

Environmental and Social Data Sheet

Overview

Project Name: S17 EXPRESSWAY PIASKI - HREBENNE

Project Number: 2025-0316 Country: Poland

Project Description: Construction of four non-continuous 93.2 km long S17

expressway sections between Piaski and Hrebenne.

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 the construction of four non-continuous sections of the S17 expressway between Piaski and Hrebenne, for a total of 93.2km. The entire project is located in Lubelskie voivodeship. The corridor starts at the end of the existing S17 near Piaski, at the junction with national road DK12, and runs in south-east direction until Hrebenne, near EU's eastern border between Poland and Ukraine.

The project scope will include the construction of 14 grade-separated interchanges for connecting to the national and municipal road network. In addition, more than 150 km of access, connecting and service roads will be constructed, reconstructed, or reconfigured to accommodate the needs of adjacent local communities and local traffic.

The project will include the design and construction of structures, noise screens and an efficient drainage system, which is adapted to the potential negative impacts of climate change. The scope also includes construction of different size animal passes, three pairs (6) of passenger service areas, relocation of utilities, installation of a modern ITS system, road safety equipment and lighting. It will also include construction and reconstruction of infrastructure for pedestrians and cyclists.

Construction works are expected to start in 2025 and 2026, with completion anticipated between 2027 and 2029. Each section will be connected to the DK17 and local road network, allowing for independent opening to traffic.

For implementation purposes, the project is divided into seven contracts, as follows:

- Piaski Wschód Łopiennik (section 1)
- Krasnystaw Północ Izbica (section 3)
- Izbica Zamość Sitaniec (section 4)
- Zamość Wschód Zamość Południe (section 6)
- Zamość Południe Tomaszów Lubelski Północ (section 7)
- MOP Jeziernia on Tomaszów Lubelski by-pass (section 8)
- Tomaszów Lubelski Południe Hrebenne (section 9)

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.



Environmental Assessment

The construction of the S17 expressway Piaski - Hrebenne is part of the current Road Construction Governmental Program for 2030 (with perspective till year 2033), adopted on 13 December 2022, which was subject to a Strategic Environmental Assessment (SEA).

The major project component, S17 expressway, falls under Annex I of EIA Directive 2011/92/EU, as amended, requiring a mandatory EIA. The subsequent changes to the project, including the pair of service stations (MOP) Jeziernia on Tomaszów Lubelski by-pass, were classified as Annex II, for which an EIA is optional.

The project scope was covered by a full EIA procedure, resulting in the decision of 8 April 2016, ref. WOOŚ.4200.1.2011.LP issued the Regional Director for Environmental Protection (RDOŚ) in Lublin. Following appeals, the decision was modified by GDOŚ on 30 November 2018 (ref. DOOŚ-oa II.4200.16.2016.PD.23).

For MOP Jeziernia on Tomaszów Lubelski by-pass, an environmental decision following a full EIA procedure was issued on 10 January 2017 by RDOŚ in Lublin, ref. WOOŚ.4200.2.2016.LP, which was later changed by the decision of 25 January 2022, ref. WOOŚ.420.9.2021.LP. The changes to the project introduced on section 6 and 9 were screened out from the environmental assessment by RDOŚ in Lublin resulting in a decision of 28 May 2024 ref. WOOŚ.420.10.2023.LP and 11 September 2024, ref. WOOŚ.420.16.2023.LP respectively.

Some elements in section 1 and 6 of the current project are covered by environmental decisions issued for adjacent projects, as follows:

- Decision of RDOŚ in Lublin of 14 December 2015 for S12 section Piaski Dorohusk, ref. WOOŚ.4200.1.4.2011.SM, following a full EIA procedure.
- Decision of RDOŚ in Lublin of 15 April 2025 for dk74 intersection Zamość East, ref. WOOŚ.420.6.2023.LP (negative screening decision).

Following the completion of the design documents, the Contractors shall complete the second stage EIA reports and apply for the Supplemental Environmental Impact Assessment (SEIA) as part of the development permit (ZRID) procedure for each of the seven sections of the S17 express road individually.

At the time of the appraisal, SEIA Decisions for sections 6, 7, and 9 have already been issued; however, only section 9 has obtained a development permit (ZRID). Notably, this ZRID is subject to an ongoing appeal procedure overseen by the Minister of Development and Technology. For the remaining four sections (section 1, 3, 4 and 8) SEIA procedures are in progress. Accordingly, prior to the first disbursement towards a particular section, the EIB shall receive a copy of the relevant Supplemental Environmental decision and the corresponding Development Permit (ZRID).



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	Impact
1.	PLH060030	Izbicki Przełom Wieprza	Intersecting: ~ 1.27 km
2.	PLH060096	Bystrzyca Jakubowicka	Distance: ~ 4.3 km
3.	PLB060013	Dolina Górnej Łabuńki	Intersecting: ~ 1.0 km
4.	PLH060087	Dolina Łabuńki i Topornicy	Intersecting: ~ 0.5 km
5.	PLH060080	Łabunie	Distance: ~ 0.07 km
6.	PLH060085	Bródek	Distance: ~ 0.25 km
7.	PLB060011	Ostoja Tyszowiecka	Distance: ~ 2.8 km
8.	PLH060025	Dolina Sieniochy	Distance: ~ 2.85 km
9.	PLB060012	Roztocze	Intersecting: ~ 3.2 km
10.	PLB060021	Dolina Sołokiji	Intersecting: ~ 1.7 km
11.	PLH060089	Minokąt	Distance: ~ 3.7 km

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.

Under the SEIA it is mandatory 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, replanting 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

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."



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 Exercise

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 55 thousand tonnes of CO₂ equivalent per year;
 - The project has a neutral impact on CO₂ emissions.
- The project boundaries are given by the new road and the existing roads (national road 17), connecting the town of Piaski with Ukraine border at Hrebenne.

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 new road construction, the project implementation requires an additional land take of approximately 953 ha. This includes the expropriation of approximately 6,000 land plots and the demolition of 326 real estate objects, including 92 residential houses. The construction will lead to the conversion and permanent loss of primarily rural as well as forest, and sub-urban land. In accordance with Polish legislation, impacted persons have been informed 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.

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 ensured stakeholder engagement during the different stages of the Programme Concept development, EIA and SEIA procedures, in compliance with the applicable legal framework. As the consultation process took place during the COVID-19 pandemic, standard in-person meetings could not be held. Instead, information was disseminated through local media, websites, social media platforms, and by posting on municipal information boards in the areas impacted by the project. Proposals and recommendations received through these channels were reported and analysed before responses were provided to the applicants. The technical requirements for the design, defined in the Environmental Decisions, are further verified during the issuance of SEIA decisions for ZRIDs.

Conclusions and Recommendations

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

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.

At the time of appraisal, the EIA decisions for all project sections had been issued.

SEIA Decisions for four sections have already been issued, while the reports for the remaining three components of the project were still being prepared.

The development permit (ZRID) for section 9 was issued.

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:

- 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.
- For sections/components of the project subject to appropriate assessment and relevant decisions, the promoter shall inform the EIB about any changes/updates to the conclusions of the appropriate assessment, in view of revised site-specific conservation objectives of the Natura 2000 sites affected by the project, as defined by the competent authority and reflected in their decision/s.
- Inform the EIB on any significant environmental claims, proceedings or investigations commenced, pending, or risk of being initiated regarding environmental matters affecting the project.