

Semi-annual Environmental Monitoring Report

Project Number: 50388-001

Reporting period: July-December 2025

#1 Semi-annual Report

January 2026

Georgia: Batumi–Sarpi Road Project

Loan No GEO 2843

(Financed by the Asian Development Bank (ADB))

Prepared by Roads Department of the Ministry of Infrastructure of Georgia for the ADB

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CURRENCY EQUIVALENTS

(As of December 2025)

Currency unit	–	United States Dollars (USD)
{GEL}1.00	=	\$ 0.37 USD
\$1.00	=	2.69 GEL

Abbreviations

ADB	Asian Development Bank
CC	Construction Contractor
CH	Cultural Heritage
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
GRM	Grievance Redress Mechanism
GRCE	Grievance Redress Committee
HS	Health & Safety
HSE	Health, Safety and Environment
IFC	International Finance Corporation
LARP	Land Acquisition and Resettlement Action Plan
MoEPA	Ministry of Environmental Protection and Agriculture
MoESD	Ministry of Economy and Sustainable Development
MoI	Ministry of Infrastructure
NCN	Non-Conformance Notice
NCR	Non-Conformance Report
PMCSC	“Project Management and Construction Supervision Contract
PPE	Personal Protective Equipment’
PIU	Project Implementation Unit
QC	Quality Control
RD	Road Department of Georgia
RoW	Right of Way
SAEMR	Semi Annual Environmental Monitoring Report
SC	Supervision Consultant
SSEMP	Site Specific Environmental Management Plan
SPS	Safeguard Policy Statement

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1 INTRODUCTION

1.1 Preamble

1. This report presents the Semi-annual Environmental Monitoring review of Batumi-Sarpi Road Project for the period of July-December 2025
2. This report is the 1st Semi-Annual EMR for the Project.

1.2 Headline Information

3. This SAEMR for Construction of Batumi-Sarpi Road Project and covers reporting period from July to December 2025. The report describes the status of project implementation, activities carried out by the Roads Department (RD) with regard to environmental safeguard issues.
4. The Project has been screened with the ADB's Rapid Environmental Assessment Checklist (REA). The classification was based on the most environmentally sensitive component of the project, which means that if one part of a project has the potential for significant adverse environmental impacts, then the project is to be classified as environmental category "A" regardless of the potential environmental impacts of other aspects of the project. Based on the REA Checklist, the project is classified as a Category "A".
5. The Supervision Consultant (SC) will supervise and monitor the project construction process. The SC includes Environment Specialist (national) as part of their team to oversee the overall implementation of environmental management plan (EMP)/SEMP, environmental monitoring, and compliance to the environmental requirements of ADB. SC Environmental Specialist will prepare section specific report for environment under overall Quarterly Construction Report required by ADB, monitor the environmental compliance of the Construction Contractor (CC).
6. According to the Georgian legislation a proposed project is classified as a Category "A" also and EIA state expertise conclusion according to Georgian legislation is needed. As already mentioned, this project is funded by the ADB, and the preparation of the EIA report was based on the requirements of the ADB SPS 2009 and Georgian legislation. EIA and EMP were prepared by the LTD GAMMA Consulting and SPEA Engineering S.p.A. & IRD ENGINEERING S.r.l. and submitted to the Ministry of Environmental Protection and Agriculture of Georgia (MEPA) for getting a conclusion.
7. In line with the disclosure requirements of the ADB SPS 2009, the EIA documentation, including the Georgian-language version, was disclosed on the official website of the RD (www.georoad.ge)¹.
8. Accordance with the requirements of the Environmental Assessment Code of Georgia, the Georgian-language version of the EIA was also disclosed on the official environmental information portal of the MEPA (<https://ei.gov.ge/>).
9. A positive Environmental Decision for the Project was issued on 24 December 2024 by LEPL National Environmental Agency under the MEPA (*Please see Annex 1-Environmental Decision*).

¹ <https://www.georoad.ge/?lang=eng&act=project&func=menu&uid=1748334027>

10. In accordance with the Environmental Decision, a number of binding requirements shall be fulfilled prior to and during project implementation. In particular, (i) submit an updated biodiversity monitoring plan for approval, including specific provisions for monitoring impacts on water-dependent species and Red List fauna (notably the Eurasian otter), and define reporting arrangements; (ii) develop and agree with the Agency detailed designs and spatial layouts (including GIS data) for construction camps and spoil disposal sites, ensuring compliance with water protection regulations and incorporating biodiversity-sensitive planning; and (iii) assess geological stability and potential impacts of blasting works on slopes and infrastructure safety.
11. In addition, the Environmental Decision requires full implementation of all mitigation measures, monitoring programs, and management plans defined in the EIA/EMP documentation; compliance with national regulations on soil management, waste management and environmental protection.
12. To ensure that the contractor comply with the requirements of the EIA, EMP, RD prepared and provided the following specification clauses into the bidding documentation.
13. Preparation of the Biodiversity Action Plan (BAP) is currently underway with the support of the ADB. A biodiversity specialist is being engaged under the Project to lead this process, including the identification of required monitoring measures and surveys. The finalized BAP will define the scope of actions to be implemented, including any engagement of qualified institutions, such as universities and NGOs, as necessary for its implementation.
14. The civil works did not start yet. At present, procurement procedures are ongoing for both the selection of the civil works contractor and the supervision consultant.

2 PROJECT DESCRIPTION AND CURRENT ACTIVITIES

2.1 Project Description

15. Due to its geographic location, Georgia's role as a major transit country is momentous. Transport of goods into and through Georgia has increased over the past 10-15 years. Almost two-thirds of goods in Georgia are transported by road, and haulage by domestic and international truck companies is very evident on the country's highways. Many of the roads are, however, poorly equipped to cope with the volume of traffic and the proportion of heavy vehicles, and factors such as insufficient dual carriageways, routing through inhabited areas and inadequate maintenance and repair, hinder throughputs and increase transit times. This creates difficulties for haulage companies and their clients, truck drivers, Georgian motorists and local residents.
16. The Government of Georgia (GoG) has launched a program to upgrade the major roads of the country. The program is managed by the RD of the Ministry of Infrastructure (MoI) and aims to improve transportation and transit of goods in Georgia and to surrounding countries. The World Bank, Japanese International Cooperation Agency (JICA), European Investment Bank (EIB) and the ADB have already provided series of loans to the state for construction/rehabilitation of the road infrastructure.

17. Roads from the break of bulk points on the Black Sea coasts such as Poti, Sokhumi and Batumi, as well as from Turkey, merge on the E-70 and E-60 highways (European routes) to connect to the Baku (Azerbaijan) port on the Caspian Sea.
18. The main objective of the project is to improve the connection between Batumi and Sarpi (Turkey border) building a new section in brown field of the existing E70 highway. The new section will be connected to the E70 new Batumi bypass which is under construction. A number of others infrastructure projects have been initiated by the GoG to improve the transit routes of the land transport, with the support of international Financing Institutions such as the World Bank, EIB, ADB, JICA and etc.
19. The existing road is 14.5 km long and passes through the villages of Agvia, Gonio and Kvartati, providing access to the Emerald Site of Chorokhi Estuary and to some of the most appreciated beaches of Georgian Black Sea shore with the relevant touristic services. The new road will relief the existing one from heavy and cross-through traffic, providing the due condition for developing the economic potential of the area. Similarly, the chosen alignment avoids impact to the pristine beauty of the neighboring Charnali River valley.
20. The chosen alignment connects the Batumi Bypass (interchange) with Sarpi (Border service area) on a total length of approximately 11.0 km (Figure 1). According to the current design the construction will be implemented in two separates in time phases, including the Phase 1, which will mostly be a 2-lane bidirectional road and the Phase 2, which will be an upgrade to 4 lane wide road for the entire length of the project. It should be noted that parts of phase 1 also include 4 lane road sections. The upgrade to four lane road within the context of phase 2 only includes the section of the bridge and the tunnel. The remaining section, will be four lane road from the phase 1. This decision was taken to avoid complex earthworks and temporary structures in between two phases.

