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EIA Screening

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Foreword

The study has been commissioned by the Norwegian Ministry of the Environment, to collect experience with EIA screening from member states of the European Union. This is also the background for not including Norway in this report.

Project leader has been Martin Lund-Iversen. He has also authored the report, except for the following:

The chapters on France and Italy have been written by Silvia Mete (Master student at Politecnico Milano); Davide Geneletti (University of Trento) has written on the screening process for the Autonomous Province of Trento.

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Oslo, June 2013

Evelyn Dyb
Research Director

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Summary

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The study has been commissioned by the Norwegian Ministry for the Environment, in order to gain insight into how EIA screening has been conducted in some EU countries, and the experience gained. 'EIA screening' refers to the process for determining whether a given project is likely to have significant effects on the environment, and thus should be subjected to a specific further process to assess the environmental impacts (the Environmental Impact Assessment – EIA – itself).

All the countries examined in this study, except Denmark, have thresholds for Annex II projects. In all these, measurements of length (meters, kilometres), weight (tons), square meters and performance (kilowatts) are used. In the case of France, also a monitory threshold has been set. Denmark has not yet abolished a threshold approach in a broader sense, in that EIA is defined as relevant for *industries* only. This approach avoids a placing a massive screening load on the system (which the other countries seem to fear); and what the country has, is seen as manageable.

With regard to the level of detail for Annex III criteria, all countries studied here maintain an Annex III structure, as in the Directive. How this is supported by links to other sector-specific regulations (with operational approaches) on environmental subjects (such as habitats, water, pollution), seems to determine how well the approach works. This reduces ambiguity in screening. In the UK, there has been massive rejection of the Annex III approach. By contrast, such support is in place in Denmark and Italy, and has been well received. That is perhaps the most important finding of this study.

An exciting prospect is to view EIA screening in a wider perspective than its primary purpose. That involves activating the broader field of environmental management and regulation in the screening context, so that information is provided to screening from relevant regulations and data-bases, and from the developers' own process of responding to environmental concerns. Such screening can also alert developers, and authorities, to likely environmental impacts, so that project proposals can be adjusted at an early stage. This has been shown by the Danish experience.

1 Introduction

1.1 EIA screening

This report explores simple and efficient ways of conducting Environmental Impact Assessment (EIA) screening. 'EIA screening' refers to the process for determining whether a given project (e.g., land-use, construction) is likely to have significant effects on the environment and thus should be subjected to a further process to assess the environmental impacts (the EIA itself).

This study has examined experiences in some EU member-states who have all implemented the EU's EIA Directive (2011/92), to make this information available for work on such mechanisms elsewhere. The countries studied here are Denmark, England and Italy (The Autonomous Province of Trento). France is represented only as regards its formalities.

With the development of Environmental Impact Assessment has come the understanding that it should be applied only for projects likely to have significant effects on the environment. This view has been presented repeatedly in the literature (see e.g. Glasson et al. 2005: 89), and has also been incorporated in the relevant EU Directive (2011/92, Article 2 (1)), in the sense that only such projects are required to undergo EIA. Possibly all member states have taken the opportunity not to perform EIA for every possible project – creating the issue of the screening mechanism.

Screening must be conducted in accordance with the Directive, and in a way commensurable with the context in which EIA is performed. Thus, such a mechanism should be 'simple' and 'efficient', serving to identify those projects that can be expected to have significant impacts on the environment.

Although we describe their transpositions in this area, this is in no way an analysis of the legality of this. However, we pay note to the European Commission when it reports that there are often such issues (COM 2009:5).

How the Directive can be seen to emplace limitations on the shaping of a screening mechanism with regard to 'simplicity' and 'efficiency' forms the backdrop for this study.

We also note that the European Commission mentions 'simplifying' and 'clarifying' the mechanism (COM 2009:5), and 'avoiding unnecessary administrative burden' (COM 2012:3, 5). This issue has been addressed recently with a proposal for a new directive. With regard to the relevant issues in this report, changes in the proposed directive are, firstly, amendments to Annex III, in order to 'clarify the existing criteria (e.g. cumulative effects or links with other EU legislation) and to include additional ones (mainly those related to new environmental issues)' (ibid: 6). Secondly, a new

Annex (IIA) 'sets out the information to be submitted by the developer as regards projects listed in Annex II' (ibid: 6).

1.2 Methods

In preparing this study, the authors have read through the regulations to establish how the system is set up, and spoken with key people and consulted research on the subject.

