

Luxembourg, 5 March 2025

## Environmental and Social Data Sheet

### Overview

Project Name:	POLISH NATIONAL ROADS RESILIENCE PROGRAMME
Project Number:	2024-0609
Country:	Poland
Project Description:	Rehabilitation of small road schemes vulnerable to climate change impacts and included in the Polish National Roads Strengthening Programme until 2030.
EIA required:	To be assessed at allocation stage

Project included in Carbon Footprint Exercise<sup>1</sup>: To be assessed at allocation stage

### Environmental and Social Assessment

#### Environmental Assessment

*The context:* The project is aimed at co-financing the implementation of the Polish National Roads Strengthening Programme until 2030 ("Programme"). The Programme includes countrywide road rehabilitation/reconstruction works on the national roads, which are neither motorways nor expressways (DK – Droga krajowa). The foreseen rehabilitation works include pavement structure strengthening, renewal of bridges, rehabilitation of the roadside drainage systems, replacement of road elements to ensure traffic safety and environment protection and improvements to intersections.

*The project:* The project focuses on road schemes (sub-projects) under the Programme, which are particularly vulnerable to climate change impacts. Its scope consists of two parts: (A) Schemes under physical implementation and (B) Schemes under preparation.

At a time of the Framework loan appraisal, the Promoter (GDDKiA) has selected a preliminary list of advanced schemes, located in the regions identified as vulnerable to climate change impacts (further referred to as List A). In line with the EIB Framework loan procedures, all schemes are small road investment projects. The designs for these schemes have been completed and their implementation has started.

Schemes under List B are yet to be selected from among the planned sub-projects, also located in the regions which are particularly vulnerable to climate change. The implementation of these sub-projects had not been launched at the time of appraisal. It is expected that the design of these schemes will ensure enhanced adaptation and resilience to climate change impacts, by following the recently adopted design standards which take into account climate change risk and by incorporating additional adaptation and resilience measures.

*Compliance with applicable Environmental Legislation:* Environmental procedures follow the Polish regulatory requirements. The Program was subject to a strategic environmental impact assessment (SEIA) in 2022. Public consultation took place during the period June to July 2022.

<sup>1</sup> 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 CO<sub>2</sub>e/year absolute (gross) or 20,000 tonnes CO<sub>2</sub>e/year relative (net) – both increases and savings.



Luxembourg, 5 March 2025

The sub-projects under preliminary List A of 34 projects predominantly include reconstruction or rehabilitation works on 1x2 roads along the existing road alignment and within the existing right-of-way. Some schemes focus on the reconstruction of existing bridges.

These schemes are outside the scope of Annex I of the Directive 2011/92/EU, as amended by 2014/52/EU. They are either subject to screening by the Competent authority (i.e. Annex II of the EIA Directive), or outside the scope of the EIA Directive. At a time of appraisal, the screening process was still underway for four schemes from the List A. From among 30 already screened schemes, 21 were screened out by the Competent Authority's decision. Nine schemes were screened in and had undergone full environmental impact assessment. Environmental permits were issued for these 30 schemes.

The environmental assessment shows that the most common negative impacts are expected during the construction phase. These include: noise, dust, surface water pollution, cutting of trees and disturbance of animal migration. Negative impacts will be minimized by replanting of greenery and trees, improved passages for animals, installing of rainwater treatment devices and retention reservoirs. Noise assessments were carried out for the majority of schemes and revealed noise levels in excess of legal limits in some schemes. Negative noise impacts will be mitigated by installing acoustic screens and applying noise reducing surface coating. For List A schemes, installation of acoustic screens in a cumulative length of 9,000m is foreseen.

For List B schemes (under preparation), it is expected that, depending on the detailed scope, they will predominantly fall outside of the EIA procedure (as required by Annex I of the EIA Directive) and will either be subject to screening by the Competent authority (i.e. under Annex II of the EIA Directive), or be outside the scope of the EIA Directive. Ex-post approval of the allocations to individual sub-projects will be required to ensure compliance with the Bank's environmental and social standards, including those under the protection of sites of nature conservation, if and where applicable. This will be assessed at individual sub-project level at scheme allocation.

Road alignment of all List A schemes follow the alignment of existing national roads. In seven cases, the road alignment intersects with NATURA 2000 sites, but in none of these cases, the Competent Authority has identified significant negative impacts on the conservation objectives of a designated site.