Figure 1: General Situation Map of the Project



21. In accordance to the functional classification system of Georgia, the Project Road is classified as “International” importance road, which connects the administrative and significant centers of Georgia and other countries. The Current design includes construction in two phases. Construction of one branch serving as a bidirectional road and upon the relevant traffic increase the construction the second branch.
22. The project starts at the last interchange of Batumi Bypass project which is under construction, with direction south – southwest. Within a length of approximately 1km the designed road reaches the north bank of chorokhi river, which is crossed with a 1.5km long viaduct. In the section before the bridge there is a main interchange of the project which ensures the connection to the Custom Clearance area, the Airport and the popular Coastal resorts – settlements of southern Batumi. The south abutment of the viaduct is located in the village of Akhalsopeli. The road corridor continues in the same direction and within a distance of less than 100m enters the 7.6km long Tunnel. This tunnel bypasses from the east side the main settlements of Gonio and Kvartati.
23. The Road Exits from the tunnel at the location of St. Andrew waterfalls, and slightly changes orientation towards south, where it runs along the steep coastal area. In this area, for approximately 500m the project includes coastal protection measures. In the portal of the tunnel there is an arrangement of an interchange which connects from the south, the coastal resorts. The Phase 1 of the project ends before the settlement of Sarpi, where it connects to the Existing Road, while the Phase 2 of the project enters the settlements and end before the Border with the arrangement of Sarpi Interchange.
24. At this stage It is important to consider that the main cost of the project is the tunnel and the bridge compared to the construction cost of the earthworks of both phases together. Therefore, in order to avoid complex connections, which impacts on the quality of the roadway, for areas where the roadway sits on earthworks, the first phase will include the construction of four lane roadway. This is mainly applied for the section from Batumi Bypass until the Chorokhi river and from the south portal of the tunnel until the end of the project. Phase 2 will only include the construction of the second tunnel and the second bridge, and of course the Sarpi area.

Figure 2: Project Location



2.2 Project Contracts and Management

25. Information related to the project execution is given in Table 1:

Table 1: Project Information

Employer	Road Department of Ministry of Infrastructure of Georgia
Funding Source	ADB
“Project Management and Construction Supervision Contractor (PMSC) (Engineer)	To Be Determined
Contractor	To Be Determined
Contract Number	N/Y
Contract date	N/Y
Commencement Date of Works	N/Y
Contract Period	N/Y
Original Completion date	N/Y
Expired time	N/Y
Remaining time	N/Y
Defects Notification Period	N/Y
Contract Price (GEL)	N/Y

26. The TOR for the PMSC contains the following tasks for the environmental specialists:

- Ensure that the provisions of the approved EMP are reflected in the Contractor's Specific environmental management plan(s) (SEMPs) prior to its acceptance by the PMSC, the Employer, and thereafter ensure that the Contractor complies in every respect with the provisions of the SEMP;
- Supervision consultant shall ensure the implementation of the measures and recommendations defined in the finalized BAP, including overseeing the Contractor's compliance with relevant biodiversity requirements and ensuring that all necessary actions are carried out in accordance with the approved plan;
- Develop an environmental auditing protocol for the construction period, regularly supervise the environmental monitoring, and submit the Monthly EMR and Semi-annual EMR based on the monitoring data and laboratory analysis reports. Monthly EMR will be included as an annex to the Consultant's Monthly Progress Report;
- Develop a program for hands-on training of Contractor's staff in implementing the SEMP;
- Conduct post-construction environmental audit and prepare post-construction environmental audit report.

27. The obligation of the Contractor to safeguard the environment, mitigate adverse impacts, and implement rehabilitation measures is addressed through environmental provisions included in the FIDIC Conditions of Contract for Construction (MDB Harmonized Edition, June 2010), as

well as through project-specific environmental clauses incorporated into the Contract. In particular, FIDIC Clauses 4.18 (Protection of the Environment), 4.8 (Safety Procedures), 6.4 (Labour Laws), 16.3 (Cessation of Work), 2.3(b) (Employer's Personnel), and 4.21 (Progress Reports) establish key environmental and safety obligations applicable to the Contractor.

28. These provisions have been incorporated into the draft bidding documents, ensuring that environmental obligations are clearly defined, legally binding, and enforceable throughout project implementation
29. In addition, in accordance with the requirements of the EIA (Section H.4), the EIA and EMP form integral parts of the Contract as annexed documents. The Contractor is contractually obligated to implement all mitigation measures, monitoring requirements, and environmental management provisions defined therein. Any non-compliance with EMP requirements constitutes a breach of contractual obligations and is subject to corrective actions and enforcement measures in accordance with the Contract conditions.
30. The PMCSC was not awarded during the reporting period. At present, the procurement process is ongoing, and the selection is at the tendering stage.
31. The Contractor was not awarded during the reporting period. The procurement process for civil works is currently ongoing.
32. The ToR for the supervision consultant include the required environmental and health and safety expertise in line with the EIA. In particular, the ToR provide for the engagement of both international and national environmental specialists, including a Senior Environmental Specialist and an Environmental Specialist, as well as dedicated Occupational Health and Safety Specialists.
33. Furthermore, the ToR assigns clear responsibilities for environmental supervision, monitoring, and compliance with the EMP and Contractor's SSEMPs, including continuous site-based oversight of environmental mitigation measures, monitoring activities, and reporting. These functions collectively ensure that ecological supervision requirements are effectively covered within the supervision framework.

Table 2. Summary of Civil Works Contracts and works progress

Contractor	Signed	Approval Date	Environmental personnel		Civil Work		Progress as of	
		SSEMP	Environmental officer	Health and Safety officer	Start	End		
Not selected yet	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Note: The Month/Years in brackets are planned schedule.

SSEMP = site-specific environmental management plan

34. Contact details of ADB, EBRD, CC, “Project Management and Construction Supervision Contractor (PMCSC) and RD representatives are given in Table 3 below:

Table 3: Main Environmental Staff of ADB, RD, PMCSC and CC

Organization	Position	Name
ADB	Environmental Specialist (Safeguard)	Armine Yedigaryan ayedigaryan@adb.org
	TA Environmental Specialist (consultant)	Name: Giorgi Kobaladze gkobaladze.consultant@adb.org
	Safeguards Officer (Environment) Georgia Resident Mission	Nino Nadashvili nnadashvili@adb.org
Client/ Borrower	Environmental Specialist of RD	Luiza Bubashvili likabubashvili@yahoo.com
	Head of Environmental and Social Division of RD	Mikheil Ujmajuridze mikheil.ujmajuridze@georoad.ge
	Head of Environmental Unit of RD	Gia Sopadze sopgia@hotmail.com
	H&S Specialist of RD	Giorgi Kochiashvili giorgi.kochiashvili@georoad.ge
CSC	International Environmental Specialist	TBD
	Environmental Expert	TBD
Contractor	Project Manager	TBD
	Environmental Specialist	TBD

Note: The above table only includes the main environmental staff.

2.3 Project Activities during Current Reporting Period

35. At the current stage, the status of key project readiness activities is as follows, in line with the Project Administration Manual (PAM) implementation plan:
36. The detailed engineering design has been completed. The Environmental Decision has been obtained on 24 December 2024 from the MEPA. Disclosure of the EIA documentation, including the Georgian-

language version, has been completed in accordance with both ADB SPS 2009 and national legislation requirements.

37. The EIA and EMP have been incorporated into the draft bidding documents as contractual requirements. Procurement processes for both the civil works contractor and the construction supervision consultant have been initiated and are currently ongoing, with both processes at the tendering stage.

38. Preparation of the BAP has been initiated with the support of the ADB and engagement of a biodiversity specialist has already been engaged under the Project to lead this process.

2.4 Description of Any Changes to Project Design

39. N/A

2.5 Description of Any Changes to Agreed Construction Methods

40. N/A

3 ENVIRONMENT SAFEGUARD ACTIVITIES

3.1 Description of Environment Safeguards Activities

41. N/A

3.2 Site Audits

42. N/A

3.3 Issues Tracking (Based on Non-Conformance Reports)

43. N/A

3.4 Trends

44. N/A

3.5 Unanticipated Environment Impacts or Risk

45. No unanticipated impacts or emerging risks identified during the reporting period

4 RESULTS OF ENVIRONMENTAL MONITORING

4.1 Overview of the Monitoring Conducted During Current Period

46. Due to the fact that no construction activities were carried out, no environmental measurements have been undertaken within current reporting period.

