



Comments of Association “Green Alternative” and CEE Bankwatch Network on Rustavi Solid Waste Management project

Introduction

The EBRD considers to participate in the Rustavi Solid Waste management project allocates EUR 1.6 million to Rustavi city. The total capital cost of the project is EUR 5.46 million (Additional funds supposed to be covered by donor grant - EUR 4.66 million and EUR 0.8 will be a local contribution¹). Environmental Impact Assessment of the project has been prepared by the Baku-Tbilisi-Ceyhan Pipeline Company (BTC).

The objectives of the EIA of the project include “a review and analysis of existing environmental and social baseline information and other technical documentation in undertaking the design and EIA for the proposed landfill site, to ensure that it complies with EU and national legislation and the best practice. The outcomes of the EIA will then influence the detailed design of the landfill to ensure that identified negative impacts are appropriately mitigated”².

According to the announcement of the Rustavi Municipality BP’s participation in the project is limited only with purchasing of the land for the landfill and technical support (Financing international consultants that have prepared Environmental Impact Assessment of the project)³. But it is not still clear if the costs made by the BP are included in the total cost of the project.

The EBRD’s approach towards the waste management projects in Georgia

Itself the fact that EBRD started considering to finance waste management projects in Georgia (Adjara and Rustavi Solid Waste Management Projects) that will comply with EU directives should be welcomed. Unfortunately till now there is not any sustainable waste policy and waste management options available in Georgia.

¹ <http://ebrd.com/projects/psd/psd2009/40019.htm>

² EIA of the project, “Environmental and Social Impact Assessment”; ES-1;

³ http://rustavi.ge/geo/index.php?cat=advertising_board&level=level3&res_id=78 paragraph 1.1, page 2;

However, the EBRD's approach towards the waste management projects is focused on simple landfilling and not includes environmentally sustainable waste management options e.g. establishing a Mechanical Biological Treatment (MBT) plant at the landfill site.

The provision of public funds for waste management should prioritise solutions of the waste problem according to the waste hierarchy, with prevention of waste production, reuse of waste, separate collection - recycling and composting.

Public participation in the project

As the project is A category, the project sponsor is obliged to inform all interested stakeholders including local population and arrange hearings regarding the project before the approval of the project in accordance of EBRD's environmental and social policy⁴.

During the visit the village Akhali Samgori located next to the proposed landfill site, it becomes clear that the villagers had not been informed about the project and no public hearings were arranged in area.

Content related comments

Proposed landfill site area

According to the paragraph 1.3.1 of EIA of the project BP and representatives of Rustavi and Gardabani Municipalities selected existing site with the total area of 7.4 ha. Taking into account the fact that the lifespan of the landfill is only 13 years and the closure and aftercare stage may be expected to last up to 50 years, the sustainability of the project is really questionable.

Without preparing a general waste management plan for Rustavi and establishing more sustainable waste management options it has no sense to construct the landfill on this site not only from the financial but also from environmental point of view e.g. Establishing MBT plant at the landfill site will significantly increase lifespan of the landfill.

Cumulative impacts

Paragraph 6.1.6 of the EIA describes the cumulative impacts only for the BTC landfill and proposed Rustavi landfill sites regarding odour, dust, combustion and globally in atmosphere. But there is nothing mentioned about the possible cumulative impacts on health for local communities not only from landfill sites but also in relation with emissions from BP pumping station and stone carriers located in few kilometers from the village.

⁴ <http://ebrd.com/about/policies/enviro/policy/2008policy.pdf> paragraph 12-18; page 71;

Closure of Gardabani Dumpsite

One of the objectives of the Rustavi Solid Waste Management Project is closure of the Gardabani Dumpsite. The BP prepared EIA does not include description of how the closure of Gardabani Dumpsite (how it will be closed; What methods will be used etc) will be implemented.

Waste collection service tariff

The project includes loan component and of course it will have impact on waste collection service tariffs for population of Rustavi, Gardabani and some other villages. Unfortunately EIA does not include any information describing how the growth of tariff would be addressed and what are the mitigation measures for socially vulnerable groups.

Recommendations

Taking into account all abovementioned issues, with the support of EBRD, it is necessary to:

- Prepare a general waste management plan for Rustavi where the main focus will be not only on simple landfilling but also on other environmentally sustainable waste management options, (Promoting Waste prevention; Reuse; Recycling; Composting and establishing Mechanical Biological Treatment (MBT) plant at the landfill site).
- Inform local population of Akhali Samgori regarding the project and arrange public hearings in order to discuss project impacts;
- Conduct additional research regarding the cumulative impacts of the project in connection with other existing infrastructure in the area;
- Conduct research regarding the closure of the Gardabani Dumpsite (how it will be closed; What methods will be used etc) that is omitted in the EIA of the project at all;
- Analyse the impact of the project on waste collection service tariffs, including mitigation measures for socially vulnerable groups.

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