

Romania Gouvernment Ministry of Transport

General Transport Master Plan for România Environemntal Report - Completions -



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General Transport Mater Plan for Romania

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During the public debate period, 7.11.2014 – 12.01.201, for the Environmental Report of the General Transport Master Plan, the public sent observations/commnets related to the content of the Environemntal Report.

Following those observations/comments, the conten of the Environmental Report will be completed as follows:

Observations/Commnets	Adressed comments/ Public letters	Changes/Completions for the Environmental Report of the GTMP
1. On page 209 of the Environmental Report: from the list of the environmental impacts relevant for the Master Plan, for water environmental aspect, was not considered the negative imapct on the waters generated by the hydromorphologic changes, related to implementation of somen measures proposed to improve the navigation conditions.	WWF Letter no. 406/19.12.2 014	In the Environmental Report, Chapter 6, Relevant environmental for the General Transport Master Plan, for Water environemenatal aspect have been identifed as environmental problems: Deterioration of water quality and damage aquatic ecosystems In Table 6.1, the section of associated causes of the Environmental Report will be completed as follows: "The structural measures to improve navigation conditions (such as works of type of bank, bottom sills etc.) can have a negative impact on the ecological status of the Danube leading to changes in hydrology and morphology."
2. On page 269 of the Environmental Report it is mentioned the conlcusion from the Apropriate Assessment, which states that generaly the impacts can be avoided by changing the red line/ alignment and place them outside the Natura 2000 Site limits, this measure being insuficient. Thus, in comformity with GEO 57/2007 related to protected area regime conservation of natural habitats, flora and fauna, approved with amendments and additions by Law no. 49/2011, with subsequent amendments, to take account of other types of protected areas of national interest (parks, natural reservations), and protected areas of international interest (world natural heritage sites, geoparks, wetlands of international importance and biosphere reserve).	WWF Letter no. 406/19.12.2 014	The comment will be considered in the Ennvironmental Report which will be completed as follows: " Most of the significant impacts can be avoided by reconsider the alignments/redlines out side of the limit of Natura 2000 sites including here the national parks and national protected areas (parks, natural reservations), as weel as internation protected areas, (world natural heritage sites, geoparks, wetlands of international importance and biosphere reserve)."
3. On page 269 in the Report: as regards measures to reduce the negative impacts of transport infrastructure by increasing permeability, we consider necessary to be specified also the measure of integration of green infrastructure in transport projects, regardless of the sector type (including shipping).	WWF Letter no. 406/19.12.2 014	The comment will be considered in the Envrironmental Report, which will be completed as follows (on page 269 and in Chapter 11 of the): <i>" it is recomanded to be considered the integration of green</i> <i>infrasturctures in for the transport sectors, relardless the sector type</i> <i>(including shipping)".</i>

