Turkish Studies
Social Sciences
Volume 13/18, Summer 2018, p. 1119-1132
DOI Number: http://dx.doi.org/10.7827/TurkishStudies.13772
ISSN: 1308-2140, ANKARA-TURKEY

Research Article / Araştırma Makalesi

Article Info/Makale Bilgisi
Received/Geliş: Haziran 2018 **Accepted/Kabul:** Eylül 2018
Referees/Hakemler: Prof. Dr. Habib AKDOĞAN - Dr. Fidan FIRAT

This article was checked by iThenticate.

"STRATEGIC EIA" AS A NEW ENVIRONMENTAL IMPACT ASSESSMENT METHOD AND ITS IMPLEMENTATION PROCESS IN TURKEY*

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ABSTRACT

Strategic Environmental Assessment (SEA) is the process by which possible negative impacts on environment of plans implemented on spaces and investments made accordingly are identified at regional level through long-term projections and in which necessary measures are taken so as to minimize or eliminate these impacts.

SEA is a globally accepted practice which allows environmental assessment of the place and scale of an activity through decisions (policy, plan and programmes) forming a frame for activities to sustain our natural resources and which supports and strengthens the Environmental Impact Assessment (EIA) process.

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 is called SEA Directive within the legal framework of the European Union.

SEA is a process by which environmental opinions are requested within the framework of the preparation of Plans and Programmes. It is possible to determine in advance what kinds of investments will be made so as to ensure high environmental protection and, within this context, it can be used as a significant social and economic assessment tool integrated with planning or programming process.This method strengthens the process of planning or programming and ensures that the public and relevant environmental authorities efficiently participate in planning measurements carried out at sectoral level.

* This paper is produced based on the Scientific Research Project named "Strategic Environmental Assessment (SEA) as a New Environmental Impact Assessment Method and its Implementation Process in Turkey" which was successfully completed on October 31, 2017.

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A higher quality and environmentally friendly planning is yet another goal of introducing the Strategic EIA. It is aimed to ensure that sectoral development plans on tourism, agriculture, water management, energy, industry, transportation and space planning are "environment-friendly". It is also aimed that EIA practices to be carried out in the fields where Strategic Environmental Assessment is conducted are completed in a shorter period of time.

STRUCTURED ABSTRACT

"Sustainable development", which is developed as a solution approach for problems increasing incrementally since the industrial revolution, sets development objectives which maintain the balance between ecology and economy. Environmental Impact Assessment (EIA) process is one of the tools which contain these objectives and it is included in our national legislation, implemented in various countries and efficiently used so as to prevent problems to occur.

Environmental Law No. 2872 entering into force on August 11, 1983 is the first legal arrangement made in our country with regard to the process of Environmental Impact Assessment. The first Environmental Impact Assessment Regulation issued on February 7, 1993, which is ten years later than adoption of the Law, was published in the Official Gazette No. 21489. This Regulation was subsequently amended and finalized, and it brought forward an understanding and functioning completely different from the previous EIA Regulation. The relevant Regulation was amended and republished in 1997, 2002, 2003, 2008, 2013, 2014, 2016 and 2017. The Regulation published on May 26, 2017 is the eighth regulation which has been republished and it contains amendments to the Environmental Impact Assessment Regulation No. 29186 of November 5, 2014. (http://www.resmigazete.gov.tr/eskiler/2017/05/20170526-2.htm, 2018). As a result of the frequent and constant amendments to EIA Regulation, the quality and functionality of EIA reports have gradually diminished. When the efficiency of EIA process and the "environmental protection" objective of this process and its performance are taken into consideration, they are proved "unsatisfactory", and the need for *Strategic Environmental Assessment (SEA)* process has been brought to agenda. Strategic Environmental Assessment is one of the most significant environmental protection tools which will serve to the sustainable development model and it is an approach used so as to assess and eliminate possible negative impacts of plans and programmes and decisions at strategic levels.

SEA is a globally accepted practice which allows environmental assessment of the place and scale of an activity through decisions (policy, plan and programmes) forming a frame for activities to sustain our natural resources and which supports and strengthens the Environmental Impact Assessment (EIA) process. Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 is called SEA Directive within the legal framework of the European Union.

