

Environmental and Social Due Diligence, Impact Assessment and Road Safety Audit for the Moldova TEN-T Road Network Rehabilitation Project (DTM 55768)

Non-Technical Summary, Tranche 2, M3 (4 Lots)

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Project sheet

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Abbreviations

Abbreviation	Description
C-ESMP	Construction Environmental and Social Management Plan
DD	Detailed Design
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EA	Environmental Agency
EPI	Environmental Protection Inspectorate
ESDD	Environmental and Social Due Diligence
ESA	Environmental and Social Assessment
ESAP	Environmental and Social Action Plan
ESP	Environmental and Social Policy
ESIA	Environmental and Social Impact Assessment
EU	European Union
EUR	Euro
GD	Gouvernement Decision
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
IUCN	International Union for Conservation of Nature
INSP	National Inspectorate for Public Security
LPA	Local Public Authority
NCM	Normative in Constructions from Moldova
NGO	Non-Governmental Organization
NPA	Natural Protected Areas
NRA	National Road Administration J.S.C.
NTS	Non-technical Summary
OHS	Occupational Health and Safety
RAP	Resettlement Action Plan
RDA	Regional Development Agency
RM	Republic of Moldova
RoW	Right of Way
RPF	Resettlement Policy Framework
RSA	Road Safety Audit
PR	Performance Requirement
PAP	Project-Affected People
SE	Supervision Engineer
SEP	Stakeholder Engagement Plan
TEN-T	Trans-European Transport Network
TOR	Terms of Reference

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Executive Summary

This Non-Technical Summary provides essential information about the Project in a clear and accessible way. Its purpose is to help stakeholders understand what the Project involves, the potential environmental and social impacts, and how these impacts will be managed. It summarises the following key aspects:

- The purpose, nature, and scope of the Project;
- Potential environmental and social impacts on stakeholders, including any that may affect vulnerable or disadvantaged groups, and the measures proposed to avoid or minimise these impacts;
- Opportunities for stakeholder engagement throughout the Project lifecycle; Information on public consultation activities;
- How concerns or complaints can be submitted and addressed through the Project's grievance mechanism.

All information will be disclosed in the local language (Romanian), using formats accessible to all stakeholder groups, including those who may be differently or disproportionately affected. Brochures and Leaflets will be available in Romanian and Russian languages.

All consultation and disclosure activities will follow EBRD Performance Requirement 10: Information Disclosure and Stakeholder Engagement.

1. Project Description

1.1. A concise and comprehensive description of the Project

Tranche 2 of the M3 Road Corridor Project involves the rehabilitation and upgrading of sections of the M3 Chişinău–Cimişlia–Comrat–Giurgiuleşti corridor, which connects the capital with southern regions and international border points. The Project is part of the Trans-European Transport Network (TEN-T) and supports national mobility and connectivity priorities.

The M3 corridor is a key north–south route, linking major economic areas and providing access to the Giurgiuleşti International Port, as well as freight flows to Romania and Ukraine. Tranche 2 covers approximately 71 km of road, passing through Chişinău Municipality and the districts of Ialoveni, Cimişlia and Cahul, in predominantly agricultural and semi-rural landscapes. Some sections are located near environmentally sensitive areas, including Emerald Network sites.

The works are organised into four lots covering rehabilitation of existing road sections and construction of a new bypass near Giurgiuleşti.

Given the scale and sensitivity of the works, a full Environmental and Social Impact Assessment (ESIA) has been prepared in line with EBRD requirements to identify, assess and manage potential environmental and social impacts.



Figure 1:Tranche 2, M3 road divided in 4 lots

1.2. Proposed construction works and subsequent maintenance/operation

The main construction activities include:

- rehabilitation of existing road sections, including pavement repairs and drainage upgrades;
- widening of the Porumbrei–Cimișlia section to four lanes;
- construction of a new bypass around Giurgiulești to divert heavy traffic from residential areas;
- upgrading of bridges, junctions, culverts and road safety features;

- slope stabilisation, drainage improvements, and erosion-control measures;
- installation of signage, lighting, guardrails, and pedestrian safety measures.

The Project includes road rehabilitation, widening, drainage improvements, bridge works and new construction where needed to improve safety, capacity and connectivity along the M3 corridor. Works also include upgrades of intersections and traffic layouts, as well as measures to manage stormwater and reduce erosion.

- Lot 1 involves rehabilitation of the existing road section between the Airport interchange and Porumbrei, including pavement strengthening, drainage repairs and updated road markings. Works remain within the existing road corridor.
- Lot 2 includes widening the existing two-lane road to four lanes, with full pavement reconstruction, improved drainage and enhanced road-safety features near settlements.



Figure 2: General view of the Lot 2 road section

- Lot 3 consists of rehabilitating the existing two-lane road, improving pavement structure, shoulders and drainage to restore riding quality and reduce long-term maintenance needs.
- Lot 4 includes rehabilitation of short road sections near Giurgiulești and the construction of a new bypass around the village to divert heavy traffic travelling to the border crossings with Romania and Ukraine. The bypass will reduce traffic through the settlement, improve safety and decrease disturbance for local residents.

During operation, the rehabilitated road will require routine maintenance, including upkeep of drainage systems, road markings, signage and safety installations. Periodic monitoring of pavement condition and structures will ensure long-term performance and traffic safety.

M3 road, Tranche 2	Gigiulești Bypass	M3 km211+980-km213+690 and M3.1
Road category (NCM D.02.01:2024)	III	III
Climate zone	IV	IV
Length, km	3,86	2,45
Type of road surface	Asphalt	Asphalt
Number of lanes	2x4,0m	4x3,5m

Table 1: Overview of main characteristics of Project Roads (Lot 4)



2. Background

2.1. Rationale of the Project

The M3 Chişinău–Cimişlia–Comrat–Giurgiuleşti corridor is a key national and regional transport route, forming part of the Trans-European Transport Network (TEN-T) and linking the capital with southern regions and international border crossings. It provides access to the Giurgiuleşti International Free Port and supports trade flows with Romania and Ukraine.

The existing road infrastructure suffers from pavement deterioration, safety deficiencies and capacity limitations, leading to delays, higher transport costs and increased accident risks. Upgrading the corridor will improve mobility, reduce travel time and enhance safety for all road users. The Project supports national priorities for safer, more efficient and climate-resilient transport infrastructure, in line with Moldova's long-term development and mobility strategies.