47. Baseline environmental conditions were established during the EIA stage, including air quality, noise, and water quality parameters at representative receptor locations. These baseline data will serve as reference values for comparison during construction-phase monitoring.

48. Detailed baseline results are presented in the EIA² and will be incorporated into the Contractor's SSEMP.

4.2 Trends

49. N/A

4.3 Summary of Monitoring Outcomes

50. N/A

4.4 Material Resource Utilization

4.4.1 Current Period

51. N/A

4.4.2 Cumulative Resource Utilisation

52. N/A

4.5 Waste Management

4.5.1 Current Period

53. N/A

4.5.2 Cumulative Waste Generation

54. N/A

4.6 Current Period

55. N/A

4.7 Health and Safety

4.7.1 Community Health and Safety

56. N/A

4.7.2 Occupational Health & Safety

57. No construction activities or workforce mobilization took place.

² <https://www.georoad.ge/?lang=eng&act=project&func=menu&uid=1748334027>

58. The requirement for Health & Safety specialists at a ratio of 1:50 workers, in accordance with Georgian legislation and reflected in the EIA, is included in the contractor specifications. Compliance will be reported in subsequent SAEMRs following contractor mobilization.

4.7.3 Worker Safety and Health

59. N/A

4.8 Trainings

60. N/A

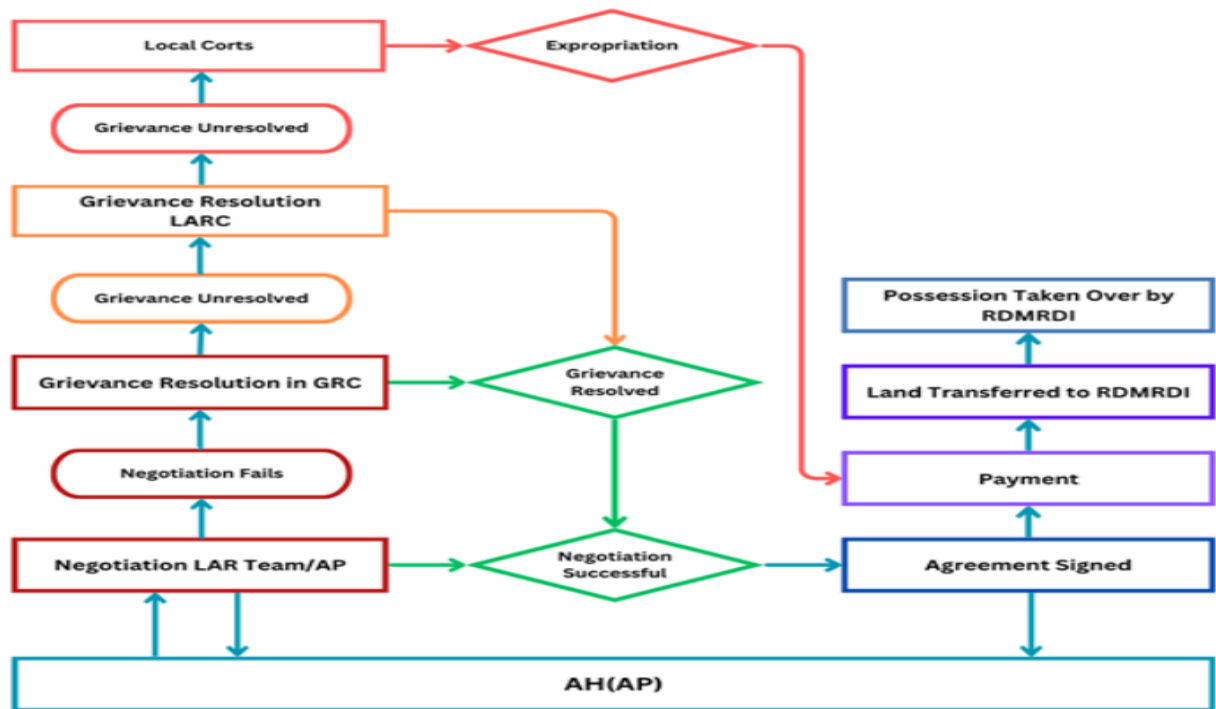
4.9 Grievance Redress Mechanism and Complaints

61. The Grievance Redress Commission is established at the RD level as a permanent Grievance Redress Mechanism (GRM) structure by order No. 234.
62. The LARP includes in its scope the establishment of a responsive, readily accessible, and culturally appropriate GRM capable of receiving and facilitating the resolution of affected persons' concerns and grievances related to the project. An established grievance redress mechanism allows an AP to appeal any decision, practice or activity arising from land or other assets compensation that they disagree with. The scope of the GRM is to address issues related to involuntary resettlement, social and environmental performance, and information disclosure. The established GRM is available to all people whether or not affected by physical or economic displacement.
63. The APs will have the right to file complaints and/or queries on any aspect of the project, including social, environmental, H&S issues, as well as land acquisition and resettlement. Under the adopted grievance mechanism, the APs may appeal any decision, practice or activity related to the project. All possible avenues will be made available to the APs to voice their grievances. The IA will ensure that grievances and complaints on any aspect of the project are addressed in a timely and effective manner.
64. The fundamental objectives of the GRM are:
- (i) To reach mutually agreed solutions satisfactory to both the Project, and the APs, and to resolve any grievances locally, in consultation with the aggrieved party.
 - (ii) To facilitate the smooth implementation of the LARP, particularly to cut down on lengthy litigation processes and prevent delays in Project implementation.
 - (iii) To facilitate the development process at the local level, while maintaining transparency as well as to establish accountability to the affected people.
65. APs, at each stage of project development – preconstruction and construction, were and will be fully informed of their rights and of the procedures for addressing complaints whether orally or in writing

during the consultations and surveys and will be informed again when the compensation is disbursed. Care will be taken to prevent grievances rather than relying solely on the redress process. This can be achieved through careful LAR design and implementation, by ensuring full participation and consultation with the APs, and by establishing extensive communication and coordination between the affected communities, the EA, and local governments in general.

66. The GRM consists of the project-specific systems established at the municipal level and a regular system established at RD. Grievance Redress Committees (GRCE) will be established at a municipal level as a project-specific instrument and will function for the duration of Project implementation. The Grievance Redress Commission (GRCN) was formed as an informal structure within the RD to record and ensure grievance review and resolution.
67. The GRCN was formed by the order of the Head of the RD as a permanent and functional informal structure, engaging personnel of RD from all departments to work on LAR issues and complaint resolution. This includes the top management of the RD, safeguard or LAR units, legal other relevant departments (depending on the specific structure of the IA). The GRCN is involved in Stage 2 of the grievance resolution process. The order states that, if necessary, a representative of local authorities, NGOs, auditors, APs and any other persons or entities can be included in the Commission as its member.
68. A GRCE is, project-specific grievance redress mechanism established to administer grievances at Stage 1. This informal body will be established at the community level in each affected municipality (village/community authority). The GRCE includes representatives of municipal LAR teams and local communities. The RD representative in the municipal LAR team coordinates the GRCE formation. He/she is responsible for the coordination of GRCE activities and organizing meetings (conveyor). In addition, GRCE comprises the village representative or his/her representative, representatives of APs, women APs, and appropriate local NGOs to allow the voices of the affected communities to be heard and ensure a participatory decision-making process.
69. Following the LARP approval, GRCEs will be established at the municipality level for the Project.
70. Once the civil works and supervision companies are mobilized, they will establish their grievance redress mechanism as an integrated part of existing one within RD. Their dedicated social and environmental specialists will receive and respond to all grievances in line with the established principles, participate in the GRCE and GRCN functioning, and also ensure proper recording, redress and monitoring of all grievances received at this level. A report on grievance receipt, record and redress will be submitted to the RD as part of the monthly and semi-annual safeguards reporting.
71. RD will keep a record of all complaints received for its use as well as for any review by ADB during regular supervisions. The following flowchart describes a grievance redress process for land and other assets acquisition, either acquired by an agreement or resolved through the courts. Organization Chart is provided in **Figure 3**.

