



REPUBLIC OF MACEDONIA
PUBLIC ENTERPRISE FOR STATE ROADS



PROJECT: CONSTRUCTION OF A1 EXPRESSWAY SECTION: RAEC RIVER BRIDGE – DRENOVO INTERCHANGE

*Consultation Report on EIA, Non-Technical Summary
and Critical Habitat Assessment Disclosure*

November 2014

1	INTRODUCTION	3
1.1	INTRODUCTION	3
1.2	STRUCTURE OF THIS DOCUMENT	4
2	OVERVIEW OF PUBLIC CONSULTATION PROCESS.....	4
2.1	INTRODUCTION	4
2.2	CONSULTATION AND ENGAGEMENT TOOLS	5
2.2.1	Newspaper ads.....	6
2.2.3	Project Website.....	6
2.2.5	EIA Reading Rooms	6
2.2.7	EIA Public Hearings	6
3	FEEDBACK FROM STAKEHOLDERS AND PROJECT RESPONSES	7
3.1	INTRODUCTION	7
4	CONCLUSION	11

1 INTRODUCTION

1.1 INTRODUCTION

This document is the Consultation Report for the Project “**Construction of A1 Expressway Section: Raec River Bridge – Drenovo Interchange**”, which is part of the state road A1 Gradsko – Prilep (Pan-European Corridor X (E-75), Branch Xd. The company for planning, design and engineering “Prostor” from Kumanovo has been selected by the Public Enterprise for State Roads (PESR) to carry out the detailed design for the project.

Public Consultation processes have been implemented in accordance with the national legislation for the whole section from River Raec Bridge to Gradsko in total length of 25km in the period 2011-2013. This section has recently been divided in two sub-sections: (1) Section from Raec River Bridge to Drenovo Interchange in length of 10,2km and (2) from Drenovo Interchange to Gradsko (Junction with motorway A1) in length of 15km.

EBRD financing has been sought for the first section from Raec River Bridge to Drenovo Interchange, while the other sub-section is planned to be funded from other sources (IPA funds).

The EBRD, who are providing a loan for the expressway section River Raec Bridge to Drenovo Interchange, is working with the PESR to ensure that the Project’s environmental and social risks are appraised and managed in accordance with the **Environmental and Social Policy (ESP 2008) and Performance Requirements (PRs)**. To this end, an updated Non-Technical Summary (NTS), Environmental and Social Action Plan (ESAP), Critical Habitat Assessment (CHA), Stakeholder Engagement Plan (SEP) and a Land Acquisition and Resettlement Framework (LARF) have been developed and disclosed for the project in 2014 to set out PESR’s commitments to national and EBRD ESP and PRs.

This Public Consultation Report provides an overview of the consultations and communication with concerned stakeholders for the following phases of the project development. The following provides a summary of the key documents that have been disclosed for stakeholder comment:

- (1) Planning and field work, such as Urban Plan for Line Infrastructure, Geodetic Survey and Geo-mechanical Investigations for the section River Raec Bridge - Gradsko (2011);
- (2) Strategic Environmental Assessment for the section Prilep - River Raec Bridge –Gradsko (2012). As part of the SEA process, a 30-day public consultation exercise was undertaken during which the SEA Report was disclosed and comments sought through a programme of engagement activities commencing on 27th August 2012 and concluding on 27th October 2012. This document summarises the results of this consultation exercise and explains how the project has responded to the various issues raised;
- (3) Environmental Impact Assessment for the section River Raec Bridge - Gradsko (2013). As part of the EIA process, a 30-days public consultation exercise was undertaken during which the EIA Study was disclosed and comments sought through a programme of engagement activities commencing on 20th July 2013 and concluding on 21st March 2014. The EIA and updated Non-Technical Study was publicly available from the 27th May 2014 on the EBRD website was also publicly disclosed on the 6th October 2014;
- (4) An updated Non-Technical summary, Stakeholder Engagement Plan (SEP), Land Acquisition and Resettlement Framework (LARF) and Resettlement Action Plan (RAP) for the section River Raec Bridge to Drenovo Interchange (2014).