The counties were selected on the basis of the language skills of the research team: Scandinavian, English, Italian and French, and from previous indications about what there is to find.

2 England

2.1 EIA in English law

England[1] has recently undertaken a revision of its EIA regulations, 'The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 No. 1824', which applies to projects that come under the planning regime for England.

2.1.1 Annexes I, II and III

The Act follows closely the Annex I (Schedule 1) and II (Schedule 2) structure of the EU Directive, and there are thresholds on Annex II list. In setting the thresholds, measurements such as hectares, square meters (e.g. floor space), meters, tonnes (e.g. deadweight fish, petroleum), megawatts, number of installed units (turbines), are used.

Below the threshold, there is no requirement for conducting an EIA, unless the project is in a sensitive area – Natura 2000 sites (e.g. Special Protection Area, Special Areas of Conservation and Ramsar sites), Sites of Special Scientific Interest; National Parks; The Broads; Areas of Outstanding Natural Beauty (AONB); World Heritage Sites and Scheduled Monuments, in Regulation 2 – where the thresholds are not applied. Also, the Secretary of State may designate any project for EIA (Regulation 4(8)).

Annex III (Schedule 3) is transposed, word-for-word.

2.2 Screening process

Annex II (Schedule 2) screening is generally conducted by the local planning authorities, on the basis of information provided by the developer. A decision is to be reached within three weeks of the request from the developer.

If an EIA is found to be required, a developer may appeal to the Secretary of State via the National Planning Casework Unit (NPCU) in Birmingham.

2.3 Experiences

Perhaps as many as 27,500 projects are screened every year in the UK (population: 63 mill.), but only an estimated 500–600 EIAs are performed, which indicates that

[1] The regulations presented here are for England, and not other parts of the UK. However, the experiences are all reported as UK experiences, the assumption being that there are no significant differences.

the screening mechanism is relatively effective (IEMA 2011:20, 34). For England, the figure is 6.9 EIAs per year per 1 million inhabitants (for Italy (ATP) 10, Denmark less than 7).

However, the response-time of three weeks for screening decisions is 'rarely achieved' (IEMA 2011: 36).

There seem to be almost a screening crisis in England (and the rest of the UK). The situation has been met with considerable scepticism from practitioners, and was characterized as ineffective in a study from the Institute of Environmental Management & Assessment (IEMA):

> There is considerable concern amongst EIA practitioners about the application of the UK's case by case approach to screening. Issues appear to be more acute in England; however, there is a clear need for further research in this area to understand the true scale of ineffective screening practices across the UK. (IMEA 2011:4)

However, the report presents a range of findings. The first reason given for ineffectiveness is how screening practice is challenged by appeals. Such appeals typically concern the wording in the regulations, and the amount of evidence needed to make the screening decision (ibid: 33).

The second reason has to do with lack of knowledge within the planning authorities (ibid: 36f). Basically, they ask for simpler and more standardized screening. Here we may note the following findings in a survey involving planning authorities (and other professionals):

> IEMA has received answers from 1815 of them to central questions about how screening works in the UK. Findings are that 66.4% agree that 'screening is an effective tool to ensure that only projects likely to have significant environmental effects are subject to EIA' (IEMA 2011, Appendix 2:17).

Only 33% of respondents agreed that 'all projects likely to have significant effects on the environment are subjects to EIA', 44% disagreed, and 25% were undecided. (ibid: 19).

With regard to common EU threshold setting on Annex II, 61% agreed that this should be done. Only 7% disagreed, and 31.3% were undecided (ibid: 20). It also seems that national threshold setting is considered a problem. As regards the statement, 'The current screening criteria in Annex III (for the Annex II projects) should be replaced by a more detailed checklist', 55.5% agreed, only 9.5% disagreed, and 35% were undecided (ibid: 21).

England and Scotland each have their checklists for screening, and the two are quite similar. In the checklist for England, there are very sporadic and generalized references to legal conditions (items 8 and 11 in the checklist), whereas the Scottish goes further in identifying specific concerns. There are references to 'species and habitats of Local Biodiversity Action Plan', 'locations which are used by protected, important or sensitive species of fauna or flora, e.g. 'nature reserves', and 'environmental standards'.