The Giurgiuleşti bypass will divert heavy transit traffic away from residential areas, improving local safety and reducing disturbance for the community.

Overall, the Project will address key transport bottlenecks and contribute to safer roads, improved regional connectivity and socio-economic development.

2.2. Legal aspects and compliance with relevant environmental and social laws

The Project is implemented in accordance with Moldovan environmental and social legislation and the EBRD Environmental and Social Policy (2019). Given the scale and nature of the works, a full Environmental and Social Impact Assessment (ESIA) and a comprehensive stakeholder-engagement process have been carried out. The Project complies with applicable national legislation on environmental protection, land acquisition, labour, occupational health and safety, road construction and spatial planning.

Environmental permits required under Moldovan law have been obtained or are being processed for the relevant project sections. The Project also adheres to the EBRD Performance Requirements, covering environmental and social assessment, labour and working conditions, community health and safety, land acquisition, biodiversity, cultural heritage and stakeholder engagement.

Where national requirements and EBRD standards differ, the Project will apply the more stringent provisions.

2.3. Current environmental and social situation and considerations

The Project road passes through predominantly agricultural and semi-rural landscapes in central and southern Moldova, with several villages located close to the existing alignment (including Băcioi, Răzeni, Sagaidacul Nou, Porumbrei, Cimişlia, Ciucur Mingir and Giurgiuleşti). The area of influence for environmental and social impacts extends from the road corridor to nearby settlements, watercourses and protected natural areas, with the greatest effects expected within a few hundred metres of construction sites and access roads.

Air quality along Lots 1–3 is generally good to moderate, with localised increases in pollutants and dust near busy sections and during dry periods. In the Giurgiuleşti area (Lot 4), background air quality is influenced by activities at the International Free Port, industrial/logistics operations and unpaved access roads; here, dust is the main

concern. No permanent monitoring stations are located directly on the M3, but available data and targeted measurements indicate that gaseous pollutants are mostly within legal limits, while dust levels may be elevated near construction platforms and borrow pits.

Road traffic is already the dominant source of noise and vibration along the corridor, especially where houses and public buildings lie within about 100 m of the carriageway (e.g. in Băcioi, Răzeni, Ciucur Mingir and Giurgiulești). Baseline noise measurements and modelling are being carried out to compare existing levels with Moldovan and EU guideline values and to identify where additional mitigation (such as low-noise pavement, barriers or traffic-management measures) may be required. During operation, vibration is expected to remain similar to current conditions if pavement quality is maintained.

Geologically, the M3 traverses rolling hills of the Southern Moldavian Plain and the Lower Danube Plain, with slopes that are locally prone to erosion. The alignment crosses Neogene formations of clays, sands and gravels and lies in seismically active zones (intensity VII for Lots 1–3 and VIII for Lot 4). Site investigations have identified a few locations with reduced slope stability, mainly related to water infiltration, while most sections are considered stable. The Project design includes appropriate engineering solutions to address these local risks.

Soils along the corridor are mainly chernozems of moderate fertility, widely used for agriculture but sensitive to water erosion and drying. In some communes (e.g. Ciucur Mingir) a large share of land is already affected by erosion, indicating existing land degradation pressure. Careful topsoil management and erosion-control measures are therefore important elements of the Project.

The road crosses several river basins (Bîc, Botna, Cogâlnic, Ialpug and Prut), where many watercourses are already classified as moderately to heavily polluted due to upstream pressures. Existing culverts and drainage structures are in mixed condition, with some sections requiring repair or replacement. The Project will upgrade roadside drainage and culverts to improve water conveyance, reduce flood and erosion risks and avoid additional deterioration of surface- and groundwater quality.

From a biodiversity perspective, the M3 corridor intersects or passes close to four Emerald Network sites and several nationally protected areas, including “Pădurea Molești–Rezeni”, “Cărbuna”, “Bugeac Steppe” and the “Lower Prut” Ramsar and Biosphere Reserve. The route also forms part of an important migration area for birds and includes forests, steppes, wetland and agricultural ecosystems. As most works are limited to rehabilitation within the existing road footprint, direct impacts on key habitats are expected to be limited, with no significant loss of Emerald habitats anticipated. Tree falling is largely confined to spontaneously grown roadside trees of small diameter and does not affect the state forest fund. Bridges and selected structures are designed to function as wildlife crossings where feasible.

Socially, the corridor serves communities that depend mainly on agriculture, small businesses and cross-border trade. Key concerns raised by residents include road safety, noise, dust, access to land and businesses, and potential land acquisition at specific locations. These aspects are addressed through the ESIA, the Resettlement Policy Framework and the Stakeholder Engagement Plan.

2.4. History of the Project development and planning

Project preparation started with a feasibility study in 2009, financed by the European Commission, which examined traffic, technical condition and upgrade options for the M3 corridor. Further design and feasibility updates were

prepared by the National Road Administration and international consultants between 2014 and 2024, including the Giurgiulești bypass. The overall approach has been to upgrade the existing corridor to EU-compatible safety and geometric standards while using the current alignment as far as possible.

The M3 is being upgraded in stages through several projects (including bypasses of major settlements) so that, once completed, long-distance traffic will largely avoid passing through villages. Tranche 2 forms an important part of this broader programme.

During project preparation, different alternatives were compared to identify the most technically, economically and environmentally viable solution for the four lots, taking into account the strategic role of the M3 in the national and TEN-T networks.

No-Project Scenario

If the Project were not implemented, road conditions would continue to deteriorate, accident risks would remain high and regional and international connectivity would be constrained. This would also be inconsistent with national strategies and TEN-T obligations.

Improvement of the existing corridor

Rehabilitation and partial widening within the existing road corridor was preferred, as it improves mobility and safety while minimising land acquisition and avoiding significant impacts on protected areas.

Technical alternative for lot 1 – Diamond Grinding vs. full asphalt overlay

For Lot 1, different technical solutions for rehabilitating the existing concrete pavement were assessed. A “diamond grinding” solution is to be considered instead of full asphalt overlay, as it re-uses the existing pavement, reduces material use and emissions, lowers costs and provides a longer service life.

Giurgiulești Bypass Route Alternatives (2024 Feasibility Study)

For the Giurgiulești bypass, several route options were analysed. The chosen alignment avoids the village, limits impacts on agricultural land and sensitive habitats and does not require significant resettlement, in line with EBRD requirements on land acquisition and resettlement (PR5).

