres* (District) Office is understood to have at least the following staff in its Environment Department:-

- Head (Technical)
- Territorial Planning Specialist
- Settlement Planner
- Officer in Charge of Water Management
- Solid Waste Specialist
- Nature Protection Specialist

However there is variation in the structure and staffing levels, presumably determined by the size (area and population) and nature (urban/rural balance) of the *Okres*. For example, in 1999, there were 12 staff in the Environment Department of *Detva Okres*, five in an Environment and Territorial Planning Section and six in a Building Regulation Section, plus one overall Head of Department. *Banska Bystrica Okres* had, in 1999, 21 staff grouped into four sections, Environmental Sectors (Water, Waste Management, Air); Nature Protection; Territorial Planning; Building Regulation.

### 3.2.4 ROLE OF MUNICIPALITIES IN ENVIRONMENTAL MANAGEMENT

#### (1) Legal Responsibilities

Municipalities are mentioned separately, since their responsibilities and functions are somewhat different from other organisations and they are key players in some environmental matters.

The Law for Municipalities 369/90 Zb (as amended by 481/92) defines their functions. However, as far as the environment is concerned, most of these functions are quite general referring to eg

- the general protection of health, lifestyle and environment of citizens
- education, culture and sport

The Law for Municipalities makes no distinction in their responsibilities according to their size (population), despite considerable variation - especially between the urban *Mesto* and rural *Obec*. Thus, according to the law, Municipalities have responsibility for the development of their area, but some Municipalities are very small (with as few as 200 residents) - making a practical role very difficult - whereas others in urban areas have over 10 000 residents, giving advantages in terms of scale.

#### (2) Staffing Levels

Replies to the Study Team's Environmental Questionnaire to Municipalities in the study area

(Annex L.2) indicate the large variation in staff levels that exist (Table 3.2.2), and the small number of employees dealing with environmental and public health matters (Table 3.2.3). Of the 98 Municipalities that responded to the question on overall staffing levels, 59 had four or fewer staff, 32 having only 1 or 2 employees. Of the 91 Municipalities that responded to the question regarding environmental/public health employees, 80 (88%) had zero or one such staff member: i.e. only 11 (12%) of Municipalities have more than one environment/public health employee.

Table 3.2 - 2 Total No. of Employees of 98 Municipalities in the Hron Basin Study Area.

No of Employees	No of Municipalities	Percentage of Municipalities
1	9	9%
2	23	23%
3	15	15%
4	12	12%
5	3	3%
6 to 10	16	16%
10 to 15	3	3%
16 to 20	1	1%
21 to 25	3	3%
26 to 30	1	1%
More than 30	4	4%
No answer	8	8%
Total	98	100%

Source: 1998 Environmental Questionnaire of the JICA Study Team

Table 3.2 - 3 No. of Environmental and Public Health Employees of 40 Municipalities in the Hron Basin Study Area.

No. of Environmental and Public Health Employees	No. of Municipalities	Percentage of Municipalities
0	69	70%
1	11	11%
2	3	3%
3	4	4%
4	2	2%
6	1	1%
7	1	1%
No Answer	7	7%
Total	98	100%

Source: 1998 Environmental Questionnaire of the JICA Study Team

As might be expected, it is the larger, urban municipalities (*Mesto*) that employ the majority of environmental staff, 34 in the 10 *Mesto* which responded fully, compared to 16 in the 80 rural municipalities (*Obec*) which responded (Tables 3.2 - 4 and 3.2 - 5). The largest

Municipality in the Study Area, Banská Bystrica *Mesto*, has a formal organisation structure with a Department of Territorial Development and Communal Affairs that includes both an Environment Section and a 'Healthy City' Office - see section (5) 3) below. Zvolen *Mesto* on the other hand has no formal Environment Department or Section, though it does have staff with environmental responsibilities (eg waste, greenery/landscaping) within established Departments (eg the Head of Landscaping is in the Architects Department).

Closer examination of the data (Table 3.2 -5) show that the percentage of employees dealing with environmental and public health matters in *Mesto* (7.6%) is approximately 50% higher than in *Obec* (4.9%). This could in part be attributed to the existence of more environmental problems in urban areas, but a more significant factor will be the inability of small Municipalities with small budgets to employ any environmental staff at all. If Municipalities co-operate and the costs of employing one or more environmental staff are shared between several small Municipalities (eg through the establishment of micro-regions), then improvements in environmental staffing levels could be expected. If increased environmental staffing levels can be achieved, then improvements in environmental management might reasonably be expected.

Table 3.2 - 4 Total No. of Employees and No. of Environmental and Public Health Employees of *Mesto* in the Hron Basin Study Area.

Mesto (Town Municipality)	No. of Employees	No. of Environmental and Public Health Employees
BANSKA BYSTRICA	130	6
BANSKA STIAVNICA	NO REPLY	NO REPLY
BREZNO	NO REPLY	3
DETVA	39	1
HRINOVA	10	2
KREMNICA	22	1
NOVA BANA	NO REPLY	NO REPLY
SLIAC	7	3
ZVOLEN	82	7
ZARNOVICA	25	2
ZIAR NAD HRONOM	NO REPLY	NO REPLY
LEVICE	67	4
STUROVO	28	4
TLMACE	NO REPLY	NO REPLY
ZELIEZOVCE	20	1
<b>TOTAL</b>	<b>430</b>	<b>34</b>

Source: 1998 Environmental Questionnaire of the JICA Study Team



Table 3.2 - 5 Comparison between *Mesto* and *Obec* in the Hron Basin Study Area of number and percentage of employees that are dealing with Environmental and Public Health matters.

	<i>MESTO</i>	<i>OBEC</i>
No. of Environmental and Public Health Employees	31	16
Total No. of Employees	410	327
Percentage of Environmental and Public Health Employees	7.6%	4.9%

Source: 1998 Environmental Questionnaire of the JICA Study Team

### (3) Municipal Functions for Different Aspects of Environmental Management

Municipalities have some responsibilities for Nature Protection and can make local bye-laws eg on Waste Disposal and Air Pollution, provided that they are consistent with state law. More specific functions of Municipalities in relation to different aspects of environmental management can be summarised as follows:

#### 1) Solid Waste

Municipalities are responsible for organising their own waste collection, either through private contractors or their own staff / enterprises, and for disposal at a landfill site.

#### 2) Wastewater and Water

The Municipalities are responsible for funding the construction of sewers, but StVak (a State Enterprise) is said to be responsible for constructing Sewage Treatment Plants (STPs) - StVak may assist with acquiring funds for STPs, but does not have its own capital funds for construction of STPs. Similarly, responsibility for obtaining the capital funds for installing piped water supplies is that of the Municipalities.

#### 3) Gas Supplies

Obtaining the capital costs for piped gas installations is the responsibility of Municipalities.

#### 4) Air Pollution

This is classified, according to output, size and type of source, by the Register Emicii Zdrojov Zneistenia Ovzdušia (REZZO = EAPSI, Emission and Air Pollution Source Inventory). Three categories refer to stationary sources. Large (> 5MW and selected technologies) and Medium (0.2 - 5MW and selected technologies) sources of air pollution are the responsibility of the state administration, but sources of < 0.2MW are the responsibility of Municipalities.