Strategic Environmental Assessment (SEA) is the process by which possible negative impacts on environment of plans implemented on

spaces and investments made accordingly are identified at regional level through long-term projections and in which necessary measures are taken so as to minimize or eliminate these impacts. It is possible to determine in advance what kinds of investments will be made so as to ensure high environmental protection and, within this context, it can be used as a significant social and economic assessment tool integrated with planning or programming process. This method strengthens the process of planning or programming and ensures that the public and the relevant environmental authorities efficiently participate in planning measurements carried at sectoral level.

A higher quality and environmentally friendly planning is yet another goal of introducing the Strategic EIA. It is aimed to ensure that sectoral development plans on tourism, agriculture, water management, energy, industry, transportation and space planning are "environment-friendly". It is aimed that EIA practices to be carried out in the fields where Strategic Environmental Assessment is conducted are completed in a shorter period of time.

Furthermore; it is obvious that EIA, which is implemented at a project level in our country, will make positive contribution in terms of fillings the gaps related to combating the environmental problems which it leads to and meeting the obligations imposed by national programmes for undertaking EU acquis. In addition, SEA process is considered as a tool smoothing the process of urban planning in practice even though it is known to delay the planning process. Therefore, it is required to implement environmental plans and strategic environmental assessment process together when EU and the other country examples implementing this assessment process are examined.

On the other hand, it is stated the relevant regulation is issued on grounds that it serves to the approach of "environment-sensitive development" in the process of prevention of environmental pollution before it occurs or planning in advance the investments to be made. However; considering that the subject of environment cannot be assessed in a single topic and it has multifactorial impacts, it is not as easy as it is defined to establish interinstitutional coordination, to inform the public via public institutions at planning stage and to ensure civil participation. Therefore, we should discuss to what extent the regulation issued in 2017 achieves its objectives only after putting it into practice.

As is mentioned in this paper; the Regulation on Strategic Environmental Assessment entered into force and was published in the Official Gazette on April 8, 2017 as a result of the implementation of the EU project prepared within the scope of harmonization of the Directive of the European Union on SEA in Turkey. Plans and programmes -forming a frame for the projects listed in the Annex-1 and Annex-2 to the Environmental Impact Assessment Directive No. 29186 of November 25, 2014 concerning waste management, fishing, energy, coastal management, space planning, forestry, industry, water management, agriculture, telecommunication, tourism and transportation sectors- encompass administrative and technical procedures and principles related to implementing, monitoring and giving training on the Strategic Environmental Assessment. They will become operational as of the issue date of the Regulation for plans and programmes subject to SEA prepared in coastal management, space planning, water management, agriculture

and tourism sectors; as of January 1, 2020 for plans and programmes subject to SEA prepared in fishing and forestry sectors; and as of January 1, 2023 for plans and programmes subject to SEA prepared in waste management, energy, industry, telecommunication and transportation sectors.

A huge gap has arisen between the Environmental Impact Assessment (EIA) Regulation which Turkey includes in its national legal system as well as its implementation and its original objectives with the passing years. That the sensitivity and awareness of the public on EIA have raised can be considered as a positive development.

The Strategic Environmental Assessment is found beneficial in the planning process in terms of assessing on catchment area basis or at regional level and on a large scale; in revealing in advance the impacts of projects to be realized, and in taking necessary actions. This is because they are aware of the areas where investments can be made and the areas which should be protected prior to the application made for EIA and they can take necessary actions at early stage, providing benefits in terms of opportunities, costs and time. As it is possible to determine the areas where investments can be made by this means, it can be ensured that they are conducted in a more expeditious and sound manner and such delicate matters as forestry area, agriculture area and the protected areas are included in the application areas.

Keywords: Strategic Environmental Assessment, Environmental Impact Assessment, Urban Planning, Environmental Protection, SEA Directive.

YENİ BİR ÇEVRESEL ETKİ DEĞERLENDİRME YÖNTEMİ OLARAK "STRATEJİK ÇED" VE TÜRKİYE'DEKİ UYGULAMA SÜRECİ

ÖZET

Stratejik Çevresel Değerlendirme (SÇD), mekân üzerinde gerçekleşen planların ve buna uygun olarak gerçekleşen yatırımların çevre üzerinde olası olumsuz etkilerinin bölgesel düzeyde ve uzun erimli öngörülerle tespit edilmesi ve bu etkilerin en aza indirilmesi ya da ortadan kaldırılması için gerekli önlemlerin alınması sürecidir.

Doğal kaynaklarımızın sürdürülebilmesi için faaliyetlere çerçeve oluşturan kararlarla (politika, plan ve program) bir faaliyetin yeri ve ölçeğinin çevresel açıdan değerlendirilmesine olanak sağlayan ve Çevresel Etki Değerlendirme (ÇED) sürecini destekleyerek güçlendiren SÇD uygulaması dünyada kabul görmektedir.