3. Process

3.1. ESIA process carried out and integration with design

The ESIA was carried out in line with Moldovan legislation, EU-aligned methods and EBRD requirements. It followed the typical stages of screening and scoping, baseline studies, impact assessment, analysis of alternatives and development of mitigation measures, leading to preparation of the ESMP.

Screening and scoping identified key issues, sensitive receptors and potential impacts. This stage also reviewed relevant legislation and planning documents and helped define required field investigations.

Baseline studies were carried out along the corridor, covering air quality, noise, soil and geology, water resources, biodiversity, land use, cultural heritage and socio-economic conditions. Particular attention was given to water bodies, drainage structures and settlements located close to the road.

Impacts were then assessed for the design, construction and operation phases. Both positive and negative effects were considered, including cumulative impacts and climate-related risks.

Stakeholder engagement was carried out throughout the process, in line with national and EBRD requirements.

Consultations with local authorities, communities and service providers helped identify local concerns and site-specific constraints, which were incorporated into the design and mitigation measures. A statement of the Project's current state of compliance with national regulatory requirements and relevant EU requirements

The Project has been developed in accordance with Moldovan environmental, social and technical regulations and is broadly aligned with relevant EU principles. It meets the key national requirements related to environmental protection, water management, land acquisition, permitting and public consultation.

The ESIA and design take into account national environmental standards and water-management requirements, including objectives that are harmonised with EU policies on surface-water protection and pollution reduction. The engineering design applies national road-construction standards and integrates good international practice on drainage, erosion control, soil protection, waste management, pollution prevention, health and safety and climate resilience.

Required environmental permits and land-use authorisations have been obtained or are being processed by the competent authorities. No issues have been identified that would prevent full compliance with national laws.

Based on available information, the Project is considered compliant with Moldovan regulatory requirements and aligned with the main objectives and principles of relevant EU environmental and social policies.

3.2. Public consultations and disclosure and dealing with objections

Stakeholder engagement for the M3 corridor has been undertaken throughout multiple stages of Project preparation. Consultations were conducted during feasibility study updates and the permitting process, involving local public authorities, community representatives, and institutional stakeholders along the corridor.

During the ESIA stage, meaningful engagement was implemented in accordance with the Stakeholder Engagement Plan (SEP), Moldovan legal requirements, and EBRD PR10. More than 350 residents participated in public consultations, while 160 individuals were surveyed through the primary socio-economic data collection programme. Engagement will continue as an ongoing process throughout the full lifecycle of the Project—including pre-construction, construction, operation, and eventual decommissioning—to ensure continuous information flow, timely disclosure, and incorporation of stakeholder feedback into Project decision-making.

Community engagement during ESIA aimed to identify potentially affected stakeholders, gather local knowledge about environmental and social concerns and present the scope of the assessment and the proposed Project.

Information was shared through a combination of public meetings, online announcements and local notice boards, baseline survey, to reach both urban and rural communities. Feedback received during ESIA has been taken into account and will continue during ESIA disclosure package during 120 days to collect additional feedback and integrate into the Final ESIA documents..

Communities expressed broad support for the Project. Key concerns related to road safety, access, noise and construction management. In the south, the Giurgiulești bypass was highlighted as a priority. This feedback has been integrated into Environment and Social Impact Assessment (ESIA), Stakeholder Engagement Plan (SEP), Road Safety Audit (RSA), Land Acquisition and Resettlement Framework (LARF) and Environment and Social Action Plan (ESAP)

Stakeholders noted expected benefits such as improved safety, better connectivity, enhanced alternative routes, economic opportunities and reduced heavy-vehicle traffic through settlements.

Requests and concerns raised during consultations are summarised in the ESIA and are subject to be addressed during detailed design and implementation.

A project-wide grievance mechanism was elaborated as the National Road Administration will operate with it throughout construction and operation, allowing communities to raise concerns or complaints at no cost.

The draft and final ESIA will be disclosed publicly, followed by consultations with affected communities, vulnerable groups, NGOs and institutional stakeholders.

4. Summary of Environmental Benefits, Potential Adverse Impacts, Mitigation and Management Measures

4.1. Air quality

The results of the laboratory analyses for atmospheric pollutants (SO₂, NO₂, NO, CO, CH₄) and suspended particles (PM_{2.5}, PM₁₀, and total dust) carried out within this project confirm a favorable initial state of air quality, indicating a low level of background pollution in the project area. This provides a solid baseline for monitoring the evolution of environmental factors throughout the implementation of the M3 national road rehabilitation and extension project. Construction activities may generate dust from earthworks and vehicle movement, and exhaust emissions from construction machinery and material transport. Limited volatile emissions may occur during asphalt production and laying.

These impacts are expected to be short-term, localised and reversible, with temporary nuisance possible for workers and nearby receptors.

Air quality monitoring may be carried out during early operation to confirm compliance with national requirements. Mitigation during construction will include regular watering of exposed surfaces, covering material transport, limiting vehicle speeds on unpaved areas, maintaining machinery and avoiding unnecessary idling. Construction activities near sensitive receptors will be scheduled to minimise nuisance.

During operation, maintaining the road in good condition and managing traffic flow will help minimise emissions. Climate-resilience measures, such as improved drainage and slope stabilisation, will also support long-term environmental performance.

With mitigation in place, no significant deterioration of air quality is expected; residual impacts will remain minor, localised and temporary.

4.2. Soil

Construction activities may affect soil through accidental spills, improper material or waste management, and erosion associated with earthworks. The Giurgiulești bypass will require a small permanent land take, including loss of some agricultural soil. Use of borrow pits may cause temporary disturbance and changes to local relief.

During operation, soil impacts are expected to be limited, mainly related to stormwater runoff or accidental spills. Mitigation during construction will include demarcation of work areas, use of designated access routes, proper waste and material management, stripping and separate storage of fertile soil for later reuse, and stabilisation of exposed surfaces. Borrow pits will be operated with appropriate permits and fully rehabilitated after use.

During operation, maintenance of slopes and drainage systems will minimise erosion risks.

Residual impacts will be minor and localised. Temporary areas will be fully restored, and permanent impacts will remain confined to the road footprint.

4.3. Water resources

Construction activities may create limited risks to surface and groundwater through improper material storage, accidental oil or fuel leaks, inadequate waste or sanitary management, temporary drainage modifications and erosion near watercourses. Water use during construction will be low and mainly for domestic needs and dust suppression.