All the above mentioned documents were/are freely available (in both Macedonian and English) on the PESR website (www.roads.org.mk) and hard copies can also be found in PESR premises, “Dame Gruev” Str., No. 14 1000 Skopje, working hours 08.30-16.30 CET, from Monday to Friday.

1.2 STRUCTURE OF THIS DOCUMENT

The remainder of this document is structured as follows:

Section 2 provides an overview of the public consultation process, describing the engagement and consultation activities and providing further details on specific consultation events (such as public hearings).

Section 3 presents a summary of the consultation submissions and comments received. Details are provided on the topics and issues raised by specific stakeholders (such as international NGOs). Additionally, an assessment of the level of community support for and opposition to the Project is provided.

Section 4 details how the project has responded to the various submissions and issues presented in Section 3. This section references some specific response made by PESR to consultation submissions received. It also presents a short conclusion to this Consultation Report.

2 OVERVIEW OF PUBLIC CONSULTATION PROCESS

2.1 INTRODUCTION

The first project specific consultation process formally commenced on 27.08.2012 by uploading the draft Strategic Environmental Assessment (SEA) Report on the website www.sea-info.mk. The PESR published on 27.09.2012 an invitation to concerned stakeholders to attend a public hearing on 10.10.2012 in PESR premises. On 03.12.2012 a report on the public hearing was also made available to the public.

Consultation continued in 2013 by publishing the draft EIA Report on 20.07.2013 (or 5 days after the submission of the Draft EIA Report by the PESR to the competent authority) on the website of the Ministry of Environment and Physical Planning. The concerned public, NGOs, all relevant institutions had the opportunity to comment on the Project within 30 days of the publication of the EIA Report. On 11, 12 and 13 September 2013 public hearings were organized in Municipalities of Rosoman, Kavadarci and Gradsko.

A Stakeholder Engagement Plan (SEP), was made available on 27.05.2014 as part of the suite of materials released during the 2014 consultation process.

An overview of the consultation process conducted for the section River Raec Bridge – Gradsko is provided in the table below:

Table 1 Overview of the consultation process

Stakeholders	Date	Issues	Outcomes
Residents and community members	In 2012 - Consultants with PESR and designers	Needs of residents and community members	Development of project documentation
Residents and community members	In 2012	Data collection on environmental and social issues; Public hearing held on 10.10.2012.	SEA development
Residents and community members, Municipality of Kavadarci	Since 2013 to Date	Data collection on environmental and social issues	EIA, NTS, CHA, SEP and LARF development
Local	11.09.2013	Public hearing on draft EIA	EIA development

Stakeholders	Date	Issues	Outcomes
Government - Rosoman			
Local Government - Kavadarci	12.09.2013	Public hearing on draft EIA	EIA development
Local Government - Gradsko	13.09.2013	Public hearing on draft EIA	EIA development
All stakeholders Residents and community members	27.05.2014	Disclosure of updated Non-technical summary, stakeholder engagement plan	Environmental and Social Management and Monitoring Plans.
All stakeholders Residents and community members	29.09.2014 – 11.11.2014	Biodiversity and Critical Habitat Assessment	Biodiversity Management Plan (to be developed)

In accordance with good practice the Project will continue to engage with external stakeholders throughout its preparatory stage as well as after the period of construction and operation. For the present any stakeholder can continue to contact the Project using the mechanisms available (see Stakeholder Engagement Plan).

2.2 CONSULTATION AND ENGAGEMENT TOOLS

Table below summarizes the consultation methods and engagement activities during the consultation period.