27 06 2001 yılında (2001-42-EC) sayı nolu Avrupa Parlamentosu ve Konsey Direktifi kararı ile Avrupa Birliği yasal çerçevesinde SÇD Direktifi olarak anılmaktadır.

SÇD, Plan ve Program hazırlığı çerçevesinde çevresel görüşlerin talep edildiği bir süreçtir. Yüksek düzeyde çevre koruma sağlamak için, nerelere yatırım yapılacağı önceden belirlenmekte ve buna paralel olarak

plan ya da programlama süreci ile bütünleşen önemli bir sosyal ve ekonomik değerlendirme aracı olarak da kullanılabilmektedir. Bu yöntem ile planlama ve programlama süreci güçlendirilmekte, sektör düzeyinde gerçekleşen planlama ölçeklerine halkın ve ilgili çevresel otoritelerin etkin katılımı sağlanmaktadır.

Stratejik ÇED 'in uygulamaya alınmasındaki bir diğer amaç ise; daha kaliteli ve çevre dostu planlamadır, Turizm, tarım, su yönetimi, enerji, sanayi, ulaştırma ve mekânsal planlamaya yönelik sektörel gelişim planlarının "çevre dostu" olması hedeflenmektedir. Stratejik Çevresel Değerlendirme uygulanan alanlarda yapılacak ÇED uygulamalarının daha kısa sürede tamamlanması amaçlanmaktadır.

Anahtar Kelimeler: Stratejik Çevresel Değerlendirme Çevresel Etki Değerlendirme, Kentsel Planlama, Çevre Koruma, SÇD Direktifi.

INTRODUCTION

"Sustainable development", which is developed as a solution approach for problems increasing incrementally since the industrial revolution, sets development objectives which maintain the balance between ecology and economy. Environmental Impact Assessment (EIA) process is one of the tools which contain these objectives and it is included in our national legislation, implemented in various countries and efficiently used so as to prevent problems to occur. EIA process was first developed the in United States. US legislative bodies were directed to prepare the National Environmental Policy Act in 1969 as it was understood in 1960s that pollution and the other environmental problems could be solved via interdisciplinary approaches. (Güneş, 2008: 40) "Increased sensitivity to environmental issues since 1970s has put at the core of the debate the relation between development and environment. As it is realized that "react and cure" strategy -in other words, the approach of first polluting and then cleaning which was adopted so as to eliminate environmental impacts of development in the beginning- has both technological and economic challenges, it is understood that we must move from "react and cure" strategy to "anticipate and prevent" strategy (Serter, 2005:1). The Declaration prepared within the scope of "Conference on Environment", which was brought into agenda as a political regulation in pursuit of answers for the increasing concerns of the society and environmental outcomes of economic development in the beginning (Cashmore, 2004:403) and which was organized in Rio de Janeiro as a reflection of these developments in the international arena, lays emphasis on the significance and necessity of EIA (Güneş, 2008:40).

Environmental Law No. 2872 entering into force on August 11, 1983 is the first legal arrangement made in our country with regard to the process of Environmental Impact Assessment. The first Environmental Impact Assessment Regulation issued on February 7, 1993, which is ten years later than adoption of the Law, was published in the Official Gazette No. 21489. This Regulation was subsequently amended and finalized, and it brought forward an understanding and functioning completely different from the previous EIA Regulation. The relevant Regulation was amended and republished in 1997, 2002, 2003, 2008, 2013, 2014, 2016 and 2017. The Regulation published on May 26, 2017 is the eighth regulation which has been republished and it contains amendments to the Environmental Impact Assessment Regulation No. 29186 of November 5, 2014. (http://www.resmigazete.gov.tr/eskiler/2017/05/20170526-2.htm, 2018). As a result of the frequent and constant amendments to EIA Regulation, the quality and functionality of EIA reports have gradually diminished. When the efficiency of EIA process and the "environmental protection" objective of this process and its performance are taken into consideration, they are proved "unsatisfactory", and the need for *Strategic Environmental Assessment (SEA)* process has been

brought to agenda. Strategic Environmental Assessment is one of the most significant environmental protection tools which will serve to the sustainable development model and it is an approach used so as to assess and eliminate possible negative impacts of plans and programmes and decisions at strategic levels.

