

**To the Ministry of environment and physical planning
Office for public affairs**

Skopje, 08.07.2008

Subject: Comments to the environmental impact assessment study for the Demir Kapija-Smokvica highway project

Dear Sir/ Madam,

Please find below our comments to the environmental impact assessment study for the Demir Kapija highway project:

1. Air emissions and waste

According article 8 of the Regulation of the procedure for carrying out environmental impact assessment, the environmental impact assessment study for the Demir Kapija- Smokvica highway project should contain "description of type and quantity of emissions and waste... especially air emissions, solid waste and waste waters...". The Study, in chapters V. 15. 8 and V. 15. 9 the amount of emissions or waste and waste waters are not specified (not calculated). We propose to the Project Sponsor to carry out a detailed additional assessment of the amounts and types of air emissions and waste to occur during the construction of the highway, as well as to propose sustainable measures for waste management during the construction and operation of the highway.

In chapter V. 16. 9 it is stated "still, amounts of waste in normal situations will be insignificant, so the impact on environment is also insignificant". The experiences with the construction of the Skopje Bypass highway indicate that waste generated during the construction of the highway is far from "insignificant". These are tons of waste materials and waste oils generated during the construction. The impacts from waste on the environment must not be neglected or ignored, and the environmental impact assessment study should calculate with as much preciseness the amounts of waste generated and ways of treatment and management according national legislation.

2. Ammendments of the study with additional information

On many occasions, the experts have indicated in the Study a lack of information leading to inadequate assessment. As the detailed design is prepared, the Study needs to be ammended with additional information and released for public once again.

3. Maps

The Study explains at the very begining that the new Alternative B is the changed alternative that shares the same route with Alternative A in the first kilometres. Regretfully, the maps published together with the Study show the old Alternative B passing near the Bela Voda cave. The Study needs to be ammended with new maps and released for public once again.

Best regards,

Ana Colovic

Center for environmental research and information
Eco-sense
Skopje
Macedonia

To
The Ministry of environment and physical planning
Public relations office
Mr. Saso Sekulovski

Skopje, 30.07.2008

Subject: Additional comments to the Environmental Impact Assessment Study for the Demir Kapija- Smokvica highway project

Dear Mr. Sekulovski,

At the public hearing held on July 25, 2008 in Gevgelija, regarding the environmental impact assessment study for the Demir Kapija- Smokvica highway project, the representative of the Ministry of environment announced that the Ministry will accept additional comments to the study during this week.

Eco-sense would like to use this opportunity and raise the issue of the archaeological sites on the route of Alternative "B" (appendix I-4 Habitat map).

Namely, at the public hearing, when the question of existing archaeological sites on the route of Alternative "B" was raised, the experts explained that these sites are not certain and that the red dots indicating them on the map are merely indication of where these sites could be. However, in the Environmental Impact Assessment Study for the Demir Kapija- Smokvica highway project, these sites are well described. The sites Gudlanica and Trskata are located on the 25th and 26th kilometer of the route itself, and are already known to exist and to be of Neolite period and Roman period respectively.

We strongly believe that if the sites are clearly known to exist and still happen to be on the route of Alternative "B", the route should be changed in order to protect the sites from damage during construction works. We recommend to the Ministry of environment and Road Fund that they take this into consideration when preparing the main design of the project.

Eco-sense is also seeking the expert opinion from the Cultural Heritage protection Office of the Ministry of culture.

Sincerely,

Ana Colovic
Center for environmental research and information
Eco-sense
Skopje