

Luxembourg, 16 July 2025

Environmental and Social Data Sheet

Overview

Project Name: S74 EXPRESSWAY SULEJOW - OPATOW
 Project Number: 2025-0139
 Country: Poland
 Project Description: Construction of a 97.2 km long S74 expressway on two non-continuous sections between Sulejów and Tomaszów and a 14 km bypass of Opatów.

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

The Project concerns construction of a new 97 km long S74 expressway section between Sulejow and Tomaszow and a 14 km long bypass of Opatów. The Project section starts on the Swietokrzyskie voivodeship border, follows through Kielce and ends in Opatów. The project design foresees construction of a "greenfield", primarily 2x2 lane expressway, mostly along a new alignment. The project scope also includes constructing 15 grade separated interchanges, advanced drainage systems, noise protection screens, over 200 animal crossings, connections to local and service roads, 8 expressway service areas and an expressway maintenance centre.

The project implementation has started with a design phase in 2021, while works on Opatow bypass started in 2023. Most of the works are expected to start in 2025 and be completed by 2028.

Environmental Assessment

The construction of the S74 expressway from the border of Swietokrzyskie voivodeship to Opatow is part of the current "Road Construction Governmental Program for 2030 (with perspective till year 2033)", adopted on 13th December 2022, which was subject to SEA.

The major project component, S74 Express Road, falls under Annex I of EIA Directive 2011/92/EU, as amended, requiring a mandatory EIA. The northern connector was considered as belonging to Annex II for which an EIA is optional. The EIA was not carried out for this section.

For implementation purposes, the project is divided into seven contracts including 6 sections of S74 express road and the connector between DK74 and DK9, as follows:

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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- 1) Voivodeship border – Przełom-Mniów (27.48km)
- 2) Przełom-Mniów – Kielce Zachód (16.37 km)
- 3) Kielce Zachód - Kielce (DK 73) (5.01 km)
- 4) Cedzyna - Łagów with bypass (30.02 km)
- 5) Łagów - Jałowęsy – Tomaszów (18.31 km)
- 6) Northern connector between DK9 and DK74 (3.09 km)
- 7) Opatów Bypass S74 and DK9 (10.89 km)

The project scope was covered by six EIA procedures, resulting in 5 full EIA and one negative screening decision issued by the competent authorities, being the Regional Director for Environmental Protection (RDOS) in Kielce for S74 express road and the Mayor of Opatów for the northern connector:

1. Decision of RDOŚ in Kielce of 24 June 2015 (ref. WOO-I.4200.3.2012.MGN.68) for the section S74 voivodeship border – Przełom-Mniów, modified by GDOŚ on 1 March 2017 (ref. DOOŚ-OAI.4200.18.2015.EU.15).
2. Decision of RDOŚ in Kielce of 28 June 2018 (ref. WOO-I.4200.4.2015.MM.49) for the section S74 Przełom-Mniów – Kielce Zachód, modified by GDOŚ on 31 March 2021 (ref. DOOŚ-WDŚ/ZIL.420.103.2018.KCz.203) and 1 June 2021 (ref. DOOŚ-WDŚ/ZIL.420.103.2018.KCz.270).
3. Decision of RDOŚ in Kielce of 30 July 2021 (ref. WOO-I.420.16.2020.KT.46) for the section S74 Kielce Zachód - Kielce (DK 73), modified by GDOŚ on 30 December 2022 (ref. DOOŚ-WDŚZIL.420.29.2021.MKW.mw.20) and 1 December 2024 (ref. DOOŚ-WDŚIII.420.2.2021.mk.5).
4. Decision of RDOŚ in Kielce of 19 June 2017 (ref. WOO-I.4200.1.2012.MGN.37 WOO-I.4200.2.2015.MGN.17) for the section S74 Cedzyna - Łagów - Jałowęsy, modified by GDOŚ on 6 February 2019 (ref. DOOŚ-dŚI.4200.14.2017.AB.25).
5. Decision of RDOŚ in Kielce of 28 November 2019 (ref. WOO-I.420.108.2018.KT.32) for the Opatów bypass S74 and S9.
6. Decision of the Mayor of Opatów of 29 May 2020 (ref. RŚP-II-6220.13.2019) for the northern connector between DK9 and DK74.

