



CEE Bankwatch Network  
Na Rozcesti 1434/6  
190 00 Praha 9 – Liben  
Czech Republic  
Email: [main@bankwatch.org](mailto:main@bankwatch.org)  
<http://www.bankwatch.org>

**Bulgaria:**  
Centre for Environmental  
Information and Education  
(CEIE)  
For the Earth!

**Czech Republic:**  
Centrum pro dopravu a  
energetiku  
Hnutí Duha

**Estonia:**  
Estonian Green Movement–FoE

**Georgia:**  
Green Alternative

**Hungary:**  
Nature Protection Club of  
Eotvos Lorand University (ETK)  
National Society of  
Conservationists–FoE (NSC)

**Lithuania:**  
Atgaja

**Macedonia:**  
Eko–svest

**Poland:**  
Polish Green Network (PGN)  
Institute of Environmental  
Economics (IEE)

**Russia:**  
Sakhalin Environment Watch

**Slovakia:**  
Friends of the Earth – Center  
for Environmental Public  
Advocacy (FoE–CEPA)

**Ukraine:**  
National Ecological Centre of  
Ukraine (NECU)

CEE Bankwatch Network's  
mission is to prevent  
environmentally and socially  
harmful impacts of  
international development  
finance, and to promote  
alternative solutions and public  
participation.

**TO:**  
Anastasios Nychas  
Deputy Head of Unit  
Unit B4. Cohesion policy & EIA  
DG ENVIRONMENT  
[Anastasios.Nychas@ec.europa.eu](mailto:Anastasios.Nychas@ec.europa.eu)

Giorgio Chiarion Casoni  
Head of Unit  
Liaison with the EIB group and IFIs, new financial instruments  
DG ECFIN  
[giorgio.chiarion-casoni@ec.europa.eu](mailto:giorgio.chiarion-casoni@ec.europa.eu)

Hilde Hardeman,  
Head of Unit  
E1, Russia and Northern Dimension Policy  
DG RELEX  
[Hilde.hardeman@ec.europa.eu](mailto:Hilde.hardeman@ec.europa.eu)

**CC:**  
Jaime Reynolds  
Policy Officer  
Enlargement and Neighboring Countries  
DG ENVIRONMENT  
[jaime.reynolds@ec.europa.eu](mailto:jaime.reynolds@ec.europa.eu)

24 November 2009

Dear Mr Nychas, Mr Chiarion Casoni and Ms Hardeman,

### **M10 Road PPP (km 15 - 58), Russia**

We are concerned to discover that the European Investment Bank is considering a loan for the Moscow to St. Petersburg motorway,<sup>1</sup> as this project has been the subject of vigorous protests from local residents in Khimki near Moscow due to its unnecessary destruction of the valuable Khimki Forest.

Khimki Forest Park is a protected natural area with rich wildlife including relic oak groves. According to local people it is a natural habitat for elks, boars and other wild animals. It is almost the only wildlife area in this polluted and overpopulated region, and is of crucial importance to local people.

It was only when preliminary survey work was carried out in the Khimki Forest Park in 2007 that most of Khimki's population found out about the project. It sparked public outrage and mass protests and an informal public movement to defend Khimki Forest was formed. Some activists have been arrested and meetings and tent camps have been systematically attacked. In November 2008 one of the activists, local journalist Mikhail Beketov, was brutally beaten. As a result, Mikhail became seriously disabled; he is still treated in hospital.

It is not only local people who are opposed to the proposed routing: The Director of Krasnogorsky Spetzleskhoz (local forestry commission) refused to sign a protocol on the chosen variant for this section and the

---

<sup>1</sup> <http://www.eib.org/projects/pipeline/2007/20070489.htm>

decision on the route through the Khimki Forest Park was in 2006 officially protested by the Chief of the Moscow City Forest Department. The department was then the governmental body responsible for the use, conservation and protection of the city's forests including Khimki Forest Park. Other bodies such as the Moscow Duma, Rosprirodnadzor (the state environmental inspectorate) and Moscow's State Department for Conservation and Natural Resources have also criticized the plans to route the motorway through Khimki Forest.

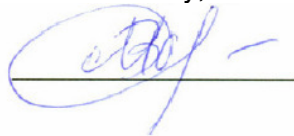
**Given the likely damage caused by the project and the alarming attacks on those who are raising questions about the project, we ask the EC to request the EIB not to approve the project unless the route is changed, in consultation with local people, to avoid the destruction of the Khimki Forest.**

It is not sufficient to state, as the EIB does on its website, "*However, with respect to lenders requirements some areas were identified which would benefit from further work, notably with regards to the extent of consultation that was carried out and the biodiversity assessment of the Kimkhi forest. Final management measures are to be agreed during appraisal.*" Such matters must be properly assessed before the project is approved, as the approval gives a public signal that the EIB condones the project - a signal that is surely inappropriate given the dubious way in which the project has been developed.

We would like to draw your attention to the fact that Environmental Impact Assessment is available only in Russian what raise justified concerns about the capacity of the Bank to analyze this Report. Therefore we would like to ask you to demand the bank to provide the EIA in the Bank's working language in order to enable Commission and all interested stakeholders to review the document.

We thank you for your time and look forward to seeing what action you now take.

Yours sincerely,



Vladlena Martsynkevych  
CEE Bankwatch Network  
e-mail: [vladlena@bankwatch.org](mailto:vladlena@bankwatch.org)  
<http://www.bankwatch.org>