European Investment Bank

16/12/2025

Environmental and Social Data Sheet

Overview

Project Name:	S19 EXPRESSWAY BIALYSTOK CHLEBCZYN
Project Number:	2025-0065
Country:	Poland
Project Description:	Construction of two non-continuous sections of the S19 expressway in the Podlaskie Voivodeship, 32 km northern Bialystok bypass and 68 km section between Deniski and Chlebczyn.
E&S Risk categorisation	High

Project included in Carbon Footprint Exercise[1]: yes

(Details for projects included are provided in section: “EIB Carbon Footprint Exercise”.)

Environmental and Social Assessment

The Project is categorised as high risk in accordance with Article 4.18 of the EIB Group Environmental and Social Policy dated 2 February 2022 2, as it was subject to EIA.

The Project comprises the construction of two sections of the S19 expressway, totalling 100 km of new 2x2 lanes constructed largely on a greenfield alignment, as well as the rehabilitation/widening of a 3 km section of national road DK66 near Bielsk Podlaski.

The scope includes 10 grade-separated interchanges connecting the expressway with national and municipal roads, 185 engineering structures, and more than 40 km of access, connecting, and service roads serving local communities and traffic.
For implementation purposes, the Project has been divided into eight sections (contracts) as follows:

1. Białystok Północ - Dobrzyniewo (9.476 km)
2. Krynice - Dobrzyniewo - Białystok Zachód (10.167 km)
3. Czarna Białostocka - Białystok Północ (12.335 km)
4. Deniski - Hańcki (6.503 km)
5. Hańcki - Bielsk Podlaski Zachód (9.009 km), with section of DK66 from existing DK19 (3.02 km)
6. Bielsk Podlaski Zachód - Bońcki (12.191 km)
7. Bońcki – Malewice (15.911 km)
8. Malewice – Chlebczyn (25.073 km)

The Project implementation started with a design phase in 2021. Works started in 2023 and are expected to be completed by 2028.

[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.

European Investment Bank

Environmental Assessment

The construction of the S19 expressway Białystok – Chlebczyn 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). In addition, the section S19 Boćki – Chlebczyn is included in the National Operational Programme: European Funds for Infrastructure, Climate and Environment 2021-2027 (FEnIKS) for which a SEA was performed in 2021.

The major Project component, S19 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 intersection Deniski, were classified as Annex II, for which an EIA is optional.

The Project scope was covered by three full EIA procedures resulting in the decisions issued by the Regional Director for Environmental Protection (RDOŚ) in Białystok. The intersection Deniski was screened out from the environmental assessment.

Following the completion of the design documents, the Contractors completed the second stage EIA reports and applied for the Supplemental Environmental Impact Assessment (SEIA) within the development permit (ZRID) procedure, separately for each of the eight sections .

The development consent for S19 expressway procedure is presented in the table below:

Section	Environmental Decision	Building permit	
		SEIA decision	ZRID
S19 northern Białystok bypass			
Krynice – Dobrzyniewo – Białystok Zachód	RDOŚ dec. no WOOŚ-II.4200.4.2014.DK issued on 21.12.2015	RDOŚ resolution WOOŚ.4222.7.2022.LP issued on 18.12.2023	ZRID no 4/2024 ref. AB-I.7820.2.1.2022.MB issued on 28.02.2024
Białystok Północ – Dobrzyniewo	RDOŚ dec. no WOOŚ.420.4.2020.DK issued on 28.09.2021 GDOŚ dec. no DOOŚ-WDŚZOO.420.67.2021.ISz.30 issued on 30.12.2022	expected 01.2026	expected 03.2026
Czarna Białostocka – Białystok Północ		expected 01.2026	expected 03.2026
S19 Deniski - Chlebczyn			
Deniski - Haćki	RDOŚ dec. no WOOS.420.6.2022.PL z 30.12.2022 (intersection Deniski) – negative screening decision	RDOŚ resolution WOOŚ.4222.5.2023.AS2 issued on 26.06.2024	ZRID Nr 14/2024 ref. AB-I.7820.1.3.2023.AK issued on 09.09.2024
	RDOŚ dec no WOOŚ.420.1.2019.PL issued on 29.01.2020 GDOŚ dec no DOOŚ-WDŚZOO.420.7.2020.BL/maz.32 issued on 16.08.2021		
Haćki – Bielsk Podlaski Zachód		RDOŚ resolution WOOŚ.4222.5.2022.KW issued on 06.06.2023	ZRID Nr 8/2023 ref. AB-I.7820.1.2.2022.AK issued on 23.08.2023 DLI-III.7621.34.2023.WA.14 issued on 15.10.2025
Bielsk Podlaski Zachód – Boćki		RDOŚ resolution WOOŚ.4222.8.2022.AS2 issued on 01.08.2023	ZRID Nr 12/2023 ref. AB-I.7820.6.4.2022.KS issued on 04.10.2023 DLI-I.7621.33.2023.LB.12 issued on 04.04.2025

