

Montenegro: Main Roads Reconstruction Project, M-2 Tivat-Jaz Road Section

Addendum and Clarification
Report: Environmental and Social
Impact Assessment Report

Prepared for: European Bank of
Reconstruction and Development

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1 Introduction

The European Bank for Reconstruction and Development (EBRD) is considering provision of finance to support the Transport Administration of Montenegro (TA) with the rehabilitation and upgrade of the Tivat - Jaz section of the country's main road network. This project is part of the TA's wider "Main Roads Reconstruction Project" scheme that includes the upgrade and improvements to the Rožaje and Špiljani and Podgorica and Danilovgrad roads.

Given the scale and nature of the Project, EBRD assigned the Project to Category A under its Environmental and Social Policy 2014. As such, a comprehensive Environmental and Social Impact Assessment (ESIA) was required, followed by public disclosure of the ESIA for a minimum of 120 days. The disclosure period started on the 7 August 2020 and ceased on the 5 December 2020.

This addendum updates the ESIA. It summarises all the relevant comments raised during the disclosure process and explains how and where they have been addressed in the updated ESIA.

In addition, and after the disclosure period an independent Traffic and Pedestrian Safety Assessment was completed. The report's recommendations have been accepted by the TA in full and the subsequent changes to the ESIA documentation are detailed in this addendum. The report itself will be included in the ESIA package.

Reference	Relevant ESIA Document	Stakeholder comment or additional information received during disclosure	ESIA Addendum
1	ESIA	<p>Numbers of chapters, tables and figures should be aligned with the corresponding information in the table of contents (this is not aligned for several segments), e.g.</p> <ul style="list-style-type: none"> - Examples of mitigation measures that could be implemented through CNVMP are listed in Chapter 6.5 (This is not listed in Chapter 6.5); - Impacts have been defined via implementation of semantic valuation of the project, as defined in sub-chapter 6.2.2., both for short term and long term impacts (Chapter 6.2.2. does not exist in the documents); 	<p>Section 7.5.5 of the ESIA document references the CNVMP mitigation measures in Section 6.5, which is not correct; the reference to 6.5 has subsequently been replaced with Section 7.6.</p> <p>Section 7.5.7 of the ESIA document references Section 6.2.2, which does not exist; the reference to Table 27 has subsequently been replaced with Section 7.3.2.</p>
2	ESIA	<p>The defined locations and exact number of animal passages should be provided as defined in the Main Design, whereby these passages would enable undisturbed migration of animals from one side of the road to the other.</p>	<p>This requirement is acknowledged and included as Action 6.4 in the ESAP; a study must be completed to identify locations for key animal crossing points prior to construction. It will be completed by a suitably qualified ecological specialist and the recommendations will be included in the final road design.</p>
3	ESIA	<p>Provide the number of trees which have large diameter and which need to be replanted, whereby these trees are a part of the project.</p>	<p>This requirement is acknowledged and included as part of Actions 6.1 and 6.2 in the ESAP (via the Framework Biodiversity Action Plan the appointment of an Ecological Clerk of Works).</p> <p>Table 71 of the ESIA confirms that because the construction design is not yet available, the tree and habitat losses resulting from the working corridor and other associated construction activities cannot yet be confirmed. As such, the TA will be required to appoint an Ecological Clerk of Works who will be responsible for monitoring all tree and associated habitat loss and ensuring the construction related losses are restored</p>

			using local seeds and saplings. If such restoration is not possible then the losses will be offset. Section 10 of the Framework Biodiversity Action Plan provides further information.
4	ESIA	The subject document stipulates that the closest measuring stations for air quality monitoring are located in Tivat and Bar. (It should be stated that data is also available at the measuring station in Kotor, which was installed in September 2019 in settlement Sveti Stasije).	The second paragraph of Section 8.3 of the ESIA document has been updated to read 'The nearest monitoring stations to the Project are at Bar and Tivat. Data is also available from the monitoring station in Kotor, which was installed in September 2019 in the settlement of Sveti Stasije'
5	LARF and LARP	LARF stipulates that the project is "probably going to have impact on a rather small number of residential objects", which will thus lead to "physical resettlement". Two houses which are going to be subject to physical resettlement have been identified so far. The final number of houses which are going to be demolished needs to be provided in LARP? (Define the exact number of objects which must be demolished, not "resettled" for the purpose of implementation of this project).	<p>The design will require the demolition of 2 houses.</p> <p>The LARF focuses on the number of physical resettlements as the land acquisition and resettlement process includes provisions for households and businesses to request resettlement once the severity of the impacts is better understood.</p> <p>The subsequent LARP confirms that two houses will be demolished and therefore resettled. It further explains the process for how resettlement will be managed and that the Project is, at the time of writing, waiting for the Real Estate Administration of Montenegro (REA) to complete its ground-truthing surveys that will confirm the number of houses and other built structures that will be demolished.</p>
6	ESIA	The text defines that "bike trails have not been clearly defined in this initial stage" (This sentence should be justified or deleted – it should be stated the Project does not include construction of bike trails, in case that is the plan).	The Project design does not include the construction of any cycle paths or associated access. Section 6.4 states 'Cycle routes have not been explicitly identified at this baselining stage, as construction routes are not yet known'. This is with reference to collection of baseline data in the Traffic and Transport chapter only.
7	ESIA	The document should stipulate that it is mandatory to enable undisturbed passage of firefighting vehicles, ambulance and rescue	The second paragraph of Section 6.6.1 of the ESIA document is updated to include 'The contractor's CTMP will make provisions for firefighting vehicles, ambulances and other rescue vehicles to retain access during the

		vehicles over the entire course of construction works.	construction phase either within the construction footprint or the retained operational lanes.'
8	ESIA LARP &	A definite estimate – assumption of the number of business entities which are going to be closed over the course of construction works should be provided so as to be able to reach the conclusion regarding the scope of impact of this project on business activities in the project impact area.	The LARP confirms that the expropriation study indicated that no businesses closures are anticipated. The study confirmed, however, that further consultation was required as the project design evolved. At the time of writing the TA is waiting for the REA to complete its ground-truthing surveys, which includes details consultation with all businesses.
9	ESAP	An independent Traffic and Pedestrian Safety Report was completed after the closure of the disclosure period. It was commissioned to better understand the utilisation of the locations where pedestrian crossings and left turn movements across the upgraded project road are proposed. It made 8 recommendations to improve the safety of the Project for pedestrians and traffic.	The TA has accepted the report inclusive of its recommendations, which will now all be taken forward and implemented. Because the main design for the ESIA was already completed the recommendations will be incorporated into the contractors detailed design. Each recommendation has therefore been included in the updated ESAP as Action 1.7.