#### **(4) Municipal Finances**

The Municipalities receive regular income from (i) the State, according to the number of citizens, and (ii) local sources eg tax from property/land (Real Estate); fees/charges for use of recreation facilities etc. According to the law on charges for waste disposal to landfills, Municipalities may also charge for waste disposal within their area; they have to use the income for environmental improvements.

Municipalities can apply to the State Environment Fund for capital financing of environmental projects, as described below, but availability of funds from this source is limited for the time being due to overspending.

In recent years the State Environment Fund (SFZP) has been regarded as a significant source of finance for environmental improvement projects eg for the installation of gas supplies, sewers and sewage treatment plants in villages etc. However the size of the fund has been limited and unable to meet the very large number of requests from Municipalities, including the hundreds of Projects listed in National, Regional and District Environmental Action Programmes. As a result, and in an attempt to distribute financial resources evenly, it is understood that project components have sometimes been started with finance from the SFZP, but that adequate funds have not been available for completion of these projects.

At the time of writing, the funds in the SFZP are over-committed and a situation has been reached where many *mesto*, *obec* and other eligible institutions feel it is no longer worthwhile making the effort to apply for project funding. Since most of these institutions have limited experience of making applications to international agencies that provide grants or loans, or of obtaining private sector investment, there appears to be little scope in the short term for obtaining the funds to implement many desirable municipal projects. The situation is exacerbated by the current system in Slovakia, whereby charges for certain utilities/services are fixed, such that improved services cannot be financed through increasing fees/charges etc.

#### **(5) Projects to Assist Municipalities**

The financial, institutional and technical problems being faced by Municipalities in Slovakia have been recognised in various quarters, such that they have been the beneficiaries of a number of projects and programmes. A main or subsidiary focus of some of these has been the enhancement of environmental management in Municipalities and some are mentioned below. The Village Renewal Programme, in which the SAZP is playing a key role, has already been described in section 3.2.1 (2).

## 1) Environmental Manual for Slovak Municipalities

As part of a UK Know How Fund (KHF) Project on Environmental Capacity Building in Municipalities, an Environmental Management Manual has recently been prepared for Municipal Governments. The work was undertaken *inter alia* by IROMAR (Research Institute for Regional and Municipal Development) of the Economics Faculty of the University of Mateja Bela and by the School of Planning at Oxford Brookes University (OBU) in the UK. The manual deals with environmental issues such as:-

- Roles, Legislation and Competences
- Territorial Planning
- Environmental Impact Assessment
- Air Quality
- Nature Conservation
- Waste Management

These, and associated training sessions should help Municipalities to understand better their environmental management responsibilities and how to carry them out. However, it is believed by the Study Team that it will also be essential for Municipalities to employ at least some specialised staff to guide the process of planning and implementing environmental management measures. In the light of the review of environmental staffing levels in Municipalities, as presented above, it is considered that this applies in particular to the rural municipalities (*Obec*).

## 2) Regional Development and Institutional Strengthening Project (REDISP)

This is a UK 'Know How Fund' Project which is being carried out in the Stredne Pohronic Region (the *Okres* of Banska Stiavnica, Zarnovica and Ziar nad Hronom) by UK Consultants (GHK) in association with Slovak specialists - and a large number of local partners / stakeholders, including Municipalities and the private sector. A Regional Development Strategy has been prepared (Ref. 3 -5) and, in accordance with this, proposals for investment in sewerage, waste management, housing, tourism and other development projects have been made by REDISP in conjunction with their various partners. The Project encourages a new, co-operative approach to funding infrastructure, environment and other projects using private/commercial investment and international assistance. Such an approach could be very beneficial to many *Mesto* and *Obec* when it comes to implementing those projects and programmes proposed by the REMP, which are the responsibility of Municipalities.

### 3) Healthy Cities Programme

Following a WHO initiative there is a strong 'Healthy Cities' movement within Slovakia, though so far it could be said that it has generated more plans than action. Within the Study Area an attractive Healthy City Plan has been produced for Banska Bystrica. (Ref. 21-5), with assistance from the Open Society Foundation and USAID, and Banska Bystrica *Mesto* intends to commit funds for its implementation. The plan, guided by surveys of citizens, addresses a range of social, health and environmental issues, including air, noise, waste management, wastewater, and drinking water and makes reasonable proposals to address them – but many will require action/investment by others eg the polluting industries. Nevertheless the plan was produced in a participatory manner, with declarations of support from state institutions (including SAZP and StVak), banks, industry and NGOs and offers a good basis for improving the urban environment.

It is not known if any other *Mesto* in the Study Area has a Healthy City Plan; it is understood that Zvolen *Mesto* does not have one, nor an Environmental Action Plan, but is preparing a Territorial Plan which will cover environmental issues. Healthy City plans that are separate from other municipal plans and programmes may be appropriate only for the largest towns.

#### (6) Conclusion – Role of Municipalities in REMP Implementation

Municipalities are quite independent and retain and develop their own information, territorial plans and project proposals. They may not have a great deal of information on the environment but have a responsibility for protecting and managing it, as well as for socio-economic development. They can make good development partners and, since their responsibilities in Slovakia are likely to increase, their involvement in the regional environmental management processes, both planning and implementation, is important. As the REMP proceeds to implementation, efforts will need to be made to gain the 'political' and financial support of the *Mesto* and *Obec* for the various proposals that are the responsibility of Municipalities – especially wastewater treatment and solid waste disposal.

### 3.3 LEGAL FRAMEWORK – LEGISLATION, PERMITTING AND ENFORCEMENT

#### 3.3.1 LEGAL INSTRUMENTS

The Slovak legal system contains four main levels of national legislation. In descending order of supremacy, these are:

- the Constitution;
- Acts of parliaments;
- Governmental Orders, where powers are delegated by an Act; and
- Ministerial Regulations, where powers are delegated by an Act or by a Government Order.

The Constitution contains several provisions of a general nature in relation to the environment. Thus the Constitution provides a basic foundation for more specific legislation in the environmental sphere. Further baseline legislation is elaborated in Act number 17/1992 on Environment, which defines basic concepts and principles of environmental protection and the obligations of natural and legal persons in protecting and improving the environment. There are then a number of Acts relating to specific environmental matters, among which are Act number 138/1973 on Water, Act number 309/1991 on Air Protection against Pollutants, and Act number 238/1991 on Waste, all of which have been followed by numerous subsidiary Orders and Regulations.

The Ministry of Environment and SAZP provided the Study Team with a list (Ref. 19 – 2) and English versions of a large number of environmental laws, which are therefore available for reference and review by interested parties as required. The implementation of environmental legislation relating to industrial and related activities (especially, air, water and waste management) is summarised in sections 3.3.2 and 3.3.3. Where relevant, further reference is made in Chapter 5 to the legislation that covers each of the six main 'environmental sectors' of the REMP eg legislation relating to nature, landscape and forestry is covered in section 5.5.3. However, some general monitoring and enforcement practices for air, water, waste, nature, landscape and forestry are briefly described below in section 3.3.3.

#### 3.3.2 PERMITTING ARRANGEMENTS

Permits for environmental protection are issued by the offices of Slovakia's eight administrative Regions (*Kraj*) and 79 Districts (*Okres*). The Regions and Districts are instruments of the national administrative system, and their overall operation falls under the control of Slovakia's Ministry of the Interior. From a procedural and policy perspective, however, the environment departments of the Regions and Districts, which deliver the

licensing functions, take their direction from the Ministry of the Environment.

