

Annex IV: Summary Report on the Public Consultation

On July 9, 2024, the draft 2024-2026 Air Quality Management Plan for the Tbilisi agglomeration (hereinafter referred to as “the draft”) was made available for public consultation. It was published on the Environmental Information and Education Center’s website (see photo 1) and Facebook page (see photo 2), as well as on the website of the Ministry of Environment and Agriculture of Georgia (see photo 3). Interested individuals were invited to submit comments and feedback on the draft until August 7, 2024, via the following email: lasha.akhalaia@mepa.gov.ge.



Photo 1 - Announcement about the start of public consultations on the website of the Environmental Information and Education Center of Georgia.

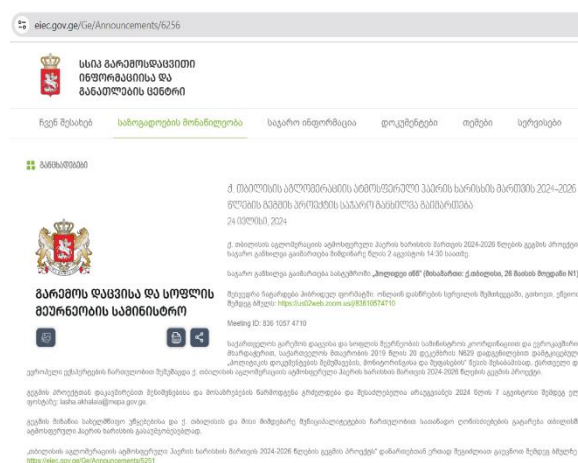


Photo 2 - Announcement about the start of public consultations on the Facebook page of the Environmental Information and Education Center of Georgia.

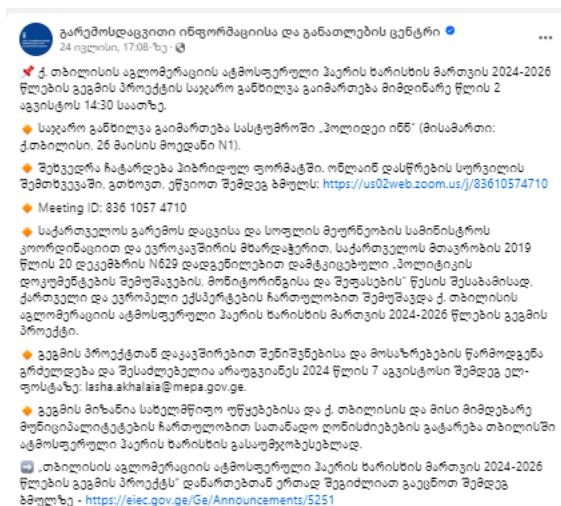


Photo 3 - Announcement about the start of public consultations on the website of the Ministry of Environment Protection and Agriculture of Georgia.

On July 24, 2024, details about the public discussion event for the project were posted on the Environmental Information and Education Center's website (see photo 4) and Facebook page (see photo 5). Information about the public hearing, along with the project details, was also shared with approximately 5,000 subscribers to the Environmental Information and Education Center's newsletter..



****Photo 4** - Announcement about the public discussion on the website of the Environmental Information and Education Center of Georgia.**



****Photo 5** - Announcement about the public discussion on the Facebook page of the Environmental Information and Education Center of Georgia.**

The public discussion of the project took place on August 2, 2023, at 15:00 in a hybrid format: in person at the Holiday Inn hotel (Tbilisi, 26 May Square N1) and online via the Zoom platform. Details regarding the time, location, format of the hearing, and the online meeting link were included in all prior announcements. Georgian-English translation was available for online participants. A total of 46 participants attended, with 17 joining in person and 29 online. Among them, 15 were male and 32 female. The meeting lasted over two hours, during which the project's goals, tasks, and activities were discussed.

As a result of the public consultations, one letter was submitted by email and was addressed with an individual response. Additional comments were also provided during the project's public hearing. A total of 19 questions, recommendations, and comments were submitted, all of which are included in the public consultation summary report. The Department of Environment and Climate Change of the Ministry of Environment and Agriculture, in collaboration with relevant structural units, reviewed the submitted comments. A table was then prepared to detail the content of these comments, their consideration status, and the corresponding rationale.

