



Luxembourg, 10.06.2022

Environmental and Social Data Sheet

Overview

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| Project Name: | COASTAL EROSION PROTECTION (FL 2015-0548) |
| Project Number: | 2021-0631 |
| Country: | ROMANIA |
| Project Description: | The Project consists of investments in the coastal protection sector against erosion and floods in Constanta County in Romania. It is an allocation under SPL Romania EU Co-financing for Environment. |
| EIA required: | yes |
| Project included in Carbon Footprint Exercise ¹ : | no |

Environmental and Social Assessment

Environmental Assessment

The Promoter of the Project is the Romanian Waters National Administration (ANAR) who is delegating the responsibility of project implementation and operation to the Dobrogea Litoral Water Basin Administration (Administratia Bazinala de Apa Dobrogea-Litoral –ABAD-L), its regional branch whose service area covers the Constanta County, located in the southern part of the Romanian Black Sea coast.

The project will contribute significantly to the protection of the Black Sea coast on the territory of Romania from the effects of coastal erosion and floods accentuated by climate change and it will provide also strong positive environmental impact. The project objective is to control and monitor coastal erosion of the shoreline and protect ecosystems, properties and socio-economic infrastructure in line with the EU environmental protection law, and also the Integrated Coastal Management Plan as per 2002/413/EC (Recommendation on the implementation of Integrated Coastal Zone Management in Europe), the EU Floods Directive, the Water Framework Directive (WFD), the Bathing Waters Directive (2006/7/EC) and the Marine Strategy Directive (2008/56/EC).

Strategic Environmental Assessment (SEA) procedure

The Project is consistent with the National River Basin Management Plan (RBMP) 2016-2021 (*Planul National de Management aferent portiunii din Bazinul Hidrografic International al fluviului Dunarea 2016-2021*) which is the Romanian National part of the full Danube RBMP. In particular, the RBMP – Danube and Danube Delta (river basin Dobrogea and coastal waters) is an integral part of the National RBMP 2016-2021.

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.



Luxembourg, 10.06.2022

The National RBMP 2016-2021 was subject to a Strategic Environmental Assessment (SEA) screening. By the final Screening Decision with ref. No. 13657 of 01 June 2016 the competent SEA authority, i.e. the Ministry of Environment, Waters and Forests, concluded that the National RBMP 2016-2021 is not likely to have significant impact on the environment and that a full SEA under the RBMP would not be required.

Furthermore, the Project is also covered under the Masterplan on Protection and Rehabilitation of the Coastal Zone that was adopted in 2012 by a Governmental Decision. Before its adoption, this master plan was subject to a SEA, which was finalised by the SEA Decision (Aviz de mediu) with ref. No. 1030 of 06 July 2017 and is available on the website of the River Basin Authority – Dobrogea Litoral.

Environmental Impact Assessment (EIA) procedure

The EIA Directive 2011/92/EU amended by the 2014/52/EU, is fully transposed in Romania according to the Law 292/2018.

The whole Project (Phase II) was screened in to a full Environmental Impact Assessment procedure by the Competent Authority, the Environmental Protection Agency (EPA) of the Constanta County through the screening Decision (Decizia etapei de incadrare) with ref. No. 15480PR of 23 February 2016. The reasons for requiring a full EIA related to:

- the large scale of the project,
- likely cumulative impacts with other projects in the area of 2 Mai-Vama Veche,
- the expected use of large amounts of sand and stone from quarries as a natural resources,
- project locations within/or in the vicinity of nature protected areas,
- production of large amounts of inert waste,
- expected emissions of noise and other sources of discomfort,
- likely transboundary impacts, etc.

Bearing in mind that the screening decision and the definition of the scope of the EIA Report took place before 16 May 2017 and in compliance with Article 3(1) and 3(2)(a) of Directive 2014/52/EU, it is concluded that the applicable legal regime for the project was the one under Directive 2011/92/EU before its amendment.

As part of the EIA, alternatives were studied, related to ways of project implementation. The EIA was carried out for the selected technical solution, which is the most beneficial for biodiversity and with the least impacts on protected habitats. The Environmental Permit (Acord de Mediu) with ref. No. 20 was issued on 11 November 2016.

Procedure for modification of the Environmental Permit

Due to modifications in the organisation of some of the construction sites, an EIA Notification was submitted to EPA – Constanta in June 2017. For this procedure, the Revised EIA Directive (Directive 2014/52/EU) was applied ad hoc. It should be noted that at that time Romania had not yet transposed the Revised EIA Directive.

The EIA screening was completed by the Screening Decision with ref. No. 3143 of 26 September 2017. The Decision provided justification of not requiring a full EIA for the modifications in the construction sites arrangements since they did not involve use of natural resources, and the proposed changes did not have additional impact on the environment.



Luxembourg, 10.06.2022

Appropriate Assessment

In compliance with Romanian national legislation, the Appropriate Assessment (AA) procedure was integrated into the EIA. Hence, the AA for the project was carried out together with the EIA as described above. The whole Phase II was made subject to a single AA procedure.