4. On page 276 it is mentioned the fact that for all projects, including the shipping for Călărași-Brăila sector, it has been already developed the EIA procedure and the environmental permitt issued. The permitt hass been issued based on a technical solution which will not be implemented due to the impact predicted to be generated on the sturgeon, on sector of Bala channel. Thus, in order for this project to be implemented, it is necessary the renewal of the Emvironemtnal Permitt, based on new technical solution which will not affect this specie , and thus, a new EIA procedure.	WWF Letter no. 406/19.12.2 014	For the project related to the impovmetn of the shipping on the Sector Calarasi – Braila, it has been developed the EIA procedure. In the Environmental Report, on page 276 and in table 5.1. Situation of the EIA / appropriate assessment for projects included in the reference scenario will be added the following amendments: <i>"This project is in the phase of initial planning, in order to be found</i> <i>somen technical solutions related to works that will be developed in</i> <i>the critical point 01 Bala. For the new adopetd solutions, the</i> <i>Environmentla Permit will be renewed, thus teh EIA procedure will</i> <i>be repeted and measures to reduce the environemntal impact will</i> <i>be proposed and considered".</i>
5. On page 284 it is omitted the fact that "disruption of morphological elements and / or water flow may occur not only temporary / during construction, but may continue during implementation of technical solutions proposed, operation period".	WWF Letter no. 406/19.12.2 014	The WWF comment will be considered in the Envrironmental Report, which will be completed, on page 284, as follows: "disruption of morphological elements and / or water flow may occur not only temporary / during construction, but may continue during operation period, depending on the technical solutions used. In assessing the impact of individual projects, depending on their specific details, it will be considered such potential impacts".
6. On page 289 it is necesaryy to be added the following paragraph: "the interventions in Natura 200 sites, when they dont have any direct connection with the management of the protected areas and which can affect significantly the area, can be justified, only exceptionally, in confomrity with art. 28, alin 9, lit.c) from GEO 57/2007, amended and supplemented, if it is shown that there are overriding reasons of public interest on which it has been obtained the opinion of the European Commission".	WWF Letter no. 406/19.12.2 014	The recomandation of WWF will be considered and the Environemntal Report will be completed on Chapter 10 - Proposed measures to prevent, reduce and compensate, as completely as possible, any adverse environmental impact resulting from the implementation of the General Transport Master Plan, as follows: " For the trasnport infrasturcture projects, if the apropriate assements reveals negative effects on the natural protected area and in the lack of some alternative solutions, will be respected the provisions of art. 28, EO 57/2007, with subsequent amendments, respectively paragraph (7) – if the project is imperative to be developed based on reasons of overriding public interest, including social or economic, the environmental competent authority is issuing the environmental, permitt or Natura 2000 declaration, only afte the compensatory measure are being proposed in order to protect the Natura 2000 network" and parag. 9 – "in the situation of the Natura 2000 sites, identified in conformity with the legislation in force, housing a priority natural habitat type and / or a priority species, the only considerations which may be raised for the environmental permitti issuance are the ones related to: a) public health or safety; b) benefic consequences of primary importance for the environment; c) other imperative reasons of overriding public interest on which it has been obtained the opinion of the European Commission ".
7. On page 290 we consider necesarry to be included/mentioned specific measures for the conservation of the sturgerons, in case of the projects developed on teh Danube.	WWF Letter no. 406/19.12.2 014	Withing the Environmental Report, at the end of Chapter 10 - Proposed measures to prevent, reduce and offset as completely as possible any adverse environmental impact resulting from the implementation of the General Transport Master Plan, the biodiversity component, page 290 will be completed with specific

8. Table 10.1 (page 291) – Proposed measures to prevent, reduce and offset as completely as possible any adverse environmental impact resulting from the implementation of the General Transport Master Plan, section Climate Change, does not contain any specific measures in order to adapt to the climate exchange, by avoiding deforestration works, maintenance of wet areas, and others.	WWF Letter no. 406/19.12.2 014	 measure, as follows: "it is recomanded to be considered specific measures for the conservation of the sturgerons, in case of the projects developed on teh Danube, in order to avoid the potential effects on the specie." Withing the Environmental report, on chapter 10 - Proposed measures to prevent, reduce and offset as completely as possible any adverse environmental impact resulting from the implementation of the General Transport Master Plan, table 10.1, climate change section, on page 291, will be completed with teh measure: <i>"Avoiding as much as possible the forest areas, proteted areas, wet areas when choosing the projects locations or when planning the extension of the existing infrastructure".</i>
 9. For the table 10.1., on page 291, environemntal apect Water, we consider to be necesary the following amendments: a) a) Completion of the measure 20 with the following words: "[] as the changing river beds and connectivity interruption"; b) b) Change the measure 21 "In the optimum solution works, to improve navigation on the Danube, will be given priority to the non-structural measures, with particular attention to the protection of biodiversity, especially sturgeon" c) c) Completion of the measure 25 by the following: "[] and all other necessary permits and authorizations" 	WWF Letter no. 406/19.12.2 014	 The Environmental Report, on chapter 10 - Proposed measures to prevent, reduce and offset as completely as possible any adverse environmental impact resulting from the implementation of the General Transport Master Plan, table 10.1, will be completed as follows: <i>Measure 20:</i> "the project proposed by the GTMP, must be proposed teh best solutions for the design and cosntruction with the main scope to reduce/limitate the potential negative effects of the activities leading to changes / negative disruption of rivers or river beds or connectivity disruption in relation to natural morphological changes". <i>Measure 21:</i> "in chosing the optimum solutions for the improvements of the navigation on Danube, it will be cosnidered non-structural measures(to the extent that they are applicable and feasible), with special attention for the protection of biodiversity, specially the sturgeons "; <i>Measure 25:</i> "Execution of the projects proposed by the GTMP which are related with water, or are consitructed on water, will be realized bazed on the Water Management Permitt and also all other permitts and authorizations, in conformity with the legal provisions".
10. In table 10.1 (on page 296), Biodiversity section, we request an amendament for the measure 37, respectively compeltion with all type of natural protected areas which can be affected by the proposed transport projects.	WWF Letter no. 406/19.12.2 014	In the Environmental Report, on Chapter 10 - Proposed measures to prevent, reduce and offset as completely as possible any adverse environmental impact resulting from the implementation of the General Transport Master Plan, table 10.1, the measure 37 will be completed as follows, on page 296: "Choosing the project location, inlcuding the site management locations, prodution bases, concrete plants and others, needed for the construction works, in such a way so that the construction works will avoid the natural protected areas and habitats included in Bird Directive and Habitat Directive, including nationa protected areas (national parks, natural parks, scientific reserve, nature monuments, natural reserves), natural protected areas of international interest (natural World Heritage sites, Geoparks, wet areas of international importance and biosphere reserves), ecological coridors.