Figure 3 - Showing the Grievance Redress Process



5 FUNCTIONING OF SEMP

5.1 SEMP Review

72. The SEMP will be developed by the Contractors after their selection. No civil works will be commenced before the review, verification of SEMP quality and approval by Engineer and PIU.

6 GOOD PRACTICES

6.1 Good Practices

73. N/A

6.2 Opportunities for Improvement

74. N/A

7 SUMMARY AND RECOMMENDATION

7.1 Summary

- 75. No construction works were undertaken during the reporting period, as the Project remained in the pre-construction phase.
- 76. The procurement process for the PMCSC is ongoing, and the contract was not awarded during the reporting period.
- 77. The procurement process for the civil works contractor is ongoing, and the contract was not awarded during the reporting period.
- 78. Key project readiness activities were progressed, including completion of detailed design, obtaining the Environmental Decision, disclosure of EIA documentation, initiation of procurement processes, and commencement of BAP preparation with engagement of a biodiversity specialist.

7.2 Recommendations

- 79. Continue procurement processes for both the PMCSC and the Contractor in accordance with the PAM implementation schedule.
- 80. Finalize the BAP prior to commencement of construction activities.
- 81. Ensure incorporation of all environmental, health and safety, and biodiversity requirements into the Contractor's SSEMP prior to approval.
- 82. Ensure incorporation of all environmental, health and safety, and biodiversity requirements into the Contractor's SSEMP prior to approval.
- 83. Initiate construction-phase environmental monitoring and reporting upon contractor mobilization, including verification of compliance with EMP and occupational health and safety requirements.

ANNEXES:

Annex 1 – Order on the Issuance of an Environmental Decision for Batumi Bypass – Sarpi road Section



LEPL National Environmental Agency

24 December 2024

No. 726/s

ORDER

On the Issuance of an Environmental Decision for the Construction and Operation of the Batumi Bypass – Sarpi (Turkish Border) Section of the International E-70 Motor Road of the Roads Department of Georgia in the Municipalities of Batumi and Khelvachauri

For the purpose of making an environmental decision, on 25 July 2024, the Roads Department of Georgia submitted to the Legal Entity under Public Law (LEPL) National Environmental Agency (letter No. 7584) the Environmental Impact Assessment (EIA) Report for the construction and operation of the Batumi Bypass – Sarpi (Turkish Border) section of the international E-70 motor road of the Roads Department of Georgia, located within the municipalities of Batumi and Khelvachauri, along with the supporting documentation required by legislation. In response, the Agency ensured the establishment of an expert commission (Order No. 397/s dated 01.08.24) and, for the purpose of disseminating information about the planned activity, forwarded the materials to the LEPL Environmental Information and Education Centre. The submitted documentation was published on the environmental information portal. The EIA report was prepared by the consulting company LLC "Gama Consulting."

In 2023, for the purpose of obtaining a scoping opinion, the Roads Department of Georgia submitted a scoping report for the construction and operation of the "Batumi Bypass – Sarpi (Turkish Border) section" of the international E-70 motor road of the Roads Department of Georgia, located within the municipalities of Batumi and Khelvachauri. As a result of the scoping procedure, the list of studies, data to be obtained and examined, and issues to be studied in detail within the EIA process was determined (Scoping Opinion No. 37; Order No. 647/s dated 17.11.2023).

During the administrative proceedings, upon the Agency's request (letter No. 21/10749), the Roads Department of Georgia submitted additional information related to the project (letter No. 11169). Specifically: information regarding the fracturing of rock formations, as well as the anticipated impact of blasting operations on the stability of the massif and roadside slopes; hydrological data of watersheds along the road section; data on wave characteristics at the design cross-section; information on the vegetation subject to removal (quantity, species); clarified information regarding the construction of the retaining structure; an emergency response plan; and other relevant details.



The additionally submitted documentation was reviewed by the Expert Commission (Order No. 672/s; 25.11.2024), published on the environmental information portal, and a deadline was set for the submission of comments by the interested public.

According to the submitted information, the construction of the Batumi Bypass – Sarpi (Turkish Border) section of the international E-70 motor road is planned within the boundaries of Batumi and Khelvachauri municipalities. The project corridor crosses the Chorokhi River within the administrative boundaries of the village of Tkhilnari, enters a tunnel that exits in Sarpi near the Monument of Saint Andrew, and connects to the existing road. The starting point of the projected road is located within the boundaries of Batumi Municipality, on the right bank of the Chorokhi River (approximate GPS coordinates according to the .shp files: X-719714.61, Y-4608056.53), and the endpoint is located in Khelvachauri Municipality, in the area of the village of Sarpi (approximate GPS coordinates according to the .shp files: X-712647.27; Y-4600303.79).

The impact zone of the projected road includes several districts of Batumi and the villages of Tkhilnari, Akhalsopeli, Charnali, Zeda Charnali, and Sarpi in Khelvachauri Municipality. The approximate distances from the road axis to the nearest residential buildings are as follows: from the starting section of the road – approximately 353 m; from the northern portal zone of the tunnel – 83 m; from Ventilation Shaft No. 1 – 39 m; from Ventilation Shaft No. 2 – 318 m; from Ventilation Shaft No. 3 – 50 m; and from the southern portal zone of the tunnel – 66 m.

The EIA report presents information on alternative options for the planned activity, including a discussion of the “no-action” alternative, road expansion, alternative road alignments, and alternative tunnel construction technologies. According to the report, the existing road infrastructure, without future modernization, will not be able to ensure uninterrupted traffic flow. Moreover, unlike the existing road, the proposed road will not pass through densely populated areas, which will reduce the risk of increased impacts from noise and emissions during road operation. Accordingly, the “no-action” alternative was rejected.

The road expansion alternative envisaged the modernization of the existing road—its widening—to allow for the uninterrupted passage of increasing traffic flow. However, since the road passes through densely populated areas, the works would involve significant resettlement. Additionally, the existing road is located near the protection zone of Gonio Fortress and the Gonio-Apsaros architectural-archaeological complex, which constitutes an additional limiting factor. Therefore, the alternative of widening the existing road was also rejected.

The report provides a comparative analysis of four alternative road alignments (A, B, C, and D). Based on a comparison of environmental, technical, and socio-economic aspects, preference was given to Alternative “D.”



The total length of the proposed section is 11 km, of which 10.2 km involves the construction of new infrastructure, while in the Sarpi zone, near the Monument of Saint Andrew, the final 800 m will coincide with the existing road.

The project envisages the following: construction of a four-lane interchange at the beginning of the road (on the right bank of the Chorokhi River); construction of a two-lane bridge over the Chorokhi River; construction of a two-lane tunnel; and construction of a four-lane section in the zone connecting with the existing road beyond the southern portal. The infrastructure will serve traffic flows in both directions.

At the start of the road, an interchange is planned to connect the proposed road to Batumi Airport and Gonio, which will ensure the flow of traffic from the Batumi Bypass road to the customs area near the airport.

According to the EIA report, the project has been developed in two phases based on traffic forecasts. Considering traffic dynamics and intensity, the second phase may be implemented in the future, which includes the construction of a parallel second tunnel and bridge. The report clarifies that the submitted documentation covers only the activities planned under the first phase.

The proposed road begins on the right bank of the Chorokhi River, at the junction with the Batumi Bypass road, and crosses the Chorokhi within the administrative boundaries of the village of Tkhilnari via a 1,471-meter-long bridge. After the bridge, near the village of Charnali, the project corridor continues through a tunnel approximately 7.6 km in length, passing through the territories of Charnali and Akhalsopeli villages up to the Sarpi zone. In the final section, near the tunnel portal, the construction of a 60-meter-long bridge is planned as part of the Kwariati entrance ramp. The proposed road section will end at the entrance to the village of Sarpi, where it will connect to the existing two-lane road.

