Semi-Annual Environmental Monitoring Report

№ 15th Semestral Report
Reporting Period: January - June 2025

July 2025

Georgia: Batumi Bypass Road Project

Financed by the Asian Development Bank and the Asian Infrastructure Investmen Bank

Loan Number: 3520-GEO -Project Number: 50064-001

Prepared by: Roads Department of the Ministry of Infrastructure of Georgia for the Asian Development Bank

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Abbreviations

ADB	Asian Development Bank
AIIB	Asian Infrastructure Investment Bank
GoG	Government of Georgia
BBRP	Batumi bypass road project
EA	Executing Agency
IA	Implementing Agency
RD	Road Department
MoI	Ministry of Infrastructure
PIU	Project Implementation Unit
NTP	Notice to Commence
EEMF	External Environmental Monitoring Firm
BoQ	Bill of Quantities
BR	Bridges
CSCS	Consultancy Services for the Construction Supervision
dB	Decibel
BOT	Batumi Oil Terminal
CPT-SPT	Cone Penetration Test - Standard Penetration Test
CC	Construction Contractor
CH	Cultural Heritage
CSEMP	Contractor's Contract Specific Environmental Management Plan
DNP	Defects Notification Period
EIA	Environmental Impact Assessment
EDDR	Environment Due Diligence Report
EMP	Environmental Management Plan
EMR	Environmental Monitoring Report
GRM	Grievance Redress Mechanism
GRCE	Grievance Redress Committee
HS	Health & Safety
H&S	Health & Safety
HSE	Health, Safety and Environment
HSMP	Health and Safety Management Plan
IFC	International Finance Corporation
MAC	Maximum Allowable Concentration
MoEPA	Ministry of Environmental Protection and Agriculture
MSs	Method Statements
m S/cm	Milli Siemens/ centimetre
NCN	Non-Conformance Notice
NCR	Non-Conformance Report
PMCSC	"Project Management and Construction Supervision Contract
PPE	Personnel Protective Equipment'
QC	Quality Control
Row	Right of Way
SAEMR	Semi Annual Environmental Monitoring Report
SDS	Spoil Disposal Site
SSEMP	Site Specific Environmental Management Plan
SPS	Safeguard Policy Statement

1 INTRODUCTION

1.1 Preamble

1. The Government of Georgia (GoG) has launched a program to upgrade the major roads of the country. The program is managed by the Roads Department (RD) of the Ministry of Infrastructure (MOI) and aims to improve transportation and transit of goods in Georgia and to neighbouring countries.
2. Batumi bypass road project (BBRP) covers the section from Makhinjauri to Chorokhi River. Total length of the road is 14.325 km while the width is 14.0 m. The mentioned section flows through mountainous terrain and includes construction of 5 tunnels, 3 bridges, 10 viaducts, 8 overpasses, 1 underpass, 52 culverts and 4 interchanges.
3. The start section is separated from an existing road to detour villages near the Black Sea and then bypasses villages in the mountainous area through tunnels. There are tunnels and bridges to cross a dismantled military base and mountainous area in the middle section. The end section traverses flat terrain and joins an existing road while bypassing several obstacles.
4. The Executing Agency (EA) of the project is the Ministry of Infrastructure of Georgia (MoI) and the Implementing Agency (IA) is Roads Department's Project Implementation Unit.
5. The BBRP is co-financed by the Asian Development Bank (ADB) and the Asian Infrastructure Investment Bank (AIIB) and the GoG.
6. The Project is classified as category A for the environment under ADB's Safeguard Policy Statement (2009) so that an Environmental Impact Assessment Report (EIA) was prepared and disclosed on ADB website on 27 March 2017.
7. The RD of the MoI of Georgia submitted an EIA to the Ministry of Environmental Protection and Agriculture of Georgia (MoEPA) on 18 August 2017. The EIA was approved by MoEPA on 30 August 2017.
8. The civil works contract was awarded to JV Polatyol & Mapa Joint Venture on 29 August 2017 with the Notice to Commence (NTP) dated 14 March 2018, however, the contractor started Project preparatory work on 14 March 2018.
9. Target completion date set for the Project was 30 September 2024 with construction period 2392 days and defects liability period of 3 years (1095 days). The first extension for the works was awarded up to 31 December 2021, the second extension was awarded up to 31 December 2022, the third extension was awarded up to 31 May 2024 and the fourth extension was awarded up to 30.September.2024.
10. The Construction Supervision Consultant (CSC) is the SMEC International Pty Ltd (Australia). The CSC contract was awarded on 11 September 2017 with NTP dated 26 September 2017.
11. Major Change in Project (Change in Scope, Amount, and Implementation Arrangements) was conducted in September 2019. The major change is an increase in project scope through the addition of a fourth output under the project comprising two additional construction subprojects: a new bridge and approach roads over the Rioni River in Poti and a new bypass road from Bakurtsikhe to Tsnori. Reallocation of existing savings can be utilized to fund the new output, which will reinforce the project's impact of improving regional connectivity in Georgia. The change is considered major because it fundamentally affects the approved project scope and outcome by more than doubling the length of roads and/or bridges to be built. The approved revised Project completion date is 30 September 2024 Currently the project is in the Defects Notification Period (DNP).
12. Supplementary Agreement No. 4 (SA No. 4) provided an extension to the works contract, extending the completion date to 30 September 2024. However, the Contractor has not met this completion date, and the outstanding construction works are expected to continue during the Defects Notification Period (DNP), which extends from October 2024 to October 2027.

13. This report presents the Semi-Annual Environmental Monitoring Review (EMR) for the January–June 2025 reporting period. It represents the 15th Semi-Annual EMR for the BBRP and the 8th Semi-Annual EMR for the Construction of Poti Bridge and Access Roads and the Construction of Bakurtsikhe–Tsnori Road Projects.

14. The BBRP was officially opened to traffic on 11 October 2024. Although the road is now operational, several construction activities remain ongoing. These include tunnel emergency exit and safety works, landscaping and tree planting, drainage completion, slope stabilization and remediation and installation of noise barriers.

15. It should be noted that, due to the Contractor's financial difficulties, construction works were suspended, and no physical progress was achieved during the reporting period.

16. The RD has scheduled a noise impact study for summer 2025, which will be carried out by a specialized consulting company contracted by the RD. The timing of this study has been deliberately selected to coincide with the peak tourist season, when traffic intensity is at its highest, ensuring that the monitoring results capture the worst-case scenario for noise levels.

17. During the reporting period (January–June2025), no road incidents were reported. Nevertheless, the incomplete status of several works poses potential health and safety risks, particularly associated with partially finished structures and construction zones.

Figure 1: Project Location Map

2 PROJECT DESCRIPTION AND CURRENT ACTIVITIES

2.1 Project Description

18. The 81-km Poti–Batumi–Sarpi Road ("S2" under Georgian Highway Designation) along the western coast of Georgia, located in the Adjara Autonomous Republic, is a key international highway and international transit route in Georgia. It is connected to the important towns of Batumi, Poti and Kobuleti. Batumi is a major Black Sea port and a holiday resort. Poti is the largest port of Georgia and Kobuleti is a holiday resort. Due to heavy traffic on S2, there has been a significant increase in congestion and accidents particularly during the tourist season in Batumi and Kobuleti. The Government of Georgia is constructing two bypass roads around Batumi and Kobuleti to improve traffic flow from these towns.

19. The Project Road, bypassing the city of Batumi to the east. is entirely located in Khelvachauri District. The design alignment goes through the villages of Makhinjauri, Gantiadi, Kapreshumi, Salibauri, Peria, and Makhvilauri. Passing through these villages, the design alignment crosses a diverse landscape of multiple ravines, streams, rivers, hills and hillsides.

20. **Road design.** The road is designed as a freeway by overpassing or underpassing all the existing roads. The design speed of the Project Road is 100 kilometers per hour (kph). The width of the road is 14.0 m but the Right-of-Way (RoW) extends to at least 7 m outside the toe of the embankment to accommodate space for drainage ditch and a 3 m reserve zone outside of the ditch. The embankments consist of rocky soil. Asphalt concrete will be used for roads pavement, whereas cement concrete will be used in tunnels. The ramps have a different pavement structure due to lower expected traffic volumes on them. The pavement structure conforms to Georgian National Standards and to German and AASHTO standards.

21. **Tunnels.** Five tunnels are planned along the Project alignment. The total length of tunnels along the alignment is 3,808 m. Emergency shafts will be installed in Tunnels 2, 3 and 4. Due to short lengths, no shaft will be required in the Tunnels 1 and 5.

22. **Bridges.** There are 15 bridges planned along the main alignment. Additionally, 3 bridges are designed on interchange ramps and 1 bridge is planned to connect to the existing roads. The bridges will be either 15 meters or 19 meters (where an acceleration or deceleration lane is required) wide.

23. **Interchanges.** There are 4 interchanges planned on the alignment.