Permitting activities can generally be divided into two categories: those relating to construction; and those relating to pollution during operation.

#### **(1) Construction Permits**

These permits, which are issued by the Districts, control environmental impacts during the construction phase of new installations, as well as specifying construction requirements. In order to obtain a construction permit, applicants proposing to build certain types of large new installations must first submit a report prepared in accordance with Act number 127/1994 on Environmental Impact Assessment (EIA).

The first stage in obtaining construction permission is to elaborate the so-called 'intent' to construct at a particular site, which must be accompanied by submission of an EIA report. A number of interested parties, including members of the public, then have an opportunity to comment, before the District decides whether to approve or refuse the intent. Where the intent is approved, the District issues a construction permit, setting conditions which take account of the comments received from the interested parties as well as the requirements of the relevant environmental and other legislation.

#### **(2) Operating Permits**

As regards permits to protect against environmental harm during operations, there are three different types. These are waste permits, water permits and air permits, which are issued in accordance with the separate legal acts controlling these matters. An installation which is covered by all three acts will require three distinct permits. All of the air permits and most of the waste and water permits are issued by the Districts, each of which will typically have one member of staff for each of the three permitting regimes. Only the largest waste and water permits are granted by the Regions rather than the Districts.

##### **1) Waste**

Nationwide, about 13 000 installations have been granted waste permits. These include permits for waste production, collection, transport and treatment. The permits issued by the Regions and Districts typically reproduce conditions which are stipulated in national law relating, for example, to waste amounts, handling, record-keeping and other such matters. There are few site-specific conditions. However, a controlling Region or District may refer an application for a waste permit to another party for advice if an installation raises particular issues or concerns. Such advice may be sought from the Slovak Environment Inspectorate

(SIZP, see 'Monitoring and Enforcement' below), or from an expert such as a university or institute listed by Regulation as having competence in this area.

## 2) Water

National law specifies that any one who discharges polluted material to water may be subject to permitting. In practice, there are about 200 large, industrial sources for which permits have been issued. Emission limit values (ELVs) are included in the permits, following different standards set in national law for new plants and for existing plants. The national ELVs are usually reproduced in permits without change, although the controlling Region or District may impose stricter requirements in order to ensure that water quality standards are achieved.

## 3) Air

About 8,000 installations are controlled via permits, ranging from several hundred large industrial sites down to small dry-cleaning operations. National law establishes different standards, in the shape of ELVs for various categories of industry, for new plants and existing plants. All installations, for which the ELVs for existing plants had been applied, were due to meet the new plant standards by the end of 1998. However, it was estimated that some 30-35 per cent of the existing plants would not be able to achieve this. As a result, a change to the law was made, extending the compliance deadline until the end of 2006. All installations pay 'emission charges' based upon the levels of their emissions, and it has been specified that the plants whose deadlines have been prolonged will become subject to higher fees during the extension period.

There is no general *provision* in law for the granting of an air permit containing ELVs that take account of the effects of emissions on ambient air quality. This has the potential to cause difficulties where, for example, there are several sources of emissions in close proximity, each of which may be in compliance with their ELVs, but from which the total emissions could lead to exceedance of an ambient standard. The possibility of setting stricter ELVs than are specified in national law only exists for new sources coming into operation in certain designated, highly-polluted areas. In deciding upon such cases, the controlling Districts may seek advice from other sources.

### 3.3.3 MONITORING AND ENFORCEMENT

#### (1) Waste, Water and Air

The Regions and Districts issue permits as outlined above, and also have competence to

undertake monitoring and enforcement. However, their capabilities in respect of the latter are limited because, for example, they have little appropriate equipment or resources. The functions of monitoring and enforcement are therefore the primary responsibility of the Slovak Environment Inspectorate (SIZP), operating under the direction of the Ministry of the Environment.

The SIZP undertakes site visits and checks to see if installations are operating within the requirements of their permits. Separate inspections are undertaken in respect of waste, water and air permits, although inspectors for different disciplines may choose to visit a site at the same time.

If an installation is not in compliance with its permit, measures to correct the situation can be specified and a fine can be imposed – by the *Kraj* or *Okres* office. If the installation fails to comply with the measures specified, a further penalty can be determined. The relevant Region or District also has powers to order suspension or closure of the installation, although it appears that neither of these powers has been used in practice.

The SIZP's capacity to undertake monitoring is limited. For air permits, stack tests are carried out on different sites, but (on a national scale) only around 60 such tests can be undertaken per year due to the high cost involved. Similarly for water permits, a limited number of samples are taken for laboratory analysis. For waste, meanwhile, there is little available for use by inspectors in respect of technical monitoring methodologies or equipment, so most inspection is limited to visual observation of matters such as waste handling and record-keeping. In order to try to overcome these difficulties, Slovakia is increasingly moving towards requiring self-monitoring by industrial installations – and this is the case with recently licensed municipal landfill sites (see section 3.6 and Chapter 5.4).

## **(2) Nature, Landscape and Forests**

The monitoring and enforcement of the provisions of the Nature and Landscape Protection Act are carried out by various agencies of the Ministry of Environment. The implementation of the law concerning Protected Landscape Areas (Level II) and Level IV and Level V protected areas outside national parks is the responsibility of the Department of Landscape Protection of the Slovak Environmental Agency. The overall responsibility is with the head office in Banská Bystrica, supported by the local office for each of the four Protected Landscape Areas in the Hron Basin. These local offices have no responsibility for Level IV and V protected areas, which are cared for by the head office.

The monitoring and enforcement of activities in National Parks is carried out under



regulations of Act 287/1994 through the head office of Administration of National Parks, based in Liptovský Mikuláš. This office is assisted by the individual offices responsible for the day-to-day management and planning for each national park - in Banská Bystrica for the Low Tatry National Park, in Revúca for the Muránska Plain National Park and in Spišská Nová Ves for the Slovak Paradise National Park.

Additionally the regional office of the Nature Protection Department of the Slovak Environmental Inspectorate, based in Banská Bystrica, has responsibility for monitoring and enforcement of Act 287/1994. This is done mainly via inspection (monitoring) visits to check on legal (permitted) and illegal activities being carried out in protected areas. The Inspectorate works closely, via joint monitoring visits, with the national park and protected landscape authorities.

### **3.4 ENVIRONMENTAL INFORMATION AND COMMUNITY PARTICIPATION**

#### **3.4.1 INTRODUCTION**

Two issues should be made clear by way of introduction to this section. For the provision of environmental information and community participation there is no strong argument to suggest that the Hron River Basin is the natural planning unit as it might be for other aspects of the REMP. In terms of these two aspects, the Basin is far from being a self contained unit. To take three examples; people are trained outside the Basin and work within it, NGOs are funded from Bratislava, business investment decisions that affect the basin are made elsewhere.

Secondly, many of the issues surrounding environmental information and community participation are related to national policies, national legal requirements and national funding. The ability for authorities to make decisions specifically for the area within the Hron River Basin is often limited. A number of the recommendations made therefore have national implications.