Table 2 Consultation and engagement activities (Main Timeline of Public Consultation Period)

Activity	Date	Dissemination methods
Strategic Environmental Assessment	August – October 2012	<ul style="list-style-type: none"> – Website – Newspapers – Opportunity to submit written comments – Public hearing – Posting of Minutes of meeting
Environmental Impact Assessment	July – September 2013	<ul style="list-style-type: none"> – Website – Newspapers – Opportunity to submit written comments – Hard copies of EIA available on request in PESR and municipalities Rosoman, Kavadarci and Gradsko – Public hearing – Posting of Minutes of meeting
Non-Technical Summary & Biodiversity and Critical Habitat Assessment (CHA)	June 2014 - onwards	<ul style="list-style-type: none"> – Website – Opportunity to submit written comments – Hard copies of NTS and CHA made available at PESR, EBRD and municipality of Kavadarci
Stakeholder Engagement Plan & Land Acquisition and Resettlement Framework	June 2014 - onwards	<ul style="list-style-type: none"> – Website – Opportunity to submit written comments – Hard copies of SEP and RAP available at PESR and EBRD

2.2.1 Newspaper ads

Public advertisements were published about the commencement of the consultation period, project website address and the dates of public hearings.

The announcements for publication and availability of the SEA and EIA were published in daily newspapers (“Nova Makedonija”, “Dnevnik”, “Vecer” and “Koha”), in the local media, at web sites of the PESR (www.roads.org.mk) and at the Municipality of Kavadarci (www.kavadarci.gov.mk) in the whole period from August 2012 until September 2013 respectively.

2.2.3 Project Website

Project information is available at PESR website which provides access to all the EIA documents as well the NTS, CHA and SEP (<http://www.roads.org.mk/470/environment-protection-and-social-aspects>). All of these public consultation materials are still available on the website and further documents will be added including this report. The website will continue to provide a source of information during the construction and operation of the project.

2.2.5 EIA Reading Rooms

Five EIA Reading Rooms (three in the municipalities of Gradsko, Kavadarci and Rosoman) and in the PESR and MoEPP were opened in the period July/ September 2013. These rooms were supplied with sufficient hard copies of the full EIA Study. These locations were chosen to be as close to the project alignment as was reasonably possible. During the consultation period on EIA, there were no visitors in the Reading Rooms.

In addition, two Reading Rooms were opened in May 2014 at PESR, “Dame Gruev” Str., No. 14 1000 Skopje and the municipality of Kavadarci, “Marsal Tito” Str., No bb 1430 Kavadarci. The full EIA, NTS, CHA, LARF and SEP are available on request.

2.2.7 EIA Public Hearings

Three public hearings were held in public venues. These were advertised in advance on the MoEPP website, in the two newspaper advertisements and through local media. Various documents about the project were available for inspection at these public events including hard copies of the full EIA Report, the Project Summary, maps, alternatives etc. Project staff were on hand to answer any questions. Each public hearings ran from 11am to 14pm on one working day.

The venues of public hearings are as follows:

Venue	Date
Local Government - Rosoman	11.09.2013
Local Government - Kavadarci	12.09.2013
Local Government - Gradsko	13.09.2013

3 FEEDBACK FROM STAKEHOLDERS AND PROJECT RESPONSES

3.1 INTRODUCTION

This section presents an overview of the comments and submissions received from stakeholders during the consultation period and the Project responses.

The issues have been grouped as follows:

- land property issues due to the alignment of the expressway;
- providing access road to local farms (outside the sub-section Raec – Drenovo);
- economic decline of villages bypassed by the expressway (outside the sub-section Raec – Drenovo);
- Alternatives of the project route (within Drenovo Gorge).

I

Table 3 below identifies individuals/organisations responding to the SEA/EIA consultation and their main comments and the project's response.