Table 1 - level of consideration of comments submitted within the framework of public consultations

Total Number of Submitted Comments	19
Fully Addressed	7
Partially Addressed	3
Not Addressed	9

For a detailed record of the submitted comments and the responses from the Ministry of Environment Protection and Agriculture of Georgia, please refer to Table 2.

Table 2 - List of comments submitted within the framework of public consultations with reference to feedback

Notes	Status	Comment
"The target indicator (12) for impact indicator 1.2 (the number of monitoring points in the Tbilisi agglomeration where the average annual concentration of NO ₂ does not exceed the permissible limit) is lower than the baseline indicator (14). To what extent does this indicator point to progress in solving the air pollution problem?"	Fully Addressed	Impact indicator 1.2 is defined as follows: 'The number of monitoring points in the Tbilisi agglomeration where the average annual concentration of NO ₂ exceeds the permissible limit
1.1 In the outcome indicators of the task, we find it appropriate to add an indicator that will measure progress in reducing the concentration of particulate matter in the atmospheric air	Not Addressed	The indicator for reducing the concentration of particulate matter in the atmospheric air is presented in the plan as impact indicator 1.1
It is important to define an additional outcome indicator 1.2.2 for task 1.2: the annual emissions of nitrogen oxides (NO _x) from motor vehicles in the Tbilisi agglomeration. It is essential that the targets related to changes in the average annual concentration of NO ₂ are directed toward positive outcomes.	Not Addressed	According to the emissions forecasting report developed in 2020, an increase in the total emissions of nitrogen dioxide is expected during the years 2020-2030 against the backdrop of a rise in the number of vehicles. Therefore, the indicator 'annual emissions of nitrogen oxides (NO _x)' will not measure progress in the fulfillment of the task. Furthermore, it is noteworthy that the plan includes an impact indicator (1.2) that measures progress in terms of changes in the concentration of nitrogen dioxide in the atmospheric air compared to the baseline level
It is important for the Tbilisi Municipality, in collaboration with the Ministry of Environmental Protection and Agriculture and with the involvement of the public, to develop a strategy for the protection, preservation, and development of the capital's green spaces, along with a detailed action plan. The strategy and/or action plan must consider the best approaches for the rehabilitation of parks and other green spaces, including the elimination of harmful practices such as the concreting of	Not Addressed	The development of a strategy for the protection, preservation, and development of green spaces and a detailed action plan goes beyond the goals of air quality protection and falls within the broader scope of environmental protection competencies. In terms of reducing atmospheric air pollution, it is crucial to cover the dust-prone open soil, and the corresponding measure is

these areas and the excessive ornamental functionalization. It is crucial that the air quality management plan identifies major green spaces for which restoration or rehabilitation work is planned to begin in 2024-2026. One such priority area is the territory of the Digomi Floodplain		included in the air quality management plan
We find it appropriate for the plan to include an activity that would restrict amendments to the general plan for land use in the city of Tbilisi by the Tbilisi City Council	Not Addressed	The Tbilisi City Council has the legislative authority to make amendments to the land use plan. This matter falls outside the mandate of the air quality management plan
It is important for the Tbilisi Municipality to take into account and ensure the environmental impact assessment of individual large-scale projects when issuing construction permits. At the same time, it is crucial to conduct a cumulative assessment of the environmental impact of issued construction permits and to develop appropriate measures for mitigating negative impacts	Partially Addressed	The plan includes an activity (1.2.23) that involves the development of a methodology for assessing the impact of architectural projects on transportation in the territory of Tbilisi. This methodology will establish a unified approach for the evaluation of the impact of architectural design solutions on existing transportation/road infrastructure, which serves as a prerequisite for the issuance of construction permits in Tbilisi. Additionally, in relation to the construction sector, this issue aligns most closely with the identified challenges regarding air pollution in the air quality management plan. Regarding emissions of particulate matter from the construction sector, task 1.1 of the plan includes several activities aimed at improving existing regulations and enforcement systems
It is essential that the improvement of existing regulations for reducing dust emissions caused by construction and demolition within the framework of the air quality management plan includes mechanisms for protecting the population and the natural environment, including from concrete mixing plants	Fully Addressed	The plan includes an activity (1.1.3) that involves improving existing regulations for reducing dust emissions caused by construction and demolition. It is within the framework of this activity that the presented issue will be addressed
The draft plan was published on July 9, and on July 24, information about the public discussion was published and sent to interested parties along with the project. We believe that the deadline for submitting comments—August 7—is insufficient, and	Not Addressed	According to the Resolution No. 629 of the Government of Georgia dated December 20, 2019, on the approval of the rules for the development, monitoring, and evaluation of policy documents, 'in the case of both