To connect to the Batumi Customs area via the Batumi Bypass road, the construction of a symmetrical, cloverleaf-type four-lane interchange is planned, with two roundabout sections, located on both sides of the main axis, allowing for the development of the surrounding area. Within the Batumi territory, the interchange will also include an overpass and a bridge.

The overpass will be a 40-meter-long structure installed on reinforced concrete piles with a diameter of 900 mm and a length of 10.7 m. To ensure connection with the local road, an 8-meter-wide overpass is planned, consisting of two traffic lanes (each 3 meters wide), shoulders, and sidewalks (each 0.5 meters wide). The road surface slope will be 0.4%.

As part of the interchange, the construction of a reinforced concrete bridge-type overpass is also planned, designed to serve two traffic lanes in each direction. The length of the designed bridges on the overpass will be 41.6 meters, each with a width of 13 meters,

7.3356326


and the total width (including sidewalks and other structural components) will be 32 meters.

The planned two-lane bridge over the Chorokhi River will be 1,471 meters in length and consist of 25 spans, built with steel superstructure. The total width of the carriageway will be 11.5 meters, and the sidewalk width will be 1 meter. The projected bridge will have 2 abutments and 24 intermediate piers. According to the EIA report, several piers will be located within the Chorokhi River. The superstructure of the span will be made of steel-reinforced concrete, composed of two main beams spaced 7.6 meters apart. The bridge overpass will be constructed partially on a straight and partially on a curved section, with a 0.2% slope on the façade. The GPS coordinates of the initial section of the bridge are: X-718940.93; Y-4607519.49, and the endpoint coordinates are: X-717748.32; Y-4606661.88.

At the endpoint of the proposed bridge, in the northern portal zone of the tunnel, there is an existing 3-meter-wide road that connects to residential houses. This road is located within the project's impact zone. According to the EIA report, to ensure uninterrupted movement of the population, the construction of a new 310-meter-long road toward the village of Akhalsopeli is planned. Since the designed section of the local road passes through a landslide-prone area, the report indicates that protective retaining walls will be constructed on both sides of the road (approximately 60 meters on the northern side and 30 meters on the southern side), with piles up to 30 meters deep.

According to the report, after the planned bridge over the Chorokhi River, the road connects to a two-lane proposed tunnel with the following parameters: length – 7.6 km, carriageway width – 7.5 meters, and height – 5 meters.

Based on the .shp files, the GPS coordinates of the starting section of the tunnel are: X-717767.54, Y-4606652.28; and of the endpoint: X-712713.63, Y-4601123.58.

The tunnel will be constructed using the drill-and-blast method; however, part of the work will be carried out without blasting, by means of mechanical excavation. Prior to closed-type tunneling, a working portal will be constructed using the open-cut method.

The tunnel will be excavated using the ADECO-RS method, which allows for the early identification and mitigation of potential risks during the construction process. The selected method helps reduce the risks associated with geodynamic processes.

The tunnel will be equipped with: power supply and distribution systems; lighting system; luminous markings, reflective signs, traffic lights, and digital display boards; ventilation system (including three ventilation shafts); drainage system (with water collection and sedimentation facilities); emergency exits (emergency exits will be installed every 500 meters); safety and ventilation systems (the tunnel will have a central ventilation duct); SOS stations; radio communication and transmission systems; CCTV surveillance



system; fire detection and suppression systems; data transmission network and automation system; speed radars; and a control center.

Installation of a waterproofing membrane is planned to ensure the tunnel's impermeability. A 700-meter-long additional access tunnel is also planned within the project, which will allow for the simultaneous commencement of main tunnel construction from multiple locations. During the operational phase, the access tunnel will serve as an emergency exit and ventilation passage.

On the route from Sarpi toward Kvartiati (at the southern portal of the tunnel), in order to preserve the view of the statue of Saint Andrew the First-Called and the waterfall, it is planned to construct a one-lane, approximately 60-meter-long reinforced concrete bridge. The width of the bridge will be 9.1 meters, including 1-meter-wide sidewalks on both sides. The bridge will have a longitudinal slope of 4.5% along a horizontal curve. The water from Saint Andrew's waterfall will be discharged into the sea through an 8x2.5-meter culvert located in the central span of the bridge.

According to the EIA report, construction of bank protection structures is planned in two sections of the project area: on the right bank of the Chorokhi River, in the bridge zone, and near the Saint Andrew bridge, in the southern portal zone of the tunnel. In the Chorokhi River zone, bank protection will include stone riprap with stones measuring 100–120 cm in diameter. The bank protection structure will consist of two segments, measuring 152 meters and 108 meters in length, respectively. The slope angle of the riprap will be 1:1.5; the maximum total width will be approximately 9.3 meters, and the height – 4.5 meters. The approximate GPS coordinates of the starting and endpoint of the riprap are: X-718925.889; Y-4607448.902 and X-718678.447; Y-4607523.824.

In the southern portal zone of the tunnel, part of the existing and planned road section passes along the shoreline, which is subject to active erosion. Currently, the shoreline is protected with riprap. Considering the vertical elevation of the planned road, it is planned to construct an 8-meter-high retaining wall and additional riprap.

According to the EIA report, on the approximately 400-meter-long section in the direction from Sarpi to Batumi, the land portion of the existing bank protection structure is largely preserved and will undergo only partial repair, whereas based on the condition of the underwater portion, the construction of a new shoreline protection structure is planned. From the retaining wall to the endpoint, the total length of the structure will be approximately 465 meters, and its width – 40 meters.

In the so-called "submerged" sections of the structure, bank protection works will be carried out in the sea, up to 30 meters from the shoreline. This section will measure approximately 264 meters in length and will use 15-ton tetrapods.



For the so-called "non-submerged" section above water level, bank protection works will be carried out on land, up to 10 meters from the shoreline. This section will measure 201 meters in length and will be constructed using 2-ton concrete tetrapods. Both the underwater and above-water tetrapods will be placed on a graded base of various parameters, which will be protected with a geomembrane.

According to the EIA report, the project corridor includes land plots and infrastructure under private and business ownership, which will be subject to resettlement and compensation. As stated in the report, 131 land plots will be affected (of which 112 are private properties), along with 17 commercial buildings, 9 residential houses, and one apartment block. Additionally, 129 households will be affected, of which 18 require resettlement. Land plots with annual crops will also fall under the impact zone. According to the EIA report, these aspects will be taken into account in the Resettlement Action Plan.

According to the EIA report, the project corridor crosses the following communications: overhead power transmission lines; gas pipelines owned by SOCAR; and internet lines owned by Silknet, Deltacom (MagtiCom), and Fopnet. The relocation of these utilities will be carried out based on appropriate agreements. The EIA report is accompanied by documentation confirming that the owners of the affected infrastructure have been informed and that agreements have been reached with them.

According to the report, construction works will be carried out over a period of 42 months (plus an additional 24 months for defect correction). Approximately 150–200 people will be employed during the construction phase. According to the EIA report, in case a construction camp is needed, the selection of its location and of auxiliary areas will be carried out in accordance with the recommendations and restrictions specified in the EIA report. Several potential sites for the construction camp are reviewed in the report. These areas are reflected in the attached .shp files of the EIA report (approximate GPS coordinates: 1. X-718873, Y-4607605; 2. X-719191, Y-4607452; 3. X-717977, Y-4606622).

It is also noted that, as an alternative, renting residential premises may be considered, which may fully or partially replace the need to set up a construction camp. Apart from the potential need for a construction camp, the construction contractor will also identify/clarify the locations outside the project buffer zone for access roads, parking areas for vehicles/machinery, other temporary/permanent use areas required for the project (e.g. spoil disposal/processing sites), crushing facilities, concrete plants, and other necessary infrastructure.

According to the EIA report, during the preparatory and construction phases, the fertile soil layer is expected to be affected due to the movement of construction machinery and transport vehicles, soil contamination in case of improper waste management, soil erosion during construction, and other factors. As per the report, since the project primarily involves tunnel excavation and the surface area is limited, and considering that the starting



section of the road passes through an industrial zone, the volume of the fertile soil layer to be removed is estimated at approximately 2,000 m³.