Table 3 Summary of SEA/EIA consultations and project responses

Natural and Legal persons	Date	Summary of Submission/Question	Project Response
1. "Agria" Ltd (pig farm), Veles	10.10.2012	Concerned raised about the inability to connect to the planned expressway and asked for an additional junction for better communicating with the existing road network Important note: This comment is outside the scope of subsection River Raec Bridge – Drenovo Interchange. The comment was related to the alignment Drenovo Interchange – Gradsko (Junction with Motorway A1).	The request was taken onboard and it was incorporated and addressed in the Detailed design of the Project.
2. Mayor of the municipality of Rosoman	10.10.2012	Raised concern that bypassing the village of Rosoman will cause negative socio-economic developments; 3 petrol stations, a green market on the existing road and 5 restaurants provide services to passengers running through Rosoman currently and these businesses will be affected in the future with going of the express road outside the village. Important note: This comment is outside the scope of subsection River Raec Bridge – Drenovo Interchange. The comment was related to the alignment Drenovo Interchange – Gradsko (Junction with Motorway A1).	The request was taken on board, but the express road was decided to go outside the village Rosoman, since this is black spot and very bad solution in terms of road safety in the village; the selected shall significantly improve road safety. In addition, irrigated and privately owned highly productive land is avoided while crossing plots of lower quality in state ownership. The village of Rosoman will be connected to the express road with Interchanges near the village.
3. "Vardar 03" Joint Stock company from Gradsko	10.10.2011	Raised concern that route fragments vineyards planted on the land in state ownership awarded under concession and requested bypassing the fragmented plot. Important note: This comment is outside the scope of subsection River Raec Bridge – Drenovo Interchange. The comment was related to the alignment Drenovo Interchange – Gradsko (Junction with Motorway A1).	The request was taken onboard and it was incorporated in the detailed design of the Project, so that road was on the periphery of the plot and provided access roads were technically possible.
4. Mayor of the municipality of Rosoman	09.12.2013	The Major was not supportive of the plans to move the route outside the village Rosoman. He asked for upgrading of the existing road by an additional lane in the village. Important note: This comment is outside the scope of subsection River Raec Bridge – Drenovo Interchange. The comment was related to the alignment Drenovo Interchange – Gradsko (Junction with Motorway A1).	The request was discussed, but the express road was decided to go outside the village Rosoman, since this is black spot and very bad solution in terms of road safety in village. The village of Rosoman will be connected to the express road with Interchanges near the village.
5. Individual agriculture producer	09.12.2013	Complained about intersecting a plot of 40 hectares by the route and worsening the value of both the land and the products. Important note: This comment is outside the scope of subsection River Raec Bridge – Drenovo Interchange. The comment was related to the alignment Drenovo Interchange – Gradsko (Junction with Motorway A1).	The request was taken on board. The land that will be acquired will be compensated according to the methodology prescribed under national law.

<p>6.NGO “EkoSvest” / CEE Bankwatch Network”</p>	<p>21.10.2014</p>	<p>NGO “EkoSvest/CEE Bankwatch Network” submitted a letter to the Board of Directors of the EBRD on 21.10.2014. Two issues are raised in this letter, namely:</p> <ul style="list-style-type: none"> • lack of a proper consideration of alternative routes of the Raec – Drenovo road outside the Drenovo Gorge protected area; • the capacity of the project promoter to implement appropriately envisaged mitigation measures based on the experience from the construction of the section Smokvica - Gevgelija (Corridor X). 	<p>PESR organized a meeting on 29.10.2014, in response to the letter of the NGO Eco Svest / CEE Bankwatch Network. PESR provided very detailed answers on the selection of alternatives starting from the Conceptual design of the project, some 5 years ago. The expressway purpose is to upgrade the traffic flows along the existing road corridor which already passes through the Emerald site. The selected route was aligned, to the extent possible, in parallel with the existing road R-106. The major reason for selecting the alternative crossing the “Drenovo Gorge” site was the topography of the terrain, technical difficulties and consequently the road safety.</p> <p>PESR sent further detailed explanation on 03.11.2014 to Bankwatch on the route selection process which used multi criteria analyses. In assessing the alternatives the following issues were taken into account:</p> <ul style="list-style-type: none"> • Environmental considerations comprised the number of crossings over water courses and the length of encroachment into protected areas. • Economic considerations were covered by the operating costs criteria and did consider the differences in both operating and maintenance costs and did allow for travel time and accident costs. • Social considerations included landscape disturbance, impacts on agricultural land and closeness to villages. • Human health and public safety was covered by safety consideration in technical difficult criteria and accident costs in costs <p>This information demonstrated that the variant encroaching the “Drenovo Gorge” and proposed Emerald site Raec was unavoidable. The Biodiversity Management Plan (BMP) and biodiversity offsetting management plan (BOMP) outlined in the Critical Habitat Assessment (CHA) will be designed to ensure that no net loss of natural habitats and critical habitats can be achieved. The magnitude and complexity of the offsets required to achieve no net loss and net gain outcomes for biodiversity affected by the project reflects the high value of the natural and critical habitats found in the study area, and in particular in Drenovo gorge. This project will be managed and monitored by a completely different team to those directly involved in Corridor X project.</p>
--	-------------------	--	--