we find it appropriate to extend it until September		physical and electronic public consultations, the final deadline for receiving written comments/suggestions/recommendations must be no less than 7 calendar days from the moment the package of public consultation documents is posted/sent/delivered. However, it is recommended that the minimum duration be 2 weeks.' For the project, a 30-day period was provided for submitting comments from the date of publication (July 9 - August 7), and 2 weeks (July 24 - August 7) from the dissemination of information regarding the public discussion, thus meeting the requirements of the policy planning guidelines
We find it appropriate for air quality monitoring to be conducted using more cost-effective methods and through a 'Citizen Science' approach	Partially Addressed	The plan includes examples of cost-effective alternatives for air quality monitoring in the form of indicator measurements. This represents a good tool for assessing air quality, particularly for measuring problematic pollutants such as nitrogen dioxide
We find it appropriate to add an activity to the plan that ensures public participation in the greening initiatives implemented by the Tbilisi Municipality	Not Addressed	The proposal is not specific. Moreover, the issue falls outside the mandate of the air quality management plan
We find it appropriate to add an activity to the plan that ensures safety on bike paths and restricts the movement of motorized vehicles (including scooters) on these paths	Not Addressed	The Law of Georgia on 'Road Traffic' prohibits the movement of mechanical vehicles on bike paths. With certain exceptions, the movement of mechanical vehicles (automobiles, motorcycles, scooters) is prohibited on the side of the road, bicycle lanes, bike paths, sidewalks, and pedestrian paths. When a bike path exists, a pedestrian has the right to move on it, provided that the intensity of traffic allows for it; however, they must not obstruct the

		movement of bicycles and other vehicles (e.g., two-wheeled electric scooters) for which movement on the bike path is permitted.
It is important for the Ministry of Environmental Protection and Agriculture, in collaboration with the Tbilisi Municipality, to ensure the harmonization of the General Transport Plan of Tbilisi and the Air Quality Management Plan. According to the Tbilisi Transport Plan, the following activities scheduled for 2024-2026 are significant and should be reflected in the Tbilisi Air Quality Management Plan: • Activities related to speed limit restrictions: In 2024, a hierarchy of Tbilisi streets should be developed to determine different types of speed limits on various streets. The implementation of speed restrictions is planned for 2024-2025. • Expansion of the bus lane network on the following streets: Burjanadze Street, Mindeli Bridge, Rustaveli Avenue, Beliashvili Street, and Vazha-Pshavela Avenue. It is necessary to specify the length of the bus lanes to be constructed for activity 1.2.12 - expansion of the bus lane network (Indicator 1.2.12.1). • Activities related to the rehabilitation of avenues and districts: In 2024-2026, Rustaveli Avenue and Freedom Square should be rehabilitated, while Kote Afkhazi Street should become a pedestrian street. Additionally, the implementation of the Marjanishvili Street bike lane project and the creation of superblocks in Khiacheli, Sololaki,	Partially Addressed	The Sustainable Urban Mobility Plan for Tbilisi is a recommendatory document that identifies activities to be implemented until 2040, which depend on securing the necessary financial resources. The Air Quality Management Plan for the Tbilisi agglomeration is a 3-year policy document based on indicators, which partially includes activities outlined in the Sustainable Urban Mobility Plan. However, the Air Quality Management Plan is not a transportation plan, and it is not necessary for all transport-related activities to be reflected in it, especially since transport-related activities already comprise about 60% of the activities outlined in that plan. The Air Quality Management Plan for the Tbilisi agglomeration includes an activity related to the expansion of the bus lane network (1.2.12). Currently, design work for the lanes is underway, during which it should be clarified exactly how many kilometers will be allocated to this lane on at least three streets. Regarding the rehabilitation of streets, although the implementation of such projects will lead to the optimization of vehicular traffic, infrastructure projects are accompanied by an increase in the emission of solid particles into the air, and at the same time, the expansion of roadways may lead to an even greater increase in the movement of vehicles, which also negatively affects air quality. It is also worth noting that infrastructure