11. In table 10.1 (on page 296) Biodiversitate section, we request an amendament for the measure 38, respectively "and also avoiding areas outside protected areas where have been identified species of Community interest in accordance with GEO 57/2007".	WWF Letter no. 406/19.12.2 014	In the Environmental Report, on Chapter 10 - Proposed measures to prevent, reduce and offset as completely as possible any adverse environmental impact resulting from the implementation of the General Transport Master Plan, table 10.1, the measure 38 will be completed as follows, on page 296: <i>"Avoiding as much as possible the forested areas and areas outside of protected areas which were identified as species of Community interest under the provisions of GEO 57/2007 with subsequent amendments, when choosing the location of transport infrastructure projects or expansion of existing infrastructure planning".</i>		
12. In table 10.1 (on page 301), section Landscape and cultural heritage, we request and amendmanet for the measure 58, respectively: "avoiding the protected areas, in conformity with the specifications of European Convension of landscape, Florance (2000), approved by law no.45/2002, areas with arheologic patrimony []";	WWF Letter no. 406/19.12.2 014	In the Environmental Report, on Chapter 10 - Proposed measures to prevent, reduce and offset as completely as possible any adverse environmental impact resulting from the implementation of the General Transport Master Plan, table 10.1, the measure 58 will be completed as follows, on page 301: "Avoiding as much as possible the areas of significant landscape values, natural protected areas, protected areas, areas with archaeological sites choice of transport infrastructure projects including site management planning, production bases, concrete plants etc. and compliance with the European Landscape Convention of Florence (2000) ratified by Law no. 451/2002"		
13. In table 12.2 (on page 341), section Natura 200 network – we consider that for efficiency and real protection, the target of the first three indicators, repspectively "Values lower than estimated in this report", requires the have a precise limit/value (for example: lower wi X% comparing with the ones estimated in the present report).	WWF Letter no. 406/19.12.2 014	indiacators of N	the Envrionmental Report, for the r atura 2000 Network, the following a e target of the first three indicators: Indicator Habitat areas from Natura 2000 Sites, from the inside of the comunitary interest areas that will be lost following the GTMP projects implementation. Habitat areas from Nature 2000 sites Habitat areas from Natura 2000 Sites, from the inside of the comunitray interest areas that are ireversibel affected by the works for projects proposed in the GTMP. Areas fauna habitats of Community interest sites within Natura 2000 network affected	
		Bet	by one or more disturbance factors (eg. Human presence, noise) as a result of implementing transport projects in GTMP.	