These risks are accidental in nature and expected to be short-term and localised.

During operation, the main risks relate to accidental spills. The stormwater drainage system will reduce runoff and erosion risks. Overall, impacts during operation are expected to be low.

Mitigation during construction will include proper waste and material management, provision of sanitary facilities, use of impermeable areas for machinery maintenance, erosion-control measures near watercourses and appropriate stormwater management.

During operation, regular inspection of drainage infrastructure and implementation of spill-prevention and emergency procedures will minimise pollution risks.

With mitigation in place, no significant impacts on surface or groundwater quality are expected. Residual impacts will be minor, localised and temporary.

4.4. Biodiversity and nature conservation

Most works are located along the existing road corridor. No direct impacts are expected on habitats within nearby Emerald Network sites, NPAs or forest ecosystems, and no nesting habitat loss for species of conservation importance is anticipated. In Lot 2, no protected habitats are present. Temporary disturbance to vegetation and fauna may occur near work areas.

Mitigation during construction will include limiting vegetation clearance, avoiding works in sensitive areas, storing materials away from trees and shrubs, and protecting forest edges and green areas. A biodiversity specialist will supervise works near protected sites. Vegetation removal will be avoided during the bird-nesting season where feasible.

Other potential impacts include temporary disturbance from noise, vibration, dust and vegetation removal, as well as soil disturbance affecting local flora and fauna.

During operation, potential impacts are limited to traffic-related noise and disturbance, particularly near sensitive biodiversity areas. Maintenance works may also require supervision in these locations.

Also, maintaining clean roadsides, managing waste appropriately and monitoring sensitive locations will help minimise long-term disturbance.

A biodiversity specialist will monitor works during construction and early operation, with site-specific checks in areas near Emerald sites, NPAs and forest ecosystems to confirm the effectiveness of mitigation and identify any additional measures needed.

4.5. Cumulative impacts

Cumulative impacts may arise if M3 construction activities coincide with other infrastructure works or major economic activities in the region. Combined effects from noise, dust and increased traffic may lead to temporary additional nuisance for communities and higher short-term pressure on local environments. Such impacts are expected to be localised and short-lived and will be managed through coordination with relevant authorities and the application of standard mitigation measures.

4.6. Induced (indirectly consequential) impacts

Indirect impacts may arise from increased movement of construction materials and machinery, leading to temporary increases in dust, emissions and noise along transport routes. Additional traffic on local roads may create short-term safety risks and inconvenience for residents. Local economies may experience minor positive effects from demand for services, while some secondary roads may be subject to temporary wear. Land-use changes related to construction sites and material storage areas will be short-term and reversible.

Overall, induced impacts are expected to be localised, temporary and manageable through standard mitigation and traffic-management measures.

4.7. Landscape and visual impacts

Construction activities will create temporary visual disturbance from machinery, stockpiles and excavation areas. These impacts will be localised and will disappear once works are completed. During operation, visual quality will improve through a uniform road surface, stabilised and grassed slopes and limited replanting where feasible, contributing to a more orderly and safer road corridor.

4.8. Raw material sourcing and transportation, including borrow pits

Construction materials will be sourced from licensed quarries and production facilities in Moldova. All suppliers must meet national technical standards and environmental requirements. Transport of materials may temporarily increase traffic and emissions along haul routes and will be managed through the Contractor's traffic-management plan.

A borrow pit is planned near Cîșlița-Prut village to supply embankment materials for the Giurgiulești bypass. The site is located outside populated areas and will operate under permit conditions, including topsoil removal, erosion-control measures and full rehabilitation after extraction.

4.9. Road safety

The M3 corridor is among the country's higher-risk routes, with recorded accidents and fatalities in recent years. Improving safety for all road users is therefore a key objective of the Project.

A Road Safety Audit (RSA), required under EBRD Performance Requirements, has been carried out to ensure that safety considerations are fully integrated into the design and implementation of all tranches.

National road-safety policies and EU-aligned standards will guide the implementation of the Project and support long-term improvements in traffic safety.

Key safety improvements proposed include:

- Upgraded junctions and roundabouts, with clearer traffic organisation;
- Traffic-calming measures, improved signs and markings;
- Enhanced pedestrian safety through better lighting, crossings, bus-stop relocation and footpaths;
- Dedicated parking areas, including for heavy vehicles;
- Optimised access points to reduce conflict points and improve safety in settlements.

Overall, the Project is expected to substantially reduce accident risks for drivers, pedestrians and other road users along the M3 corridor.

4.10. Traffic, noise and vibration

Within the ESIA study for the rehabilitation and extension project of the M3 national road, a noise monitoring campaign was conducted in February 2026 to establish baseline conditions. Measurements were carried out at 10 representative points located near the road and sensitive receptors (residential buildings, schools, and natural areas), in accordance with applicable standards.

The recorded noise levels (Leq) range from approximately 52 to 71 dB(A). Overall, noise levels are mainly influenced by existing road traffic and human activities. The obtained data provide a reference baseline for assessing future impacts and highlight the need for continuous monitoring and, if necessary, the implementation of noise mitigation measures in sensitive areas.

Areas where exceedances of the maximum permissible values are estimated (in the absence of mitigation measures) include:

- Băcioi: Receptors located on Chişinăului, Burebista and Independenţei streets.
- Răzeni: Area of Independenţei and Biruinţei streets.
- Străişteni: Eastern sector adjacent to the road.
- Porumbrei, Ciucur-Mingir and Giurgiuleşti.

During construction, temporary increases in noise and vibration will occur from machinery operation and the transport of materials. These impacts will be short-term and localised, with occasional disturbance near sensitive receptors.

Mitigation will include notifying communities, limiting noisy activities to daytime hours, enforcing speed limits, avoiding residential zones for haul routes where feasible and applying noise-control measures near sensitive locations. The use of mobile noise-absorbing panels is recommended to protect species of conservation interest as well as sensitive receptors, particularly residential buildings located in the immediate vicinity of the project site. It is recommended that the mobile panels have a minimum height of 4 metres.

During operation, long-term impact are primarily driven by tyre–road interaction and engine emissions at cruising speeds.