This section covers the provision of information about the environment to the general public and different groups of professionals and also the involvement of the general public and different groups in the process of environmental decision making. Although to a certain extent, these are two different things, they are also closely related. The ability of people to contribute towards environmental decisions is often based on their access to information.

It should also be noted that because of the nature of the subject and a lack of information about the activities in the basin as a whole, it is difficult to present a consistent overall picture of what is happening in the Hron River Basin as has been the case for other characteristics such as waste management. Case studies are therefore cited and used to illustrate best and worst cases, and a subjective assessment is made of the overall pattern from the evidence collected through interviews and documentation. Full details of each of the case studies appears in the Supporting Report.

#### **3.4.2 THE STATE OF ENVIRONMENTAL INFORMATION AND COMMUNITY PARTICIPATION IN THE HRON RIVER BASIN**

##### **(1) Policies for Environmental Information and Community Participation**

###### **a) The International Context**

Slovakia is a signatory to most of the key international statements on the provision of

information and community participation.

In terms of access to information and the involvement of the community in decision making, one of the key statements is Agenda 21 - the Environmental Programme for the United Nations for the 21st Century accepted during the World Conference of Environment and Development in Rio de Janeiro in 1992. Chapter 36 sets out the importance of community participation.

The ideas agreed in Rio and their implementation were further expanded in following meetings and documents. One of the most important subsequent statements is "Caring for the Earth" produced by IUCN, WWF and the UN, it examines the importance of community education information and involvement in the creation of a sustainable society and provides detailed guidelines on how effective community participation can be implemented.

On a European scale, the three Pan European Conferences of Ministers of the Environment held in Dobris, Lucerne and Sofia have all emphasised the importance of the provision of information and community participation as critical elements in the strategy of the safe guarding of the future environment. These are non binding guidelines and Slovakia has not yet published these or made them available publicly, though it is a signatory to each of them. The most recent Pan European Conference took place at Aarhus in Denmark and resulted in the Convention on Access to Information, Public Participation in Decision Making and Access to Justice on Environmental Matters. This is a critical document in terms of public participation, and has not yet been signed by the Slovak Government.

Slovakia is also a signatory to the following conventions, all of which have access to information and public participation provisions: The European Convention for the Protection of Human Rights and Fundamental Freedoms; The Convention on the Conservation of European Wildlife and Natural Habitats and the Convention on Environmental Impact Assessment in a Transboundary Context.

b) The National Context

(i) Slovakia citizens have a constitutional right to a healthy environment (Constitution Act No 460/1992 Article 44). However this right can only be exercised under very specific conditions and therefore it's practical effect is very limited. There are two sets of laws governing the provision of information about the environment and community involvement in Slovakia.

(ii) Access to Information

A new law on public access to environmental information held by State bodies came into

force on September 1st 1998. One of the basic Principles of this law states that "The right of access to environmental information is one of the fundamental human rights and freedoms" and goes on to provide details of how this information may be accessed. This law is an improvement on the previous rights of citizens although it is still problematical in a number of areas, although for the most part the law conforms with EU Directives.

### (iii) Public Participation in Planning and EIA

A second set of laws determines what happens when planned changes in land use take place whether this be the building of a new road or dam on the one hand or the small scale development of a new house or building on the other. These laws also determine the consultation that takes place on larger plans such as Territorial Plans and other regional developments.

The plans have to be made available to the general public for them to view for 30 days and give their comments on. They have to have access to the information. Secondly, the public also have to be consulted about the plans, but there is no enforceable right to be heard, unless property is actually affected directly by the plans.

The Slovak laws on Environmental Impact Assessments are relatively strong when compared with many other European countries. There is wide access to information. However, less effective is the process of considering public comments where there is no enforceable right to have serious comments taken into consideration.

### (iv) National Legislation

The Slovak National Environmental Policy and the National Environmental Action Plan both have specific statements about the provision of information and the development of training programmes for those responsible for providing information.

## (2) The Provision of Information - some case studies

a) The case studies below focus on the provision of environmental information to the general public by different state and non state organisations. Nearly all the organisations listed below have a responsibility to provide environmental information to governmental regulatory bodies as part of the national environmental monitoring system. However, the provision of this legally required information is not the focus of this section.

### b) National State Provision

The SAZP is the major collector and disseminator of information about the environment in

the Slovak Republic and has the responsibility of providing information to the State and other government bodies and also the general public. The most important document produced each year is the State of the Environment Report. This is produced in full in Slovak and English and a summary is also produced by the SAZP. 2000 copies of the Report are produced in Slovak and 1000 in English. The SAZP also has a Centre concerned with Eco labeling that is also providing more environmental information to the public. The SAZP also publishes a bi monthly magazine called "Enviromagazin" which is aimed mainly at state employees and professionals. Around 3000 copies are produced for each issue and half of these are distributed throughout state organisations by the Ministry of Environment.

Most recently, the Ministry of Environment has established a department of Public Relations and one of the first tasks has been to establish an Information Office located at the Ministry in Bratislava. This has a full time staff of three people and is open for members of the general public and professional enquiries. It is the first such office in Slovakia, and might serve as a model for further information centres.

c) Local Government Provision through Kraj, Okres and Municipalities

Each level of government has slightly different responsibilities in terms of the provision of information, however the information about the environment they provide to the general public appears to be relatively limited. In most cases however, it is claimed that this is not so much through a desire to withhold information but by the legislation under which local government operates and budget constraints. The Kraj Offices of Banska Bystrica and Nitra both have press officers, however, their role in relation to providing environmental information is limited, as the environment is only one of many areas of responsibility.

If people want or need environmental information it is freely available from Kraj offices, but members of the general public have to go to the office and request it in person. In terms of access to information one Kraj officer suggested that only about 5% of the people would know where to go to get environmental data and information and the questionnaire survey undertaken supports this estimate. Information is not provided in a pro active way and the amount provided might depend on whether there are any current local environmental issues. Some Kraj, Okres and Municipalities are more active than others.

d) Other Institutions Organisations

Povodie Hrona and StVak are examples of two other organisations that are involved in providing a public service. Both have responsibilities linked to public and business water supply in the Basin. Their specific roles are described elsewhere in this Report.

Although StVak and Povodie Hrona the key water management authorities in the Hron River Basin , they do not have a remit to provide information directly to local people, but provides necessary data through the Municipalities and other structures and appear to rely on local government to facilitate local community relations. Neither organisation have public relations officers.

e) Businesses

On the whole, businesses do not see the need to provide information about their impact on the environment to the general public, and therefore do not make systematic or structured attempts to do so. Some state that they are willing to provide specific information should it be requested, but many of the larger organisations consider that because a large proportion of a local community work force is employed by their business, the general public know what the impacts are and accept that a certain amount of pollution is inevitable. Some also have occasional open days for children and members of the general public, and some produce newsletters for their employees that contains some environmental data. Information on environmental impact is provided to the appropriate government regulatory bodies.

f) Nature Protection Information

Nature protection information is a special case in terms of information provision to the general public. There is a well established system of nature protected areas in Slovakia and in the Hron River Basin. There is one information Centre in the Low Tatras National Park, with two others planned. All the national parks and other protected areas have a system of tourist and the National Park administration and the SAZP (for the other protected areas) produce a range of publicity and information materials. A current Environmental Know How Fund project of the British Government is supporting the training of National Park and Landscape Protected Area staff on community involvement and environmental education.