SEA is of importance in terms of taking measures on negative environmental impacts of projects at early stages as it will be applied to the upper scale plans and of preparing consultation-based plans shaping via opinions and recommendations on environment and human health of the public institutions and organizations, universities, trade associations and the public.

Strategic EIA is used as a significant tool which has recently shaped the projects; enforced the policies, plans, programmes and laws in general; and enabled us to consider upper scale decision-making mechanisms and environmental values together. For the subsequent practices, SEA has been put into practice as a version of EIA process which has been expanded in terms of both space and scope. (Serter, 2005: 36)

DEFINITION AND HISTORICAL DEVELOPMENT OF STRATEGIC EIA

The primary goal of those countries which did not experience the industrial revolution and have not completed their objectives is to accomplish the industrialization. However, environmental pollution arising in the aftermath of the Industrial Revolution has ceased to be micro-scale in the course of time and has led to cumulative results. The fact that most environmental problems arising in this process influence the whole world has led to "a common concern for the future" of humanity and "a need to adopt an integrated approach" for problems. (Gökçe, 2015:786)

Strategic environmental assessment concept was cited in Our Common Future Report. The report features the title of common environmental assessment with respect to this subject and it is expressed in this report that the "strategic environmental assessment" should be applied not only to production process and projects but also to policies, plans and programmes shaping these projects in general. (Our Common Future (Brutland Report), 1987: 22)

In parallel with the sustainable development principles, it is required to make predictions on future in each stage of making decisions on any investment/labour activity and to take measures accordingly. (Say; Baykan, 2013: 223) The standard EIA practice related to the activities allows *only* for the assessment of the *final stage* of activity process and, as mentioned by Von Shete (Shete, 1999:1-2), EIA, in fact, fails to cope efficiently with environmental issues. On the other hand, strategic EIA which allows for a comprehensive environmental assessment is a method that can be implemented from the very first stage of business-activity process (Say, Baykan: 2013: 223). Fischer defines the Strategic EIA as "a decision support tool which helps to establish sustainable spatial and sectoral policies" (Fischer, 2003:155). Jones, on the other hand, regards SEA as "a tool coming into play at a very late stage so as to guarantee that all alternatives and impacts related to the sustainability are taken into consideration in planning process (at project level) and lays emphasis on the necessity of a mutual assessment through regional, sub-regional and local planning stages starting from national scale with a view to bridging this gap" (Jones, 2005).

Here is a point that activities which are conducted within the scope of Directive of European Union on Strategic EIA implemented under the European Commission and the United Nations have a strong influence on that Strategic EIA concept has matured and moved to a stage different from EIA process.

The first draft protocol produced for Strategic EIA was prepared within the body the United Nations and presented so as to receive opinions of the world countries during the 2nd Conference of the Parties organized in Sofia, Bulgaria on February 26-27, 2001 and opened for signature with an international meeting held in Kiev, Ukraine in May 2003. On the other hand, the European Union

issued the "Directive 2001/42/EC on the Strategic Environmental Impact dated June 27, 2001" without waiting for the outcomes of these works conducted within the body of the United Nations (Aydın, 2003:20).

The said Directive encompasses plans and programmes on agriculture, forestry, energy, transportation, industry, tourism, urbanization, etc. (http://www.ec.europa.eu/environment/eia/sea-legalcontext.htm, 2018). Monitoring is obligatory within the scope of SEA and it is argued about the implementation of each and every project by the member states, observation of their impacts on the environment, making early intervention against unexpected adverse impacts, and taking corrective actions on these impacts (Aykul, 2015:32). Therefore such practices as a more participatory, transparent, and strategic planning and strategic EIA are brought to the agenda with a view to measuring the efficiency of tools regarding environmental protections and policies like planning and EIA and offering permanent solution.

Political structure of countries and their approaches to environment have led to the differences in practices between the countries where SEA is being improved. (Serter, 2005:41) However, regardless of political culture and environmental consciousness, the Strategic EIA process is considered as an arrangement which can succeed in parallel with how broad the participation is and how transparent and clear the management is, making the Strategic EIA process compulsory to the public consultation. (Partidato, 1996: 15)

SEA PRACTICES AROUND THE WORLD

While the first legislative arrangements concerning this issue were generally initiated in 2000s at international level; countries like Canada, the Netherlands, New Zealand, USA, etc. have introduced their environmental assessment principles with cabinet decrees, policies, plans and programmes since 1980s.