24. **Culverts**. In total 67 culverts are located along the project roads. For design life of rectangular and circular culverts AASHTO and SNiP-84 design standards are used. The application of the SNIP Standard considers the utilization of locally produced prefabricated culvert elements.

Table 1: Project outline (km.-1+000 - km.13+325)

Classification of road	International highway
Design speed	$V = 100\ km/hr$
Road length	$L = 14.325\ km$
Road width	$B = 14\ m$
Lane numbers	$2\ lanes$

25. An ADB Mission Meeting was held at the Engineer's Office on Saturday, 22 March 2025. The mission included the participation of the Environmental Safeguards Team, who reviewed the current environmental performance, discussed key issues identified during site inspections and provided guidance on required corrective actions.

26. Based on the Safeguard Policy requirements of ADB SPS-2009 to conduct an external independent monitoring and assessment of the Projects' environmental compliance and reporting, an External Environmental Monitoring Firm "Eco-Spectri" Ltd. (EEMF), was engaged for all Environment Category A Road projects in Georgia.

27. The objectives of the EEMF are to provide an independent review and assessment of the achievements of Georgian Transport Sector projects in environmental safeguards objectives and principles, the effectiveness, impact and sustainability of taken measures to minimize, mitigate and/or compensate environmental impacts, the necessity of further mitigation measures if any, to identify strategic lessons for future policy formulation and planning and capacity building in environmental safeguards.

Table 2: Project Information

PROJECT ITEM	DETAILS
Employer	RD
Funding Source	ADB and AIIB
The Engineer	SMEC International Pty Ltd with Sub-consultants: Uniprof Group Ltd and Lider + Ltd
Contractor	JV Polatyol & Mapa
Letter of Acceptance	06 July 2018
Signing date of Contract	29 August 2017
Commencement Date of Works	14 March 2018: section km6+700 – km12+830 24 May 2018: section km1+750 – km2+250 15 Oct 2018: sections km0+00 – km0+650 and km2+250 – km6+700 30 April 2019: section km 0+850 - km 1+750 21 October 2019: section km12+830 - km13+325 12 March 2021: section km0+650 – km0+850 30 July 2021: section Km 12+870 – Km 12+980
Contract Period	2392 days
Original Completion date	30 September 2020
Time Extension (EOT No. 1)	31 December 2021
Time Extension (EOT No. 2)	31 December 2022
Time Extension (EOT No. 3)	31 May 2024
Time Extension (EOT No. 4)	30 September 2024
Expired time	2665 days
Remaining time	-273 days
Certified Advance Payment	GEL 49,444,610.22
Advance repayment	GEL 49,444,610.22
Retention money (10 %)	GEL 35,231,860.75
Amount certified as per works done	GEL 352,231,860.75
Percentage of achieved Physical Progress	92.99%
Defects Notification Period	3 years

2.2 Project Contracts and Management

28. As noted above, the EA of the project is the MoI and the IA is the PIU under the RD.

29. The Contract for CSCS covers three phases of the project:

Phase 1 – Design review, to be completed in a period of three months.

Phase 2 – Construction supervision and contract administration.

Phase 3 – DNP- three years.

30. The period of implementation of the CSC contract, including the DNP-and until the issuing of Final Acceptance and Performance Certificate is 114 months after the Commencement Date. CSC's Terms of Reference (TOR) requires, among others, the monitoring and ensuring of compliance of civil works with the Site-Specific Environmental Management Plan (SSEMP) to be prepared by the contractor based on the identified environmental and social impacts in the project's EIA/EMP.

31. Obligation of the contractor, to safeguard, mitigate adverse impacts and rehabilitate the environment is addressed through environmental provisions in the FIDIC conditions of contract for construction, MDB harmonized addition - June 2010 and special clauses included in the contract related to environment, especially, section 116 (pollution) and appendix X of technical specifications. FIDIC clause 4.18 (protection of environment), 4.8 (safety procedures), 6.4 (labor laws), 16.3 (cessation of work/remedial work), 2.3 b (employer's personnel), 4.21 (progress report) are important in this regard. The EIA's EMP and were included in the bidding documents during the procurement and selection of the contractor.

32. Details of the main organizations and staffing involved in the Project relating to Environmental Safeguards, including lender, borrower, Main Contractor/s and significant sub-contractors are given in **Table 3**. Individual contact details can be provided on request.

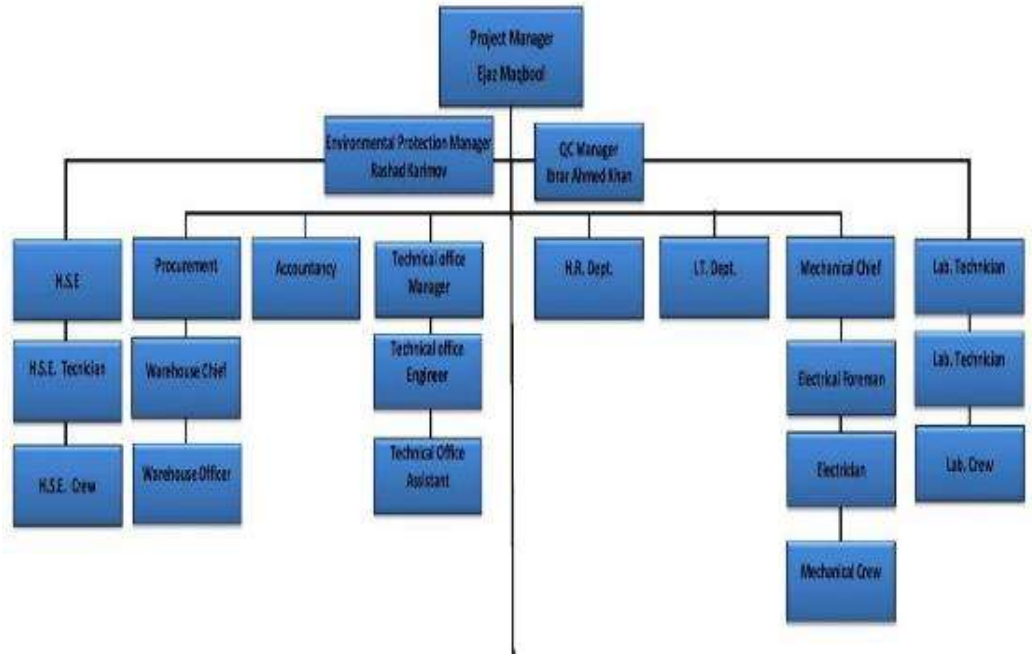
Table 3 Staff Involved in Environmental Safeguards

ADB	Ninette R. Pajarillaga Georgia Country Focal/ Principal Environmental Specialist/ ADB Head Office Nino Nadashvili Safeguards Officer /ADB GRM Giorgi Kobaladze RETA/ADB National Environmental Consultant
RD	Luiza Bubashvili Environmental Safeguard Consultant under ADB Financed Projects

PolatYol & Mapa Joint Venture	Ejaz Maqbool Project Manager Rashad Kerimov International Environmental Specialist Ayaz Abdurahmanov Health, Safety & Traffic Manager Jaba Mzhavanadze Local Environmental Specialist
SMEC International PTY Limited	Michael Holics International Environmental Specialist
Sub-consultant	Tengiz Lagidze Local Environmental Specialist
	Davit Tevzadze Local Environmental Specialist

33. Responsibility for daily management for environmental monitoring and implementation of the SSEMP is given to the Environmental Protection Manager, Mr. Rashad Karimov. He has direct authority from the Project Manager to give instruction to all site staff regarding environmental issues. The project organization chart for key Contractor management staff is provided in ***Figure 2***.

Figure 2: Contractor's Project Management Staff



2.3 Project Activities during Current Reporting Period

34. The financial progress of the works at the end of June 2025 is 95.01% in accordance to the original contract price (329,630,734.78).

35. The physical progress of the works is 92.99% based on the implemented works. The remaining 7% of the works include Environmental activities, which also involve the removal of waste stored under the bridges.

36. **Tunnels:** The main outstanding works include the completion of the Emergency Exits, associated Tunnel Service Buildings and the Tunnel Operation and Control Building, all of which are at various stages of completion, although none are currently operational.

37. **Bridges and Roadworks:** The BBRP was opened to traffic on 11 October 2024.