g) The Role of the Media

Nearly all those interviewed as part of the REMP survey process, and also the national policies and strategies, stressed the importance of the media of television, radio and newspaper in disseminating environmental information. In the Questionnaire Survey of individuals, over 40% said that the media was their main source of information, however the Conception on Environmental Education and training of Slovak Government suggests that generally coverage of environmental issues is not of a high quality. Details of the TV channels and newspapers are provided in the Supporting Report

(3) **Community Consultation - some case studies**

a) **Consultation on the Territorial and Environmental Action Plans for the Kraj and Okres**

Over the past three years, local governments have gone through the process of producing major new land use planning documents, the Territorial and Environmental Action Plans. The process for Territorial Plan development and consultation was similar in both the Banska Bystrica and Nitra Krajs. The detailed content of the plans and their status in land use planning terms is described elsewhere in this report. Krajs, Okres and Municipalities are all supposed to produce plans to different scales, and are required to consult the general public and other stakeholders, before submitting the plans for approval to the state. This consultation follows a similar pattern to a greater or lesser extent at all levels of local government. The plans have to be available for public view for 30 days, usually announced in the media, and usually in the local government offices. During this period consultations are usually held, sometimes attended by a relatively large number of people. Some progressive Okres held a greater number of public meetings and arranged for more substantive local media coverage.

b) **Environmental Impact Assessment Information.**

Another area where the general public have a right to be involved in giving environmental comments is through an EIA process. The EIA legislation of 1974 provides the right of access to information about the environmental impact of a development, and the right for members of the public to give their views. However, the right to be heard and for comments to be taken notice of, is less strong. For local communities to have this right they have to form a Civil Association with a specific number of signatures on a constitution and a certain number of people living in the municipality affected. These conditions are difficult to meet. In addition, it is up to the company doing the EIA to decide how to consult the public and involve them.

c) **Banska Bystrica - Healthy Cities Project**

The development of the Territorial Plans only require public consultation once the plan has been drafted. The Kraj and Okre have no legal obligation to consult the public on their ideas prior to the development of the plan. The Healthy Cities Project is one example where this prior consultation and view seeking of the community about local environmental and health issues has taken place as an integral part of the process of writing a management plan for a city. Banska Bystrica is part of a network of cities throughout Europe related to a Healthy Cities project from the World Health Organisation. At least 12 cities in Slovakia are involved

with Banska Bystrica being the only participating city in the Hron River Basin. A key output from the whole process is the Healthy Cities Plan for Banska Bystrica. The plan examines 30 different aspects of the environment and health of the city. The individual sections of the plan were written by a group of experts and these experts consulted the appropriate groups in the Kraj, Okres and Municipalities, as well as other groups such as NGOs and Institutions. At the same time as the sections were being developed a public consultation exercise was conducted and the results of the questionnaires were fed into the plan development process.

d) Village Renewal Programme

One programme that is taking a more formal approach to community consultation is the Village Renewal programme. In this programme some 750 villages throughout Slovakia are taking part to regenerate village communities. Some details of this programme are given in Section 3.2.1, (2), but one critical element within the programme is the involvement of the local community in the development of the village plans. Most of the renewal focus on improvements to the village infrastructure, with typical examples being the provision of a new bus shelter, the renovation of an old building, or the redesign of a village community space. The villages have to also demonstrate that they have linked these environmental improvements with economic and social aspects of village development.

e) Community NGOs

Community involvement is relatively new in Slovakia. The Questionnaire survey highlighted that communities generally feel uninvolved in the planning process and many people expressed a need for more information, but at the same time felt that it was difficult to get hold of and would welcome being more closely involved in environmental decision making. One hurdle that has to be overcome is convincing people that their views will be listened to and taken into account and a number of NGOs play a critical role in bridging the gap between decision makers and local communities. Active NGOs are a sign of a healthy approach to democracy and decision making.

NGOs fall into a number of different categories. A number are issue based such as Torissa, which was formed to fight against the construction of more dams in the region. Some focus on larger national issues and campaign for changes in legislation, whilst there are also a growing number of smaller more community based NGOs working in a specific area such as Nas Domov in Sasova, a run down housing area of Banska Bystrica.



### 3.4.3 THE PRESSURES AFFECTING COMMUNITY PARTICIPATION

#### (1) The Pressures

a) The pressures for increased provision for **environmental information**, come from two directions. Firstly, there is an increasing demand from some groups, especially business and lobbying NGOs, and in some cases the general public, for increased levels of environmental information, and secondly, government policy states that environmental information should become more freely and easily available

b) Much of the pressure in Slovakia for increased community participation in environmental issues and decision making comes from the requirement to implement the international declarations and statements that Slovakia has signed. Although there are a growing number of NGOs in Slovakia there is not really a widespread community pressure for environmental improvement. Community Participation has a strong role in environmental improvement. The most recent statement from the European Environment Ministers Conference in Aarhus makes strong statements in terms of the requirements for, and importance of community participation. So far, the Slovak Government has not signed this Declaration. EU accession will also require Slovakia to meet the criteria laid down in the Declaration and conform to other international agreements. Currently, the legislation on public participation is rated in a recent survey by the Regional Environmental Centre in Budapest as being good in some areas, but only average in others.

c) In the business sphere, there will also be increasing pressure for Slovak industries to adopt internationally recognised environmental management systems such as EMAS and ISO 14000. Some western European businesses already require that their suppliers adhere to these standards, and the EBRD investment in the Aluminium works in Ziar nad Hronom also insisted on a degree of community information and participation as well as an EIA. Such requirements are likely to spread to other projects and investments.

d) On a local scale, developments which have negative environmental effects sometimes excite active community interest. Recent examples of successful community involvement include participation in the EIA process to locate a new waste disposal site in Banska Bystrica, the challenge made to the construction of a dam at Slatinka and discussions over the flooding problem along the valley. There is however, little pressure from the community as whole for change, with there being a relatively low level of environmental concern.

(2) **Some of the weaknesses of environmental information and community participation**

a) There are wide variations in the application of the legislation, largely as a result of the organisational and management culture of local government and business which considers that information has to be protected. There is therefore a lack of transparency in decision making and little accountability for decisions made. Although there are some excellent examples of community involvement, there is still a belief that local people do not need to be informed or involved and that it is the job of the experts to make the decisions. State organisations and other bodies are rarely active in providing information to the general public and the organisational culture does not support this concern for the "customer". Few local plans include any reference to public information or community participation. This includes the management plans produced by other state organisations such as Povodie Hrona. When local people are mentioned in plans it is usually in the context of providing information rather than involvement in decision making.

b) There are some weaknesses in the structure of the legislation that gives opportunities not to release information or involve people. For example, the new law on access to information gives a number of possibilities to restrict the availability of information. It is possible, for instance, to define some information as "work", with the result that it becomes the property of an individual or organisation and availability is restricted. Another example is that although EIA information has to be made available during the EIA process, after the process has been completed it becomes the property of the contracting company and may not necessarily be made available to the general public.