The removal of the fertile soil layer will be necessary in the areas selected for temporary and/or permanent use, such as construction camps and spoil disposal sites. These details will be clarified by the construction contractor.

During tunnel excavation, the generation of spoil material is expected to amount to 1,035,000 m³ (or 1,138,500 m³ including swell). Of this, 480,000 m³ will be suitable for reuse, while 658,500 m³ will be placed at spoil disposal sites.

The EIA report provides recommendations and restrictions concerning the selection of designated areas and conditions for storing both the fertile soil and spoil material. The report also lists possible spoil disposal areas that may be used for the placement of material/spoil and fertile soil (approximate GPS coordinates): X-716573, Y-4609061 X-717549, Y-4607034 X-718584, Y-4606634 X-719795, Y-4606506 X-722015, Y-4604897 X-723633, Y-4605160 X-733849, Y-4634022 X-733995, Y-4634000 X-733831, Y-4633659 X-732167, Y-4630687 X-728324, Y-4621111 X-728998, Y-4621471.

According to the report, the construction contractor will prepare and coordinate a reclamation plan.

During the construction of the proposed highway, water will be used for drinking and domestic purposes. Bottled water will be used for drinking. In the event that a construction camp is established, the volume of water required for domestic use will be specified by the construction contractor based on the number of workers residing in the camp. A water tank may also be installed on-site for such purposes. For technical use, water will be sourced from the nearest surface water body and/or from the water supply system.

Although hard rock has low permeability, some water inflow into the tunnel may still occur. According to estimates, the potential water inflow could reach 1.76 m³/s. As previously stated, the tunnel will be equipped with a drainage system. Pipes will be installed at the bottom of the tunnel to direct the water flow toward the tunnel exit. Water that enters from the outside, through the temporary shotcrete lining and up to the waterproofing membrane, as well as runoff from inside the tunnel (platform), will be collected by the drainage system in sedimentation chambers with a capacity of 61 m³, located at the tunnel portal. From there, the water will be directed into a roadside soil channel through a trapezoidal drainage ditch.

According to the report, sedimentation chambers equipped with oil separators will be used. Based on the submitted documentation, no water discharge into surface water bodies will take place. The sedimentation chambers will be periodically inspected and cleaned by a contractor holding the relevant permit.



during the operational phase after construction is completed. It must be taken into account that, following tunnel construction and installation of the waterproofing membrane, the water level/discharge gradually begins to recover. The duration of this process depends on geological conditions and may take from several months to 1–2 years. The trend of recovery can be identified through monitoring. In case a reduction in groundwater discharge is observed during construction, water users will be supplied from alternative sources.

During the construction phase, contamination of surface and groundwater may occur due to fuel/oil/lubricant leaks or spills from machinery and equipment; increased turbidity when working near or in water bodies; drill-and-blast operations; improper handling of construction materials and waste; improper storage and handling of explosives; and infiltration of contaminated water from the surface into the aquifer, among others. Surface water impact is also expected during the construction of the bridge over the Chorokhi River and in the coastal area near Saint Andrew's waterfall (tunnel's southern portal) during shoreline works and construction of bank protection structures.

During the operational phase, impacts may be related to sediment inflow and/or pollution caused by runoff from the roadway; pollution during accidents; improper waste management; pollution during road repair or maintenance works, and other sources. Various mitigation measures will be implemented to reduce impacts, including regular maintenance checks of vehicles and construction machinery; immediate cleanup of accidental fuel/oil spills using absorbents; placement of crushing facilities (if any) and other dust sources as far from the riverbed as possible; equipping sedimentation chambers in areas where runoff may be contaminated with petroleum products with oil separators; ensuring proper functioning of culverts and drainage systems through periodic cleaning, maintenance, and repair.

As already stated, no direct discharge into surface water bodies is planned. However, according to the EIA report, if such a need arises, a project establishing the maximum allowable discharge (MAD) limits for pollutants entering surface water bodies along with runoff will be prepared and agreed upon with the Agency.

The project corridor crosses the Chorokhi River and, over a short section, runs along the seashore from the exit of the southern portal of the tunnel to the area of Saint Andrew's waterfall. According to the report, within the study area, the maximum water discharges in the Chorokhi River, determined using empirical methods, were used as the design parameters. According to the documentation, if the maximum water discharge within the study area ($4687 \text{ m}^3/\text{s}$) occurs, the water level would reach 12 meters above sea level.

Near the study area, the estimated general scouring depth of the Chorokhi Riverbed is 7.88–7.90 meters, and the maximum scouring depth after bed erosion is approximately 15.50 meters. According to the submitted documentation, dam-equipped hydropower plants are in operation in the upper part of the project area, which regulate the downstream

river flow. These dams are arranged in a cascade manner, and therefore, in the event of emergency discharges or detection of maximum natural inflow, such volumes of water are not expected to reach the project cross-section.

According to the EIA report, the river's flow regime is characterized by spring floods, autumn flash floods, and unstable low-water periods in winter and summer. Based on the submitted information, wave characteristics were studied near the area of Saint Andrew's waterfall within the scope of the project, with the aim of determining the maximum expected wave height in the specific area and identifying appropriate measures to ensure the safety of the designed infrastructure.

According to the documentation, the planned viaduct is located approximately 4 kilometers inland from the shoreline. Even if a storm raises the sea level to 4.7 meters in height, it would not reach the area of the bridge, as the minimum ground elevation in the viaduct area ranges between 8 and 9 meters.

The EIA report and the attached documentation present the results of a biodiversity survey within the project corridor zone, assess the impacts on biodiversity components, and propose relevant mitigation measures. The EIA report provides information on the methodology, findings, mitigation measures, and recommendations based on the research. The report also includes information on sensitive habitats and species, including species listed in the Red List, as well as endemic, relict, and other rare species.

The study was conducted on representatives of flora and fauna. According to the EIA report, the research included the analysis of literature sources and field observations carried out in the spring and autumn of 2023.

The project corridor intersects several habitats classified according to the European Nature Information System (EUNIS) habitat list: G1.7 thermophilous deciduous forests; H3.6 screes and rocky outcrops; G1.1 alluvial and riverside forests dominated by alder, birch, poplar, or willow; E2 mesophilic grasslands; C2.2 permanent, non-tidal, fast, turbulent streams; C3.62 sparsely vegetated river gravel banks; J1.2 villages and urban peripheries; I domestic plots; J4.2 road networks; J1.1 city centers and residential areas.

According to the documentation, the surface area of the proposed road mainly consists of anthropogenically altered landscapes, which are not characterized by significant vegetation cover. Specifically, in the Batumi area, the road passes through a gas production zone, and after the southern portal of the tunnel, it follows the corridor of the existing E70 highway. Taking this into account, the new infrastructure will not cause additional habitat fragmentation.

The project area does not fall within the boundaries of protected areas; however, it is entirely located within the boundaries of a Key Biodiversity Area (KBA) (Batumi 1; Batumi

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2; Chorokhi–Sarpi) and lies within the conservation landscape of the Western Lesser Caucasus “7-Western Lesser Caucasus”.

Considering the specifics of the project (bridge, tunnel, works conducted within the corridor of the existing highway), large-scale tree removal is not planned. According to the submitted documentation, the impact zone of the project includes eight tree species: alder (*Alnus barbata*, *Alnus glutinosa* subsp. *barbata*), Japanese cryptomeria (*Cryptomeria japonica*), tung tree (*Aleurites fordii*, *Vernicia fordii*), Chinese sumac (*Rhus javanica*, *Rhus chinensis*), Manchurian walnut (*Juglans mandshurica*), black locust (*Robinia pseudoacacia*), mulberry (*Morus* sp.), and fig (*Ficus carica*). Among the tree species located within the corridor of the proposed road, alder is dominant.