The following measures are proposed to ensure effective monitoring and mitigation of noise and air quality impacts during the operational phase of the project, with a focus on protecting sensitive receptors and maintaining compliance with applicable environmental standards:

- Noise and air quality monitoring will be carried out for at least 2 years after construction at representative roadside receptors (inhabited areas).
- Installation of permanent noise-absorbing panels (approx. 4 m height) is recommended in areas with sensitive

receptors.

- Forster 20 treated wood panels have been validated as effective, due to their suitable acoustic absorption properties for road noise reduction.
- In specific cases (receptors very close to the road or above the shielding angle), additional local measures may be required (e.g., barriers at property boundaries), to be defined during the design stage in accordance with CP D.02.30:2023.

4.11. Waste management

Construction activities will generate different types of waste, including inert construction materials, metals, packaging, small quantities of hazardous waste (e.g. oils and filters) and household-type waste from site facilities. Proper management is required to avoid environmental impacts.

These wastes will be separated where feasible and handled according to national requirements.

Mitigation measures will include designated on-site waste-storage areas, separation of recyclable materials, proper handling and disposal through authorised operators and avoiding uncontrolled dumping. Hazardous waste will be stored securely and removed by licensed companies.

5. Summary of Social Benefits, Potential Adverse Impacts, Mitigation and Management Measures

The Project will rehabilitate and upgrade the M3 road corridor, improving road safety, mobility and long-term access to services for communities located along the alignment.

While the Project provides significant long-term social benefits, temporary and localised social impacts may arise during construction and early operation. These impacts are manageable through the mitigation measures described in this chapter.

5.1. Community impacts

Communities located near the M3 may experience temporary disruption during construction, including short-term access constraints, increased construction traffic, and localised nuisance (noise, dust). Safety risks may increase near schools, cemeteries, churches located near the road and pedestrian areas. Mitigation measures include maintaining access to key community facilities, providing safe pedestrian routes, clear signage and speed control, and regular communication with local authorities and residents. Residual impacts are expected to be temporary and localised.

5.2. Contractor management, including the siting and management of worker camps

The National Road Administration will tender and select the Execution Contractor, who will be responsible for identifying and establishing construction camps and laydown areas. These facilities will be confirmed during detailed design and reflected in updated ESMP documentation. The establishment of construction camps and

laydown areas by the Execution Contractor may generate localised land-use change, vegetation clearance, increased noise, dust, and traffic, as well as temporary disturbances to adjacent communities and agricultural activities. Improper siting may also pose risks to surface water, soil quality, and biodiversity, and could create access restrictions for nearby land users. These impacts will be managed and minimised through siting criteria, permitting requirements, and updated ESMP measures once locations are confirmed during detailed design.

Construction facilities will be organised to ensure safe and efficient execution of works and to minimise environmental and social impacts. Designated zones will be established for material storage, equipment operation, waste management and worker facilities (including accommodation, if required). Camp management will follow national requirements, good international practice and relevant EBRD Performance Requirements.

The location of camps and laydown areas will be agreed with local authorities, considering available land and opportunities to reuse existing disturbed sites. Any temporary access roads required for these areas will be coordinated and assessed during detailed planning.

Water and basic services for camp operations will be provided in line with applicable standards, ensuring adequate supply and sanitary conditions for workers.

5.3. Cultural heritage

Cultural heritage receptors along the M3 corridor include churches, cemeteries and other community religious or cultural sites. Potential impacts during construction relate to temporary access disturbance and vibration risks near sensitive structures. Mitigation measures include avoiding intrusive works during religious events, maintaining access to cemeteries and cultural sites, and applying vibration controls where needed.

The likelihood of uncovering undocumented archaeological resources is low, except in the Giurgiuleşti bypass area where new construction is planned. A Chance-Finds Procedure will be implemented by the Contractor.

5.4. Disruption and public health and safety during construction

Construction activities may temporarily increase public safety risks due to the movement of machinery, construction traffic and material deliveries. Short-term inconveniences may occur due to restricted access to junctions or bus stops. The Contractor will implement good site management and health and safety measures, including fencing, signage and controlled access to work areas. Any workforce accommodation will be managed to avoid community impacts. A Traffic Management Plan, community engagement measures and a public grievance mechanism has been established to minimise disruption, ensure safe conditions throughout construction and allow for reporting on any issues that arise.

5.5. Impacts on businesses and employment

The Project will generate short-term local employment opportunities during construction, with the Contractor encouraged to prioritise local hiring where feasible.

Businesses located near the road may experience temporary access restrictions or changes to entry/exit points during construction.

Temporary noise and dust may affect businesses close to work areas.

Traffic-management measures will be applied to minimise safety risks around businesses.

Consultation with affected businesses will continue throughout construction, and access will be maintained wherever possible. No economic displacement is expected.

5.6. Impacts to existing infrastructure and public services

Construction activities may temporarily affect existing infrastructure and public services, including roads, utilities and private assets located near the works. The Contractor will coordinate with utility providers, maintain service continuity where possible, and reinstate any affected infrastructure. In the event that utilities are to be disrupted, information will be shared with affected parties in advance and disruptions will be kept to a minimum. Baseline documentation of the condition of nearby assets will be prepared prior to works to support clear identification of any damage and facilitate grievance resolution.

5.7. Labour issues and standards

Labour and working conditions for all workers involved in the Project will comply with national legislation and EBRD Performance Requirement 2. The Contractor will be required to implement appropriate Human Resource (HR) policies, ensure fair and safe working conditions, provide a worker grievance mechanism and apply a Code of Conduct to all employees and subcontractors. Measures will also be taken to prevent child or forced labour, promote non-discrimination and ensure that health and safety provisions are applied consistently across all work sites.

5.8. Land acquisition and resettlement (cross reference any resettlement report that is being developed)

Most of the Project is located on existing state-owned road land. However, small areas of private land will be required for minor alignment adjustments and for the Giurgiulești bypass.

Temporary land use may also be required for construction sites, access routes or material storage, with preference given to state lands.

Potential impacts include small-scale acquisition of agricultural land and temporary restrictions to access for farmers. No physical displacement is expected. Economic displacement risks are limited and will be mitigated through the Environmental and Social Management Plan (ESMP) and Resettlement Policy Framework (RPF).

A RPF has been prepared in parallel and this NTS cross-references that document in accordance with EBRD PR5. Compensation will follow EBRD PR5 and Moldovan law, including payment at full replacement cost prior to land take, support for affected livelihoods where needed, targeted engagement with vulnerable households, and maintenance of temporary access during construction.

