

ENVIRONMENTAL COMPLIANCE FILE

IMPORTANT NOTICE

Instructions for compiling the Environmental Compliance File

The Environmental Compliance File will be used to check compliance in the context of the evaluation of your application.

It should cover all aspects of the project that may have an environmental impact.

Include the requested information/supporting documents that you have at the moment of your application.

Minimum font size: Arial 9 points. Page size: A4.

Project name and acronym:	Collaborative Adaption of bottlenecks on the E67 in Estonia and Latvia for safe and resilient dual-use road infrastructure — MobileEstLat_E67	
Location:	ESTONIA, Rapla and Pärnu counties	
Project type:	Works	X
	Study with physical intervention	☐
	Study without physical intervention	☐

ENVIRONMENTAL COMPLIANCE QUESTIONNAIRE

(To be filled in and uploaded as part of the application — merged into one file together with the signed and scanned declarations by the competent authorities.)

1. Development consent

1.1 Has a development consent¹ already been given to the project and when (if already issued)?

☐ NO

☒ YES

12.02.2026

(dd/mm/yyyy)

¹ 'Development consent' means the decision of the competent authority or authorities which entitles the developer to proceed with the project (Directive 2011/92/EU). In practice, it is referred in several member states as an integrated permit or a construction permit.

☐ N/A

Reconstruction of the road E67 section **Päärdü – Pärnu-Jaagupi** was approved on 12.02.2026 by Estonian Government within the Road Management Plan 2026–2029 (available at <https://www.transpordiamet.ee/sites/default/files/documents/2026-08/Riigiteede%20teehoiukava%202026%20-%202029.pdf>).

According to section 1¹ of the Road Traffic act of Estonia, the approval of the Road Management Plan by the Government constitutes the first step for any road section or junction (including road E67 section **Päärdü – Pärnu-Jaagupi**) to be developed according to the Estonian permitting system for roads. According to section 1¹ subsection 6 of the Road Traffic act of Estonia, the national road management plan must include at least a list of construction and reconstruction sites as well as the volume and sources of financing per year. Based on the Road Management Plan, a road construction project (including road E67 section Päärdü – Pärnu-Jaagupi) will undergo preliminary (already implemented) and detailed technical designs, which will result in a construction permit issued by the Estonian Transport Administration.

1.1.1 If YES, has an appeal been launched against the development consent?

☒ NO

☐ YES

If YES, explain:

N/A

1.1.2 If NO development consent has been given, please specify the administrative steps already taken and those still needed (e.g. a reasoned conclusion² has been issued, a request for a development consent has been submitted on dd/mm/yyyy):

N/A

By which date is the final decision expected?

N/A

(dd/mm/yyyy)

2. Compliance with the EIA Directive (2011/92/EU)³

² The 'reasoned conclusion' is the term used in the Directive 2011/92/EU. It finalises the examination of the environmental impact of the project (i.e. the environmental impact assessment procedure) by the competent authority. Depending on the permitting system in member state (a multi stage or an integrated procedure), it can take different forms.

³ Directive [2011/92/EU](#) of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 26, 28.1.2012).

2.1 Is the project listed in Annex I or II of the Directive:

- ☒ Annex I of the Directive (go to question 2.2)
- ☐ Annex II of the Directive (go to question 2.3)
- ☐ Neither of the two annexes (please explain below)

2.2 If listed in Annex I, attach the following documents:

- a) the non-technical summary of the EIA report⁴ - see <https://pilv.transpordiamet.ee/s/oG5UxvH8IKkpddS> (File: T42_Konuvere-Pärnu-Jaagupi_KMHA_2021_0075_v6; KOKKUVÕTE/SUMMARY p 7)
- b) information on consultations with environmental, local or regional authorities, the public concerned and, if applicable, consultations with other Member States, carried out in accordance with Articles 6 and 7 of the EIA Directive - see <https://pilv.transpordiamet.ee/s/oG5UxvH8IKkpddS> (File: T42_Konuvere-Pärnu-Jaagupi_KMHA_2021_0075_v6; ÜLEVAADE KMH ARUANDE MENETLUSEST p 190 and EIA Report Annexes File: Lisa_4_Asjaomaste asutuste kirjade koopiad; Lisa_5_Avalikustamise käigus laekunud kirjade koopiad; Lisa_6_TRAM-i vastused avalikustamise käigus laekunud kirjadele; Lisa_7_Avalike arutelude protokollid).
- c) the decision of the competent authority issued in accordance with Article 8a of the EIA Directive, including information on how it was made available to the public and authorities referred to in point b) in accordance with Article 9 of the EIA Directive.