Table 4 Construction Progress

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
I.	**Setting Out and Site Clearance**					
Basic topography and detailed setting out						
	For main road	km	14.325	13.125	91.62	
	for ramps and secondary roads	km	10.858	8.287	76.32	
	Site cleaning	ha	76.80	36.37	47.35	
1	Cutting trees of more than 0.1 m diameter	piece	1,908.00	6,502.0	340.8	The variance occurred because, during the design stage, trees with a diameter smaller than 0.8 m were not counted in the inventory, whereas during the construction stage, these smaller trees were also included in the actual field measurements. In addition, the total number includes trees located on privately owned land, which were not

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
						clearly distinguished in the design documentation. Separate compensation was provided to the affected landowners for the trees located on private property.
	Demolition of walls	m^3	244.00	509.23	208.00	
	Demolition of buildings	m^3	92,700.00	58,369.72	62.96	
II.	Earthworks					
2	Topsoil removal	m^3	56,000.00	9,466.13	16.90	
	Removal of unacceptable soil at any level, withdrawal at stockpile/embankment area (according to the instruction)	m^3	137,520.24	491,618.40	357.48	
	Arrangement of embankment material to design level	m^3	603,734.55	815,475.72	135,07	
	Provision, allocation and compaction of acceptable material from the borrow pit at weak and hollow areas	m^3	6,890.00	13,789.63	200,13	
	Filling the embankment with soil excavated from Tunnel	m^3	320,519.00	117,535.59	36.67	
III.	Water Culverts and Drainage					
3.1	Cast-in-situ RC culvert - sq. m. 6,0∂ X 5,0m	piece	7	7	100	
	Precast RC culvert - sq.2,50∂ X 2,50m	piece	3	3	100	
	Precast RC pipe - d= 1,50m	piece	31	31	100	
	Precast RC pipe - d= 1,00m	piece	7	7	100	
	Precast RC (double) pipe - d= 2X1,50m	Piece	2	2	100	
	Metal pipe - d=0,50m	Piece	4	0	0	
	Lengthening of Cast-in-situ RC culvert - sq. m. 1,30m X 1,80m	Piece	1	1	100	

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
	Lengthening of Cast-in-situ RC culvert - sq. m. 1,50m X 1,50m	Piece	1	1	100	
Additional Culvert						
3.2	Cast in situ RC culvert – sq.5,00∂ X 2,50m	piece	1	1	100	
	Cast in situ RC culvert - sq.5,00∂ X 4,00m	piece	1	1	100	
Design Variation						
3.3	Cast-in-situ RC culvert - sq.1,50∂ X 1,20m	piece	1	1	100	
	Cast-in-situ RC round culvert d-1.5m	piece	2	2	100	
	Cast-in-situ RC box culvert Section 2,50m X 2,50m	piece	1	1	100	
IV.	**Slope Stabilization**					
RC Retaining Walls						
4.1	km 0+160 - km 0+400	m	240.00	216.00	90.00	
	Km 2+178 – km 2+215	m	37.00	37.00	100	
	km 3+941 - km 3+951	m	10.00	10	100	
	km 7+534 - km 7+663	m	149.80	149.80	100	
	Km 8+730 – km 8+760	m	10.00	0	0	
	km 9+470 - km 9+ 480	m	10.00	0	0	
	km 11+ 530 - km 11+540	m	10.00	10.00	100	
	km 11+ 580	m	10.00	10.00	100	
	Km 0+310 – km 0+377 (CL203)	m	73.92	73.92	100	
	Km 5+955 – km 5+994	m	30.85	30.85	100	
	Km 12+097	m	18.4	18.4	100	
Gabion Wall						
4.2	km 0+230 - km 0+265	m	35.00	0	0	CL 103
	km 0+850 - km 0+904	m	54.00	0	0	CL 103
	km 12+475 - km 12+725	m	250.00	0	0	
	km 12+814	m	50.00	0	0	Left
	km 12+814	m	48.00	0	0	Right
	km 12+831	m	50.00	0	0	Left
	km 12+831	m	54.00	0	0	Right
	km 13+940 - km 14+120	m	180.00	0	0	
"Terramesh" System						
4.3	"Terramesh" system arrangement	m	2769.00	0	0	
Design Variation						

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
4.4	Slope stabilization by soil nailing at section km10+102 - km10+340	m	238.00	238.00	100	
4.5	Drilled and filled RC pile wall at section km 11+ 460 - km 11+503	m	43.00	43.00	100	
4.6	Reinforced concrete supporting wall at section km 11+513 - km 11+585	m	72	72	100	
4.7	RC Retaining Wall (CL 203) at Km 0+310 – Km 0+377		73.6	73.6	100	
4.8	Drilled and filled RC pile wall at section km 9+244 - km 9+340	m	96	96	100	
4.9	Drilled and filled RC pile wall at section km 9+340 - km 9+440	m	100	100	100	
4.10	Slope strengthening by earth anchors at section km9+440 – km9+520	m	80	80	100	
4.11	RC Retaining Wall at Km0+080-Km0+110	m	38.85	38.85	100	
4.12	RC Retaining Wall at Km0+080-Km0+110	m	30	30	100	
4.13	CL 300 – CL 301 RC Retaining Wall	m	84.35	84.35	100	
4.14	Km 12+465 – Km 12+720 RC Retaining Wall	m	465.0	465.0	100	
4.15	Km 5+955 – Km 5+794 RC Retaining Wall	m	30.85	30.85	100	
4.16	Km 5+476 – Km 5+636 RC Piled Wall	m	160	160	100	
4.17	Km 0+612 – Km 0+686 RC Retaining Wall	m	60.60	60.60	100	
V.	**Bridges**					
5	Bored piles: BR-01 - BR-05; BR-07; BR-07.1; BR-12/13; BR-12/13A; BR-14: BR-03.1: BR-06A; BR-6B; BR-6C: BR-6D; BR-08A	Unit	1,558.00	1,558.00	100	
	Pile cap: BR-01 - BR-05; BR-07; BR-07.1; BR-12/13; BR-12/13A; BR-14: BR-03.1: BR-	Unit	142.00	142.00	100	

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
	06A; BR-6B; BR-6C: BR-6D; BR-08A					
	Column: BR-01 - BR-05; BR-07; BR-07.1; BR-12/13; BR-12/13A; BR-14: BR-03.1: BR-06A; BR-6B; BR-6C: BR-6D; BR-08A	Unit	282.00	282.00	100	
	Crossbar: BR-01 - BR-05; BR-07; BR-07.1; BR-12/13; BR-12/13A; BR-14: BR-03.1: BR-06A; BR-6B; BR-6C: BR-6D; BR-08A	Unit	120.00	120.00	100	
	Back wall and wingwall: BR-01 - BR-05; BR-07; BR-07.1; BR-12/13; BR-12/13A; BR-14: BR-03.1: BR-06A; BR-6B; BR-6C: BR-6D; BR-08A	Unit	36.00	36.00	100	
	Installation RC beams: BR-01 - BR-05; BR-07; BR-07.1; BR-12/13; BR-12/13A; BR-14: BR-03.1: BR-06A; BR-6B; BR-6C: BR-6D; BR-08A	Unit	667	667	100	
	Unification of prestressed beams by cast in situ RC concrete slab	m	4,669.0	4,669.0	100	
5.1	Construction of cast in situ sidewalk	m	4,669.0	4,669.0	100	
5.2	Construction of cast in situ rails	m	4,669.0	4,420	94,7	
5.3	Expansion (temperature) joints	Unit	95	95	100	
5.4	Binder course	m^2	54,564.00	54,564.00	100	
5.5	Base course	m^2	54,564.00	54,564.00	100	
5.6	Wearing course	m^2	54,564.00	54,564.00	100	
5.7	Handrail	m	10,788	9,804.1	99.7	
VI.	**Tunnels**					
Tunnel No. 3						
6	Arrangement of outside utility channel	m^3	77	77	100	
	Concrete lining works	m^3	77	77	100	
	Arrangement of the emergency exit	m	70	70	100	

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
	Tunnel Service Building				90	
	Gravel foundation	m^3	7,391	7,391	100	
	Drainage system arrangement	m	805	805	100	
	Utility Box arrangement	m	1610	1610	100	
	Construction of pile wall system at the exit portal				100	
	Construction of pile wall system at the entrance portal	u	101	101	100	
	Soil excavation at the exit portal				100	
	Tunnel excavation and installation temporary lining	m	749.0	749.0	100	
	Construction of permanent lining	m	749.0	749.0	100	
	Arrangement of Portal part	m	56	56	100	
	Concrete pavement	m	805	805	100	
Tunnel No. 4						
7	Arrangement of outside utility channel				100	
	Construction of pile wall system at the exit portal	u	203	203	100	
	Utility channel	m	2,134	2,134	100	
	Soil excavation at the entrance portal	1000 m^3	51.25	51.25	100	
	Tunnel excavation and installation temporary lining	m	843.0	843.0	100	
	Construction of permanent lining	m	843.0	843.0	100	
	Arrangement of the Portal Part	m	224.00	224.00	100	
	Arrangement of the Drainage System	m	1,067.00	800.00	75.00	
	Concrete pavement	m	1067	1067	100	
	Tunnel Service Building				90	
	Backfilling works at exit portal				10	
Tunnel No. 5						
8	Arrangement of operational control center				100	