5.9. Local traffic and access impacts

Construction works may require temporary traffic restrictions, including single-lane sections and reduced speeds. A Traffic Management Plan will ensure safe vehicle and pedestrian movement, clear signage and timely communication of detours.

Temporary changes to access points may occur, with redirection via local roads where needed. Final access arrangements will be confirmed through the Road Safety Audit.

5.10. Occupational and public health and safety issues

Construction activities will generate occupational health and safety risks, including work near traffic, machinery and utilities. The Contractor will implement an Occupational Health and Safety Plan covering training, use of protective equipment, supervised work areas and emergency procedures. A worker grievance mechanism and Code of Conduct will apply to all employees and subcontractors. During operation, road maintenance will follow standard safety practices.

5.11. Socio-economic impacts; including vulnerable groups (taking into account gender specificities and needs)

During construction, temporary access restrictions, noise, dust, and increased traffic may disproportionately affect also vulnerable groups—including women with caregiving responsibilities, elderly persons, children, and persons with disabilities—by limiting safe mobility and access to essential services. Disruptions to public transport stops, pedestrian paths, and local road crossings may increase safety risks and travel times, particularly for women and girls who rely more on walking and buses.

In the operational phase, improved connectivity will enhance access to health, education, and other essential services, while upgraded lighting, safer pedestrian routes, and improved bus stop infrastructure will strengthen mobility, comfort, and personal security for all, with particular benefits for women, children, elderly people, and persons with disabilities.

6. Communications

6.1. Contact details

The National Road Administration (NRA), acting as Project Implementing Unit, will serve as the main contact point for information, questions and concerns related to the Project. Contact details and communication channels are publicly available on the NRA website (www.andsa.md), contact person: Ludmila Vîrlan – Environment and Social Specialist – Chief of Department Sustainable Development and Environment: e-mail: ludmila.virlan@andsa.md. The NRA website provides contact information and an online form for submitting questions or complaints (grievances). A project-specific grievance mechanism, described in the SEP, is available for all affected and interested stakeholders.

Key Project documents (ESIA, ESMP, NTS, SEP, RPF and updates) will be available on the NRA website and, where relevant, on the EBRD website. Hard copies will also be accessible at local public administration offices along the corridor.

Information boards will be placed in affected settlements to provide updates on works and contact information.

The Executive Contractor will appoint a Community Liaison Officer (CLO) to maintain day-to-day communication with affected communities. The CLO's contact details will be disclosed prior to the start of construction.

Ongoing engagement will continue throughout construction and operation, following the SEP. Particular attention will be given to ensuring that vulnerable groups receive information in an accessible way.

Residents may also submit questions or complaints through their local mayor's office, which will maintain printed grievance forms and project information.

6.2. Process for addressing any issues arising

A multi-level, accessible, and transparent grievance mechanism is available for all communities, businesses, and land users throughout construction and early operation. This follows EBRD PR10 requirements.

A multi-level, accessible and transparent Grievance Redress Mechanism (GRM) will operate throughout construction and early operation, in line with EBRD PR10. The GRM will allow any community member, business, land user or organisation to submit concerns verbally or in writing, in person or anonymously, with no cost to users. The NRA and its Contractor(s) will implement and manage the GRM, ensuring that all complaints are registered, assessed, and responded to within the timelines set by national legislation and the procedures described in the Project SEP. All grievances will be logged and monitored through the NRA system.

Grievance Forms are available in Romanian and Russian on the NRA website, and printed copies will be distributed to mayoralty offices, contractor offices (on-site and off-site), and the supervision engineer to ensure easy access for affected communities. Complaints may also be submitted by phone, email or post using the contact details publicly disclosed in the SEP.

Community members may file grievances directly with the mayoralty for issues related to contractor activities. These will be forwarded to the Construction Supervision Company (representing the NRA). If the issue is not resolved within one week, complainants may escalate the matter to NRA management.

The NRA acknowledges that concerns may arise at different stages of the Project; therefore, the Contractor's contact details will be made publicly available once the EPC Contractor is appointed.

A separate Workers' Grievance Mechanism will be established by the Contractor to address workplace-related concerns, ensuring confidentiality and non-retaliation.

6.3. Link to Stakeholder Engagement Plan

A Stakeholder Engagement Plan (SEP) was prepared as part of the ESIA and a dedicated Grievance Mechanism has been developed in accordance with national requirements and EBRD PR 10. This Non-Technical Summary is designed to complement and cross-reference the SEP.

The SEP outlines: identification of all stakeholder groups, engagement activities conducted during ESIA scoping, ESIA drafting and disclosure, future consultation programme for Project Lots, engagement methods adapted to vulnerable groups, disclosure materials and channels, grievance mechanism procedures, monitoring indicators for stakeholder engagement and reporting commitments. The SEP ensures:

- regular, timely, understandable communication
- meaningful two-way engagement
- recording and responding to feedback
- adaptation of engagement during construction (e.g., more frequent meetings when access changes occur)

The SEP and GRM have been approved by the NRA to ensure continuous, transparent, and inclusive engagement throughout the Project lifecycle. Further stakeholder engagement will continue during detailed design and construction phases to ensure that all affected groups remain informed and consulted.

The SEP and GRM will be implemented jointly by the NRA/PIU and Contractors, under supervision of the NRA Environmental and Social (E&S) Team, which will coordinate, monitor, and report engagement activities.

Stakeholder engagement outcomes and grievance statistics will be summarised in semi-annual environmental and social monitoring reports submitted to the EBRD.

The SEP will remain a living document, updated as the Project design, construction schedule, or stakeholder priorities evolve, ensuring continuous compliance with EBRD PR 10 and ToR requirements. The updated SEP will remain publicly accessible until the Project becomes fully operational.