Following the completion of the design documents, the Contractors completed the second stage EIA reports and applied for the Supplemental Environmental Impact Assessment (SEIA) as part of the development permit (ZRID) procedure for each of the six sections of S74 express road separately.

At the time of the appraisal, two out of six SEIA Decisions and the final development permits (ZRIDs) have already been issued. For the remaining four sections the SEIA reports are being reviewed by the competent authority and the SEIA decisions are expected by October 2025. Therefore, before first disbursement towards a particular section, the EIB shall receive a copy of the Supplemental Environmental decision together with a copy of the Development Permit (ZRID) for the respective section.

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Assessment of effects on Natura 2000 sites

The following NATURA 2000 sites were identified as being potentially impacted by the Project:

No	Code	Site name	Distance to the Project (km):
1.	PLH260015	Dolina Czarnej	In collision of app. 2.1 km
2.	PLH260014	Dolina Bobrzy	In collision of app. 1.26 km
3.	PLH260010	Lasy Suchedniowskie	In collision of app. 0.037 km
4.	PLH260035	Ostoja Wierzejska	App. 2.9
5.	PLH260030	Ostoja Pomorzany	App. 2.2
6.	PLH260021	Dolina Warkocza	App. 0.4
7.	PLH260040	Lasy Cisowsko-Orłowińskie	App. 0.19
8.	PLH260028	Ostoja Jeleniowska	App. 0.67
9.	PLH260037	Przełom Lubrzanki	App. 0.84
10.	PLH260002	Łysogóry	App. 4.3
11.	PLH260036	Ostoja Żyznów	App. 4.7

The project impact on Natura 2000 areas was analysed by the competent authorities as part of the EIA procedures concluding that the project would have no significant adverse impacts on the objectives and functioning of the sites.

It is mandatory under the SEIA to verify if the detailed project design meets the conditions set in the EIA decision by considering specific technical solutions and current environmental conditions, as well as the established and revised site-specific conservation objectives (SSCOs).

Impacts and mitigation

During the EIA process, the studies, followed by the reviews of the competent authorities, have been carried out in accordance with the EU EIA Directive requirements. The EIA process included the analysis of variant solutions, the assessment of impacts along with mitigation measures and environmental monitoring needs.

Negative impacts include conversion of agriculture, urban and forestry land, noise and vibration, visual intrusion and severance of communities and habitats. The Environmental Decisions specify a range of mitigating measures which include installation of acoustic screens, construction of different size animal passes, drainage and rainwater treatment systems, re-planting of greenery, fencing, various restrictions on working periods, hours, and practices as well as requirements for supervision and monitoring.

Although the project will have some negative impacts, these have been properly assessed and adequate mitigation, management and monitoring measures have been/are to be identified in consultation with relevant stakeholders and included in the final designs, which are subject to the SEIA decisions.

Climate adaptation

According to the climate risk and vulnerability assessment the most significant risks, deemed highly probable and impactful, are associated with increased snow loading and flooding. Other relevant climate change related project risks, such as temperature increase, precipitation increase and strong winds, have been rated as "medium". The promoter has confirmed that the project design incorporates proper measures and is sufficiently adapted to the identified climate vulnerabilities with the highest risks, and that maintenance planning will properly address the possible intensive snow loading risk. Following the application of proper mitigation measures, the climate risk of the project has been assessed as "low".



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Paris alignment

The project was assessed by the Bank's Services for Paris Alignment in accordance with the policies set out in the Climate Bank Roadmap ("CBR"). The project is considered being aligned with the low carbon goal as it consists of a capacity expansion of an existing road infrastructure meeting the EIB eligibility criteria for Transport, including passing the Adapted Economic Test introduced under the CBR and is consistent with national and EU level infrastructure planning.

Poland's alternative fuel infrastructure national policy framework has been assessed to have shortcomings, but Poland has shown improving commitment to plan for alternative fuel infrastructure. The climate risk of the project is assessed as low, and the project is therefore considered to be aligned with the resilience goal.