Compliance of List B schemes with the EIA, Birds and Habitats Directives will be checked before allocation to a particular scheme. In the Finance Agreement, the Bank will include an undertaking for the Promoter to confirm that individual sub-projects do not significantly impact nature conservation areas, or that impacts are sufficiently mitigated, to be ascertained through the required applicable appropriate assessment and providing the Competent Authority's agreement.

*Promoter's E&S capacity:* The capacity of the Promoter in terms of managing environmental and social risks, as well as its capacity to implement project is in line with EIB environmental and social standards, as experienced during the previous similar operations, is satisfactory. The Promoter is familiar with the EIB's Environmental and Social standards and requirements.

*EIB Carbon Footprint Exercise:* The EIB Carbon Footprint Exercise does not cover framework loans. Carbon Footprint assessment of large schemes, if any, will be undertaken at the time of appraisal prior to allocation. It may be expected that the project will contribute to a minor reduction in road transport related GHG emissions due to improved efficiency and decongestion of the road network.

*Climate change:* Climate change related risks and adaptation measures will be assessed during the appraisal of individual sub-projects. A preliminary assessment indicates that flooding and snow loading are the highest risks to the sub-projects, while rising temperature and wind speed represent medium risks. The sub-projects are typically vulnerable to these risks due to their nature and location in vulnerable areas.

Luxembourg, 5 March 2025

The climate change related risks will be mitigated using adapted design and maintenance standards, and by implementing sub-project specific adaptation measures where necessary. This will be checked at the allocation stage.

*Paris Alignment:* Being a project primarily aimed at rehabilitation of the existing poor quality road infrastructure within the existing right of way, it is expected that the sub-projects of the Project will be aligned with climate change mitigation goals. A more detailed assessment will be carried out at a sub-project allocation stage, when a more detailed technical characteristics of works are known.

## **Social Assessment**

Overall, the project is expected to have a positive impact on the living conditions of inhabitants of the settlements along the project road sections. Users of the reconstructed road sections are expected to benefit from a safer road infrastructure. It is expected that the number of crashes and resulting casualties will be reduced. Traffic safety measures will create not only safer driving conditions and operating cost savings, but also provide with a better protection of vulnerable road users. Improved interchanges, lighting, road marking and equipped pedestrian crossings in villages will be important components of the foreseen works.

On the basis of the information provided to the Bank at this stage, the potential schemes are not likely to have significant negative social impacts, although some limited land expropriation may be necessary in places where road re-alignment and interchanges upgrades are foreseen. When designing the sub-projects, the intervention will be kept as much as possible to the existing right of way, which reduces potential impacts to a minimum.

## **Public Consultation and Stakeholder Engagement**

The Programme was subject to a strategic environmental impact assessment (SEIA) in 2022. Public consultation took place during June-July 2022. The SEIA documentation and reports on the outcome of the consultations are publicly available on the Polish government portal ([link](#)).

Public consultations single schemes that are screened in are expected to be carried out in line with the National legal requirements.

## **Other Environmental and Social Aspects**

### *Road safety*

Some project schemes fall under the scope of the application of the European Directive 2008/96/EC on Road Safety Infrastructure Management (Directive 2008/96/EC) as amended by Directive (EU) 2019/1936. Road safety audit at different stages is expected to be undertaken for them.

## **Conclusions and Recommendations**

Given that detailed information on the sub-projects to be financed under the framework loan is not available at this stage, environmental and social aspects will be further checked at scheme allocation stage and the Bank will require the Promoter to comply with the Bank's environmental and social standards.

For sub-projects aimed at capital repairs and upgrading along the existing alignment, the Promoter will be requested to confirm that the screening decision of the competent authority, stating if a full EIA is required or not, is available.

Prior to allocating financing to a sub-project requiring a full EIA procedure, the Promoter will be requested to confirm to the Bank that the Environmental Decision has been issued by the relevant Competent Authority. The Promoter will be requested to store and maintain updated the relevant EIA documents (including environmental studies related to the EIA, the Non-



Luxembourg, 5 March 2025

Technical Summaries of the EIAs, and Nature/Biodiversity Assessments or equivalent documents supporting the compliance with the EU Habitats and Birds Directives – Form A/B or equivalents) during Project implementation and promptly provide them to the Bank upon request.

For the schemes impacting the protected sites the Promoter will be requested to provide evidence that the competent authority has reviewed and has issued a decision regarding the significance of impact of the sub-project on protected areas.

Based on the above elements, the Project is acceptable to the Bank for financing.