Annex

Date	Locality / Stakeholder Engaged	Feedback/Concerns/Issues
28.08.2025	(Lot 1, 2) Porumbrei Village, Mayor	<p>Welcomed renewed consultations and requested alignment of road works with local development plans. .</p> <p>The commune reported strong demographic growth, high gas network coverage, and recent wastewater investments.</p> <p>Highlighted that the settlement is expanding and will benefit from improved access and road traffic safety.</p> <p>Requested cadastral extracts to verify land plots potentially affected by widening and support to organise focus groups with farmers and roadside businesses.</p>
28.08.2025	(Lot 4) Giurgiulești Village, Mayor	<p>Safety and access management, Integration with border logistics and regional projects is a priority in the south</p> <p>The mayor and council emphasised the acute need to divert heavy transit flows from the village centre after two decades of burdensome more than two decades of heavy through-traffic. The bypass was widely seen as the single most important is considered the most important improvement for community well-being and safety.</p> <p>Local services are comparatively strong for a small commune (school, kindergarten, clinic, library, museum; broad aqueduct coverage), yet gaps remain - most notably the incomplete sewerage network an incomplete sewerage network and a legacy of unmanaged waste that the municipality is working to systematise is currently systematising.</p> <p>The administration offered parcel-level land information for the bypass and confirmed readiness to coordinate with the Giurgiulești International Free Port and the two cross-border points (Giurgiulești–Galați and Giurgiulești–Reni) so that construction logistics and future traffic management are coherent remain coherent.</p> <p>Local authorities asked that truck parking and staging areas be planned coherently with in coordination with the bypass and noted the interface with the Slobozia-Mare bypass, now under construction.</p>
28.08.2025	(Lot 4) District Council Cahul, vicechair	<p>Construction Impacts</p> <p>The administration echoed community concerns, highlighting building cracks and household repair costs attributed to vibration from heavy vehicles, and supported the plan for a truck parking area and logistics improvements near the border to better stage international freight. The district also pointed to a network of regional strategies (water, waste, transport, climate, public health) that should frame the project's mitigation and monitoring.</p>
12.09.2025	(Lot 1) Bacioi village , Mayor	<p>Peri-urban safety and access concerns at junctions and along densely settled frontages</p> <p>Mayor requested a properly designed junction at km 13+243 (accel/decel lanes) to serve a growing residential area, noise barriers along inhabited stretches, and a new turning facility near Străisteni to support the emergent industrial zone.</p>
12.09.2025	(Lot 1) Horești village, Țipala village, Mayors	<p>Safety and access management</p> <p>Horești and Țipala stressed the need to regularise and make safe the access patterns that have evolved over time: businesses and farms rely on multiple informal turn-ins; residents use unsafe U-turns near a fuel station to avoid long detours; and poor night-time visibility contributes to collisions. Both communes asked that all accesses be audited for safety, that lighting be provided at the L465 round junction, and that agricultural machinery movements be explicitly accommodated in design.</p>
18.09.2025	(Lot 1) Răzeni village, Mayor	<p>Safe, signed and lit junctions with accel/decel lanes</p> <p>Răzeni, split by the M3, flagged high crash risk at town entries and the particular danger for pedestrians crossing to the cemetery on the opposite side; the commune advocated full median separation, elimination of at-grade crossing movements, controlled access with acceleration/deceleration lanes (including at km 28 to orchards), and alternative parallel routes for vehicles</p>

		restricted from an expressway
18.09.2025	(Lot 1) Focus Group Discussion with elderly people (20 participants)	Formal pedestrian solutions where communities or destinations (e.g., cemeteries) lie across the carriageway; and measures to deter cut-through traffic in villages. Răzeni residents reinforced the mayor points and added requests for continuous lighting and formalised crossings.
19.09.2025	(Lot 2) Sagaidac Village, Mayor	Mayor reported good basic access and viewed the 2-to-4 lane expansion as a net benefit for safety and economic links, provided temporary construction impacts are well managed
20.09.2025	(Lot 3) Ciucur-Mingir village, Mayor	The administration raised a recurring pattern of drivers diverting through the village at high speeds to avoid monitoring on the mainline, asking for signage and restrictions at the M3 interface to deter cut-through traffic.

Table 2: Scoping stage consultation feedback

Lot	Communities /Key Stakeholders	Engagement and Primary Data Collection	Proposed Type of Engagement	Responsibilities	Link to publication	Participants
All	NRA	10-26 February 2026	Baseline Survey and Community Engagement	ESIA Consultants/ NRA	https://www.andsa.md/consultari-publice-anunturi-si-procese-verbale/anun-cu-privire-la-organizarea-consult-rilor-publice-privind-proiectului-de-evaluare-a-impactului-de-mediul-social-i-siguran-rutier-pe-traseul-m3/	On-line Announcement
Lot 1	Băcioi commune with villages Străisteni, Frumușica, Brăila	10 th of February 2026 11.00-12.00	Community meeting, FGD landowners near M3 ROW and roadside businesses, FGD with Vulnerable People, Baseline survey, Leaflet presentation with Project Information and GRM	ESIA Consultants/ NRA	https://bacioi.md/2026/02/05/consultari-publice-privind-proiectului-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/	Community Engagement - 22 participants, including landowners FGD with women - 12 participants Surveyed - 25 residents
Lot 1	Răzeni commune with Milestii Noi village	10 th of February 2026 14.00-15.00	Community meeting, FGD with farmers/land users and businesses near M3 ROW, FGD with women (vulnerable groups), Baseline survey, Leaflet presentation with Project Information and GRM	ESIA Consultants/ NRA	https://www.facebook.com/share/p/1aqY4W3Jx/?mibextid=wwXlfr	Community Engagement - 23 participants FGD with women - 10 women Surveyed - 16 residents
Lot 1	Horești commune	11 th of February 2026 10.00-11.00	Community meeting, FGD with agricultural landowners and businesses near M3 ROW, FGD with vulnerable people, Baseline Survey Leaflet presentation with Project Information and GRM	ESIA Consultants/ NRA	https://www.facebook.com/share/p/18RPHiX66r/?mibextid=wwXlfr https://horesti.md/2026/02/05/520/	Community Engagement - 23 participants, including farmers and RoW businesses. FGD with women - 10 women Surveyed - 10 residents
Lot	Țipala	11 th of	Community meeting,	ESIA	https://tipala.primari	Community