Section	Environmental Decision	Building permit	
		SEIA decision	ZRID
Boćki – Malewice		RDOŚ resolution WOOŚ.4222.3.2022.PL issued on 13.07.2023	ZRID no 13/2023 ref. AB-I.7820.4.2.2022.AS issued on 06.10.2023 DLI-I.7621.36.2023.LB.13 issued on 03.04.2025
Malewice – Chlebczyn		RDOŚ resolution WOOŚ.4222.1.2023.JK issued on 06.12.2023	ZRID no 1/2024 ref. AB-I.7820.4.3.2022.AS issued on 30.01.2024 DLI-I.7621.11.2024.KM.11 issued on 25.06.2025

Before the disbursement of the loan, the Bank will request the Borrower to provide a copy of the final Development Permits (ZRIDs) together with the associated SEIA decisions and reports.

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.	PLB200003	Puszcza Knyszyńska	Intersecting
2.	PLH200006	Ostoja Knyszyńska	Intersecting
3.	PLB200001	Bagienna Dolina Narwi	Distance ~ 1.8 km
4.	PLH200024	Ostoja Narwiańska	Distance ~ 5 km
5.	PLH200015	Murawy w Haćkach	Intersecting
6.	PLH200010	Ostoja w Dolinie Górnej Narwi	Distance ~ 0.4 km
7.	PLB 200007	Dolina Górnej Narwi	Distance ~ 0.4 km
8.	PLH200021	Ostoja w Dolinie Górnego Nurca	Distance ~ 1.8 km
9.	PLB200004	Dolina Górnego Nurca	Distance ~ 4.8 km
10.	PLH200014	Schrony Brzeskiego Rejonu Umocnionego	Distance ~ 3.5 km
11.	PLH140011	Ostoja Nadbużańska	Intersecting
12.	PLB140001	Dolina Dolnego Bugu	Intersecting

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. The cumulative impact was taken into account.

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”.

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. The project will also include preparatory works for the future installation of electric vehicle (EV) charging stations

*Register of Commission Documents - SWD(2019)29

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 91.9 kt of CO_2 equivalent per year;
  - Forecast emissions avoided are 8.2 kt of CO_2 equivalent per year.

- The Project boundaries are given by the new road and the existing roads (national roads 19 and 65), connecting the city of Białystok with the village Chlebczyn.

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.

European Investment Bank

Social Assessment, where applicable

Being a new road construction, the Project implementation requires an additional land take of approximately 1,030 ha. This includes the expropriation of approximately 3,400 land plots and the demolition of 79 real estate objects, including 6 residential houses. Most sections have completed land acquisition, while two sections are still awaiting ZRID decisions. 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 temporary job creation during construction.

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.

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 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 all Project sections had been issued. In addition, six out of eight SEIA Decisions together with development permits (ZRIDs) have already been 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 Impact Assessment decision together with a copy of the final 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.
- Inform the EIB on any significant environmental claims, proceedings or investigations commenced, pending, or risk of being initiated regarding environmental matters affecting the Project.