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
	Gravel foundation	m^3	1,069	1,069	100	
	Tunnel excavation and installation of temporary lining				100	
	Portal excavation				100	
	Installation of waterproofing	m^2	20,650.0	20,650.0	100	
	Installation perforated PVC pipes	m	1,084.00	1,084.0	100	
	Filter concrete (C12/15)	m^3	8.0	8.0	100	
	Cast-in-situ concrete for drainage	m^3	20,030.0	20,030	100	
	Installation reinforcement frame	t	323.0	323.0	100	
	Tunnel lining (permanent lining)	m	542	542	100	
	Construction of portal part	m	45	45	100	
	Communication Channel	m	1084	1084	100	
	Arrangement of Drainage System	m	587	587	100	
	Concrete pavement	m	587	587	100	
	Tunnel Service Building				90	
Tunnel No. 1						
9	Tunnel Service Building				90	
	Arrangement of the Piled Wall System at the Entrance Portal	u	131	131	100	
	Construction of pile system wall at the exit portal	u	131	131	100	
	Tunnel excavation and construction of temporary lining	m	465	465	100	
	Arrangement of drainage system	m	542	542	100	
	Vertical Jet Grouting	u	625	625	100	
	Tunnel lining (permanent lining)	m	542	542	100	
	Installation of waterproofing	m^2	19,068.0	19,068.0	100	
	Construction of Portal section	m	77.0	77.0	100	
	Concrete pavement	m	542	542	100	
	Crushed base	m^3	1,069	1,069	100	

N	WORK DESCRIPTION	DIMENSION	DESIGN	ACTUAL	%	NOTE
	Arrangement of outside utility channel				80	
Tunnel No. 2						
10	Construction of pile system wall at the entrance portal	u	119	119	100	
	Tunnel excavation and construction of temporary support	m	720	720	100	
	Construction of pile system wall at the exit portal	u	96	96	100	
	Installation of waterproofing	m^2	211.18	211,18	100	
	Installation perforated PVC pipes	m	1366.0	1,366	100	
	Cast-in-situ concrete for drainage	m^2	23.55	23.55	100	
	Tunnel lining (permanent lining)	m	705.0	705.0	100	
	Installation of waterproofing	m	705.0	705.0	100	
	Construction of Portal section	m	102.0	102.0	100	
	Tunnel Service Building				90	
	Gravel foundation	m	705.0	705.0	100	
	Concrete pavement	m	102.0	102.0	100	
	Arrangement of outside utility channel				80	

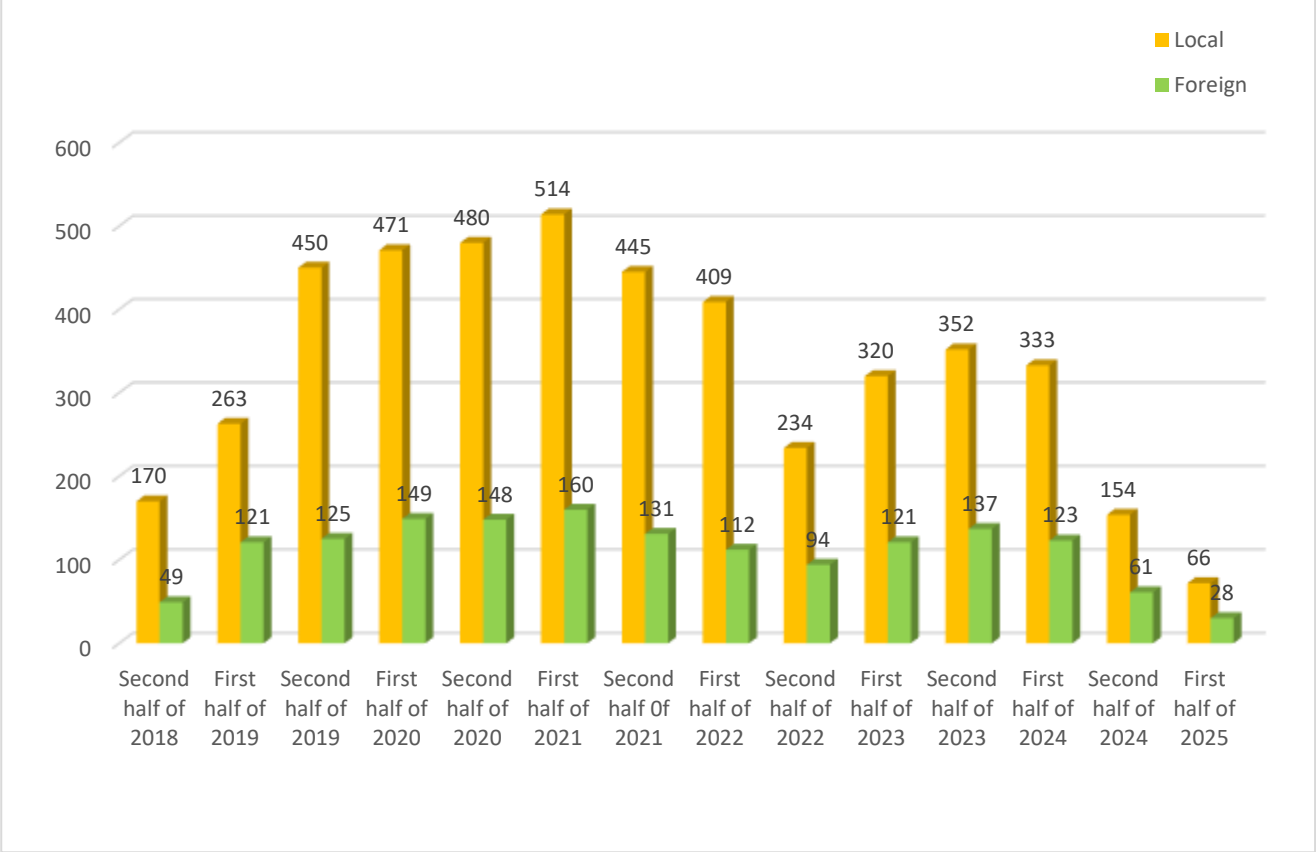
38. According to the data from the previous reporting period (July–December 2024), the total number of personnel was 215, including 61 foreign and 154 local employees. During the current reporting period (January–June 2025), the Contractor suspended operations due to financial constraints and also reduced the number of personnel. The remaining staff (30 foreign and 72 local employees (see Table 5) were placed on unpaid leave by the Contractor.

Table 5 Contractor's Personnel as of June 2025

N	POSITION	POLATYOL		SUBS		SUM
		Foreign	Local	Foreign	Local	
1	Project Manager	1	0	0	0	1
2	Site Manager	1	0	0	0	1
3	Engineer staff	2	0	0	0	2
4	Technical office	2	1	0	0	3

N	POSITION	POLATYOL		SUBS		SUM
		Foreign	Local	Foreign	Local	
5	Technicians	1	0	0	0	1
6	Skilled Labour	5	18	0	0	23
7	Unskilled Labour	1	10	0	0	11
8	Driver	1	13	0	0	14
9	Operator	3	3	0	1	7
10	Finance & Administration	1	2	0	0	3
11	HSE Team	1	6	0	0	7
12	Environmental Manager	1	0	0	0	1
13	Foreman	2	0	0	0	2
14	Repairman	3	0	0	0	3
15	Security	0	12	0	0	12
16	Forest Expert	0	0	0	0	0
17	Mechanical Department	2	1	0	0	3
18	Tunnel works Subcontractor	0	0	0	0	0
19	Concrete works (Subcontractor)	0	0	0	0	0
20	Pile construction team (Subcontractor)	0	0	0	0	0
21	Blasting works (Subcontractor)	0	0	0	0	0
22	Stone column works (Subcontractor)	0	0	0	0	0
23	Pre-cast beam (Subcontractor)	0	0	0	0	0
24	Designer	1	0	0	0	1
25	Catering service Subcontractor	0	0	2	5	7
26	Concrete Road Subcontractor	0	0	0	0	0
Total		**28**	**66**	**2**	**6**	**102**

Figure 3: Contractor's Personnel as of June 2025



2.4 Changes to Project Design and Agreed Construction Methods

39. There were no changes in the project design during the reporting period.

Table 6 Summary of Civil Works Contracts and Work Progress

Scope	Contractor	Signed	Approval Date		Environmental Personnel		Civil Work		(%) Progress as of	
			SSEMP	COVID-19 HSMP	Environmental Officer	Health and Safety Officer	Start	End	31 Dec 2024	30 June 2025
Construction BBRP	JV Polatyol & Mapa	29.08.2017	30 May 2018	30 March 2019	Jaba Mzhavanadze	Ayaz Abdurahmanov	06.07.2018	30.09.2024	92.99 %	92.99 %

3 ENVIRONMENTAL SAFEGUARD ACTIVITIES

3.1 General Description of Environmental Safeguard Activities

40. Throughout the weekly monitoring sessions, the National Environmental Specialists designated by the Engineer, namely Mr. Tengiz Lagidze and Mr. Davit Tevzadze, conducted assessments. Their evaluations focused on scrutinizing the Contractor's activities with regard to environmental impact and assessing the Contractor's adherence to the environmental stipulations outlined in the Project's requirements.