and London Park are planned during this period.		projects aimed at developing alternative means of transportation are outlined in the plan (see activities 1.2.14 and 1.2.16)
Within the framework of the Air Quality Management Plan for the Tbilisi agglomeration, expanding the current restrictions on the movement of vehicles intended for distribution and large-sized vehicles (including concrete mixers and oil product transporters) would be a significant step towards improving air quality	Not Addressed	This restriction was implemented a few months ago. It is important to note that many stakeholders are involved in the process, which encompasses not only the management of transport flows but also components related to product delivery, safety, and pricing. Therefore, it is essential first to assess the results of the restriction and the potential for expansion, and only based on this evaluation should it be determined how effective its further expansion will be
It is important to develop a suitable model for a carbon tax for Tbilisi and to take effective steps in this direction	Not Addressed	This issue primarily pertains to the field of climate change mitigation, for which Georgia's Climate Change Strategy for 2030 and its Action Plan for Implementation in 2024-2025 have been developed separately from the Air Quality Management Plan. It is advisable that the consideration of the proposed activity be discussed during the process of developing the next phase of the action plan for implementing this strategy
It is important for the ministry to ensure the processing of information on air quality monitoring in Tbilisi and public reporting, through the definition of indicators and target indicators related to the publication of public information in the Air Quality Management Plan (including reflecting the publication of the Air Quality Yearbook on the website air.gov.ge in the outcome indicator	Fully Addressed	The source for confirming the impact indicator of the plan is the air quality portal - air.gov.ge and the Air Quality Yearbook, which means that the results of air monitoring will indeed be publicly available
It is essential to ensure the publication of monitoring reports for the Tbilisi agglomeration's air quality management plan and to reflect the corresponding accountability in the plan.	Fully Addressed	The section on monitoring and evaluation of the action plan indicates that progress reports and annual reports for the action plan are published on the website of the Ministry of Environment Protection and Agriculture of Georgia.

In parallel with the integration of a module to consider the real state of air quality in the smart traffic light system, it is essential to establish a system that processes the collected data and ensures public access to this information on the air quality portal (air.gov.ge).	Fully Addressed	The results of monitoring nitrogen oxide concentrations integrated into the smart traffic light system will be publicly available on the air quality portal. The relevant activity (1.2.5) has been added to the source of verification as air.gov.ge.
It is essential to plan an extensive information campaign in 2025-2026, aimed at raising awareness about the risks of air pollution and mitigation measures. This campaign should target a wide and diverse audience, utilizing formats beyond just face-to-face meetings.	Fully Addressed	The objective 1.4 of the plan includes activities aimed at raising environmental awareness among both general and specific target groups. Awareness-raising activities are also outlined in other policy documents, including the Environmental Action Program for 2022-2026.
It is important that the studies outlined in the air quality management plan (specifically activities: 1.2.7; 1.2.8; 1.2.9; 1.2.19; 1.2.25; 1.3.3; 1.3.4; 1.3.5) be made public. The result indicator of the activity should include the obligation to publish these studies on the official website of the relevant authority, and the source of verification should include the website address of the relevant authority.	Fully Addressed	The indicators for the relevant activities have been updated to include the term "published," and for activity 1.3.5, the source of verification has been updated to include air.gov.ge.