<p>7.NGO “EkoSvest” / CEE Bankwatch Network”</p>	<p>06.11.2014</p>	<p>The NGO “EkoSvest” / CEE Bankwatch Network” submitted another letter to the Board of Directors of the EBRD on 06.11.2014. Two issues are raised in this letter, namely:</p> <ul style="list-style-type: none"> i. They acknowledged that PESR kindly provided required information in due time, however they consider that provided request is far from elaborate, suggesting the Board to raise questions about the alternatives and the efforts of the EBRD's client to ensure that the choice of alternative is based not only on technical, legal and economic criteria but also on ecological criteria; ii. Although they realized the different management structure in relation with projects D .Kapija – Smokvica and Raec – Drenovo, still express their doubt about the capacity of the client to ensure 'No Net Loss' of biodiversity. 	<p>The raised issues were raised and discussed at the EBRD Board of Directors.</p> <p>Correct implementation and effectiveness of these mitigation measures is strongly tied to adequate supervision by qualified ecologists and independent auditing of ecological outcomes, which shall be included in performance-based contracts for the execution of mitigation and offsetting measures. The Critical Habitats Assessment already specifies a number of monitoring requirements. They are as follows:</p> <p>CONSTRUCTION PHASE</p> <ul style="list-style-type: none"> • Supervision of works by a trained ecologist during the construction phase • In Drenovo gorge, regular (twice a week) monitoring of Egyptian vulture presence and behaviour will be undertaken from March 15th to September 15th, during the construction phase. <p>OPERATIONAL PHASE (Drenovo Gorge)</p> <ul style="list-style-type: none"> • monitoring of Egyptian Vulture breeding during the first 5 years of operation • monitoring of impacts on the bat population using the cave above the road • monitoring of impacts on the endemic snail <i>Carinigeradrenovoensis</i>, during the first 5 years of operation <p>This project will be managed and monitored by a completely different team to those directly involved in Corridor X project.</p>
--	-------------------	--	---

4 CONCLUSION

All stakeholder submissions, either written or verbal, were treated equally and transparently. While the road design process is completed and certain residual impacts are evident in the social and environmental segments, adequate mitigation measures are envisaged and these will have to be implemented responsibly and with due care by those involved in the project implementation.

PESR is truly committed to receiving and responding to all comments or complaints, either verbally or in writing in relation to the Project. PESR recognizes that consultation is an ongoing process and different concerns may arise as the Project moves into the land acquisition and construction phases.

Stakeholders, including the public, will also be able to use the grievance procedure; information regarding the grievance procedure will be widely disseminated to affected municipalities and affected local communities.

Stakeholder Engagement Plan (SEP) was disclosed in public on 27.05.2014 on PESR website (www.roads.org.mk) and on EBRD web site (www.ebrd.com) and will be reviewed and updated as the project progresses.

All comments and complaints will be and should be forwarded and processed by the responsible person of the PESR services:

Mrs Biljana Todorova, Department for Legal Affairs
Tel: + 389 (0)2 3118-044 ext.119
Fax: + 389 (0)2 3220-535
e-mail: biljanal@roads.org.mk
Address: Public Enterprise for State Roads
Dame Gruev 14, 1000 Skopje, Republic of Macedonia
Web: www.roads.org.mk

The response time for grievances will be in accordance with the SEP.

Comments on the Project, and complaints, can also be submitted to the responsible contact person of the municipality of Kavadarci or EBRD's office (Skopje):

Municipality of Kavadarci
Address: BulMarsal Tito bb, 1430 Kavadarci
E-mail: opshtina@kavadarci.gov.mk
EBRD's office in Skopje
Address: Soravia Centre Skopje, VII floor
St. Filip II Makedonski no. 3, 1000 Skopje Republic of Macedonia
Tel: +389 2 3297 800
Fax: +389 2 3231 238