Experience in Scotland with the checklist has been mixed, we were told, and this is also reflected in the EIA Forum outputs – see EIA Forum output for 3 October 2012, were one participant asks: 'Why is irreversible loss of prime quality land not identified in check list?'. Including that point would mark a further advance towards making the screening mechanism more specific, not least because 'prime quality land' could be backed by classifications that probably exist already.

There has been growing concern in the UK that the authorities may need to allow the possibility of re-screening, as projects change, for many reasons (screening may itself be one of them). We return to this phenomenon in the case of Denmark

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3 Denmark

3.1 EIA in Danish law

Denmark has transposed the EU Directive into its national legislation, BEK nr 1510 af 15/12/2010. Bekendtgørelse om vurdering af visse offentlige og private anlægs virkning på miljøet (VVM) i medfør af lov om planlægning.

3.1.1 Annex I, II and III

The Act follows closely the Annex I (in Danish: Bilag 1) and II (Bilag 2) structure of the Directive. There are *no thresholds* on the Annex II list, but this does not mean the system is threshold-free. The understanding that EIA is for *industries* have been established, and there is an ongoing discussion as to what that means, but with no legal code.

Annex III (Bilag 3) is transposed word-by-word, but guidelines have links to the understanding of the criteria to regulations on other specific environmental issues, like habitats, water or pollution.

3.1.2 The screening process

In most cases it is the municipality which is the competent authority for EIA, and thereby responsible for the screening process and decision. The exceptions are when a central government environmental body takes over (Naturstyrelsen or Miljø-styrelsen) for a range of legal, administrative and project-related reasons. According to the regulations, screening is to be completed within three months.

It is not in the regulations, but taken for granted, that if the competent authority is in doubt over the application of the Annex III, other agencies are to be contacted.

If the competent authority decides that a given project does not need to be subject to an EIA, this can be appealed to a central government authority (Natur- og Miljø-klagenævnet). Further appeal, to the courts, is also possible.

3.2 Experiences

Approximately 2000 projects are screened every year (ca. 20 per municipality, population of Denmark: 5.6 mill.). Of these, under are found to 2% require an EIA (less than 7 per year per million inhabitants (by comparison: England 7, Italy (ATP) 10). Non-EIA screening decisions are appealed in 5–10% of the cases every year. Court cases are very rare, as the cost is almost always a deterrent.

Denmark's experiences with the screening process have been researched quite extensively, with a particular focus on the contribution to the environmental adaptation of projects.

There is in Denmark a screening practice which allows developers to 'return with a changed project' in order to have a screening prospects revised. One study finds that 45% of all projects are changes as the result of EIA (and the possibility of being screened), and that half of these were changed during the screening process (Holm Nielsen et al. 2003). Similar findings are also reported in Christensen et al. (2005 and 2012).

As other policy instruments concerning the environment are improved – in the sense of distinguishing between significant and less significant aspects/impacts – EIA screening regulations can pick up these, helping to reduce ambiguity as regards screening decisions. This has happened in Denmark with the linking of EIA screening to the specifications from e.g. the EU Habitats Directive (92/43/EEC). The focus in this work is mostly on nature protection being enforced this way, but the benefits for screening practice are also made clear, because it becomes easier to 'argue from wording to concrete regulatory practices' (Christensen 2011:1103) – to remove ambiguity from the decision.

Research, and our respondents among the authorities, are less concerned with the time and resources that go into EIA screening. However, this is taken up by Holm Nielsen et al., who note that 'authorities use very few resources' in the screening work (2003: 12), and that screening 'seems to be a cost-effective instrument in the sense that, without incurring much administrative expense, it potentially results in environmental benefits' (Christensen et al. 2005: 36).

Improvements in the Danish procedure are underway. The obligations for developers to make an 'Environmental Approval' (according to another regulation) have been linked to the screening procedure, in order to rationalize the part in which information about the projects and its impacts is communicated from the developer towards EIA screening.

4 Italy

4.1 EIA in Italian law

Italy has transposed EU Directive 2011/92 of 13 December 2011 into its national environmental law no. 152 of 3 April 2006 (modified and integrated). The law *Norme in materia ambientale* ('Environmental regulations') defines the procedures and principles for EIA (in Italian: VIA), including annexes acknowledged from the EU Directive and extra annexes specifying contents, list of polluting substances, categories of industrial activities and general considerations about the principle of precaution and prevention.

4.1.1 The relationship between national level and the regions

An important aspect of Italian regulation, also important regarding the transposition and application of environmental standards expressed by the EU Directive, is the division of competences (in urban development in particular) between the central state and the regions.