include informations related to environmental monitoring. Taking intoconsideration the complexity of this plan, it is considered to be insufficient the development of one report at the end of the period and we request to be developed a reporting procedure (annualy), on the entire implementation period.		following mention: "The monitoring of the possible effects on environment is the responsability of the beneficiary. The beneficiary is obliged to annualy submit to EPA, until the end of the first trimestre of next year, the results of the monitoring (according to provisions of GD 1076/2004, art 27, paragraph 3)) ".
15. On page 345, we consider unfounded (being contradictory with other provisions and measures of the report) the statemant: "For all project types, no matter of the transport sector, the effects on environment during execution period are insignificant, locally developed, on the working points and temporary" and we request the removal of thish statment.	WWF Letter no. 406/19.12.2 014	It will be removed from the page 345., the following statement, as requested: "For all project types, no matter of the transport sector, the effects on environment during execution period are insignificant, locally developed, on the working points and temporary".
16. We apreciate that fact that the study for the trnasport development is enough form the point of view of the reduction of traffic in the urban areas, specially (aprox. 10 % from teh population of Romania, aprox. 400.000 cars which are crossing daily).		The Environmental Report and the summary will be completed with the following paragraph, on Chapter - Relevant aspects of the current state of the environment (on page 20 - Non Technical Summary and on page 125 - Environmental Report):
Despite evidence extracted from all available data and all goals of strategic documents of Romania and the EU (lower share of road transport by developing means of transport less polluting and safer, etc) GTMP states that railway sector is uncompetitive (of course only in Romania) and must be developed first the road sector	EU CONCEPTS R&D Letter no. 390/11.11.2 015.	"Number of deaths involving passengers or railway employees is relatively small if we consider the number of deaths per billion passenger kilometers. There is however a significant number of deaths in suicide or due to other incidents occurring at railway level crossings. In the period 2007-2011, statistics showed a ratio of 79 deaths related to railway property to a billion kilometers. This report is almost four times higher than the EU average and places the country in 4th place in terms of this parameter. Rail-related accident rate is about 1% of that related to road transport. This parameter
Regarding accidents: note again the abundance of data, sometimes truncated and unanalyzed. In 2012, in Romania there were 2,042 deaths and 8,860 serious injuries (2nd in the EU, but in 2013 we passed on the first place). As VF index given by the European Council for Transport Safety (ETSC), the cost of a life is EUR 1.84 million, so the costs calculated for 10,902 deaths and serious injuries in car crashes in 2012 in Romania means a loss of EUR 20.06 billion.		 Was considered in technical assessment for GTMP ". On page 126, in teh Environemntal Report, will be specified the fact that: "These accidents occur due to collision of trains and automobiles means, which may mean, on the one hand, some weaknesses in delimitation and marking of railway property. The public should be better aware of the dangers they expose by inadequate rail crossing". This paragraph will also be includen on page 20, in the Summary pf the Envrionemntal Report.