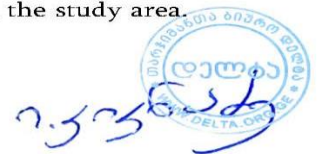
Within the scope of construction, the cutting of approximately 310 units of alder is planned. The impact on the remaining species is relatively minor; with the exception of black locust (50 units to be cut), the number of trees to be removed for the other listed species ranges between 1 and 18 units. The total number of trees to be cut under the project will not exceed 431 units. According to the report, the cutting and compensation of any Red List tree species (if necessary) will be carried out in accordance with the requirements of the legislation.

According to the LEPL Adjara Forestry Agency, a section of the road project area falls within the territory of state forest land, specifically: in the Tkhillnari forest district of the Khelvachauri Forestry Administration, in compartments No. 9, 18, and 23 of Quarter No. 1, and in sub-compartment No. 2 of Quarter No. 7. Additionally, the EIA report states that since the proposed road mostly passes through anthropogenic areas and will traverse by tunnel, significant impact on habitats or vegetation cover is not expected. Moreover, the project infrastructure does not intersect the forest zone; therefore, no direct impact on the state forest is anticipated. However, in the area of the southern portal, the project road is located approximately 20 meters from the forest zone.

In the event that construction activities reveal the necessity of entering the forest zone, the issue of special use will be regulated in accordance with Resolution No. 221 of 18 May 2021 of the Government of Georgia “On the Rules for Forest Use.”

According to the EIA report, based on field studies and the review of existing scientific literature, within the project corridor and its adjacent areas, the following have been identified: 40 species of mammals, up to 20 species of bats, more than 300 species of birds, 25 species of reptiles and amphibians, 26 species of ichthyofauna, and more than 500 species of mollusks and various types of invertebrates.

Within the project impact zone, among Red List mammal species, the presence of the Eurasian otter (*Lutra lutra*) and the Caucasian squirrel (*Sciurus anomalus*) has been identified. The probability of lynx (*Lynx lynx*) and brown bear (*Ursus arctos*) occurring in the area is low, as suitable habitats for these species are not found within the study area.

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Although no signs or dwellings of the otter were observed during field studies, appropriate mitigation measures are planned: prior to the commencement of construction works within riverbeds or along riverbanks (within a 10-meter radius), the site will be inspected for the presence of otters or their shelters; works will be conducted in a manner that preserves the otter's habitat as much as possible; in the unavoidable case of burrow damage or disturbance, an alternative shelter will be created; in case otters are detected, works will be temporarily suspended, and other similar measures will be applied.

The project area intersects an Important Bird Area (IBA GE014 – Batumi), a Special Protected Area (SPA – Chorokhi), and is also located within a bird migration corridor known as the Batumi Bottleneck. According to the report, among Red List bird species, the following are present within the project impact zone: great white pelican (*Pelecanus onocrotalus*), Dalmatian pelican (*Pelecanus crispus*), black stork (*Ciconia nigra*), lesser white-fronted goose (*Anser erythropus*), ruddy shelduck (*Tadorna ferruginea*), Levant sparrowhawk (*Accipiter brevipes*), and others. According to the EIA report, no Red List species were observed during the field study.

According to the report, blocking of surface water flow, alteration of hydrology, or temporary diversion of flow is not planned during construction works. The ichthyofauna may be affected by water pollution (due to accidental spills and waste contamination), increased turbidity, noise, vibration, and other factors. The EIA report includes corresponding mitigation measures, such as avoiding construction during biologically sensitive periods, prohibiting in-stream works during fish spawning seasons, implementing pollution prevention measures, and preserving the riverbank vegetation cover to the maximum extent possible.

According to the EIA report, the impact on atmospheric air was assessed using both one-time measurements and computer modeling of pollutant dispersion in the air under existing traffic flow conditions in the Gonio – Chorokhi section. The study area was divided into four segments based on anticipated vehicle movement intensity. Since motor vehicles are mobile sources of pollution, under Georgian legislation, it is not required to develop a project for maximum allowable emission limits for the operational phase. Moreover, according to the submitted report, the majority of the planned road passes through a tunnel; therefore, significant deterioration in ambient air quality from vehicle exhaust emissions is not expected.

The potential impact on atmospheric air has also been assessed under construction conditions, during which an increase in nitrogen dioxide concentration is expected in certain sections of the road during construction works, while the remaining parameters do not exceed permissible values. The only receptor where nitrogen dioxide concentration may exceed the allowable limit is a hotel located in the southern portal zone of the tunnel. However, given the height of the existing hotel, the associated risk is significantly reduced.

The assessment of potential air pollution during construction was carried out considering the operation of standard construction machinery. Computer modeling of harmful substance dispersion in the atmosphere was performed under conditions involving the maximum number of construction equipment operating simultaneously. Identified equipment included trucks, bulldozers, cranes, graders, and similar machinery.

During the construction phase, air pollution is expected from the following harmful substances: iron trioxide, manganese and its compounds, nitrogen dioxide, nitrogen monoxide, carbon (soot), sulfur dioxide, carbon monoxide, gaseous fluorides, weakly soluble fluorides, petroleum fraction, and suspended particles.

Additionally, when assessing atmospheric air quality, a coefficient of 0.8 was used as defined in Article 5, Paragraph 3 of Resolution No. 408 of the Government of Georgia dated 31 December 2013, applicable in cases of planning and conducting activities in resort zones and protected areas. According to the submitted report, the construction phase will not cause deterioration in air quality.

According to the report, various mitigation measures will be implemented to reduce the impact on atmospheric air, including the imposition of speed limits in sensitive areas, monitoring compliance, maintenance of green barriers, and, if necessary, the development and implementation of additional measures.

According to the report, vibration-generating activities (which also include blasting works in the tunnel) will be subject to vibration monitoring. In addition, during vibration-causing works, monitoring will be conducted within a 250-meter radius from the source of impact near sensitive receptors. Works in these areas will be carried out with special caution, which will be reflected in the management of the blasting process (selection of charge mass, delay time, and other parameters).

The spread of noise and vibration during the construction phase will also be related to the operation and movement of heavy construction equipment, vehicle traffic, the installation of bridge piles, site grading, material transportation, and other activities. Noise- and vibration-related impacts are also expected during the operational phase, caused by the movement of vehicles.

According to the noise modeling presented in the EIA report, during both the construction and operational phases, noise levels are expected to exceed permissible limits near the closest residential area. According to the report, various mitigation measures will be implemented during both the construction and operational phases to reduce the impact caused by noise.

Specifically, during the construction phase, the following measures are planned: the use of methods/equipment that generate less vibration during construction activities; assessment of potential risks before the start of the working day/shift and during work

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involving vibration-generating construction activities, and, if necessary, adjustments to the blasting process; installation of warning signs and, where necessary, control of movement on the site to ensure safety; inspection and documentation of the condition and structural state of buildings within the potential impact zone before vibration-generating activities commence; the use of equipment that produces less noise; the use of technically well-maintained construction machinery; regular inspection and maintenance of construction machinery/vehicles before work begins; prohibition of idling engines; adherence to optimal movement speeds; installation of temporary noise barriers around the construction site, and other measures.

During the operational phase: monitoring of noise levels; installation and maintenance of noise barriers if necessary; imposition and enforcement of speed limits in sensitive areas; maintaining the road surface in good condition; and, in the event of complaints or as required, determining and implementing additional mitigation measures.

The EIA report provides information on the expected types and approximate volumes of waste, as well as the measures for their management. During the preparatory and construction phases of the project, the generation of household, inert, and hazardous waste is expected. According to the submitted documentation, separate collection of generated waste will be ensured according to type and hazard classification. Appropriate containers will be installed in the designated areas for temporary storage of waste. According to the EIA report, a contract will be signed with an authorized company for waste removal and disposal, which will be reflected in the waste management plan.

According to the National Agency for Cultural Heritage Preservation of Georgia, the project area does not fall within the individually protected zones of immovable cultural heritage monuments. However, the project area and its surroundings are archaeologically sensitive. According to the EIA report, no cultural heritage or archaeological monuments have been identified directly within the project corridor. Nevertheless, during field works, in the area connecting to the access tunnel portal, in the vicinity of the village of Charnali, an iron smelting workshop dated to the 9th century BC was discovered (GPS coordinates: X-717416.50; Y-4604345.13), which is not registered in the official database. According to the EIA report, construction works will be carried out with consideration of this site. Furthermore, in the event that archaeological monuments are discovered during earthworks, all legal requirements will be observed.