Following the screening procedure, EPA – Constanta concluded that the project is likely to have significant impacts on protected habitats and species and that an AA would be required for the project and issued a Screening Decision with ref. No. 15480PR of 23 February 2016. The reasons for requiring a full AA relate mainly to the location of the project, which will be carried out inside and/or in the vicinity of NATURA 2000 sites and other nature protected areas.

During the AA, the authorities managing the NATURA 2000 sites were consulted and gave favourable opinions. In addition, alternatives for implementation of the project were assessed and the draft AA Report confirmed that the selected technical solution is the most beneficial to biodiversity and it will have the least negative impacts on benthic species.

Following the AA, EPA – Constanta concluded in the abovementioned Environmental Permit that the project as proposed for implementation will allow the protected areas to preserve their integrity and that it is consistent with the NATURA 2000 sites' conservation objectives. It is noted that the Permit takes into account the measures and the conditions recommended by the consulted authorities managing the NATURA 2000 sites, which were fully integrated in the project design and are mainly the following:

- Construction of bio-structures and artificial reefs in order to protect and enhance species: construction of artificial reefs with *Pholas dactylus*;
- Planting *Zostera noltii*, *Cystoseira Barbata* and *Pholas dactylus*;
- Populating with *Donacilla cornea* and *Donax trunculus*;
- Construction of coastal structures connected to the shore, with some of these protection structures leading to increase the conservation value of the area by favouring the development of marine habitats;
- Beach nourishment with specifically calibrated sand (on several proposed areas) as substrate for a favourable development of the benthic organisms in these areas. The development of such species will be enhanced by the technical solutions chosen for the nourishment;
- Implementation of a biodiversity monitoring programme. Specific details on this programme are mentioned under the section "Other Environmental and Social Aspect";
- Remedial measures consisting in setting up the site for environmental protection and landscaping to bring it to the initial state after completion of the works.

These measures are expected to increase the value of the habitats and the capacity of self-regeneration of the species in dynamic environmental conditions. In addition, the project ensures the implementation of measures that would protect the fresh water lakes Lacul Techirghiol and Razelm-Sinoe against intrusion of sea water, which would lead to destruction of the habitats.

According to the AA conclusions, the impacts on NATURA 2000 sites are assessed comprehensively and the identified/imposed prevention and mitigation abovementioned measures would indeed protect the integrity of the NATURA 2000 sites.



Luxembourg, 10.06.2022

During the 2017 EIA modification procedure, it was also concluded that the modifications are not likely to have significant permanent impacts on biodiversity and therefore, a review of the AA would not be needed.

Environmental impacts

With regards to impacts on biodiversity, the EIA Report for the project concluded that:

- The technical solutions adopted in project implementation are appropriate in terms of environmental protection;
- The project's technical solution chosen is considered to be one that affects the less habitats, species and integrity of NATURA 2000 sites and natural areas protected by national and international law (UNESCO biosphere reserve, RAMSAR site). Thus, natural protected areas will retain their integrity from the fact that they respect their conservation objectives and also the self-recovery ability of species and habitats, in the context of dynamic environmental conditions, as the marine environment is.
- *During construction*: the potential project impact on biodiversity is negative, but of low intensity, localised and is considered reversible (within two to five years) for the benthic component of biodiversity and insignificant for the rest of biodiversity elements, resulting in a globally insignificant impact.
- *During operation*: No negative impacts on species and habitats are identified. The new structures will become an environment for setting characteristic habitats of marine organisms spread across the whole Romanian coast. Moreover, the project will have long-term positive impact on bird species that use the marine environment as a place of refuge, rest and feeding, because new coastal structures will provide shelter to these species

With regards to other environmental impacts, the EIA Report for the project concluded that the negative impacts related to air, landscape, soil, subsoil and noise pollution, are assessed as temporary and reversible that are likely to occur during the construction phase. These will be partially mitigated through measures proposed in the EIA.

During the operation, the impacts on air quality could be associated only with the beach maintenance works, which will be implemented at intervals. The design of the investments will require less maintenance than the current structures and facilities (on some artificial beaches additional sand top-up may be required in 15, 20, or 25 years, depending on the location). The project is not expected to cause any negative impacts on water quality. On the contrary, the project will improve the bathing water quality thanks to reduced algae proliferation. This will be achieved through avoiding shallow-water beach cells with reduced flow of currents at the coastal structures.

Also, the project is expected to have positive impacts on soil due to the increased stability of the areas. It will reduce the pressure on the cliffs which are currently exposed to wave attacks and are in poor condition. A positive visual impact is associated with the disappearance of the degraded structures.

Finally, with regards to GHG emissions, the calculation performed for a reference period of 50 years yielded results which are below the threshold values defined by the EIB Carbon Footprint Exercise.