The figure on the RM regarding railway accidents do not conincide with GTMP data and is compared with the EU figures, inducing idea of the uncertainty of the railway		
sector. But especially it is not explained that accidents are not caused by railway transport, but almost all of them are rezsults of the collision with car means - which do not follow the signals at the level crossings.		
Also, the real figures are not compared with the ones of the two systems of transprot: railway and road, in order not to clearly result the measures that are needed for transport safety increse.		
	Ministry o f Environme	On chapter <i>The potential significant effects on the environment, including health, in a transboundary context, in case of the implementation GTMP,</i> on page 297, the Environemntal Report will be completed as following:
		"On the common sector Romania - Bulgaria (km 845.5 - km 375) there are 30 critical points for navigation in the minimum water depths fall below 2.5 m, minimum depth recommended by the Danube Commission.
		The project for the improvement of the navigation on the Danube proposes the following types of work: dredging; protection and consolidation of banks; achievement of bottom sills; control dams.
17. Please present a detailed information related to the impact genertaed by the GTMP implementation on water quality and on the hydromorfology of the		The works on improving navigation will be made mostly on water surface (Danube) over a length of about 595 km, on the land there will be only points of temporary work, for arranging banks (protection and consolidation).
Danube River – including projects from "DO Something" scenario, respectively the project related to improvement of the shipping conditions on Danube, on teh sector Porțile de Fier-Călărași, and also the 6th projects related to ports infrastructure improvement.	nt and Waters in Bulgary, Letter no. 99-00- 222/8.12.20	At this level of the Strategic Environmental Assessment, the technical details on how to execute these works are not known. The Technical solutions will be analysed in detail within the technical project. In addition in the phase of the design the environmental impact assessment will be detailed.
	14.	The role of strategic environmental assessment is to analyse the groups and types of projects, while detailing the effects generated and the magnitude of expression of each individual project will be done at a later project phase, when the potential trans boundary effects will be notified to the neighbouring states concerned.
		Improving navigation conditions will not eliminate all required maintenance dredging of the fairway, but it is estimated that this will be reduce as the volume and range of achievement.
		It is known the fact that such works will produce changes water flows determined by an increase of the fairway depth (changes in the river bed morphology - ie changing cross-section and longitudinal riverbed), protection and / or consolidation of banks (the banks and bed morphology changes by diggings for embedding works and for stability), the execution of various works to prevent silting (it is difficult to prevent clogging, routing works will lead to clogging of other areas virtually no risk to navigation). Some works will even lead to a minor change of flow direction and velocity

		etc. These effects occur on a short period of time, for some narrow areas.
		In terms of quality, during the execution period there will be a certain level of mechanical impurity determined by suspensions originating from the riverbed which will subsequently be decanted along the riverbed. Major problems related to water pollution can occur, but only in case of accidents (eg accidental spills of petroleum products - especially fuel).
		Groundwater quality will not be affected. From the quantitative point of view there will be no impacts on ground water resources.
		The works on development of port infrastructure Olteniţa, Moldova Noua, Giurgiu, Corabia, Orşova. may include: rehabilitation of pears, rehabilitation of roads and railways inside ports area, quay and berth modernization.
		The works will be performed mainly inside the port, on the quay platform, at a distance of approximately 900-1000 m of the Bulgarian bank of the Danube and it is expected that they will not affect the Danube riverbed and will not significantly impact the water quality of the Danube.
		The works needed to improve navigation conditions on the Danube and modernization of port infrastructure will be carried out on different time periods. One cannot speak of a cumulative impact during execution.
		Works to improve navigation conditions on Danube and the development of port infrastructure may lead to an increase in naval traffic on the Danube. This growth also depends on economic development. Theoretically, these works lead to naval traffic flows and an incensement but also, lead to reduction in travel times and reduction of risk of accidents that may cause pollution of the watercourse.
		The development of port infrastructure and modernization of ports will increase the safety of cargo handling operations, mooring barges in the quays and reducing the risks of accidents leading to pollution of the Danube."
		Chapter Potential significant environmental, including health, in a transboundary context, where implementation GTMP, on page 297 the Environmental Report will be completed as follows:
 18. Please present detail information related to the posible impact on human health on the teritory of Bulgary, following the implementation of the modernization projects proposed for the ports on teh Danube, construction of the second bridge in Giurgiu – including information related to air pollution, and Danube water pollution. Ministry o f Environme nt and Waters in Bulgary, Letter no. 99-00-222/8.12.20 14. 	"The General Transport Master Plan does not propose any projects for the execution of other bridges across the Danube. The cumulative impact of the project with other similar projects in the Danube area will be detailed when the project will start being implemented.	
	Specific construction work for these types of projects can create discomfort to population from areas around the working site. Road traffic / naval traffic used for carrying materials, operation of machines and equipment, floating cranes required for construction works can lead to increased noise level and air emissions concentrations on the work site. These effects have a local and temporary effect and will have an insignificant impact on health.	
		During the execution period the surface water quality could be affected only if accidental/ uncontrolled spills of pollutants occur on ground or in water, improper disposal of waste or improper disposal of wastewater. The only effect that can be felt on the Bulgarian bank is the increased water turbidity caused by the suspensions