With regard to Annex I of the Directive, the part concerning projects has been incorporated with no changes from the Directive (Allegato II), while the regions are granted the competence to determine further specifications to the projects where such can be made (Allegato III).

Allegato IV (Annex II transposition) is subjected to screening under regional-level competence; every year, the regions must provide evidence of measures and procedures adopted for ongoing evaluation (also with Allegato III). It is also possible for the regions, in case of specific projects as determined in the Allegato IV, to adopt an increase of 30% of the given thresholds.[2] This particular feature, linked to the internal structure of the Italian state, could be common to other EU member states as well. The 2002 Report from the Commission to the European Parliament and the Council (European Commission (COM) (2002) highlights several difficulties related to the federal/regional structure of some member states, where it is difficult to state 'whether the amended Directive has been fully transposed at sub-national level and how the screening systems put in place have been operating in practice at competent authority level' (pp. 30, 41).

Here, we cover the regional level with The Autonomous Province of Trento (ATP).

[2] Art. 6, par. 9 of *Norme in materia ambientale* (Environmental Standards)

4.2 Listing of projects for screening

4.2.1 Annex I

Annex I (transposed in Allegato II) is word-for-word transposed from the Directive, with several additions and specifications regarding certain types of projects (petroleum, chemical projects for storage, sea protection projects). Furthermore, a few projects that are expected to have a more significant impact on the environment (or already have had in Italian history, such as asbestos, point 5/c of Annex II) are shifted from the Annex II to the Annex I in the national-level jurisdiction, thereby underlining the relevance of and the attention to those projects. This is also the case with shifting projects 3/c to 3/e of the EU Directive (referring to surface and underground storage of natural, combustible gas and fossil fuels) to Annex I (Allegato II).

4.2.2 Annex II and the use of thresholds

The Italian Allegato IV transposes all projects from the Directive Annex II, setting exclusion thresholds based largely on criteria as to performance and size. Great emphasis is put on projects that could have (or have had) impacts on the national level – e.g., point 11.b 'Installations for the disposal of waste', which is expanded in the Italian version with links to other relevant national regulations. A brief remark on criteria is appropriate here: an overview of the Allegato IV (Annex II transposition) indicates that size criteria and performance criteria appear equally used.

In terms of size criteria, there are dimensional values for surface areas (meters, kilometres, hectares, square meters) that are used mainly for specific groups of projects: 'agriculture, forestry and aquaculture' projects (point 1, Annex II), infrastructure projects (point 10, Annex II). On the other hand, many performance thresholds have been set, in particular referring to production capacity (tons per day) in the case of industries (textile, leather, wood, rubber and food) or energy output with reference to the energy industry, extractive industries, and the production and processing of metals and minerals.

In addition, some new groups of projects have been set up. Points 2 and 3 from Annex II (extractive industries and energy industry) are merged under the same paragraph, and likewise with points 4 and 5 (production and processing of metals and mineral industry). Point 6 of Annex II (chemical industry) in particular, is not present in the equivalent Italian Allegato IV, but is transcribed in an additional Allegato VIII, where more detailed specifications are provided concerning 'categories of industrial activities', for projects expected to be screened for EIA.

4.2.3 Annex III

Allegato V (Annex III of the Directive) transposes criteria for the determination of significant effects on the environment, stated in the EU Directive in Annex III. Analysis of both texts shows that this is evidently a word-for-word transposition of the Directive into Allegato V, without specific modifications related to the national context. However, there is one additional point (point i) concerning areas with agricultural products of particular quality and typicality (referring to a specific

national regulation of 2001). For Trento Province, the concept of 'areas in the surroundings of protected areas' is added to the list of the factors based on location.[3]

The concept of 'environmental sensitivity' (mentioned in Annex III as one of the guiding concept for screening) has been expanded in the guidelines attached to the regional legislation. In particular, the guidelines specify that the environmental sensitivity of the proposed location must be assessed, taking into consideration the content of the 'Environmental sensitivity information system (ESIS)' of Trentino. The ESIS is divided into different areas: ecosystems and biodiversity, landscape, natural hazards, soil/water/air protection.

4.3 The Autonomous Province of Trento (ATP)

4.3.1 The screening process

The Autonomous Province of Trento (APT) has specific regulations for projects listed under Annex II (Allegato IV).