Compliance with WFD – assessment under the 4(7) of WFD

Following a preliminary assessment of the project impacts on surface water bodies (WBs), it was concluded that it is likely to have impacts on benthic species, and in particular on macroinvertebrates for a period going beyond the current RBMP cycle, mainly due to the



Luxembourg, 10.06.2022

implementation period. Therefore, ANAR ordered a full assessment under Article 4(7) of the WFD for two WBs by letter with ref. No. 15.115/ET of 03 August 2017. The report on the assessment provided adequate justification demonstrating that the project meets all conditions under Article 4(7) and is in compliance with Article 4(8) and (9) of the WFD.

Climate Change

The Project has a significant contribution to Climate Change Adaptation since it will contribute to the protection of the Black Sea coast on the territory of Romania from the effects of coastal erosion, storms and floods accentuated by climate change. The coastal flood protection investments include large-scale nature-based solutions such as beach nourishment and construction of artificial reefs, coupled with a well prepared and equipped beach and biodiversity monitoring programme to evaluate the effectiveness of the whole protection scheme. Moreover, the demolition of obsolete existing structures, the rehabilitation of existing ones such as the sluices at Edighiol and Periboina, in the Northern coastline and the construction of new coastal structures - both connected to shoreline and detached such as groynes, breakwaters and revetments, cliff consolidation protection measures and others, will increase significantly coastal resilience in the project area.

The Project has been assessed for Paris Alignment and is considered to be aligned both against low carbon and resilience goals against the policies set out in the Climate Bank Roadmap (CBR).

Social Assessment

Once implemented, the project is expected to contribute substantially to the region by enhancing its coastal protection infrastructure against erosion and floods from the sea, providing protection for existing coastal and marine ecosystems within and/or the vicinity of the natural reserves and the Natura 2000 sites, ensuring good bathing water quality along the Romanian coast, avoiding damages to properties and infrastructure and creating prerequisites for sustainable tourism development and economic growth in the region. In addition, the project will increase the employment opportunities during the construction phase.

Public Consultation and Stakeholder Engagement

In the course of the project preparation, all the screening decisions and EIA process required documents were made public as required by applicable Environmental Impact Assessment legislation in Romania.

Other Environmental and Social Aspects

Specific biodiversity and beach maintenance monitoring programme

In the view of compliance with the environmental permit of the project, a detailed monitoring programme is being prepared with the support of a separate technical assistance contract. The Programme is expected to implement in full the requirements of the permit and it will be approved by EPA-Constanta.

The aim of the programme is two-fold: (1) beach maintenance ie monitoring of beach profiles and coastline, water and air quality, noise and waste should be better detailed and substantiated, and (2) biodiversity monitoring that would ensure performance of the protection measures against specific indicators during the implementation and operation phases in line with the Environmental Permit and the EIA and AA Reports. The Monitoring Programme for the proposed project (Phase II) will need to be integrated with the one of Phase I in one coherent programme so as to avoid duplications/financing between the two phases. It will



Luxembourg, 10.06.2022

include all necessary protocols in line with best international practice, including among others, clear protocols for preparation, methods including calibration/validation, and action levels, to data storage, post processing and analysis and follow-up, where responsibilities and interactions are clearly stated.

Transboundary Impact

EIB (JASPERS) team raised the issue with the Beneficiary and the Managing Authority of the LIOP 2014-2020 due to the location of some of the works at a very close distance to Bulgaria. Therefore, together with the EIA screening, a draft report assessing the likely transboundary impacts with Bulgaria was drafted which was sent to the Bulgarian Ministry of Environment and Water with a Notification with ref. No. 5063/GLG of 26 June 2017 under the Convention on environmental impact assessment in a transboundary context (Espoo Convention).

The Bulgarian Ministry of Environment and Water responded by letter with ref. No. OBOC-42 of 08 August 2017 that there are no significant direct or indirect negative impacts identified on the Bulgarian Black Sea coast expected and therefore, the country does not need to participate in the EIA procedure.

Conclusions and Recommendations

The project will provide a significant contribution to EU policy through strong positive environmental impact and will contribute significantly to the protection of the Black Sea coast on the territory of Romania from the effects of coastal erosion and floods accentuated by climate change. The project is in line with the EU environmental legislation, in particular the Water Framework Directive, the Floods Directive, the Bathing Directive and the Marine Strategy Directive.

All project components will be subject to the Promoter complying with the following requirements:

- The Promoter will be required to act according to the provisions of the relevant EU Directives, including the EIA (2014/52/EC) amending the EIA Directive (2011/92/EC), Habitats (92/43/EEC) and Birds (2009/147/EC). In case of a change in scope of the Project, the promoter undertakes not to allocate Bank funds to project components that require a full EIA until the EIA and the necessary appropriate assessment, if required, have been finalised and approved by the relevant competent authority. Once any EIA is finalised, the promoter will provide the Bank with an electronic copy of the EIA, for publication on the EIB website.
- The Promoter undertakes to provide to the Bank, if requested, any decisions issued by the competent authority that screen out project components and the main reasons for not requiring EIA with the reference to the relevant criteria listed in Annex III of the EIA Directive.

Considered the above, the Project is acceptable for EIB financing from an environmental and social point of view.