



## **Centar za ekologiju i održivi razvoj (CEKOR)**

Center for Ecology and Sustainable Development

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To:

Mr. Jorge Pinto Antunes

Unit 3 Enlargement and Neighbouring Countries

Policy Officer - Liaison for pre-accession assistance and relations with IFIs

DG Environment

European Commission

Subject: Need of EIA for the EIB-financed Gazela bridge rehabilitation project, Serbia

February 23, 2007

Dear Mr. Antunes,

We request the European Commission to review the European Investment Bank's decision not to require full Environmental Impact Assessment for the Gazela bridge rehabilitation project which is currently under the Bank's appraisal.

According to the project summary the Gazela bridge rehabilitation will involve:

- Rehabilitation of the Gazela bridge on the E70/E75 Highway crossing Belgrade, forming part of Pan European Corridor X;
- Rehabilitation and upgrading of access roads with a total length of 29.3 km;
- Reconstruction/ upgrading of the R251 ring road between Lestane and Zeleznik located in the south of Belgrade with a total length of 29.4 km. The reconstruction consist of widening of the ring road to half-motorway standard (3 lines) and construction of new junctions;
- Relocation of informal Roma settlements currently established underneath both ends of the bridge.

The Environmental Statement 2004 of the European Investment Bank (EIB) requires that every project, including those located outside the EU must conduct Environmental Impact Assessment (EIA) according to the requirements of the EU EIA Directive 97/11/EC. The EIB commits to respect the applicable environmental EU law in the EU Acceding, Accession, Candidate and potential Candidate Countries as a signatory of the European Principles for the Environment.

However, in its letter to CEKOR, Serbia from 27 December 2006 the EIB writes that: "Regarding environmental issues, the project comprises the rehabilitation of existing

infrastructure on current alignments and the upgrading of the R251 ring road. The project therefore neither falls under Annex I nor under Annex II of the EIA Directive, thus it does not require an EIA. The project has no significant environmental problems, apart from the temporary movement of some of the population living along the R251 road due to some heavy traffic diversion during bridge reconstruction. It will also involve the displacement of families currently resident beneath the bridge in informal accommodation.”

According to our reading of the EU EIA Directive, the Gazela bridge rehabilitation project falls into the category of projects that apply ”any change or extension of projects listed in Annex I or Annex II, already authorized, executed or in the process of being executed, which may have significant adverse effects on the environment”. The rehabilitation project directly refers to the “construction of motorways and express roads” listed in the Annex I. As such, the project falls in the remit of Article 4 which rules that such projects shall be made subject to “an assessment through a case-by-case examination”.

Contrary to the EIB we believe that the project will have significant impacts on the air-pollution and health in the area of reconstruction of the bridge and the access roads and it will adversely affect living conditions of the Roma community living under the bridge.

More than 100 000 people that live along the ring road and the access roads will be affected by the reconstruction and upgrading project. The ring road is expected to absorb at least 10 % of the Gazela bridge transport during and after the reconstruction; this is additional 12 000 v/d out of 120 000 v/d traffic passing through Gazela bridge. We expect that this figure will be even higher because we doubt that the Gazela bridge will function at 90% of its capacity during the reconstruction process.

The ring road will pass near or thorough at least tree industrial zones (Rakovica, Lesce, Zeleznik). Currently some parts of the ring road manifest serious congestion and high number of accidents caused by the local traffic circulating to and from the industrial zones. The additional traffic from Gazela bridge consisting in large part of transit freight traffic will even worsen the situation.

The Gazela bridge reconstruction will also lead to resettlement of approximately 2000 Roma people. Without a due consideration of its impacts and mitigation measures, the resettlement could result in massive social upheaval of both the resettled and host communities. As the EIB policy documents does not provide for the special study of the social impacts of the project we consider that the EIA report should also cover that aspect of the project.

In conclusion we are strongly convinced that the Gazela bridge reconstruction and upgrading project will have significant environmental and social outcomes that need to be properly assessed. Considered the EIB role as one of the major investors in Serbia and its mandate to promote EU policies and standards in accession and candidate countries, the

EC should oversee that the Bank conducts the due diligence process in accordance with the EU environmental standards.

We appreciate if the EC investigates the case and takes a position to whether the EIB needs to conduct a full EIA for the Gazela bridge rehabilitation project.

Please do not hesitate to ask for additional information or clarification. We will also post and send you any new information we get about the project.

Thank you for your collaboration and understanding.

Sincerely yours,

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