c) This old style management culture still persists for a number of reasons. Firstly, there is little guidance and training provided to decision-makers about effective methods of community participation or the need for local government to become more service orientated. For example, although the Kraj offices were required to consult people on the new territorial plans adopted in 1998, this consultation was largely restricted to an announcement in the press that the plans were available for consultation. As a result, few people made the effort to look at the plans. Local government officers are often not aware of the range of approaches available to them to inform the public, or the fact that many of these approaches are cost effective. They are also not generally not aware of the benefits of community involvement and many local government officers do not have opportunities for training and personal development. There is a belief, that Local Government offices often "hide and hold" information from others, but the same is perceived to be true of Ministries in Bratislava who do not always pass on information to local government offices.

d) Because of the low level of environmental awareness and information availability, the general public often does not know what to ask for, or how to ask for it. As a result they do not ask, and so there is an assumption that they are not interested! This is supported by the questionnaire surveys where the majority of people said that they are not sure what information to ask for and are not confident that they will get it! In some cases there is also a lack of interest amongst the general public. This may be because they are really not interested or because past experience has shown that any concern is not handled positively.

e) Although there is a growing number of NGOs, they do face a number of problems in supporting the development of great participation. One of the biggest challenges is that of finding enough people with skills to lead and organise community activity. A second challenge is that most NGOs rely on funding from outside Slovakia and support from the US is likely to decline in the short term. Although there is a special EU accession fund it is unlikely, without strong lobbying, that this will be available to support NGO development. Other weaknesses include the fact that some community based NGOs are also perceived as being politically orientated and not democratically accountable.

In addition, the population of the River Hron do not immediately identify themselves with the Basin as a geographical unit. Community attachments are much more local. This contrasts with the situation on the Ipel River where there is an active association of NGOs, "Ipel Union". There was an attempt over five years to establish such a network in the Hron Basin but this was unsuccessful.

f) The media is weakly developed in terms of environmental campaigning and information provision. It is therefore unfortunate that 40% of those responding to the questionnaire said that they relied on the media for environmental information. The national strategy on environmental education and training states that "the majority of broadcast services provide only uncoordinated information on the environment".

### **(3) Slovakia compared with other European countries**

The legal and practical situation regarding access to information and public participation is relatively weak in Slovakia compared with many other central and eastern European countries as well as with western Europe. The detailed comparative situation is shown in the Supporting Report

In most areas the current legislation has a requirement that there is access to information and that there is adequate notification. There is generally no requirement that comments are taken seriously. There are no legislative examples where decision making power is shared or

controlled. When compared with other central European countries Slovakia is: below average in terms of participation in the development of national policies and plans and average in participation of local and regional plans; above average in terms of screening and scoping and review practices for EIA and is average in relation to EIA appeal procedures and is average when it comes to access to environmental information.

#### **(4) The National Environmental Policy**

The National Environmental Policy of the Slovak Government referred to below, also makes an analysis of some of the weaknesses of environmental information and community participation in Slovakia - though at a very general level. It states that there is an,

- a) "inadequately developed municipal administrative system and limited municipal participation in solving local environmental problems" together with a reduction in funding have both negatively affected the environment.
- b) "generally low environmental awareness"
- c) "generally underdeveloped respect for life and values, neglect of environmental education and unfamiliarity with environmental necessities, values and approaches in socio economic activities."
- d) There is a "lack of integrated monitoring and information systems".

#### **(5) Strengths of community participation**

- a) There are some examples of good practice of community participation, but these are the exception rather than the rule and are generally NGO led. For example, the Healthy City Project in Banská Bystrica and Zvolen has produced an action plan for the city that involved community consultation during the preparation phases of the plan. There are also examples of small scale projects funded by the Community Foundation in Banská Bystrica and Zvolen as well as projects funded by the Environmental Partnership that involve local environmental improvements. There is a growing number of NGOs throughout the Basin which are working for environmental improvement. Within the state structure of local government there are also some Okres and Municipalities that take an active approach to public participation such as Brezno.
- b) There is a growing body of national legislation that requires community participation. The legislation for conducting Environmental Impact Assessments is of a similar standard to that in most EU member states, and the new Environmental Information Act (1998) has given

people access to a wider range of environmental data. Although there is a large and varied gap between what is required by law and how effectively this is put into practice, the situation is improving slowly. For example, the Ministry of Environment is currently preparing guidelines on how to interpret and deliver the new law on access to environmental information and has also recently established a Department with responsibility for working with NGOs and Communities. NGOs are also active in working for the better implementation of legislation. There is a Centre for Environmental Public Advocacy which offers support for NGOs and other groups involved in environmental campaigning, and in 1998 it was an NGO in Banska Bystrica organised a workshop for local authorities on the environmental information legislation.

c) The questionnaire surveys undertaken by the Study team indicate that there is clearly an interest in environmental issues and also an understanding that a large measure of responsibility for solving environmental problems lay with individuals. There also appeared to be an apparent willingness to sacrifice some aspects of development for the sake of environmental improvement. The results of these questionnaires conflict with the view of most respondents that the general public are apathetic about environmental issues and are more concerned with the current economic situation, unless it is their immediate local environment that is under threat.

## **3.5 ENVIRONMENTAL EDUCATION**

### **3.5.1 INTRODUCTION**

Two issues should be made clear by way of introduction to this section. Firstly, for the provision of environmental education there is no strong argument to suggest that the Hron River Basin is the natural planning unit as it might be for other aspects of the REMP as the Basin is far from being a self contained unit. For example, people are trained outside the Basin and work within it, NGOs are funded from Bratislava education provision decisions that affect the basin are made elsewhere. The pressures on environmental education, the state of environmental education, and recommended responses, are not specific to the Hron River Basin, but have an impact on Slovakia as a whole.

Secondly, many of the issues surrounding environmental provision are closely related to and affected by national policies, national legal requirements and national funding. The ability for authorities to make decisions specifically for the area within the Hron River Basin are often limited.

It should also be noted that because of the nature of the subject there is a lack of information relating to the situation in the whole basin. It is therefore difficult to present a consistent overall picture of what is happening in the Hron River Basin in a way that can be done for other characteristics such as water quality or forest management. Information is particularly difficult to come across for environmental education for business, local authorities and the general public as there is no over co-ordinating body as there is for environmental education for children and young people. Case studies are therefore used to illustrate best and worst cases, and a subjective assessment is made of the overall pattern from the evidence collected through interviews and documentation. Details of the case studies are presented in the Supporting Report.

### **3.5.2 THE STATE OF ENVIRONMENTAL EDUCATION IN THE HRON RIVER BASIN**

#### **(1) Policies for Environmental Education**

##### **a) The International Context**

Environmental education in Slovakia incorporates the definition and approaches to environmental education taken internationally and set down in a number of key documents and Statements. Most of these definitions of environmental education build on an initial declaration developed by UNDP and UNESCO and made in Tbilisi in 1971. Slovakia is also a signatory to Agenda 21, the Environmental Programme for the United Nations for the

21<sup>st</sup> Century, accepted during the World Conference on Environment and Development in Rio de Janeiro in 1992. In this declaration Chapter 36 stresses that education is seen as having a key role to play in bringing about sustainable development. On a European scale, Slovakia is a signatory to three of the four pan European Conferences of Environment Ministers held in Dobris, Lucerne and Sofia. All these have produced statements endorsing environmental education as a critical element in the strategy of safeguarding the future of the environment.