Firstly, a project proposal is to be submitted to the Environmental Assessment Department, which is the competent authority. After compliance with the documents provided has been checked, the screening process begins. Here the project is assessed in terms of its own characteristics (size, activities) and the proposed location, according to the criteria set in Allegato V (Annex III). This procedure is to be completed within 45 days. A report is then produced, containing a preliminary technical evaluation of the significance of the expected environmental impacts of the proposed project. This report includes the opinions of relevant governmental agencies (Forestry Department, Wildlife Department, etc.) consulted during the procedure. On the basis of this report, the Environmental Assessment Department determines whether or not an EIA is required.

Appeal is possible (usually by providing new evidence), but it is generally considered faster not to do so, and simply conduct the EIA.

According to the EIA legislation of the APT, for any project falling, even partially, within protected natural areas, an EIA is required directly for new projects; moreover, the size and performance thresholds of Annex II (Allegato IV) are reduced by 50% for others (specified in Annex A in the provincial law).

4.3.2 ATP experiences

Over 400 projects have been submitted to screening in APT (population 530, thousand) since 2001, when the procedure was introduced. This figure includes on-going procedures, procedures that were suspended, projects that were withdrawn etc. About 80% of the projects for which the procedure was completed were not found to require EIA; about 15% were sent to EIA (approx. 10 per year/million residents). The remainder required some modifications/revisions, but not EIA.

[3] Law 28/1988, modified by decree of the Presidente della Giunta provinciale del 13 March 2001, n. 5-56/Leg.

The ESIS is the most interesting element of Trentino's experience: it represents an attempt to be more operational and to remove some of the vagueness from the concept of 'environmental sensitivity'. This has led to screening procedures that are more consistent and replicable, because they are based on a shared understanding and mapping of environmental sensitivity. That common reference has also helped in determining areas that are considered particularly sensitive ('landmarks').

5 France

5.1 EIA in French law

France has incorporated EU Directive 2011/92 within its national environmental law, *Code de l'environnement*. In particular, articles R122-1 to R122-15 are dedicated to the entire EIA procedure and its principles *(Evaluation environnementale)*.

5.2 Listing of projects for screening

5.2.1 Annexes I and II

In listing projects for screening, France does not differentiate between Annex I and II projects, but merges both in a single Annex of its environmental code,[4] grouping individual projects by category (infrastructure projects, energy industry, mineral industry, etc.).

Still the Annex I and II thinking has been retained, so there are projects listed (with or without thresholds) that always require EIA. Then, there are projects with thresholds that require EIA, if they are within the criteria for significant impacts. There is also a list of projects which never require EIA (exclusion list).

5.2.2 Annex II and the use of thresholds and criteria

Exclusion thresholds and criteria (size, performance and monetary, in relation to the project and its nature) are set in the list with projects for screening. Size and performance criteria are widely used, especially those already established by Annex I of the EU Directive – for example, point 20, 'Construction of overhead electrical power (voltage 220 kV, length more than 15 km'). In terms of size criteria, dimensional values are expressed in meters, kilometers, hectares, square meters, and are used mainly for infrastructure, water resources, agriculture and forestry. Performance criteria are set in reference to energy outputs (kW) and production capacity (tons per day). Here we note that in many cases the thresholds are not set directly by the French Annex, but stem from other articles and codes that provide detailed specifications (e.g. Le code minier, L. 211-2 (mining code)).

Monetary thresholds are set in the exclusion list –for one case: projects for modification of public and private roads, in which those below €1,900,000 are exempted from EIA.

[4] Annex to article R122-2, 29 Dec. 2011, Code de l'environnement

5.2.3 Annex III

The criteria set out in Annex III of the EU Directive are transposed into several parts of France's environmental code. There are direct references to the EU regarding projects screened with a case-by-case system: 'projects are subjected to the case-by-case procedure in accordance with Annex III of directive 85/337/CE.'[5] The French environmental code does not transpose word-by-word the criteria text from the EU Directive, but refers to them, or deals specifically with them in a few articles, in order to clarify some procedures. A good example is the Article L512-7-2, referring to the location criteria: in this case it is clearly stated that for projects falling under some of the criteria from Annex III, special regional authorization is required. Citing the text from the law, such authorization is required '1) If, in relation to the location of the project, taking into account the criteria mentioned in point 2 of Annex III to Directive 85/337/CE (…), the environmental sensitivity of the area concerned, justifies it; 2) If the cumulative impacts of the project with other projects justify it; 3) If requirements in other regulations for the projects justify it.'[6]

5.2.4 The screening process

The developer sends the information of the project to the EIA authority, DREAL,[7] which is headed by the regional governor. The authority has 15 days to check compliance of all the documents provided and, if necessary, to request more.