No building permit has been issued for the road project. By its decision of 25 July 2024 No 1.1-2/24/96 the Estonian Transport Administration determined that the Environmental Impact Assessment Report meets the applicable requirements. See <https://transpordiamet.ee/sites/default/files/documents/2024-07/Riigitee%20%28E67%29%20Tallinn-P%C3%A4rnu-Ikla%20km%2078%2C8-99%2C0%20Konuvere%20-%20P%C3%A4rnu-Jaagupi%20I%C3%B5igu%20KMH%20aruande%20NVT%20otsus.pdf>

2.3 If listed in Annex II, has an environmental impact assessment been carried out for this project?

- ☐ YES (attach the documents listed under point 2.2)

⁴ Prepared pursuant to Article 5 and Annex IV to the Directive 2011/92/EU.

☐ NO (please provide:

a) a copy of the determination required in Article 4(5) of the EIA Directive ('screening decision'), including information on the main reasons for not requiring such assessment with reference to the relevant criteria listed in Annex III, and, where relevant, to any features of the project and/or measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment

or

b) if no determination has been undertaken, please provide the information on the thresholds or criteria used according to the national law and Article 4(2)(b) of the Directive explaining that the project does not require an EIA screening.)

N/A

3. Compliance with the SEA Directive (2001/42/EC)⁵

3.1 Is the project implemented as a result of a plan or programme (e.g. plan or programme prepared for the transport sector, country planning or land use)?

☐ NO

☒ YES

3.2 If the reply is YES, please specify if the plan/programme was made subject to a strategic environmental assessment in accordance with the SEA Directive?

☐ NO

☒ YES

If NO, please provide a short explanation:

Insert text

If YES, please provide the non-technical summary⁶ of the environmental report and the information required by Article 9.1(b) of the Directive – i.e. a decision on the adoption of the plan/programme (either internet link or electronic copy).

The route corridor of the road section has been established by thematic spatial plans supplementing the Rapla County and Pärnu County spatial plans, namely "Specification of the Route Location of National Main Road No. 4 (E67) Tallinn–Pärnu–Ikla (Via Baltica), km 44.0–92.0" and "Specification of the Route Location of National Main Road No. 4 (E67) Tallinn–Pärnu–Ikla (Via Baltica), km 92.0–170.0".

Decision on the adoption of the plan in Rapla County: <https://riigiplaneering.ee/pohimaantee-nr-4-e67-tallinn-parnu-ikla-baltica-trassi-asukoha-tapsustamine-km-440-920>

⁵ Directive [2001/42/EC](#) of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ L 197 of 21.7.2001).

⁶ Prepared pursuant to Article 5 and Annex I to Directive 2001/42/EC.

SIA Report: https://transpordiamet.ee/sites/default/files/documents/2021-02/e67_ksh_aruane_harju_rapla_0.pdf

Decision on the adoption of the plan in Pärnu County: <https://riigiplaneering.ee/pohimaantee-nr-4-e67-tallinn-parnu-ikla-baltica-trassi-asukoha-tapsustamine-km-920-1700>

SIA Report: https://transpordiamet.ee/sites/default/files/documents/2021-02/e67_ksh_aruane_parnu.pdf

4. Compliance with the Habitats Directive (92/43/EEC)⁷

4.1 Is the project likely to have significant effects on the sites included or intended to be included in the Natura 2000 network?