(b) National Policies

The Slovak National Environmental Policy was approved by the Slovak Republic Government and the National Council in 1993. Some details are given in Section 4.3. The importance of environmental education is emphasised in the priorities, principles and objectives of the Policy and these aspirations have been carried forward into the National Environmental Action Programme approved in 1995. Three sections of the plan focus on information, education and community involvement and Section I focuses specifically on Environmental Education Training and Promotion, listing 21 tasks related to environmental education.

There are a number of key documents that provide more detail on the delivery of environmental education for different groups. These are listed below, and more details are provided in the Supporting Report.

- (i) Conception on Environmental Training and Education in the Slovak Republic (1998)
- (ii) Teaching Curriculum of Environmental education for Basic and Secondary Schools - Environmental Minimum (Ministry of Education 1996)
- (iii) Strategy of Education for Nature Protection (Ministry of Environment, 1997)
- (iv) Action Plan for Environment and Health of Inhabitants of the Slovak Republic (Ministry of Health)
- (v) Document on Ecological Education in Cultural and Public Facilities (Ministry of the Interior)
- (vi) Strategy for Education of State Administrative Employees in Nature Protection, National Parks and State Agency Employees (Ministry of Interior, 1997)
- (vii) Biodiversity Strategy for the Slovak Republic (Ministry of Environment 1997)

(2) Environmental Education for Children and Young People.

a) The formal education system

Schooling starts at age 3/4 for children in Slovakia when they attend Kindergarten. From this they move on to Primary or Basic School, from ages 6/7 through to 15/16. At this age

children either attend a gymnasium, from where they can go on to University, or to a Vocational School. There are many specific variations within this structure. For example, some Gymnazia, take children from age 13, and some Basic Schools have an 8 year course, whilst others have a 9 year course. In addition there are a large number of different kinds of Vocational Schools and other schools for children with special needs.

Most children attend State schools. There are few private or independent schools in Slovakia, except for children of kindergarten age. Attendance is compulsory up to the end of Basic School and then entrance into either Grammar or Secondary Vocational Schools is according to performance at Basic Schools and examination results. Education at State Schools is provided free of charge, though children often purchase their own text books and other items of equipment. Schools have to follow the national curriculum developed by the Ministry of Education. The curriculum and schools performance is monitored by a system of State Inspectors. Although there is a certain amount of flexibility in the delivery of the curriculum, most teachers still follow a largely traditional text-book based approach to learning.

#### b) Environmental Education in the Formal Education Curriculum

As stated in the section above, there is an environmental minimum curriculum for the schools of Slovakia. However, even with this it is not really possible to describe the overall quality of environmental education in the schools of the Hron River Basin. This is for three reasons. Firstly, no survey of environmental education in Slovakia has been undertaken, although one is currently in preparation. This means that there are no statistics on the numbers of schools that have an officially designated environmental education member of staffs; or how many Free Time Schools have environmental clubs or other measures of environmental education provision. Secondly, there are no national standards of environmental education as such, against which the quality of environmental education might be judged. Thirdly, it would be difficult to assess the quality of education as this to a large extent depends on the enthusiasm and interest of staff at specific schools, and is constantly changing.

There is an environmental minimum curriculum in Kindergarten and lower Basic schools. This focuses on basic knowledge about the environment and beginning the development of environmental values. In Grammar Schools, there is no separate environmental education, but it is integrated into all subjects in some form and a separate question on the environment is included in the final Grammar School examination. In Secondary Schools there is a compulsory subject on the "Basis of Ecology" in year 1 taking one lesson a week. At all



levels of education, teachers are free to devise their own curriculum for up to 30% of the time which gives flexibility to introduce environmental education.

Each school should appoint a teacher who takes responsibility for the coordination of environmental education - this is usually together with other responsibilities. This teacher is sometimes given additional time to undertake this role as long as the number of lessons a week does not require overtime payments. Some Okres have advisers with responsibility for environmental education, and both the Nitra and Banska Bystrica Kraj have an environmental education officer.

c) Environmental Education Projects

The major on going and one off projects that are currently taking place or have taken place recently, that are open to schools in the Hron River Basin, are listed below.

- (i) **Healthy Schools Project**  
This is a project managed by the Kraj and Okres from the Ministry of Health. 124 schools in the Banska Bystrica Kraj are taking part.
- (ii) **Schools 21 Project.**  
This is a project by the Faculty of Natural Sciences at the University of Matej Bel. This is a project training teachers from nursery, basic and secondary schools, in the area of primary drug prevention, health education and lifestyles and environmental education. 286 teachers and educators have taken part in training
- (iii) **The SAZP**  
The Slovak Environmental Agency both through the Education Section and Nature and Landscape Department provides environmental education. Both departments have a remit to provide environmental education through the whole of Slovakia and provide the following activities -
  - Teachers Courses (around 5-10 a year)
  - Courses for Children (40 in 1998 involving 750 children)
  - Publication, most recently Domaci Ekolog
  - Competitions, most recently "Animals and Plants of our Forest" and Sutaz
  - Co-ordinates environmental days
  - Envirofilm, an international film festival
  - Enviromagazin
  - Networking, most recently the creation of a new network of 75 organisations
- (iv) **Free Time Schools**  
These are places where children and young people can go after school to take part in different activities such as sport and culture. The schools are funded by the Ministry of Education

- (v) **Schools in Nature**  
Slovakia also has a system of Schools in Nature. Teachers usually take children to these schools for different lengths of time. The children follow the same curriculum as they would in school with perhaps some additional activities. In the Basin there are 12 such schools.
- (vi) **Summer Camps and NGO activities**  
A number of NGOs run environmentally orientated camps for children during the summer. The strongest NGOs which provide support teachers are Strom Zivota (Tree of Life) and The Slovak Union of Nature and Landscape Protectors (SZOPK) and Zelena Linka..
- (vii) **Museums**  
There are 14 Museums in middle Slovakia and a number of these provide informal environmental education. The most important of these are the Museum of Wood and Forestry in Zvolen, The Central Slovak Museum of Natural History in Banska Bystrica, and the Slovak Mining Museum in Banska Stiavnica. The Natural History Museum has a special environmental display and in 1998 hosted the visit of over 20000 children,
- (viii) **Competitions**  
There are many competitions, local, national and International associated with the environment. These are sometimes related to academic subjects - the Chemistry, Mathematics and Biology Olympiads for example. Other competitions are related to festivals. The SAZP has recently announced a widespread competition for the Bans Bystrica Kraj - Sutaz "Enviroprojekt" which is open to children of different ages and the general public.
- (ix) **National Parks and Protected Areas:**  
The Hron River Basin includes parts of three National Parks and four protected areas. None of these have specific educational activities or information centres for schools, although there are opportunities for schools to visit the Parks and take part in activities led by Rangers. A project funded by the UK's Know How Fund to build up environmental education within National Parks and Protected areas through training rangers and other staff is currently taking place.
- (xi) **Environmental Education Centres.**  
There is one environmental education centre as such in the Basin run by the NGO Strom Zivota at Cierny Balog. Other organisations, including the SAZP both at CEEV and COPK in Banska Bystrica provides courses using classroom facilities.