Within 35 days, DREAL is to notify the developer of the decision requiring submission or not of the project to EIA. The decision is reached through consultations with the various relevant authorities, which may be involved directly by DREAL, depending on circumstances. The main authorities here are the ARS (regional health agency) and representatives of chambers of commerce, natural parks, national and regional socio-professional organizations and associations. These must respond within 15 days, in order to enable DREAL to respect the limit of 35 days.

An appeals procedure is nevertheless possible for the developer. This is explained in a preliminary paragraph to the form for request of case-by-case examination, within two months of the notification and publication of the decision.

[5] 'les projets sont soumis à la procedure de cas-par-cas en application de l'annexe III de la directive 85/337/CE'
[6] Article L512-7-2, Section 2, Environmental Code
[7] 'Direction regionale de l'environnement, de l'amenagement et du logement' (Regional authority for environment, infrastructures, housing')

6 Conclusions

As the reports to the European Commission (COM 2002, 2009) demonstrate even more clearly than this study, there is great variation among EU member states in how Annex II screening is organized. For the purpose of this study, it is of interest to see whether if variations in experiences correspond with such differences in the systems.

The EU has done much to document the formal screening systems in its member states. The present study provides addition insights. The main question here is to which extent central actors feel that they have an EIA screening system that is simple enough for the system to handle, and is also efficient, producing screening decisions without too much effort.

The countries in the study, except Denmark, all operate with thresholds for Annex II projects. Length (meters, kilometres), weight (tons), square meters and performance (kilowatts) are used. In France, also one monitory threshold has been set. Denmark, still, has not abolished a threshold approach in a broader sense, in that EIA is defined as being relevant for *industries* only. This avoids placing a 'massive screening load' on the system, and what they have is seen as manageable.

Thresholds in Annex II have one obvious disadvantage: projects that come under these thresholds are not considered for EIA, even if they have significant environmental impacts. One way to avoid this problem is to link the thinking about such impacts to 'sensitive areas', as has been done in England. But this still does not escape the problem entirely, as *outside* such areas there may be projects beneath the thresholds, with significant impacts.

With regard to the level of detail for Annex III criteria, all countries examined here have retained an Annex III structure as in the Directive. In practice, how this is supported by links to other sector-specific regulations (with operational approaches) on environmental subjects (such as habitats, water, pollution), seems to determine how well it works. This reduces ambiguity in screening, and speeds up the procedure. There has been massive rejection in the UK of their Annex III approach, whereas in Denmark and Italy, where such support is in place, it has been well received (with Scotland as an in-between case). That is perhaps the most important finding of this study.

It is of interest to compare with findings from Norway on the equivalent set of criteria, which can be considered as lying somewhere in-between a word-by-word transposition of Annex III from the Directive and links to more operational,

nationally defined, references. This approach has been well received in Norway (see Hanssen 2002).[8]

Can screening be seen as a mini-EIA in itself? This question has been raised in English sources (Thomas 2012) and Danish ones (Christensen 2012). Suffice it here to note that this 'mini-EIA' concern should diminish as environmental standards for all types of projects are strengthened and reported on – independent of EIA or not, as is the case with 'Environmental Approval' as an upcoming basis for EIA screening in Denmark.

The most exciting prospect for EIA screening is to view it in a wider perspective than its primary purpose. That will involve activating the broader field of environmental management and regulation in the screening context, so that information is provided from relevant regulations and data-bases, and from the developers' own procedures for responding to environmental concerns. Screening can also alert developers, and authorities, to likely environmental impacts, so that project proposals can be adapted at an early stage.

This has been demonstrated by the Danish experience. That fact that the Danes set aside so much time for screening (three months, against England three weeks, Italy 45 days, France 35 days), and that there is considerable 'action' in the screening process, reflects the role of screening as 'extended' beyond its primary role.

Finally, as regards the changes to the EU Directive proposed by the European Commission, they would seem to address the concerns raised in the present study.

[8] English version of these criteria (see section 4):
http://www.regjeringen.no/en/dep/md/documents-and-publications/acts-and-regulations/regulations/2005/regulations-on-environmental-impact-asse.html?id=512075

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