1	commune with Budăi and Bălțați villages	February 2026 13.00-14.00	Meeting with LPA social assistant and FGD with vulnerable groups, Leaflet presentation with Project Information and GRM, Baseline Survey	Consultants/ NRA	e.md/events/consultari-publice-proiectul-de-evaluare-a-impactului-pe-traseul-m3/	Engagement - 16 participants FGD with women - 8 women Surveyed - 11 residents
Lot 1	Porumbrei commune with Sagaidacul Nou village	17 th of February 2026 11.00-12.00	Joint Lot 1–2 session, Community meeting, FGD with landowners of past Phase 1 land acquisition, Leaflet presentation with Project Information and GRM, Baseline Survey	ESIA Consultants/ NRA	https://www.facebook.com/share/p/1DUpxhecRQ/?mibextid=wwXlfr	Community Engagement - 18 participants, including business representatives FGD with women - 8 women FGD with elderly - 14 people Surveyed - 15 residents
Lot 2	Sagaidac village	17 th of February 2026 14.00-15.00	Community meeting, FGD with vulnerable households (elderly/women), Leaflet presentation with Project Information and GRM, Baseline Survey	ESIA Consultants/ NRA	published on the information board in front of the main building of the mayoralty and viber group	Community Engagement - 19 participants FGD with women - 7 women, FGD with elderly - 10 people Surveyed - 16 residents
Lot 2	Grădiște village	19 th of February 2026 11.00-12.00	Community meeting, KII with LPA social assistant and FGD with vulnerable groups, Baseline Survey, Leaflet presentation with Project Information and GRM	ESIA Consultants/ NRA	https://primariagradieste.md/2026/02/10/anunt-cu-privire-la-organizarea-consultarilor-publice-privind-proiectul-de-evaluare-a-impactului-de-mediul-social-si-siguranta-rutiera-pe-traseul-m3/	Community Engagement - 16 participants FGD with women - 6 women, FGD with elderly - 10 people Surveyed - 16 residents
Lot 2	Ecaterinovca commune with Coștangalia village	19 th of February 2026 9.00-10.00	Community meeting, KII with social workers, Baseline Survey Leaflet presentation with Project Information and GRM FGD focusing on safety (children transported to school in Grădiște)	ESIA Consultants/ NRA	https://primariaecatrinovca.md/	Community Engagement - 28 participants FGD with women - 9 women, FGD with elderly - 11 people Surveyed - 18 residents
Lot 4	Cișlița-Prut village	20 th of February 2026 11.00-12.00	Community meeting, FGD farmers & landowners near bypass, Baseline Survey on Land Acquisition and Resettlement	ESIA Consultants/ NRA	https://www.facebook.com/share/p/1DnZY2Yetz/?mibextid=wwXlfr	Community Engagement - 14 participants FGD with women - 5 women, FGD with elderly - 9 people Surveyed - 12 residents
Lot 4	Giurgiuilești village	20 th of February	FGD with businesses, Women's group	ESIA Consultants/	https://www.facebook.com/share/p/14W	Community Engagement -

		2026 13.00-14.00	session, Elderly households' consultation, FGD farmers & landowners near bypass, baseline survey	NRA	99A2R9tF/?mibextid=wwXlfr	45 participants FGD with women – 20 women, FGD with elderly – 25 people FGD with business – 5 enterprises Surveyed –29 residents
Lot 2	Cimişlia City (Joint Lot 2-3 sessions)	23th February 2026 10.30 – 11.30	Community meeting, FGD and Baseline Survey, Leaflet presentation with Project Information and GRM, Baseline Survey	ESIA Consultants/ NRA	https://www.facebook.com/share/p/17jM22r9nd/?mibextid=wwXlfr	Community Engagement - 35 participants FGD with women – 18 women, FGD with elderly – 13 people FGD with business – 6 enterprises Surveyed –29 residents
Lot 3	Ciucur-Mingir village	23th of February 2026 13.00-14.00	Community meeting, FGD focusing on safety (children transported to schools located near school), Household-level engagement for disabled/elderly groups, Baseline Survey	ESIA Consultants/ NRA	https://www.facebook.com/photo?fbid=2172123426957213&set=gm.1752907182780433&id=355999019137930	Community Engagement - 24 participants FGD with women – 11 women, FGD with elderly – 15 people Surveyed –16 residents

Table 3:ESIA engagement activities and baseline survey

Although each locality reflected local-specific issues, several recurring themes emerged across the corridor

Key concerns across communities	Description
Road Safety (Dominant Concern Across All Lots)	Unauthorised accesses and lack of acceleration/deceleration lanes. Irregular manoeuvres by drivers crossing M3 to avoid grade-separated interchanges. High incidence of road accidents and near-misses, including cases involving children and cyclists. Lack of protection barriers, unsafe curves, insufficient channelisation. Poor road illumination, especially near settlements, junctions and bus stops.
Mobility of Agricultural Machinery and Quality of Alternative Routes	Farmers consistently reported unsafe use of M3 due to lack of viable parallel roads. Alternative agricultural tracks are muddy, unmaintained and unsafe, especially under bridges.
Noise, Dust and Air Quality	Particularly severe in Băcioi, Răzeni, Giurgiuleşti and Sagaidacul Nou. Complaints regarding cumulative noise (road + airport, Lot 1)
Business Access and Economic Activity	Businesses requested: Guaranteed direct access or adequate alternative routes. Accel/decel lanes to maintain commercial viability. Avoiding closure of existing entries without prior consultation.
Pedestrian Safety and Public Transport	Missing or unsafe pedestrian crossings (e.g., cemetery access in Răzeni). Unsafe behaviour of public transport operators stopping directly on the M3 (Porumbrei–Sagaidacul Nou). Long walking distances to bus stops (Sagaidac village).
Vulnerable Groups' Risks	Elderly and women highlighted: Fear of construction-period impacts, worker influx, visibility, and unsafe temporary routes. Need for well-lit, safe access, GRM ability to submit complaints anonymously.
Drainage, Flooding and Local Infrastructure	Coştangalia reported flooding during past construction (2020) and fear of recurrence.

Border Area Issues (Lot 4)	Giurgiuleşti raised: Persistent dust, vibration, and emissions from intensive heavy truck traffic. Need for truck parking and staging areas to avoid congestion. Risks to cyclists and schoolchildren due to trucks parked along roadway.
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Table 4:Key concerns of the communities during ESIA engagement

Across all localities, residents expressed strong support for the Project, highlighting expected improvements in safety and connectivity. Commonly proposed measures included:

- **Noise barriers** for settlements located close to the road.
- **Improved illumination** at junctions, bus stops and residential clusters.
- **Parallel/alternative routes** for agricultural machinery and local access.
- **Dedicated pedestrian crossings**, including a second crossing in Răzeni and improvements in Porumbrei/Sagaidacul Nou.
- **Enhanced traffic management during construction**, clear signage and safe access.
- **Continued information flow** from NRA and contractors; functional GRM.