41. The Engineer's International Environmental Specialist Mr. Michael Holics was mobilized once during the reporting period: from 4 March to 29 March. During this period, Mr. Holics worked with the Engineer's local Environmental Specialists, undertaking weekly site visits and participating in the Engineer's progress meetings and HSE meetings with the CC.

42. With respect to site assessment, in addition to weekly visits to relevant sites, at the end of each month there were full in-depth site visits undertaken by the Engineer focusing on outstanding environmental works and findings were sent to the Contractor for follow-up.

43. The Engineer's environmental specialists prepared monthly, quarterly and semi-annual reports, which were submitted to the RD. These reports summaries all construction activities and describe the Environmental Specialist's monitoring and site inspection activities.

44. The Contractor's Environmental Specialist Mr. Rashad Kerimov (International) was not mobilized on site during the reporting period.

3.2 Environmental Site Monitoring and Inspections

45. The RD's Environmental Specialist, Ms. Luiza Bubashvili, conducted regular site visits throughout the reporting period to monitor environmental compliance. Her visits were coordinated with the Engineer's Environmental Team and focused on ensuring adherence to ADB's safeguard requirements and national environmental regulations.

46. The Engineer's Environmental Specialists Mr. Tengiz Lagidze and Mr. Davit Tevzadze conducted weekly monitoring of the following Project sites:

- Office and accommodation camp of the Contractor
- Construction camp of the Contractor
- Access roads to Bridges and Tunnels
- Tunnel No 1
- Tunnel No 2
- Tunnel No 3
- Tunnel No 4
- Tunnel No 5
- Bridge Nos 1, 2, 3, 3.1, 4, 5, 6, 6a, 7, 7.1, 8, 8a, 9, 10, 11, 12, 13, 13.1, 14
- Road sections
- Interchanges 1, 2, 3, 4
- Precast yard
- Concrete mixing plant 1.

3.3 Environmental Issues Tracking

47. Since the works have been suspended by the Contractor during the reporting period (January – June 2025), the report presents the non-conformities identified in the previous period (prior to 1 January 2025), which remain unresolved to date. In general, the non-conformities are related to the following:

    - Construction and household (plastic containers etc.) waste pollution;
    - Waste concrete and asphalt contamination;
    - Improperly stored materials;
    - Metal scrap waste is not properly disposed;
    - Waste burning on site.

48. Issues were tracked through official correspondence (see ***Table 9*** – Correspondence) and Non-Conformance Reports (see ***Annex 4*** – ENCRs from the previous period).

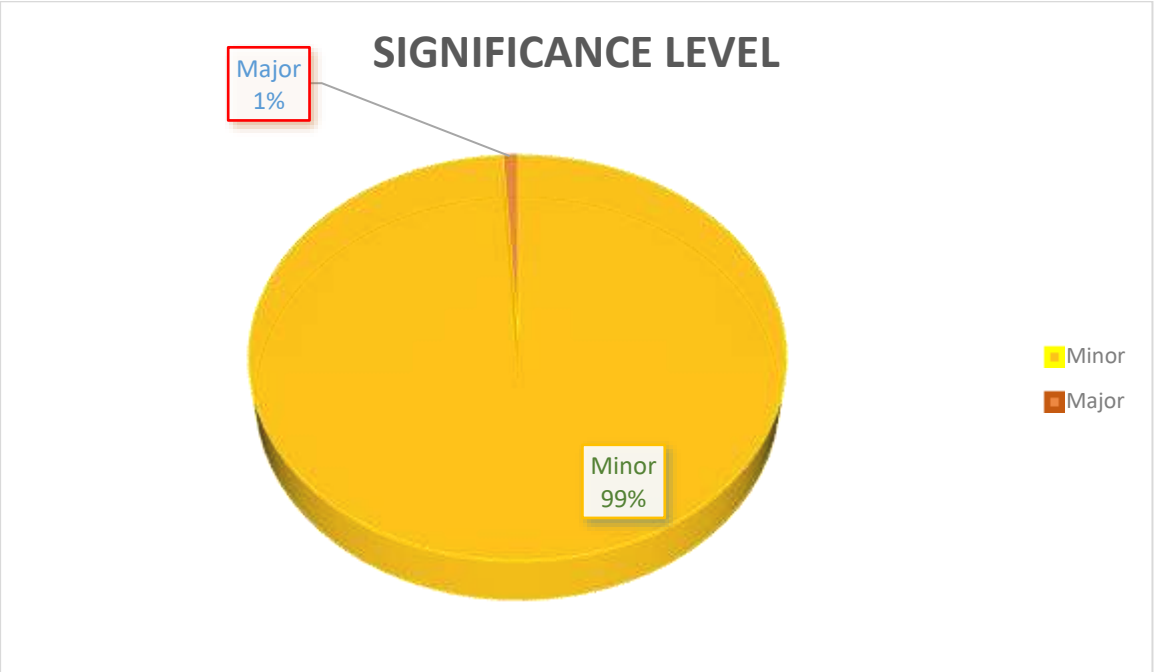
49. The number of non-conformances is summarized in ***Table 7*** for the current reporting period, as well as cumulatively from the beginning of the project to date.

Table 7 Summary of Environmental Issues Tracking Activity for the Project

Total Number of ENCRs for the Project	
Number of Issues Raised since start of Project	183
Number of Open Issues	2
Number of Closed Issues	181
Percentage Closed	99%
Issues Opened this Reporting Period (January–June 2025)	0
Issues Closed this Reporting Period (January–June 2025)	0

Note: As per the Engineer's ENCR register, ENCR 180: contamination of the territory with construction and household waste, and ENCR 183: the aforementioned territory is contaminated with scattered construction and household waste, are currently unresolved and remain open. ENCR_180 was due to be closed on 21 July 2024 and ENCR_183 was due to be closed on 15 November 2024. The Contractor has been requested to take urgent action to close these ENCRs as soon as possible. Building upon the information provided in Table 7, Figure 4 below delineates the environmental issues categorized by significance levels, ranging from Minor to Major. The Engineer conducts individual assessments for each issue based on the scale of violation and its impact on the environment. Figure 4 visually represents the percentage distribution of minor and major environmental issues observed during the reporting period. A risk assessment matrix based on the original EIA Report for the Project was used to determine the level of significance of Environmental issues (minor vs. major).

Figure 4 Summary of Non-Conformance by Significance Level



50. During the reporting period, the 2 above-mentioned non-conformances remain open, as all types of works have been suspended by the Contractor.

51. Copies of the ENCR issued during the previous period, inclusive of the outlined corrective measures, along with accompanying photographic documentation, are available for reference in Annex 3.

3.4 Non-Conformance Notices

52. Table 8 provides the status of implementation of the corrective actions from the ENCRs that remained open from the previous environmental monitoring report (July–December 2024).

53. The Contractor has been duly notified of the pending environmental issues and an action plan has been devised to guide the implementation of corrective measures within a specified timeframe for the mitigation of non-conformances. The implementation of mitigation measures to address the non-compliance was postponed, as the Contractor suspended all types of works during the reporting period.

Table 8 Status of open non-conformances for the previous reporting period July-December 2024

N	ENCR	DATE ISSUED	LOCATION	DESCRIPTION	CORRECTIVE ACTIONS	SPECIFIED CLOSING DATE	STATUS / REMARKS
1	ENCR 180	10/07/2024	Contractor's office and Residential Camp Area	Contamination of the territory with construction and household waste.	The Contractor shall immediately remove all waste, clean and restore the contaminated area and ensure regular waste collection and segregation.	21/07/2024	Open *(The non-conformance remains unresolved as the Contractor has suspended all construction activities due to financial problems.)*
2	ENCR 183	06/11/2024	Tunnel No. 1 Exit Portal, Beginning of Bridge No. 3, Interchange No. 1	Concrete blocks, concrete and asphalt waste. The aforementioned territory is contaminated with scattered construction and household waste.	The Contractor shall remove all waste materials, segregate reusable/recyclable waste and transport the remaining waste to an approved disposal site.	15/11/2024	Open *(The non-conformance remains unresolved as the Contractor has suspended all construction activities due to financial problems.)*

Note: *The non-conformances identified in the previous SAEMR remain unresolved, as the contractor has suspended all construction activities due to financial problems. In addition, the contractor's environmental personnel are currently not present on site to undertake the necessary corrective measures.*

Note: *During the reporting period, no new non-conformities were identified by the Engineer, as no construction activities were carried out.*

Note: *With the involvement of the RD roadside cleaning and removal of construction waste will be carried out by the Road Maintenance Contractor under the RD's supervision.*

54. **Table 9** lists correspondence regarding environmental issues sent to the Contractor during the current reporting period.