### **(3) Environmental Education in Higher and Further Education**

#### **a) Introduction**

Entrance in to further education is through an examination set by the Institution itself. These Institutions are generally Universities, or Training Colleges associated with a specific profession. Within the Hron River Basin there are only two University centres. One in Banska Bystrica, with some departments located in Banska Stiavnica, and one in Zvolen. Because of the nature of university education, many students living in the Hron River Basin

will receive their higher education outside the Basin and likewise students studying at these universities will find employment within the Basin area. A full list of courses is provided in the Supporting report

b) **Teacher Training**

For training teachers for Nursery and Primary schools, training is provided through Teacher Training Vocational Schools, and for Secondary and Vocational Schools, through the University Pedagogical Faculties. At the University of Mateja Bela in Banska Bystrica, teacher training is provided by three faculties. These are the Pedagogical Faculty, Faculty of Human Sciences, and Faculty of Natural Sciences.

**(4) Environmental Education for Professional Education**

a) **In Service Training for Teachers**

This is provided by a variety of agencies all of whom provide occasional courses which vary in length from a lecture of a few hours through to a week's residential course. There is however, a requirement that all teachers undertake in service training. There is a network of three government methodological centres, and one of these is in Banska Bystrica, providing courses for around 250 teachers a year in environmental education. Other courses are provided associated with the projects listed above and by the two major NGOs - Strom Zivota and SZOPK. The SAZP itself provides courses through its Centre of Environment Education and Centre for Nature and Landscape Protection as does the Mateja Bela University and the Technical University at Zvolen.

b) **Environment Inspectors**

To become an environmental inspector either for the Kraj, Okres or the Slovak Environmental Inspectorate it is necessary to have an appropriate degree followed by a post graduate course. This post graduate training is provided by the SAZP through a certificated course which is a mixture of theoretical and practical training lasting up to one year depending on performance and experience. The post graduate training is compulsory for environmental inspectors and focuses on legislation rather than the inspection techniques.

c) **Local Government Officers**

IROMAR based at the Faculty of Economics of the University of Mateja Bela in Banska Bystrica offers a number of part time training courses for Local Government Officers and elected representatives. It focuses on Local Government and the State Administration.

IROMAR are also preparing a Manual for Municipalities on Environmental Issues as part of a UK Know How Fund Project on Environmental Capacity Building.

d) Business

Environment training for business is provided by a variety of organisations and focuses on the training for environmental audits and environmental management systems. These include the Slovak Centre for Clean Production established in 1995 by UNIDO/UNEP and the Centre for Pollution Prevention managed under WEC and funded by USAID. The Industrial Ecology Society (ASPEK) is an NGO with now over 100 members which also provides training, information, newsletters and manages a number of projects related to improving environmental performance. 12 of ASPEK's members are in the Hron River Basin. Another NGO provider is the Industrial Association of Nature Protection.

A number of businesses themselves provide training not only internally, but for other business customers, and the foremost of these is the Slovak Steel company VSZ that manages and educational and consulting centre. The professional Association of Industrial Technologists develops training courses for senior managers. Business Training focuses on three elements: Health and Safety, Training related to ISO 14000 accreditation and Environmental Management Systems. Exhibitions also play a major role in environmental education for businesses, and there are several major specifically environmental events during the year that provide businesses with the opportunity to see environmentally related new technologies. Others do not have such an environmental focus but nevertheless have environmental related exhibits.

(5) Informal Adult Education

There are no formal systems for the education of the general public. Further Education is provided in an informal unstructured way through various cultural facilities and organisations, public information services, libraries, museums, galleries NGOs and expert institutions. There are wide variety of NGOs that could be said to have some environmental interest including NGOs focused on Hunting, Fishing, Tourism, Gardening, together with other associations linked to providing social services. For example, CSOD provides guided walks for families on specific days, and the SAZP COPK provides occasional series of Green Lectures.

Probably the best developed services are in national parks and nature protected areas and other tourist facilities and these are described more fully in Section 5.5.

### 3.5.3 ENVIRONMENTAL EDUCATION ISSUES

#### a) The Pressures

##### The formal education system

- (i) Environmental education is not a specific curriculum subject at most levels, it suffers even more than others, and has a low priority amongst education decision makers and headteachers.
- (ii) Funding for the education system is declining at a national and local level. Over the next year this will result in around 17000 fewer people working in the education sector, with around 50% of these being teachers. Teacher's salaries are also relatively low.
- (iii) Funding for environmental education projects is also declining. The Environment Fund, a national source of funding for environmental educational initiatives, is practically empty and as a result some recent projects have not been supported.
- (iv) Education is very competitive in Slovakia, and parental expectations are high. With a relatively traditional education system, innovation in areas such as environmental education are sometimes not welcomed as this might mean less time for children to study core subjects such as Mathematics and Language.

##### Informal adult education

- (v) Because of the poor economic situation, it is difficult for NGOs to find people who are willing to volunteer and provide support for the NGOs activities. Over the past five years NGO and voluntary work has declined. NGOs suffer in a second way in that there are few national Slovak sources of finance for activities either from the government or from business. The government environmental fund is effectively empty and there is real tradition of business support as yet.

#### b) Strengths of Environmental Education

##### The formal education system

- (i) All the required strategies from the Ministry of Education and Ministry of Environment are in place to provide a firm basis for the development of environmental education. There is an environmental minimum curriculum.
- (ii) There is an increasing realisation of the importance of Teacher Education and in service courses are available. Interested teachers can get support.
- (iii) A number of networks are developing to link environmental education providers including "NET".
- (iv) There are a number of excellent local environmental education initiatives and there are many competition opportunities available for schools that wish to take part.

(c) Weaknesses of Environmental Education

The formal education system

- (i) There is a lack of finance and formal support for environmental education strategies.
- (ii) There is an emphasis on nature education in schools rather than environmental education, and a traditional approach to teaching in schools which stresses knowledge about the environment rather than environmental lifestyles.
- (iii) There is a lack of application of the environmental minimum and a lack of consistency in environmental education provision in schools through a lack of inspection and monitoring.
- (iv) There is a lack of environmental education resources for schools
- (v) A lack of consistent training opportunities for environmental education
- (iv) The provision of environmental education is uncoordinated. As a result, there are diverse opportunities and sometimes duplication of programmes. Better use needs to be made of scarce resources

University Education

- (v) **Course Structure.** Most environmentally related courses focus on relatively traditional disciplines that reflect past needs rather than the future. Only a few departments integrate approaches to sustainable development within their courses
- (vi) **Course Approach.** Many University courses tend to take a narrowly subject based approach. There are few course that follow the multi-disciplinary approach that will be needed to provide the broadly based professional expertise needed for successful sustainable development in the future

Professional Education

- (vii) Further Professional training is very poorly developed in Slovakia as a whole in nearly all sectors, and the environment is no exception. There are very few professional development courses available, and even fewer that focus on the environment.

Informal Adult Education

- (viii) There is a general lack of interest in informal adult education, and the main reason for this is the lack of time and motivation to become involved in environmental activities. In the current economic and social climate, most people have other priorities and spare time is at a premium for any non income generating activity.
- (ix) In addition, there are many weaknesses amongst NGOs, in particular - an over reliance on external sources of funding and a greater need for trained people to work within NGOs.