

Environmental and Social Data Sheet

Overview

Project Name:	PEDEMONTANA LOMBARDA TOLL MOTORWAY PPP
Project Number:	20160045
Country:	Italy
Project Description:	Design, building, operation and maintenance of sections B2 and C of the A36 Autostrada Pedemontana Lombarda toll motorway, including complementary roads, running through the provinces of Milan, Monza-Brianza and Bergamo in the Lombardy Region.

EIA required: yes

Project included in Carbon Footprint Exercise¹: yes

(details for projects included are provided in section: "EIB Carbon Footprint Exercise")

Environmental and Social Assessment

Environmental Assessment

The A36 motorway contains sections A, B1, B2, C and D. Sections A and B1 have been in operation since 2015, while sections B2, C are foreseen to be completed by end of 2025 and section D by end of 2027. The current EIB operation relates to sections B2 and C, hereafter the Project.

The A36 is part of the Lombardy Regional Programme for Mobility and Transport (RPMT), approved by the Regional Council in 2016. As part of the approval process, the RPMT was subject to an assessment under the decree 152/2006 enacting the Directive 2001/42/EC, the SEA Directive, as amended.

The project is a partially green-field motorway and falls under Annex 1 of the EIA Directive and therefore subject to mandatory EIA.

The Environmental Impact Assessment (EIA) procedure for the whole A36 started in 2004, with the first submission of the project to the competent authority. At the time, the A36 was in the scope of special legislation (law 443/2001), which allowed the EIA to be carried out at preliminary design stage (progetto preliminare, i.e. the first design stage). The project, including the EIA, received the first approval by COMITATO INTERMINISTERIALE PER LA PROGRAMMAZIONE ECONOMICA (CIPE) on 29 March 2006. Then, the final design for the

¹ Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO₂e/year absolute (gross) or 20,000 tonnes CO₂e/year relative (net) – both increases and savings.

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A36 (progetto definitivo, i.e. the second design stage), including the related EIA, received approval by CIPE on 6th November 2009.

The detailed design (progetto esecutivo, third and last design stage), for sections B2 and C of the A36, is yet to be undertaken and submitted to the competent authority.

The 2009 approval included a total of 278 conditions and recommendations, out of which 151 are applicable to the project, i.e. sections B2 and C, related to environmental aspects to be included in the following design and implementation stages, including environmental monitoring. These conditions and recommendations concern design modifications (e.g. junctions, ramps, etc.), environmental mitigation measures, optimisation of the secondary road network, the Greenway², further investigations on impacts on ground water and analysis regarding the contaminated land following the ICMESA accident. According to the applicable national legislation, the environmental competent authority will check that the detailed design (progetto esecutivo) complies with conditions and recommendations of the 2009 EIA approval.

The validation of the compliance with some of these prescriptions for the already constructed sections A and B1 is still pending. It is expected that the Promoter will address any non-compliance for these sections according to the binding national legislation.

Regarding the sections proposed to be financed under this Project, i.e. sections B2 and C, additional surveys and design changes have been undertaken since the 2009 EIA approval. In particular, in relation to the contaminated area linked to the 1976 ICMESA accident affecting both sections B2 and C, following the initial decontamination activities, specific surveys were made to determine the current level of residual contamination and the affected volumes at each site. A Characterisation Plan was first prepared in 2015 and updated in 2018. Based on this plan, in 2019 an Operational Remediation Plan (ORP) was approved by the Region of Lombardy. The ORP was subsequently amended in 2019 and in 2020. However, in line with construction practice some surveys and design changes will only be completed at the detailed design stage and will be undertaken by the general contractor. None of these additional surveys and design changes have yet been evaluated or approved by the national environmental authority.

As mentioned above and in line with the national legal framework, the detailed design for sections B2 and C will be subject to a further compliance check with the conditions and recommendations of the 2009 EIA approval by the competent authority for environment. This compliance check will take place at the end of the detailed design phase, currently estimated by mid- 2022.

The Project does neither cross nor have negative impacts on any Natura 2000 sites or protected areas. The closest protected areas to the Project are:

- Boschi delle Groane (SIC IT2050002), some 300 m at its closest point (separated by a built-up area);
- Pineta di Cesate (SIC IT2050001), at more than 5,000 m at its closest point;
- Valle del Rio Cantalupo (SIC IT205000a) at 1,700 m at its closest point;
- Valle del Rio Pegorino (SIC IT2050003) at 2,300 m at its closet point;
- Lambro Valley Regional Park at 400m at its closest point (separated by a built-up area).

² A 90 km cycle and pedestrian lane linking the Province of Varese with Bergamo.