Table 9 Correspondence Regarding Environmental issues

NO	DATE	REF. NO.	SUBJECT
1	22/01/2025	5015001/2/3872	Regarding Waste Management
2	27/01/2025	5015001/2/3876	Reminder regarding the open ENCRs
3	18/02/2025	5015001/2/3888	BBRP Implementation of the Revised Compensatory Tree Planting Plan
4	07/03/2025	5015001/2/3895	Regarding the Outstanding Environmental Works
5	18/03/2025	5015001/2/3904	Regarding Waste Pollution at Site
6	30/04/2025	5015001/2/3940	Reminder Regarding the Outstanding Environmental Works
7	30/06/2025	5015001/2/3972	Request from the ADB regarding the preparation of an Environmental audit Report

3.5 Disposal of Spoil Material from Tunnels and Work Site Rehabilitation

55. The Contractor utilizes the space under bridges for the temporary storage of spoil material excavated from tunnels so that the spoil material can be more easily used for construction activities. The Contractor proposes to remove the spoil material to landfill once construction has been completed. The Engineer has requested the Contractor to progressively remove spoil material in those areas where construction has been completed and the spoil material can no longer be used on site as it is becoming an eyesore and in some cases has the potential to pollute nearby watercourses.

56. The Engineer prepared a waste matrix spreadsheet showing the location of all sites where waste (including construction waste) needed to be removed together with a schedule for the waste removal and site clean-up. The document was designed to be a live document to be updated progressively as sites were cleaned up. The Engineer sent the draft Schedule of site clean-up and rehabilitation to the Contractor on April 20, 2024 (Reference Letter No. 5015001/2/3570). The Contractor was instructed to update the document with performance dates and submit it to the Engineer for review by April 25, 2024. The Contractor submitted the updated document to the Engineer at the end of December 2024 and has commenced site cleanup activities, however, during the reporting period (January–June 2025), the Contractor suspended all types of works due to financial difficulties.

3.6 Trends

57. Most of the violations by the Contractor are related to waste management. The Engineer has recommended that the Contractor implement disciplinary measures to its site supervisors to

improve site environmental management. To date, the Contractor has not enforced any disciplinary measures. However, pollution from construction waste has decreased due to the reduction of the amount of work undertaken since the BBRP was opened to Traffic on 11th October 2024. Pollution remaining from the previous period (July–December 2024) has been observed during the reporting period.

58. No construction activities were carried out by the Contractor during the reporting period. As instructed by the RD the tunnel maintenance company LTD “Arali” conducted cleaning of the tunnel carriageways and shoulders, removing accumulated sand and gravel.

59. Additionally, upon the RD’s instruction, cleaning of the main road carriageway, bridges and shoulders was carried out by the road maintenance company LTD “Burji 777” during the reporting period.

3.7 Unanticipated Environmental Impacts or Risks

60. No unanticipated environmental impacts or risks were observed during the reporting period.

3.8 Compensatory Tree Planting and landscaping Works

61. The Contractor has completed the cutting of trees and In February 2024, a Compensatory Tree Planting Plan was prepared, covering all aspects related to tree planting, including the location of the planting site, spacing between trees, selected species, plant characteristics and quantities, as well as initial maintenance considerations. Species selection prioritizes native, drought-resistant, and ecologically valuable plants, while tree spacing is designed to support healthy growth and soil stabilization.

62. To ensure long-term vegetation establishment, the Contractor is also required to develop a maintenance plan covering at least two years after planting, addressing essential activities such as watering, soil care, and protective measures. Additionally, a replacement strategy for trees that fail to establish during the monitoring period will be incorporated into the plan.

63. The contractor is required to ensure an 80% survival rate of the planted trees and will be responsible for implementing replacement planting as needed to achieve this target.

64. The Compensatory Tree Planting Plan was approved by the Employer on 11 June 2024 (Reference Letter No. 2-08/8363). As part of the compensation measures, a total of 2,513 trees will be planted across 9 identified locations within the selected area. The preferred planting periods for the selected deciduous or evergreen trees are September–October or March–April. According to the approved plan, the Contractor was required to complete the compensatory tree planting between September and October 2024. However, the Contractor missed the designated planting period. Additionally, the Contractor has not yet submitted to the Engineer the signed contract with the sub-contractor company LTD "Georgian Seedlings". Also, no communication has been held between the CSC and LTD "Georgian Seedlings" regarding the clarification of the contract status, and therefore the Contractor has not submitted the relevant copies of correspondence.

65. Following consultations with the RD, the Contractor rescheduled the compensatory tree planting to take place from 9 to 25 April 2025 due to financial difficulties. However, the Contractor again missed the designated planting period due to ongoing financial issues.

66. The Engineer is yet to receive technical and financial proposals for review regarding landscaping of steep slopes and Tunnel portals. However, the Contractor has stated in its Program of Outstanding Works dated 21 December 2024, that it plans to undertake landscaping and embankment seeding in March-April 2025 (Please see ***Annex 2*** Program of Outstanding Environmental Works). As of 30 June 2025, the Contractor had not carried out the mentioned works due to financial difficulties.

67. The RD and the Engineer will incorporate contingency arrangements for potential tree planting failures and establish a survival rate monitoring methodology in the next reporting period. The arrangements will include identification of an alternative contractor, definition of emergency funding sources through project contingencies or government budget allocation and revision of the planting schedule to align with optimal seasonal conditions.

3.9 Noise Barrier Construction

68. The implementation of the technical specifications for the noise barriers — including their height, materials, expected noise reduction levels, and coverage area — as well as the execution of all related works, is planned for the summer of 2025 (see Annex 2 Program of Outstanding Environmental Works), in line with the Contractor's "Program of Outstanding Works." The preparation of the noise barrier plan is the responsibility of the RD and is currently pending. The Contractor is responsible for implementing the works once the plan is finalized and issued. The timeline has been preliminarily coordinated to coincide with the peak tourist season, aiming to maximize the effectiveness of the noise mitigation measures during periods of highest traffic intensity.

69. The preparation of the noise barrier design plan is under the responsibility of the RD and remains pending. Once the plan is finalized and issued, the Contractor will proceed with implementation.

70. The design details and exact implementation schedule are currently under development and will be finalized closer to the planned construction period. The timing has been coordinated to coincide with the peak tourist season, ensuring maximum effectiveness of noise mitigation measures during periods of high traffic intensity.

4 RESULTS OF ENVIRONMENTAL MONITORING

71. During the period of work suspension, the Engineer's Environmental Team and the RD Environmental Specialist conducted occasional inspections to ensure that environmental conditions at the site remained stable and that no significant degradation occurred.
72. The EEMF, LTD "Eco-Spectri" was mobilized during February and May 2025 to conduct environmental monitoring in accordance with the approved monitoring program. During both visits, the EEMF carried out field inspections, reviewed environmental documentation, verified the implementation of mitigation and monitoring measures and assessed overall compliance with ADB safeguard requirements.

4.1 Overview of Contractor's Environmental Monitoring during the Reporting Period.

73. During the reporting period (January–June 2025), the Contractor suspended all construction activities on 15 January 2025 due to financial difficulties. Consequently, no environmental monitoring (water quality, noise, vibration, and air quality) was conducted by the Contractor during the suspension period.
74. Limited housekeeping and site maintenance activities were performed only in early January 2025 prior to the suspension, without full environmental monitoring coverage as required under the SSEMP.
75. Environmental monitoring will be resumed once construction activities recommence, or as necessary, based on instructions from the RD and in accordance with the approved SSEMP.

4.1.1 Water Quality Monitoring

76. No monitoring conducted during the reporting period due to suspension of works.

4.1.2 Noise Measurement Results

77. No monitoring conducted during the reporting period due to suspension of works.

4.1.3 Vibration Monitoring Results

78. No monitoring conducted during the reporting period due to suspension of works.

4.1.4 Air Quality (PM2.5 and PM10)

79. No monitoring conducted during the reporting period due to suspension of works.

4.1.5 Atmospheric Air Quality

80. No monitoring conducted during the reporting period due to suspension of works.

4.2 Summary of Monitoring Outcomes

81. During the reporting period (January–June 2025), the Contractor suspended all construction activities on 15 January 2025 due to financial difficulties. As a result, no monitoring of natural environmental parameters (including water quality, air quality, noise and vibration) was conducted by the Contractor.
82. The RD continued general environmental oversight through its Environmental Specialist and the EEMF – Eco-Spectri, which carried out limited baseline monitoring in February and May 2025 to ensure data continuity during the suspension period.
83. Routine environmental monitoring by the Contractor will be resumed once construction activities recommence, or earlier if instructed by the RD or in response to any public complaints.

4.3 Material Resources Mobilisation

84. Between January and June 2025, the Contractor (see Table 10) has not mobilized materials on site.

Table 10 Material Mobilization

N	MATERIALS	UNIT	QUANTITY
1	Sand	m^3	-
2	Reinforcement steel	T	0
3	Cement	T	0
4	Additives	T	0
5	Explosives	T	0

4.4 Waste Management

85. According to the Contractor's "Program of Outstanding Works" (see ***Annex 2*** Program of Outstanding Environmental Works), the removal of all types of waste was scheduled to take place between 1 November 2024 and 1 April 2025. However, due to financial difficulties, the Contractor was unable to implement the planned activities. As for the subsequent period, the responsibility for road cleaning was transferred to a company hired by the RD, which will carry out post-opening maintenance activities.