Strategic EIA practices may differ in line with the government system and legislation of each country. (Serter, 2005:41) Table 1 below illustrates comparisons between 13 countries where it is obligatory to carry out SEA.

Table 1: Comparisons of SEA Practices on Policies and Legal Arrangements in Certain Selected Countries (Say, Baykan, 2013: 227)

Country	Provision	Is it applied to the Proposed Policies?	Applied to the legal arrangements?
Australia	Environment Protection and Biodiversity Conservation Act 1999	Applied to the regional forest policies.	Not applied
Canada	Cabinet Directive 1990 (Amended 1999)	It is applied to policies and plans subject to cabinet approval or ministerial decision.	Applied
Czech Republic	EIA Act was enacted in 1992 and amended in 1998, 2000 and 2004.	It is applied to the policies and strategies in sectors listed in the Act which are included in Development.	Not applied
Denmark	Prime Ministry Circular (amended in 1993 and 1999, 2004.)	It is applied to the government proposals.	It is applied to the bills and regulations.
Finland	Act on Environmental Impact Assessment Procedure (1994), Directive on Environmental Impact Assessment of Legislative Proposals (1998)	It is applied to the policies.	
Slovakia	EIA Act 127/1994	It is applied to the policies and plans in certain sectors.	Yes
Poland	Access to Information on Environmental Subjects and Environmental Protection and Assessment of Environmental Impacts	It is applied to the strategies and policies listed in and required by the Act.	Yes
United Kingdom	Directive on Policy Evaluation and Environment	Yes	It is applied to the draft laws.
USA	National Environmental Policy Act	Yes (It is applied as a principle)	Yes (Draft laws)

Source: (Say; Baykan, 2013: 228)

As is obvious from the Table above, there are differences in practices within the framework of individual national legislation of each country. To illustrate; the central government is more decisive in establishing a general framework and setting goals on plans in UK. In the Netherlands, there is a hierarchical space planning. Planning decisions taken on a national, regional and local scale are transferred to the construction plans drawn up by municipalities as per the regulations. (Sadler, 2005) On the other hand, when Strategic EIA practices and experiences are taken into consideration, it is seen that they are the most successful practices conducted within the framework of urban and transportation planning in Germany. The most significant reason is that inclusion of environmental matters in the planning process is a general principle which has been implemented for a long period of time (Say, Baykan: 228).

Differences in Strategic EIA practices lead to a difference in the number of the relevant institutions and organizations, and, as is obvious from the Table 1 above, the extensive scope of application varies in the process of evaluation of plans, programmes and policies.

CZECH REPUBLIC-PRAGUE EXAMPLE IN STRATEGIC EIA (FIELD WORK)

In Czech Republic, a need has arisen to assess environmental issues within the framework of land-use planning since mid-1970s. In 1992-1996 period, the relevant national legislation was prepared by examining country examples taken from the other countries. In 1996-2004 period, they got some more experience and developed methodological approaches. In that period, SEA was only applied to the plans at government level and regional plans in 14 districts of Czech Republic, and, within this scope, the Ministry of the Environment of the Czech Republic could only conduct just a

few practices a year as a central authority (The Ministry of Environment and Urban Planning of the Republic of Turkey, 2015:1) There are three administrative levels to govern the country: the government level (ministries), 14 districts (regions), towns and cities (municipalities). When SEA is conducted at district level, the relevant governorate will evaluate the reports; on the other hand, the relevant Ministry of the Environment will evaluate these reports when SEA is conducted throughout the country. SEA is not applied to issues related to national security, earthquake, etc.

Strategic EIA is transposed to the legislation of Czech Republic by SEA Directive issued in 2004; they have begun to conduct SEA at national, regional and local levels; and Natura 2000 areas are assessed considering human health as well. It is stated that there are around 100 Natura 2000 areas in Czech Republic. (The Ministry of Environment and Urban Planning of the Republic of Turkey, 2015)

2004 sets a milestone for Czech Republic since SEAs had been applied to the plans only for the government on a district basis prior to 2004 while application areas of cities and municipalities were extended and the authorized institutions made changes in their authorities and transferred SEA into their environmental plans at regional level in 2004 and afterwards.