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		produced following execution works performed in the riverbed. This type of mechanical pollution has local effects of short duration.
		The materials used for specific bank consolidation works or for bottom thresholds will not affect the quality of surface water, they fall within the category of inert material.
		Improvement of navigation conditions on Danube and port infrastructure development can lead to intensification of naval traffic. This growth also depends on the economic development in the next period. Intensification of naval traffic may lead to an increase in emissions in the atmosphere and increase the noise level in ports area. The generated impact will be insignificant and will not affect the population of the neighbouring states.
		Works to improve navigation conditions works for the development of port infrastructure can help reduce the risk of accidents during transport or when handling goods. Although through achieving these works we estimate an increase in naval traffic, by increasing safety due to better navigation conditions is expected a reduction of the incidence of accidents and reduce the occurrence of possible pollution in the Danube.
		To prevent, reduce the magnitude of the environmental effects likely to be generated by the projects included in the GTMP, the Environmental Report proposes a series of measures to help avoid, prevent and reduce environmental impacts and a monitoring system for its potential effects (these are included in Chapters 10 and 12 of the Environmental Report).
		It is mentioned that, in accordance with the applicable environmental legislation in Romania, the execution of the proposed works will be conditioned by prior consent of an Environmental Permit and completing the environmental assessment procedure related to each project.
		It is also stated that the procedure for environmental impact assessment, includes public consultation and for projects with trans boundary effects includes public debates."
		The Environemntal Report will be completed, on Chapter Conclusions, on page 384, with the following paragraphs:
19. Conclusions regarding the positive effects, potential significant negative effects, effects that could not be detected correctly / completely due to the general level of information considered in RM.	WWF – public debate 12.01.2015	 "Scenario GTMP selected to be implemented adversely affect the following components (the relevant environmental objectives): air (reducing national emissions of pollutants in the atmosphere), climate change (reduction of greenhouse gas emissions from the activity transport), water (reduce changes in the morphology and hydrology of surface water bodies), soil and subsoil (reduce consumption of natural resources in relation to the built area), waste management and hazardous substances (reducing the amount of waste generated), biodiversity (reducing pressures due to transport infrastructure leading to impairment of natural habitats and biodiversity, limiting surfaces), energy efficiency (improving energy efficiency in the transport sector by increasing the use of renewable energy resources and significantly reduce oil dependence). Scenario GTMP selected to be implemented adversely will have positive effects on environmental aspects: climate change (reducing the vulnerability of transport infrastructure to elimate change) water (prevention of the selected to prevention of transport) infrastructure to elimate change (reducing the vulnerability of transport).
		infrastructure to climate change), water (prevention of damage to surface water bodies), soil and basement (soil pollution prevention and control, development of transport infrastructure linked to improving the efficient use of land),

population and human health (protection of the public against the risks of accidents, noise reduction at source through mitigation measures, increased mobility and accessibility), transport sustainable (monitoring and development of the national transport system to ensure the achievement of sustainable transport, improving transport behavior in relation to the environment), energy efficiency (reducing energy consumption in the transport sector), raising awareness of environmental issues in the transport sector (involvement and consultation of stakeholders throughout the decision).
• For the following components (relevant environmental objectives), the GTMP selected scenario to be implemented will have effect that can not be detected correctly because the general level of information considered in RM: Air (reducing local air emissions), Climate Change (improving the efficiency of fuel used), water (prevent / limit intake of pollutants into surface water and groundwater), conservation of exhaustible natural resources (reducing exploitation of exhaustible resources and facilitate the use of renewable), raising awareness of environmental issues in the transport sector (information and raising awareness about the effects of transport activities on the environment and human health), landscape and cultural heritage (cultural and natural heritage protection, national transport infrastructure development taking into account the policies of the management, protection and planning of the landscape).
• The share of potential effects generated by the proposed development scenario for implementation on the relevant environmental objectives of the GTMP is: 22% negative effects, 47% positive effects, the remaining 31% are null effects / that could not be detected properly due to their general information considered in RM."