Background

On March 9, 2010, a loan for the Tbilisi Railway Bypass Project, initiated by the Georgian Railway company, was approved by the EBRD. The total project cost is over EUR 350 million, of which EUR 200 million will be covered by the EBRD and the EIB (EUR 100 million each).

The main goal of this project, rated category A by the EBRD, is to construct a new section of railway that bypasses the central part of Tbilisi in order to avoid the transit of hazardous freight (such as oil and oil products) through the middle of the city. While the main goal of the project – improving safety within the city of Tbilisi – is welcomed, there are several strong concerns that undermine the project goals and may cause a serious threat to Tbilisi’s population.

Concerns regarding the railway services

One of the major concerns regarding the project is the splitting of the railway system into two parts. As a result, instead of having a central station, people will have to use two different ones and in order to move between them people will need to use different means of transport. The project does not address the issue of the inconvenience and increased expenses, nor the possible reduction in the number of people using the railway that could mean increases in road traffic and decreasing railway incomes. Given the fact that in cities such as London, where there are currently split rail services, expensive projects are underway to reverse the situation and make the train network more functional, it is unclear why Tbilisi is going in the other direction.

Concerns regarding the safety of residents

The new railway will be constructed through the densely populated Avchala district, which fully undermines the essential idea of the project, namely to ensure the safety of the Tbilisi population. There do not appear to be any safeguard measures in case of accidents involving trains running on the 18–20 metre high embankments – a concern that was expressed by the local population during the public hearings. In addition, the Environmental and Social Impact (ESIA) study does not assess the leakage of hazardous goods such as oil carried by the trains, or brake fluid, which would also negatively impact living conditions in the area.

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Concerns regarding drinking water pollution
The projected railway route runs near the Tbilisi reservoir (at a minimum of 900 metres distance), one of the major drinking water supply sources for Tbilisi. Due to the underground streams that run towards the reservoir, in the event of the spillage of even half a tank of oil, approximately 50 percent of the volume of the Tbilisi reservoir could be contaminated, leaving 25 percent of Tbilisi's residents without drinking water and around 20,000 hectares of agricultural arable land without irrigation. According to an ecological analysis by the Georgian Water and Power company (GWP), these potential negative impacts mean that the preferred route does not fulfill requirements for environmental safety, and therefore additional studies need to be carried out to find a safer alternative.

Concerns regarding protected areas
The projected railway route will cross the visitors' zone of the Tbilisi National Park. According to national legislation the construction of railways is not on the list of activities that is permitted in national parks. Despite assurances from the Georgian Railway company that on the basis of consultations with the Ministry of Environment construction of the railway is included in the category of road construction, and is thus permitted, there is no legal basis for this statement and no relevant documentation has been presented to support it. The continuation of the project in a national park requires specific legislative changes and would include an obligation for a biodiversity mitigation and compensation plan under the environmental permit.

Concerns regarding the selection of the railway routes
Despite the fact that alternative routes of the railway were rejected earlier at the scoping stage by the project sponsor, additional alternatives to the preferred option were not studied in the final ESIA document of the project, which heavily impacts the ESIA’s quality.

Concerns regarding waste management
Waste management, including during the rehabilitation of the existing railway route, is not addressed properly in the project. While the project sponsor commits to adhere to EU directives and use the guidance of best international practice, a detailed waste management plan is not available, and Tbilisi has no sanitary landfill to dispose of project-related waste.

Public participation in the scoping process
Despite the fact that the Environmental and Social Policy of the EBRD says that “In the case of Category A projects the client will engage in a scoping process with identified stakeholders to ensure identification of all key issues to be investigated as part of the Environmental and Social Impact Assessment (ESIA) process”, the local population that will be impacted by the project did not participate in the scoping process. The main reason for this cited by the project sponsor in the

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2 Technical department of Georgian Water and Power (GWP), Professor Nino Kezevadze
3 ESIA of the project; Paragraph 4.1.2 „Scoping Meeting”; Page 44
ESIA of the project was to avoid additional tensions within the local population – nonetheless this represents a clear violation of the Environmental and Social Policy of the EBRD\(^4\).

**Recommendations**

Above all, before undertaking a rail bypass project, it is essential to assess the overall rail development needs of the Tbilisi region. Development of existing infrastructure to improve the efficiency and safety of freight and passenger rail operations must be prioritised. Concerning any rail bypass found to be necessary, the project design and route must avoid negative social and environmental impacts.

**Project related recommendations**

- The project’s impacts on passenger transportation and its impact on the revenues of the company need to be studied
- An additional social impact assessment should be conducted in order to assess the project's impact on people who will be living along the route after the project implementation
- An additional study should be conducted in order to find adequate alternatives for the project
- The project route must be changed in order to avoid the railway crossing the Tbilisi National Park (e.g. by constructing a tunnel)
- Modelling of the flow of surface water needs to be conducted. If research shows that even a single flow is inclined towards the Tbilisi reservoir, then the project needs to be corrected, and additional mitigation measures should be determined
- A waste management plan needs to be drafted and approved in order to determine where the project construction waste will be disposed

**For more information**

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\(^4\) EBRD Environmental and Social Policy (2008), PR10 “Information Disclosure and Stakeholder Engagement”, Paragraph 10