Miroslav Martis, an expert in SEA from Czech University of Life Sciences Prague, explained SEA practice and SEA process applied to Waste Management Plan as follows: *"In the country, strategies are set for a ten-year period and waste management plans were prepared for 2003-2014 period and for 2015-2025 period. The plan encompasses such methods as waste storage, waste incineration, etc. SEA process concerning this plan lasts for 17 months while meetings are held with the participation of 14 different communities (with 1,324 participants) and the plan is published on the web site and advertisements are put on newspapers. During these meetings, it is stated that the public is opposed to incineration plants; wastes like sewage sludge were previously imported from Germany and Poland but now it is banned in parallel with the opinions of the public on waste import following the waste management."* (The Ministry of Environment and Urban Planning of the Republic of Turkey, 2015:1)

It is also stated that in the EIA process implemented for the construction of nuclear power plant, Germany and Austria expressed their adverse opinions during the meetings conducted within the scope of Aarhus Convention but they looked after national interests and began the construction regardless of these opinions.

A study visit was paid to Czech Republic so as to evaluate on-site the SEA experiences and functioning. Within this scope, it is stated that Prague is governed by both the Act on Capital City Prague and the Metropolitan Municipality Act and that Prague has a population of 1,200,000 individuals and 57 sub-municipalities in accordance with 2015 data. It is stated that they are preparing a Metropolitan Plan which will enter into force in 2020 while simultaneously preparing a SEA Report (The Ministry of Environment and Urban Planning of the Republic of Turkey, 2015:1). It is expressed that the Metropolitan Municipality Council decides whether or not changes in the Plan are subject to SEA. Plans for which the Metropolitan Municipality conducts SEA are environmental protection strategies, Strategic Plans prepared by the Municipality (SEA is conducted for only 1 of them), space plans and sustainability plans. Transportation Strategy has been prepared by the Ministry of Transport of the Czech Republic. It covers railway transport, airway transport and river navigation and encompasses the improvement of traffic models and transportation infrastructure. Preliminary analysis of traffic volume up to next 250 years has been carried out and multi-criteria analysis methods have been used. SEA process lasts from 1.5 to 2 years. When considering the 2015 budget, the preparation cost of transport strategy is € 800,000.00 and SEA budget is € 46,000.00. It is understood that in Czech Republic there are 13 districts whose SEAs are approved by 2015 and 1 SEA is revoked for which a lawsuit was filed. It is stated that route of a highway project can be seen in these plans yet it is not possible to evaluate it on parcel basis.

STRATEGIC ENVIRONMENTAL IMPACT ASSESSMENT (SEA) BROUGHT TO THE AGENDA IN TURKEY

Inclusion of "Environmental Impact Assessment" in legal order in Turkey has begun with the Environmental Law enacted in 1983. Article 10 of this Law is titled "Assessment of Environmental Impact". As per the 1983 version of this Article, it is stipulated that *"The institutions, agencies and establishments that may cause environmental problems as a results of their activities that they are planning to carry out shall prepare an "Environmental Impact Assessment Report". In this report all impacts on the environment shall be considered and the methods for eliminating the harmful impacts of wastes and scraps that may cause environmental pollution and the corresponding precautions shall be specified. The issues concerning the type of projects that this "Environmental Impact Assessment Report" will be required, its contents and the endorsement authority shall be specified in a regulation. (http://www.mevzuat.gov.tr/MevzuatMetin/1.5.2872.pdf).* Law No. 5491 (2006) amended the earlier Environmental Law No. 2872 and the Article 10 is amended as follows: "*The institutions, organizations and establishments that may cause environmental problems as a results of their activities that they are planning to carry out shall liable to prepare Environmental Impact Assessment Report or Project information file. Unless Environmental Impact Assessment Affirmative Decision or Environmental Impact Assessment is not Necessary Decision is taken; approval, consent, incentive, construction and use permit shall not be granted; for the project, investment shall not be initiated and give out by contract. Petroleum, geothermal resources and prospecting activities are out of scope of Environmental Impact Assessment. Projects subject to EIA and plans and programmes subject to SEA and procedures and principles regarding this subject shall be determined by the regulations to be introduced by the Ministry."* (http://www.resmigazete.gov.tr/eskiler/2006/05/20060513-1.htm 2018).

With the amendments to the Environmental Law (2006), the Strategic Environmental Assessment concept is defined at legislative level for the first time in Turkish law (Güneş, 2010: 58).

In a study conducted by Innanen which examines EIA process, it is stated that strategic EIA has not become effective yet and EIA system is not integrated with the land-use and sectoral planning system (Innanen , 2004: 141-151).