According to the LEPL National Agency of Mineral Resources, the project area intersects with the contour of the Chorokhi sand-gravel deposit, as well as with the Charnali ore occurrence (gold, polymetals) and the contour of an auction-prepared area based on it. In addition, the project area includes territories for which licenses have been issued for the extraction of underground freshwater. According to the LEPL National Agency of Mineral Resources, due to the project's state-level importance, the agency does not object to the implementation of the project, provided that there is no restriction on



issuing licenses for the extraction of mineral resources in or near the area of the ore occurrence.

According to the EIA report, no other large-scale infrastructure or construction projects are planned directly within the project corridor. The nearest infrastructure project is the Batumi Bypass Road, which is expected to be completed before the start of construction works on the Batumi–Sarpi Road project. Most of the smaller-scale projects that may be implemented within the project area (rehabilitation of internal roads, installation of street lighting, construction of retaining walls along internal rural roads, etc.) are expected to have minor and short-term environmental impacts. As for the project for the construction of an artificial island in the Black Sea by LLC “Ambassador Batumi Island” in the city of Batumi, it is located at a distance of more than 6 km from the project road. Accordingly, the EIA report concludes that significant cumulative impact is not expected.

During the administrative proceedings, in order to ensure the dissemination of information in accordance with the law, the Agency forwarded the submitted documentation to the LEPL Environmental Information and Education Centre. The Centre ensured the publication of information regarding the public hearings on the environmental information portal, the official website of the Centre, and also sent the information to all of its subscribers via email. The information was also sent to the municipalities of Batumi and Khelvachauri and was published in designated public information locations. In addition, information on the public hearings was also published in a newspaper.

Public hearings on the EIA report were held on 11 and 12 September 2024 at the Batumi City Hall building and in the village of Charnali, in the cultural center building of Khelvachauri Municipality. The public hearings were attended by representatives of the LEPL National Environmental Agency, the LEPL Environmental Information and Education Centre, the consulting company LLC “Gama Consulting,” the Roads Department of Georgia, municipal representatives, and the interested public.

The comments and opinions expressed by the attendees during the public hearings mainly related to the preference for the selected project road alternative, the location of the public hearing, the increased impact caused by noise and emissions due to increased traffic in the village of Sarpi, and issues concerning land plot registration and the right to build residential houses.

Representatives of the Roads Department and the consulting company LLC “Gama Consulting” provided appropriate explanations regarding the issues raised during the public hearings. The questions and corresponding explanations presented during the public hearings were reflected in the minutes of the hearing sessions. During the administrative proceedings, no written comments or opinions on the project were submitted to the Agency.

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The EIA report is accompanied by the Environmental Monitoring Plan for the activity, mitigation measures for potential negative environmental impacts, an Emergency Response Plan, conclusions, and recommendations.

The given EIA report was reviewed by relevant experts and specialists in various areas of environmental assessment. Based on their conclusions and evaluation of the submitted documentation, as well as pursuant to Article 12 of the Environmental Assessment Code, paragraphs 11 and 13 of Annex I, and paragraph 9.13 of Annex II of the same Code,

I H E R E B Y O R D E R:

1. To issue an environmental decision for the construction and operation of the Batumi Bypass – Sarpi (Turkish Border) section of the international E-70 motor road by the Roads Department of Georgia, within the municipalities of Batumi and Khelvachauri.
2. The environmental decision specified in Paragraph 1 of this Order shall be issued for an indefinite period.
3. The Roads Department of Georgia shall implement the activity in full compliance with the submitted Environmental Impact Assessment Report, the documents attached thereto (annexes), the technological scheme, the mitigation measures for potential environmental impacts—including actions for the prevention and reduction of impacts on biodiversity—the Environmental Monitoring and Emergency Response Plans, the additionally submitted documentation, as well as the applicable national standards, construction norms, and regulations.
4. During the construction and operational phases, the Roads Department of Georgia shall ensure monitoring of the geologically unstable zones at the northern and southern portals of the tunnel.
5. Prior to the commencement of construction, the Roads Department of Georgia shall submit to the Agency an updated biodiversity monitoring plan for agreement. The updated plan shall additionally reflect provisions for monitoring potential impacts on water and water-dependent species, the effectiveness of mitigation measures on biological components, and the periodicity of reporting to the Agency concerning biodiversity monitoring actions. Given that the River Chorokhi is a potential habitat for the Eurasian otter, special attention shall be paid to this and other Red List species occurring in the project area. If necessary, additional mitigation and/or compensation measures shall be identified and implemented. The activity shall be carried out in accordance with the agreed plan.
6. The Roads Department of Georgia shall determine the quantitative rating values of the mountain massif composed of rock formations and assess the impact of blasting works on roadside slopes in relation to the project infrastructure.

A blue circular official stamp of the Delta Office is located in the bottom right corner. It contains the text 'საერთაშორისო გზების დელტა' (International Roads Delta) in Georgian and 'DELTA OFFICE' in English. A handwritten signature in blue ink is written over the stamp.

7. Prior to the commencement of construction, the Roads Department of Georgia shall submit for agreement to the Agency the detailed designs (including .shp files) of the spoil disposal site(s) and the construction camp(s). When developing the designs for spoil disposal and construction camps, the requirements of the technical regulation approved by Resolution No. 440 of the Government of Georgia of 31 December 2013 “On the Water Protection Belt” shall be observed. The documentation shall also include detailed information on the expected impact of the infrastructure on the biological environment, with particular focus—given the proximity to the River Charnali—on habitats significant for Red List and/or endemic species (e.g., Caucasian salamander – *Mertensiella caucasica*). If necessary, mitigation measures shall be identified, and to reduce environmental impact, the movement of heavy machinery near the River Charnali shall be restricted during construction. The spoil disposal and construction camp arrangements shall be implemented in accordance with the agreed projects.
8. In the event of stationary sources of emissions into the atmospheric air and/or water intake or discharge from surface water bodies, the Roads Department of Georgia shall ensure compliance with the legally established requirements prior to the installation of such facilities.
9. The Roads Department of Georgia shall ensure soil management is carried out in accordance with the requirements of the technical regulation approved by Resolution No. 424 of the Government of Georgia of 31 December 2013 “On the Removal, Storage, Use and Reclamation of the Fertile Soil Layer.”
10. The Roads Department of Georgia shall manage waste in accordance with the requirements and obligations defined under the Waste Management Code and the subordinate normative acts derived therefrom.
11. The Roads Department of Georgia shall ensure compliance with the requirements defined under Resolution No. 348 of the Government of Georgia of 14 July 2015 “On the Approval of the Rules for Implementing Prophylactic-Quarantine Measures Against Animal Infectious Diseases.”
12. The Roads Department of Georgia shall notify the Agency of the commencement, completion, and commissioning of construction.
13. In the event of transfer of the environmental decision to another party, the Roads Department of Georgia shall ensure such transfer is carried out in accordance with the procedure established by the Environmental Assessment Code.
14. This Order shall be immediately delivered to the Roads Department of Georgia and the LEPL Environmental Information and Education Centre.
15. This Order shall enter into force upon acknowledgment by the Roads Department of Georgia.
16. Within 5 days of the issuance of the environmental decision, the said decision shall be published on the environmental information portal and on the notice boards of the Batumi and Khelvachauri Municipalities.



17. This Order may be appealed to the Administrative Cases Panel of Tbilisi City Court (64 D. Aghmashenebeli Alley, Tbilisi) within one month from the date of its official notification to the party.

Vasil Gedevanishvili

Head of the Agency

LEPL National Environmental Agency

A blue circular official stamp of the National Environmental Agency of Georgia is overlaid with a handwritten signature in blue ink. The stamp contains the text 'საქართველოს ეროვნული გარემოს დაცვის აგენტობა' (National Environmental Agency of Georgia) and 'საქართველო' (Georgia). The signature is written across the stamp.