86. The waste dumpsite area which is located near Batumi Airport and Kakhaberi settlement was approved by the Ministry of Finance and Economy of Adjara on 19.11.2018 and a copy of the agreement was submitted to the Engineer.

4.5 Health and Safety

87. The CC designated Mr. Ayaz Abdurahmanov as a full-time Accident Prevention Officer for the Project. In this capacity, he is responsible for ensuring that safety and accident prevention measures are consistently implemented.

88. To support him, the CC also appointed Mr. Davit Metreveli and Mr. Levan Saginadze as H&S Specialists. Both hold labour safety certificates recognized in Georgia and possess more than three years of experience in the construction sector. They demonstrate a solid understanding of occupational safety regulations, reporting procedures, and documentation requirements and are characterized by strong analytical and teamwork skills.

89. However, due to the suspension of construction works on 15 January 2025, the H&S team was demobilized and not present on site during the reporting period (January–June 2025).

90. Despite the suspension, the Engineer's Safety Specialist remained on site, monitoring site conditions and ensuring that minimum safety standards were maintained.

91. In addition, the RD's Occupational Safety Officers conducted periodic site visits to oversee general safety conditions and verify compliance with the project's safety requirements.

92. Health and safety oversight will be fully re-established once construction activities resume.

4.5.1 Community and Worker Health and Safety

93. No incidents were recorded during the reporting period.

94. Trends related to the incidents and accidents are outlined in ***Table 11.***

Table 11 Health and Safety Trends

Incident	Reporting Period (January – June 2025)	Total (since start of Project)
Near Miss	0	7
Accident Minor	0	21
Accident Major	0	5
Incident Minor	0	11
Incident Major	0	8

95. All incidents are classified in accordance with the organization's Incident Severity Classification Framework, which aligns with recognized industry standards and internal H&S policy. Incidents are assessed based on several factors, including:
    - Nature and extent of injury or illness
    - Need for medical treatment beyond first aid
    - Duration of lost work time or restricted duties
    - Potential for escalation under slightly different circumstances
    - Actual or potential environmental or asset damage
96. The classification tiers typically include:
    - Minor – Injuries requiring basic first aid or outpatient care, with no lost time and no permanent impairment.
    - Moderate – Injuries requiring medical treatment, potentially involving restricted work duties or short-term lost time (typically less than 7 days), but no lasting disability.
    - Serious – Injuries resulting in extended lost time, hospitalization, or permanent impairment.
    - Major – Fatalities, life-altering injuries, or incidents with severe environmental or asset consequences.

4.6 Contractor's Training

97. Due to the suspension of works by the Contractor, the quarterly trainings required under the SSEMP were not conducted during the reporting period.

4.7 Community Consultation

98. Public consultation and participation are an integral part of ADB's policy which is a continuous process at conception, preparation, implementation and finally at post implementation period.

99. During the reporting period from January to June 2025, the Engineer mostly in accompaniment with the Contractor conducted 8 consultations and meetings with APs to determine and resolve outstanding issues.

100. The consultations were held mostly one-on-one between residents and representatives of the Engineer and the Contractor.

101. During the meetings issues were inspected by the residents. The issues concerned damage to residential houses and road upgrading. In most cases fruitful consultations were conducted between the parties.

102. In June 2025, consultations with the Water Supply Company and the residents have been conducted to mitigate the water related issue at Tunnel No. 1. After a long period of communication with the assistance of the Municipality of Batumi, the water issue has been resolved. The water supply has been restored for the residents located above the Tunnel.

4.8 Grievance Redress Mechanism and Complaints

103. A total of 236 grievances has been submitted across 11 categories to the GRC. Out of these, 206 grievances have been resolved as of 30 June 2025. Most people (102) applied for damage to their assets caused by construction activities, out of which 78 have been closed. 43 APs requested inclusion of their residential structures or land plots in the acquisition list, all of them are already closed. 26 Aps expressed dissatisfaction due to disturbance by noise/vibration and dust, out of which 22 cases closed. Out of 236 cases, 2 of them were received during the reporting period. Left cases are indicated below in ***Table 12.***

104. After the completion of the NATM works at the Tunnels, the post construction surveys for Tunnels No. 4 and No. 3 have been submitted by the Contractor.

105. The preparation of post construction surveys for Tunnels No. 2 and No. 1 is on-going. The submitted data is reviewed by the Engineer and recommendations are provided to RD.

106. The technical hold cases are mostly related to the post-construction surveys of the Tunnels No. 2 and No. 1. The majority of the residential houses have been already inspected. Although, the Engineer still awaits the submission of the soft documents from the Contractor. As per the construction works of the project are suspended during the reporting period, the expected resolution date is 31 December 2025.

107. For other details refer to ***Table 12***.

Table 12 Summary of Grievances by Category

Number of Complaints by Category	Closed	Technical Hold	Open	Total	%
Damage to Infrastructure / Assets	78	24	0	102	43,22%
Crop Compensation	7	0	0	7	2,97%
Other	16	0	0	16	6,78%
Inclusion in LARP	43	0	0	43	18,22%
Disturbance: Noise / Vibration / Dust	22	4	0	26	11,02%
Restriction or loss of access	12	0	0	12	5,08%
Recruitment / Employment	1	0	0	1	0,42%
Loss of business	1	0	0	1	0,42%
Compensation Rate	16	2	0	18	7,63%
Registration / Ownership Status	7	0	0	7	2,97%
HSE Concerns	0	0	0	0	0,00%
Road Upgrading	3	0	0	3	1,27%
Total	**206**	**30**	**0**	**236**	**100%**

5 FUNCTIONING OF THE SSEMP

5.1 SSEMP Review

108. The original SSEMP was prepared by the Contractor and submitted to the Engineer on 30 May 2018 by letter GEO/BB/103-18 and was prepared in a good manner although with some inconsistencies. In March 2019 the Contractor submitted an updated SSEMP to the Engineer which considered ADB, RD and Engineer's comments. As per Engineer's request (Letter Ref. 5015001/2/1138 dated 15 November 2019), the contractor updated the SSEMP/TSEMPs on 18.04.2021 and additionally prepared EMPs for the Stone Column area, No.2 Concrete Batching Plant and for each tunnel and bridge.

109. Presents the statuses of the required sub-plans and method statements in the SSEMP are indicated below in ***Table 13.***

Table 8: Status of Site-Specific Sub-plans

Plan	Date of Submission	Approving Authority	Status/Remarks (Approval Dates)
Site Specific Environmental Management Plan (SSEMP)	30.05.2018 (Ref No GEO/BB/103-18)	Engineer/RD	Approved by the Engineer on 12.07.2018 (Ref No 5015001/2/253)
Camp Management Plan	30.05.2018	Engineer/RD	12.07.2018
Workshop Management Plan	30.05.2018	Engineer/RD	12.07.2018
Plant Operation Management Plan	30.05.2018	Engineer/RD	12.07.2018
Road, Tunnel and Bridge Construction Management Plan	30.05.2018	Engineer/RD	12.07.2018
Soil Management Plan	30.05.2018	Engineer/RD	12.07.2018
Water Management Plan	30.05.2018	Engineer/RD	12.07.2018
Dust Management Plan	30.05.2018	Engineer/RD	12.07.2018
Noise and Vibration Management Plan	30.05.2018	Engineer/RD	12.07.2018
Waste Management Plan	30.05.2018	Engineer/RD	12.07.2018
Spoil Management Plan	30.05.2018	Engineer/RD	12.07.2018
Spill Prevention Management Plan	30.05.2018	Engineer/RD	12.07.2018
Borrow Pit Management Plan	30.05.2018	Engineer/RD	12.07.2018
Flora and Fauna Management Plan	30.05.2018	Engineer/RD	12.07.2018
Cultural and Archaeological Management Plan	30.05.2018	Engineer/RD	12.07.2018
Grievance Redress Mechanism	30.05.2018	Engineer/RD	12.07.2018
Environmental Monitoring and Reporting	30.05.2018	Engineer/RD	12.07.2018
Aids Training and Public Consultation Schedule	30.05.2018	Engineer/RD	12.07.2018
Health and Safety Plan	14.05.2018 Ref No GEO/BB/084-18)	Engineer/RD	Approved by the Engineer on 17.05.2018 (Ref No 5015001/2/130)

5.2 Environmental Offences and Penalties

110. Adjara and Guria Regional Division, Department of Environmental Supervision, MoEPA did not issue any environmental offences and penalties to the Contractor during the reporting period.

111. The project holds a valid Environmental Permit issued by the MoEPA and no additional formal clearance or correspondence is required under Georgian legislation during the temporary suspension of works.