Given the above-stated provisions of the law and the duties, authorities and liabilities of the relevant institutions; it is decided to prepare a Draft Regulation on Strategic Environmental Assessment to assess the possible negative impacts on the target nature/environment of the prepared plans and programmes to minimize these negative impacts with a view to fulfilling the requirements of compliance with EU Acquis ("2001/42/EC EU SEA Directive"), and, within this scope, a project was launched in 2003 and completed in 2005 in an attempt to ensure ratification and implementation of Strategic Environmental Assessment (SEA) Directive (2001/42/EC) in Turkey within the framework of MATRA Programme prepared in mutual collaboration with the Government of the Netherlands. (http://SÇD.cevre.gov.tr/SeaMenuSayfa.aspx?SeaMenuId=2009), 2018)

In this context, the first Strategic EIA project of Turkey was implemented in Çanakkale province and funded within the framework of "MATRA Social Transformation Programme" of the Netherlands with a view to strengthening institutional structures required for harmonization of EU candidate countries (Serter, 2005: 59). The relevant project is "a pilot project implemented for the Environmental Planning Revision of Çanakkale province and city center (1:25,000 scale) within the scope of SEA Practice. Within the scope of this project implemented under MATRA Programme, a draft regulation is prepared based on the Directive of European Union on Strategic Environmental Assessment and the process which is planned to be realized via this regulation is tested through the pilot project.

The project primarily aims to prepare a Draft SEA Directive in Turkey pursuant to the Directive of European Union on SEA (2001/42/EC). Thereafter the project is divided into 2 sub-projects. The first one aims to prepare a Draft SEA Directive and the other one aims to conduct a pilot region study in Antalya province so as to test SEA process of this draft directive. (Serter, 2005: 67)

Within the framework of "Oymapınar Tourism Development Project", Oymapınar which is located in immediate environment of Antalya province and included in the scope of the "Tourism Development Project for Diversifying Tourism Activities and Extending Tourism Season" is determined as the pilot project site. The underlying reason of selecting this region as the study area subject to the strategic environmental assessment is that it has a rich biodiversity and there is a different dimension of projects to be implemented in the region ("theme parks", "golf courses", "ecotourism", "tableland tourism", "natural parks", "sports tourism", etc.). (The Ministry of Culture and Tourism of the Republic of Turkey, 2004:13)

Another study conducted in Turkey within this scope is the "Capacity Building Project for Strategic Environmental Assessment Practice of Turkey" supported by MATRA programme and launched in 2008 This project gives priority to (1) building a capacity and raising awareness in the country; (2) forming a SEA team/staff authorized to give trainings on SEA; and (3) preparing resources and training materials required for SEA with the objective to implement the Directive of the European Union on SEA -which we are liable to comply with- and SEA Directive to be realized accordingly (Hamamcı, Boşca, 2013: 217). In this context, Kayseri Province Environmental Plan (1:50,000 scale) is selected as the pilot project for which SEA will be conducted. Unlike the situation set forth in the Draft Regulation on Strategic Environmental Assessment; "it is aimed to find out problems and challenges in the territory and to raise awareness on strategic environmental assessment by organizing two preliminary meetings in the territory prior to the scoping meeting." (Hamamcı; Boşca, 2013: 217)

"Technical Assistance Project for the Implementation of Strategic Environmental Assessment Regulation" which was launched on May 12, 2014 is the latest project launched in Turkey within the framework of Strategic Environmental Assessment and this project has revealed a need to provide the necessary conditions (legal, institutional, administrative and technical) for the complete and efficient application of the Strategic Environmental Assessment to the planning system and for the preparation of this regulation. Unlike the other projects, 4 different sectors are studied in the study which is completed within this framework. SEA Practice has been applied to Energy Sector (Karapınar Industry Zone Specialized in Energy), Agriculture Sector (Agriculture Master Plan of Bozcaada and Gokceada islands), and Water Management Sector and Regional Development Sector (Ankara Regional Plan). In Agriculture Sector, the Master Plan of Bozcaada and Gokceada islands comprises the phases of revealing requirements and strategies developed for the efficient use of potential agricultural resources, of analyzing the available resources and the restrictions, and of determining agricultural projects and project sites (Eptisa Engineering, Agriculture Sector, 2016: 1). When Ankara Regional Plan is analyzed for the Regional Development Sector; it is revealed that 89% of the total population live in the city center and the rest is distributed to the sub-regions and that the plan aims to redress a rural-urban balance, to create a viable rural environment and to minimize the developmental differences within the region. In addition, the primary social and physical infrastructure investments are specified as the priority environmental problems in districts with low population density where agricultural activities prevail. (Eptisa Engineering, Regional Development Sector, 2016: 2).