[*Register of Commission Documents - SWD \(2019\)29 \(europa.eu\)](#)

EIB Carbon Footprint

The project is included in the Carbon Footprint exercise on the following basis:

- Estimated annual emissions of project in a standard year of operation:
 - Forecast absolute (gross) emissions are 146,100 tonnes of CO₂ equivalent per year;
 - Forecast emission created are 3,000 tonnes of CO₂ equivalent per year.
- The project boundaries are given by the new road and the existing roads (national roads DK74 and DK9, and local road 757), connecting the border of the Świętokrzyskie Voivodeship near Ruda Maleniecka with Tomaszów, plus the bypass of Opatów.

The baseline is the forecast third party emission, in the absence of the project, from the existing network, only within the boundary defined above. The forecasts reflect the Services' assumptions on traffic, traffic growth, speed/flow, infrastructure capacity and fuel consumption.

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.

Social Assessment, where applicable

Being a road construction partially along a new alignment, partially in the urbanized area, the project implementation requires an additional land take of approximately 1250 ha. This includes the expropriation of approximately 9120 land plots and the demolition of 394 real estate objects, including 114 residential houses. The construction will lead to the conversion and permanent loss of primarily rural, as well as forest, urban and sub-urban land. Impacted persons have been informed, however, as the expropriation and resettlement process are still underway, a certain risk of dissatisfaction and appeals exists until the process is fully completed. Experience with the promoter from the previous projects shows that such risks are minimised by applying well-planned expropriation procedures in accordance with Polish legislation, involving professional staff and offering a fair compensation for the expropriated property. This procedure includes information to the owners about resettlement timing, based on real needs and works calendar.

The project is expected to have positive socio-economic impacts such as the reduction of travel costs and improvement of road safety. The project is also expected to improve the quality of life of the inhabitants of the localities crossed by the national road and local roads in the area of influence of the expressway, because of reduced air and noise pollution, as well as job creation.



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The traffic safety situation is expected to improve due to the construction of grade separated interchanges, separating transit and local traffic, constructing pedestrian bridges and underpasses, constructing dedicated bicycle lanes and providing links to local road network. Road safety audits were undertaken at the design stage and, in accordance with the requirements of the EU and Polish legislation, will be performed at pre-commissioning phase.

Public Consultation and Stakeholder Engagement

The promoter organized extensive public consultations and assured stakeholder engagement during the different stages of the Programme Concept development, EIA and SEIA procedures in compliance with the requirements of the applicable legal framework. Prior to the public consultation meetings, information was made available through publication in local media, on websites, social media and by posting on information boards of the municipalities impacted by the project. The proposals and recommendations, received during the consultations were reported and analysed before providing answers to the applicants. Technical requirements for the design, defined in the Environmental decisions are further checked at issuing the SEIA decisions for ZRIDs.

Conclusions and Recommendations

The project is part of the current "Road Construction Governmental Program for 2030 (with perspective till year 2033)" for which the SEA was performed in 2022.

The main project component falls under Annex I of EIA Directive 2011/92/EU, as amended, requiring mandatory EIA.

At the time of appraisal, the EIA decisions for the entire project sections have been issued and are in place. The SEIA reports and development permits (ZRID) have been issued for sections Przełom-Mniów – Kielce Zachód and the Opatów bypass.

The SEIA reports needed to apply for the development permits (ZRIDs) for remaining sections of S74 express road had been submitted and were under review by the Competent Authority.

Subject to the fulfilment of the below-mentioned conditions and undertakings, the project is acceptable for EIB financing in E&S terms.

Disbursement conditions:

- Before first disbursement towards a particular project section, the EIB receives a copy of the Supplemental Environmental decision together with a copy of the Development Permit (ZRID) for the respective section.

Undertakings:

- Promptly inform the EIB about any changes/updates in the project design which may affect any decisions (including, among others, administrative decisions, or internal decisions of the promoter) to implement the project.
- Promptly inform the EIB on any significant environmental claims, proceedings or investigations commenced, pending, or risk of being initiated regarding environmental matters affecting the project.