TRANSLATION INTO ENGLISH

In response to your letter of June 16, 2016, we would like to inform you:

In accordance with the EU directives on waste and landfills and the terms of Association Agreement, the Waste Management Code was adopted. As foreseen by the abovementioned code all the landfills, which do not meet the requirements of the EU directives, will be gradual closed in the period of 4-8 years. According to the approved "National Waste Management Strategy" and the national action plan, in parallel with the closure of landfills the new European standard sanitary landfills have to be arranged. It is scheduled to open 8-10 such landfills throughout the country.

Already in 2011 with the initiative of the Kutaisi municipality, the German Development Bank has launched the discussion of issues linked with the construction of a new European standard landfill in Imereti region. In 2012, after establishing the "Solid Waste Management Company of Georgia" government made a decision to initiate "Integrated Solid Waste Management Project - Kutaisi" within the framework of Georgian-German financial cooperation. Consequently, the Georgian side, in particular, the Ministry of Finance, made a financial commitment of 20 million euros to the German Development Bank.

In 2013, the German consulting company - "Infrastructure & Umwelt" in cooperation with the Georgian side "Gamma Consulting" prepared "Integrated Solid Waste Management" project feasibility study report. The region's local authorities were involved in the drafting process of this report. From the selected alternatives, the original document gave preference to the land area located in close proximity to the villages of Godogani and Chognari, however, as it became known later, the local population used given area for grazing/pasturing and other agricultural purposes, it has also to be mentioned that the site overlaped with private property as well. Therefore, after considering interests of the population and their own reference, priority has been given to the second selected area.

This year, during the meetings, it has been repeatedly explained that the project includes the construction of a modern, international standard household waste landfill and that it also, foresees an arrangement of a separation facility which will separate waste and prepare it for further recycling. The information regarding this project, has been distributed several times via local media, and the abovementioned information was also provided to the population verbally and in the form of specially prepared explanatory brochure.

Regarding the opinion expressed in the letter, alleging that the company is not complying with the rules of landfill placing foreseen by the legislation, we would like to inform you that the project is proceeding fully in accordance with the legal requirements and the process of site selection complies with the government's resolution - №416 (Technical Regulations about - the "Rules and norms of solid household waste landfill arrangement and operation"), which determines the minimum distance from the landfill site to residential zone (500 meters). It should be noted that the site/location selection process complied with all the applicable current laws and cell placement was planned to be 800 m. away from the registered residential area. Hence, the demand of having 15 km buffer zone, is devoid of any legal basis. In addition, the polygon will be operated by international standards, which means that the waste is compacted in the special cells. Also, according to the governmental resolution 421, which includes the technical regulations regarding "landfill arrangement, operation, closure and aftercare", waste sent to landfills has to be covered with clay or any other insulatin layer on a daily basis. Moreover, special nets will be placed along the disposal cells preventing any risk of spreading. It also has to be noted that the polygon should serve Imereti, Racha-Lechkhumi and kvemo Svaneti regions, therefore, even though the landfill will manage large amount of waste, in case of proper operation we will have not "the garbage mountain which is tens of meters high and spread over dozens of acres", but rather, an area covered with clay and other isolation layers. On the other hand, a unified system of solid waste collection, will contribute to createing new jobs and attracting investments for the construction of future recycling and processing facilities, which in turn, will ensure the proper protection of the environment and ecology.

Also, the company would like to note that the management of a sanitary landfill in accordance with the existing standards and usage of underground (geotextile, geomembrannes) and surface (clay, gravel) insulating layers complying with international standards, ensures safe environment for humans and animals. Landfill arrangement/design includes management of leachete and waste water, which means the installation of the water collecting reservoir, drainage and filtration systems. Surface water collection system, and surface water reservoir drainage system is designed to deal with abundant sediment/rainfal, which, potentially, could cause the formation of large amount of surface water. Leachete water decontamination will be done with reverse osmosis system, the resulting clean water will be used for agricultural purposes in a landfill, thus ensuring the safety of adjacent inflowing water biodiversity. In addition, according to the results achieved during the drilling conducted by international experts in the period of the feasibility study and its aftermath, highly dense clay layer is found 5.5 m deep, forming a natural insulating layer, and 15 meters of deep stone and road metal can be found, accordingly, providing protection to drinking water, rivers or underground currents, eliminating related possibiity of related problems occuring. Thus the threat of pouting the river Eklari (virispselas) is groundless, due to all the reasons given above, neither leachete nor waste water will get into in the river.

As for the proximity of the red-listed plant species, based the environmental impact assessment report company states that specifically the landfill area does not contain any kind of unique breed of critically endangered species of plants or animals. In addition, the law and international standards require company to protect the plant and animal cover in the vicinity of a landfill.

In response to "distorted environmental exterior" and the loss of tourist potential, we would like to inform you that the project, has scheduled to arrange green cover around the landfill, cover the waste with insulating layer overlap and carry out other measures to make landfill less visible, including - installation of high fences solving the problem of view of deterioration. In addition, cells for waste disposal are going to be arranged far from the gate, meaning that the waste will not reach the height which will be enough to create threat to views of Tbilisi-Kutaisi old path-way, "Tamar Bridge", old stony road, temples, caves and other potentially touristic destinations, such as Godogani mountains and the Archangel church. It is noteworthy that even in Europe collection, processing and separation plants are built in the centers of various cities, not far from the population and within walking distance of the historic parts of the city. The current lifestyle of the population will not be changed by constructing landfill of modern standards on this site. Therefore, future problems, which farmers, as predicted, will face in the process of crop production are eliminated. On the contrary, additional jobs will be available for the local population, which in case of willingness is going to be involved in construction as well as operational stages of the landfill. In conclusion, once again point out that proper management of the landfill will not cause the economic losses for the local population.

Skeptical and negative attitudes towards the company, were explained by the "complete failure" of Tbilisi landfill, in this regard it must be said that the "Solid Waste Management Company" was founded in 2012, while the landfill was built and put into operation in 2010, therefore, the project has not been implemented by the company and all the shortcoming that might exist, are not the responsibility of the company. On the other hand, as an example of success, we can list company-owned landfills which are being operated in full compliance with international standards.

And, the company's answer to "at least for half a century landfill will become an uncontrolled and malfunctioning hearth/hotbed of force majeure situations, landfill epidemics and environmental pollution" is as follows: The project foresees the operation of landfill for 20 years and provisions its closure in full accordance with the international standards, concluding stage of this closure will be the greening/planting of this whole territory and aftercare maintenance of the site in compliance with technical regulations.