A SEA Report is prepared for "Konya-Karapınar Industry Zone Specialized in Energy" and, within this framework, a single SEA process instead of individual SEA processes is implemented in the areas planned as Solar farms based on the SEA Report, and Environmental Impact Assessment

Affirmative Decision is given as the Strategic Environmental Assessment is conducted. (41 days/ 10.10.2016-21.11.2016). (The Ministry of Environment and Urban Planning of the Republic of Turkey; Directorate General of Environmental Impact Assessment, Permit and Inspection; Information Note, 2018:1)

At the present time, the Strategic EIA essentially aims to take into consideration the information, plans and programmes while preparing the SEA Report of the relevant regulation to be issued as it is required to take into account the potential impacts in the process of decision-making on plans and programmes. As a result of the relevant project, the Regulation on Strategic Environmental Assessment entered into force and was published in the Official Gazette on April 8, 2017 so as to support and facilitate the EIA process. In line with the opinions of the relevant institutions and organization received within the scope of the Regulation, it is aimed to carry out SEA practices in the above-stated sectors step by step.

CONCLUSION AND EVALUATION

A huge gap has arisen between the Environmental Impact Assessment (EIA) Regulation which Turkey includes in its national legal system as well as its implementation and its original objectives with the passing years. That the sensitivity and awareness of the public on EIA have raised can be considered as a positive development.

As is mentioned in this paper; the Regulation on Strategic Environmental Assessment entered into force and was published in the Official Gazette on April 8, 2017 as a result of the implementation of the EU project prepared within the scope of harmonization of the Directive of the European Union on SEA in Turkey. Plans and programmes -forming a frame for the projects listed in the Annex-1 and Annex-2 to the Environmental Impact Assessment Directive No. 29186 of November 25, 2014 concerning waste management, fishing, energy, coastal management, space planning, forestry, industry, water management, agriculture, telecommunication, tourism and transportation sectors- encompass administrative and technical procedures and principles related to implementing, monitoring and giving training on the Strategic Environmental Assessment. They will become operational as of the issue date of the Regulation for plans and programmes subject to SEA prepared in coastal management, space planning, water management, agriculture and tourism sectors; as of January 1, 2020 for plans and programmes subject to SEA prepared in fishing and forestry sectors; and as of January 1, 2023 for plans and programmes subject to SEA prepared in waste management, energy, industry, telecommunication and transportation sectors.

The Strategic Environmental Assessment is found beneficial in the planning process in terms of assessing on catchment area basis or at regional level and on a large scale; in revealing in advance the impacts of projects to be realized, and in taking necessary actions. This is because they are aware of the areas where investments can be made and the areas which should be protected prior to the application made for EIA and they can take necessary actions at early stage, providing benefits in terms of opportunities, costs and time. As it is possible to determine the areas where investments can be made by this means, it can be ensured that they are conducted in a more expeditious and sound manner and such delicate matters as forestry area, agriculture area and the protected areas are included in the application areas.

Furthermore; it is obvious that EIA, which is implemented at a project level in our country, will make positive contribution in terms of fillings the gaps related to combating the environmental problems which it leads to and meeting the obligations imposed by national programs for undertaking EU acquis. In addition, SEA process is considered as a tool smoothing the process of urban planning in practice even though it is known to delay the planning process. Therefore, it is required to implement environmental plans and strategic environmental assessment process together when EU and the other country examples implementing this assessment process are examined.

On the other hand, it is stated the relevant regulation is issued on grounds that it serves to the approach of "environment-sensitive development" in the process of prevention of environmental pollution before it occurs or planning in advance the investments to be made. However; considering that the subject of environment cannot be assessed in a single topic and it has multifactorial impacts, it is not as easy as it is defined to establish interinstitutional coordination, to inform the public via public institutions at planning stage and to ensure civil participation. Therefore, we should discuss to what extent the regulation issued in 2017 achieves its objectives only after putting it into practice.

At the present time, the Strategic Environmental Assessment is implemented in various countries across the world However, all "environmental and social" issues show us that SEA implementation process is not easy and it reveals what kind of difficulties we may encounter. It is obvious that an objection may be raised against SEA practices in the implementation process of urban planning and urban investments in particular. Consequently, it is clearly shown that SEA implementation requires a social support internalizing urbanite rights and environmental consciousness.

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