112. Accordingly, no further communication with MoEPA was initiated during this reporting period, as the suspension was related to the Contractor's financial difficulties rather than environmental issues.

113. All environmental obligations remain valid and will continue to be implemented once construction activities resume. good practice

5.3 Good Practice

114. During the reporting period (January–June 2025), despite the suspension of construction activities, several good environmental management practices were maintained under the supervision of the Engineer and RD

115. Regular environmental and safety supervision was ensured through periodic site visits conducted by the Engineer's Environmental and Safety Specialists and the RD's Environmental and Occupational Safety Officers, to verify that suspended sites remained in a stable and safe condition.

116. EEMF – Eco-Spectri was mobilized in February and May 2025 to conduct baseline environmental monitoring, ensuring the continuity and integrity of environmental data.

117. The RD initiated coordination with the Road Maintenance Contractor to plan roadside cleaning and waste removal along the project alignment.

118. As instructed by the RD, the tunnel maintenance company LTD "Arali" carried out cleaning works within the tunnels, including the removal of accumulated sand and gravel from the carriageway and shoulders.

6 SUMMARY AND RECOMMENDATIONS

6.1 Summary

119. According to the Contractor's "Program of Outstanding Works" (Annex 2), the implementation and completion of all environmental activities were scheduled for the period from 1 November 2024 to 26 April 2025. However, during the reporting period, the Contractor suspended all types of works due to financial difficulties. The RD has therefore instructed the tunnel maintenance company LTD "Arali" to carry out cleaning works within the tunnels, including the removal of accumulated sand and gravel from the carriageway and shoulders.

120. The RD and the Engineer continue to oversee environmental conditions to minimize liability risks associated with suspended works. Regular inspections confirmed that no significant erosion, waste accumulation, or water contamination occurred.

121. Preventive maintenance activities (cleaning of drainage channels, slope protection and vegetation control) were performed through the RD's Road Maintenance Contractor.

122. A consolidated action plan and implementation timeline for resolving any outstanding environmental obligations will be prepared during the DNP period and prior to the resumption of full construction works.

6.2 Recommendations

123. Despite the suspension, the Engineer's Safety Specialist and the RD's Occupational Safety Officers will continue to conduct regular site inspections to ensure that occupational and public safety standards are maintained. These activities will be supported through RD's internal resources.

124. The Engineer is yet to receive the technical and financial proposals for review regarding landscaping of steep slopes and Tunnel portals. This needs to be done as soon as possible.

125. Removal of all types of waste from construction sites and transfer to authorized companies for further disposal.

126. Implementation and timely completion of all environmental activities in accordance with the Contractor's "Program of Outstanding Works".

127. The RD and the Engineer should continue to carry out periodic environmental and safety supervision of suspended sites, including tunnels, slopes, drainage systems and access roads.

ANNEX 1 PROJECT PHOTOS

Photo №1 - The road maintenance company LTD "Burji 777" conducted cleaning works.

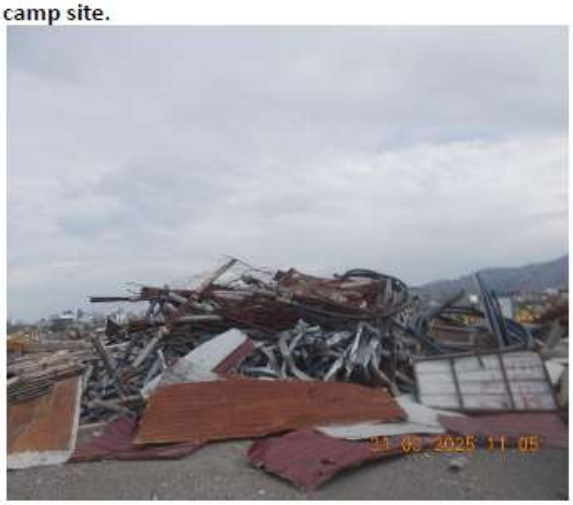
Photo №2 - The tunnel maintenance company LTD "Arali" conducted cleaning works.

Photo №3 - Area designated for topsoiling and grass seeding.

Photo №4 - Contractor's Concrete Plant №1.

Photo №5 - Used tires accumulated at the Contractor's camp site.

Photo №6 - Scrap accumulated at the Contractor's camp site.



Annex 2 Program of Outstanding Environmental Works

Environmental works to be completed **30 June 2025**
30 ივნისი 2025

Type of Works	Start Date	End Date	Status of Works
Waste management	1/11/2024	1/04/2025	Pending
Restoration of Degraded Soil	15/03/2025	18/04/2025	Pending
Grass Seeding on Embankment Slopes	11/03/2025	8/04/2025	Pending
Tree planting	9/04/2025	25/04/2025	Pending
Arrangement of Noise Barriers	6/03/2025	26/04/2025	Pending
Tunnels- T1-T5: -Construction of Sump Tanks (Tender Drawing and BoQ Item No. 1024).	No Start date in POW	No End Date in POW	Pending
Closure of ENCRs			
Closure of ENCRs	Issue Date of ENCRs	Due Date of ENCRS	Status
Closure of ENCR No. 180	10/07/2024	21/07/2024	Pending
Closure of ENCR No. 183	6/11/2024	15/11/2024	Pending

ANNEX 3- ENCRS

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Part 1 – Non-Conformance Description:

Reference Number:	ENCR_180		
Project Name:	Batumi Bypass Road Project	Date raised:	10/07/2024
Contractor Name:	POLATYOL & MAPA JOINT VENTURE		
Location:	Contractor's office and Residential Camp Area / კონტრაქტორის საოფისე და საცხოვრებელი ბანაკის ტერიტორია		

Non-Conformance details:

Contamination of the territory with construction and household waste.

ტერიტორიის დაბინძურება საშენებლო და საყოფაცხოვრებო ნარჩენებით.

Proposed Corrective Measure:

შემოთავაზებული-მაკორექტირებელი ქმედება:

Cleaning the territory from waste and removal from the aforementioned territory.

ტერიტორიის დასუფთავება ნარჩენებისაგან და ტერიტორიიდან გატანა.

Engineer's Representative: Davit Tevzadze — Signature:

Part 2 – Corrective Actions (attach any supporting information)

Agreed Close-out Date: Date: 21/07/2024

Contractor's Representative: — Signature:

Part 3 – Inspection (evidence to support corrective action implementation)

Engineer's Representative: — Signature:

Closure Date:

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

ENCR_180

Photo / ფოტო No. 1

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Photo / ფოტო No. 2

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Photo / ფოტო No. 3

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Photo / ფოტო No. 4

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Photo / ფოტო No. 5

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Photo / ფოტო No. 6

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Part 1 – Non-Conformance Description:

Reference Number:	ENCR_183		
Project Name:	Batumi Bypass Road Project	Date raised:	06/11/2024
Contractor Name:	POLATYOL & MAPA JOINT VENTURE		
Location:	Tunnel No. 1 Exit Portal, Beginning of Bridge No. 3, Interchange No. 1/ No. 1 გვირაბის გამსვლელი პორტალი, No. 3 ხიდის დასაწყისი და 1-ლი კვეთი.		

Non-Conformance details:

The following non-conformances were observed:

ტერიტორიაზე დაფიქსირდა:

Concrete blocks, concrete and asphalt waste.

ბეტონის ბლოკები, ბეტონის და ასფალტის ნარჩენები.

The aforementioned territory is contaminated with scattered construction and household waste.

ტერიტორია დაბინძურებულია მიმოფანტული სამშენებლო და საყოფაცხოვრებო ნარჩენებით.

Proposed Corrective Action:
შემოთავაზებული მაკორექტირებელი ქმედება:

It's necessary:
საჭიროა:

To clean the territory contaminated with concrete blocks, concrete and asphalt waste and remove these concrete blocks, concrete and asphalt waste to the approved disposal area.

To clean the territory from household and construction waste.

ბეტონის ბლოკები, ბეტონისა და ასფალტის ნარჩენებით დაბინძურებული ტერიტორიის გაწმენდა. ბეტონის ბლოკების, ბეტონისა და ასფალტის ნარჩენების გატანა/განთავსება წინასწარ განაზღაურებულ განკარგვის ზონაში.

ტერიტორიის დასუფთავება საყოფაცხოვრებო და სამშენებლო ნარჩენებისგან.

Engineer's Representative: Davit Tevzadze	Signature:

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Part 2 – Corrective Actions (attach any supporting information)

	Agreed Close-out Date
	Date: 15/11/2024
Contractor's Representative:	Signature:

Part 3 – Inspection (evidence to support corrective action implementation)

Engineer's Representative:	Signature:
Closure Date:	

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

ENCR_183

Photo / ფოტო No. 1

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Photo / ფოტო No. 2

Polatyol	Environmental Non-Conformance Report (ENCR)	smec engineering positive change

Photo / ფოტო No. 3