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Based on the information available, the temporary impacts during construction are expected to be noise, emissions, land occupation and risk of accidental pollution, in particular related to the handling of the polluted soils.

The 2009 EIA report and the impacts identified therein, foresee appropriate mitigation measures and monitoring in line with the applicable legislation. The main mitigation measures identified are mentioned below:

- To reduce noise, severance and visual impacts, the Project is predominantly designed in cuts and tunnels. The tunnels will also act as fauna passages and ensure continuation or, in the case of section B2, reconnection of habitats;
- Additional noise protection measures such as barriers, earth bumps, vegetal curtains are included;
- Treatment of surface run-off water to avoid pollutants being dispersed into the environment as well as measures to contain potential accidental spills;
- Replanting.

However, the above estimated impacts and foreseen mitigation measures do not include any modifications and design changes undertaken or to be undertaken since 2009.

EIB Carbon Footprint Exercise

The Project is included on the basis of the following analysis.

The Project boundaries are:

- Existing network (baseline) comprising about 30 km of SS35, A52, A4 and other regional roads between Lentate and Vimercate.
- The new network (absolute or “with project” case) comprising: (i) about 26 km of completed motorway A36 from Lentate to Vimercate as well as (ii) the existing network described above.

The baseline is the forecast third party emissions (vehicles), in the absence of the project, from the existing network only, within the boundary defined above:

- Forecast baseline (gross) emissions are 233,000 tonnes of CO₂ equivalent per year.

Estimated annual third party greenhouse emissions from the use of the project in a standard year of operation (vehicles):

- Forecast absolute (gross) emissions are 219,000 tonnes of CO₂ equivalent per year; and,
- Forecast emissions decrease is 13,000 tonnes of CO₂ equivalent per year.

The forecast for absolute emissions includes both the existing and additional network.

The forecast reflects the Services' assumptions on traffic, traffic growth, speed/flow, infrastructure capacity and fuel consumption. The vehicle fleet is assumed to be decarbonised by about 40% in 2050.

For the annual accounting purposes of the EIB Carbon Footprint, the project emissions will be prorated according to the EIB lending amount signed in that year, as a proportion of project cost.

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Public Consultation and Stakeholder Engagement

As part of the EIA process, public consultations took place in 2004 for the preliminary design phase and in 2009 for the final design. The EIA Commission gave its EIA approval in the form of opinion No.328 on 29/07/2009 taking into account the results of the public consultation. Nevertheless, the design changes undertaken and to be undertaken by the Promoter to comply with the conditions and recommendations of the 2009 EIA approval have not been presented to the public. It has also not been assessed by the competent authority whether further public consultations are required.

Conclusions and Recommendations

The approval process of the project is still ongoing.

In line with EIB requirements, the Ministry of Environment in Italy provided information regarding the environmental approval procedure to the Bank on 10th May 2021. The Ministry of Environment confirmed to the Bank that (a) the EIA procedure carried out so far was in accordance with the requirements of the national legislation; (b) as part of the next steps of the approval procedure, the competent authority will validate the detailed design's (progetto esecutivo) compliance with the conditions and recommendations of the 2009 EIA approval if there are no significant changes compared to the 2009 design (progetto definitivo); and (c) currently, to the Ministry's knowledge the competent authority has not received any proposals for significant changes to the project compared to the 2009 EIA approval.

On this basis, the Project is acceptable for EIB financing in E&S terms, subject to the following conditions and undertaking:

Prior to the first disbursement, the Promoter should provide, to the satisfaction of the Bank:

- An updated assessment of the potential impacts of the project on environment following the design changes introduced since the 2009 design and the monitoring requirements for the implementation of the project;
- A confirmation from the competent authority, that the design changes and the related impacts do not require further public consultation, or if required, proof of such consultation being completed;
- Information on the measures to be taken to characterise and minimise the release of substances into air, water or land and to ensure adequate disposal of waste containing these substances mentioned under Regulation (EU) 2019/1021 (in particular under the provisions of Article 6) on persistent organic pollutants;
- An independent assessment of the monitoring requirements during the construction activities involving the movement of the ICMESA contaminated soil, aimed at ensuring that compliance with Regulation (EU) 2019/1021 is achieved and dioxin or any other dangerous pollutants for human health is not released during construction activities, confirmed by the competent authority;
- The outcome of the compliance check carried out by competent authority on conditions and recommendations included in the 2009 EIA approval required prior to construction and the approval of the detailed design by the competent authority.

The Promoter will undertake:

- to implement all the envisaged mitigation and compensation measures related to the Pedemontana Lombarda sections, even if not part of the two EIB financed sections, within 5 years of the start of Project operation.



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- provide the Bank with the outcome of the environmental monitoring during project implementation and for the first year of operation.