

**TO:**  
Alistair Clark  
Corporate Director  
Environment and Sustainability Department  
European Bank for Reconstruction and Development  
One Exchange Square  
London EC2A 2JN  
United Kingdom

**Bulgaria:**

Centre for Environmental  
Information and Education  
(CEIE)

Za Zemiata, For the Earth

**Croatia:**

Green Action

**Czech Republic:**

Centrum pro dopravu a  
energetiku (CDE)

Hnutí DUHA

**Estonia:**

Estonian Green Movement–FoE

**Georgia:**

Green Alternative

**Hungary:**

National Society of  
Conservationists – Friends of  
the Earth Hungary (MTVSZ)

**Latvia:**

Latvian Green Movement

**Lithuania:**

Atgaja

**Macedonia:**

Eko–svest

**Poland:**

Polish Green Network (PGN)

**Russia:**

Sakhalin Environmental Watch

**Serbia:**

Center for Ecology and  
Sustainable Development  
(CEKOR)

**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.

April 13th, 2012

Dear Mr Clark,

I'm writing to you to express concerns regarding Ukravtodor's unsatisfactory implementation of the "Rehabilitation of Kiev–Chop road" (phase 3) project, financed by the EBRD<sup>1</sup>. The National Ecological Centre of Ukraine (NECU) has gathered a set of evidence during a site visit on March 13, 2012.

The project was supposed to rehabilitate the M06 Kiev–Chop Highway to European standards; moreover this was EBRD's third road project in Ukraine. Although the project was rated Category B, without significant adverse environmental impacts, it has seriously affected the life of the villages of Bolyarka and Berezivka (Vasilkivsky district, Zhitomir region) that stand along the rehabilitated road.

Before road rehabilitation, the sides of the road served as sidewalks for pedestrians and also allowed horse–drawn carts to move in parallel with car traffic, a crucial component of life in these villages. These carts are not allowed on the highway; even if they were, there are only two points for U–turn, quite far one from the other (about 8 km), especially for such type of transport. In the framework of the road rehabilitation, protective fences were installed along the roadsides, but **no special sidewalks were constructed**. A part of the old sidewalks was destroyed during the construction works and it was never rehabilitated. This has created significant problems for the local community:

**The crossroads are unsafe.** There are no pedestrian bridges in Bolyarka. The ground–level 'zebra' crossroads are not equipped with traffic lights, or with any markings. Local people have told us that one of the crossroads counts for dozens of accidents with pedestrians (some with lethal cases) after road rehabilitation. The lightning along the road in the village was installed, but operated for three days only. Now it is switched off.

<sup>1</sup> <http://www.ebrd.com/pages/project/psd/2006/36547.shtml>

**Speed limit is inadequate.** During the rehabilitation works the speed limit in the village was put at level of 60 km/h, after the rehabilitation the sign has been changed for the one with 110 km/h limitation. Taking into account absence of pedestrian bridges, or properly equipped ground crossroads this speed regime is inadequate and creates dangerous situation for local community.

**The village is literally cut in two.** The crossroads are located in areas where the sidewalks were destroyed or not constructed at all; people are forced to walk on the carriageway, including children going to school. Because of it, some children stopped going to school.

**The fences threaten the livelihood of the local community.** The protective fences are installed in such way that in a number of cases they totally block the access to private households and land plots, preventing people from cultivating their gardens or delivering wood or coal for heating, etc.

**Drainage systems are not installed properly.** Two houses where low-income elderly people live are being flooded regularly. This affects the buildings and the gardens, it damages their vegetable crops.

**Lack of protection measures.** No noise reduction panels were installed in Berezivka and Bolyarka, although they were stipulated in the project's Environmental Action Plan.

**Public transport stations.** None of the public transport stations is equipped with benches or waste containers. In some places toilets are missing, so car drivers use the stations as toilets.

In the village of **Berezivka** there is an unfinished pedestrian bridge, it has been closed for about a year. According to villagers, the local authorities were told that it is up to them to finish it, but the village lacks the money for it. All this time, children from the two schools located right near it have been crossing the highway using a dangerous crossroad.

The Environmental Action Plan for this project (provided to NECU by Ukravtodor) addresses all the above-mentioned issues, but only on paper.

According to the construction company, "Gulsar", all the works that were foreseen in the project were implemented. The shortcomings of the project, according to them, are caused by the low quality of blueprints elaborated by the Ukrainian State Institute "Ukrhiprodor" and "Zhitomirhiprodor".

Local authorities, the village council of Vasylivka, have contacted the project sponsor, Ukravtodor, many times starting with 2009, drawing its

attention to the deficiencies in project implementation. The problems were not addressed.

During this site visit the representative of Ukravtodor (Mr M. Plysak) has visited the village of Berezivka by the initiative of journalists of STB Channel<sup>2</sup>. He has visited all the problematic spots and promised to address the issues. One month later the situation is not changed.

We conclude that the project has led to a serious deterioration of life for the Bolyarka and Berezivka communities. We seek your involvement, to make sure that Ukravtodor takes the necessary measures immediately to address the shortcomings of project implementation.

This is one specific example of the underperformance of Ukravtodor we know about, but we are afraid that such a situation may be typical for other sections of the Kiev–Chop whose rehabilitation was financed by the EBRD. As Ukraine has big plans for cooperation with IFIs in the area of road rehabilitation we hope that the bank makes the effort to ensure that, firstly, Ukravtodor addresses all the shortcomings in the already constructed parts of the road and, secondly, avoids such obvious disregard of the local communities' interests in the future.

We attach a photo report from the project site.



With best regards,  
Olena Miskun

National Ecological Centre of Ukraine/CEE Bankwatch Network

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<sup>2</sup> First news on problems in Bolyarka was released on STB on November 11, 2011

<http://vikna.stb.ua/ua/news/2011/11/22/83461/>

The second TV story was released on March 15, 2012

<http://vikna.stb.ua/ua/news/2012/3/15/96737/>