- ☒ NO (declaration has to be signed by the competent authority)
- ☐ YES (please provide:
- 1) the decision of the competent authority approving the project
 - 2) the results of the appropriate assessment carried out in accordance with Article 6(3) of the Habitats Directive (this information is not needed, if it is already included in the decision mentioned under point 1)
 - 3) a map (at a scale of 1:100,000 or the nearest possible scale) indicating the location of the project and the Natura 2000 sites concerned
- and
- 4) only in cases where the competent authority has determined that the project has significant negative effects on one or more sites included or intended to be included on the Natura 2000 network, the following information should be provided:
 - (a) a copy of the notification to the European Commission according to Article 6(4) of the Habitats Directive⁸ and, if relevant,
 - (b) an opinion of the European Commission under Article 6(4) of the Habitats Directive in case of projects having significant impacts on the priority habitats and/or species and justified by imperative reasons of overriding public interest other than human health and public safety or beneficial consequences of primary importance for the environment.

5. Compliance with the Water Framework Directive (2000/60/EC)⁹

5.1 Does the project involve a new modification to the physical characteristics of a surface water body or alterations to the level of bodies of groundwater which may deteriorate the status of a water body or may cause failure to achieve good water status/potential?

☒ NO

⁷ Council Directive [92/43/EEC](#) of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L206, 22.7.1992, p.7).

⁸ [Revised version](#) adopted by the Habitats Committee on 26.4.2012

⁹ Directive [2000/60/EC](#) of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p.1).

☐ YES

5.1.1 If YES, please provide the assessment of the impacts on the water body and a detailed explanation of how the conditions¹⁰ under Article 4(7) of the Water Framework Directive were/are fulfilled.

5.1.2 If NO, please provide evidence of the absence of impacts of the project on water (e.g. including the relevant assessments or studies).

See EIA Report: <https://pilv.transpordiamet.ee/s/oG5UxvH8IKkpddS> (File: T42_Konuvere-Pärnu-Jaagupi_KMHA_2021_0075_v6), chapters 7.5-7.8, pp 118-124.

5.2 Please attach a confirmation by the competent authority (under Article 3(2) of the Directive).

¹⁰

- The reasons for the project are of overriding public interest AND/OR a detailed cost-benefit assessment demonstrates that the benefits of the project to human health, to the maintenance of human safety or to sustainable development outweigh the costs from deteriorating the status of water that are accruing to the environment and to society.
 - The overriding public interest or the benefits expected from the project cannot, for reasons of technical feasibility or disproportionate cost, be achieved by alternative means that would lead to a better environmental outcome.
 - All technically and economically feasible and ecologically relevant mitigation measures are implemented to reduce adverse impacts on water as well as on protected habitats and species directly dependent on water.
 - The reasons for those modifications or alterations are specifically set out and explained in the river basin management plan required under Article 13 of the Water Framework Directive.

or floating vegetation (3260), *semi-natural dry grasslands and scrubland facies on calcareous substrates (important orchid sites) (6210), *species-rich grasslands on poor soils (6270), floodplain meadows (6450), lowland hay meadows with *Alopecurus pratensis* and *Sanguisorba officinalis* (6510), *wooded meadows (6530), *active raised bogs (7110), Rhynchosporion depressions on peat substrates (7150), *old natural forests (9010), herb-rich spruce forests (9050), *bog woodland and swamp forests (9080), and *wooded transition mires and bog woodlands (91D0)**, as well as the habitats of the Annex II species Eurasian otter (*Lutra lutra*), bullhead (*Cottus gobio*), and thick-shelled river mussel (*Unio crassus*).

At the national level, the part of the nature area closest to the road section is protected as the Konuvere Conservation Area (KLO2000178), while the southern, more remote and spatially separate parts are protected as the Araste capercaillie permanent habitat area (KLO3000220) and the Illaste golden eagle permanent habitat area (KLO3000011).

The Oese Bog Nature Area (RAH0000316) is located 1.1 km from the southern part of the road section. At the national level, the area is protected as the Oese Bog Conservation Area (KLO2000273). The conservation objective of the Oese Bog Nature Area is the protection of the Annex I habitat types *active raised bogs (7110), transition mires and quaking bogs (7140), rich fens (7230), and *wooded transition mires and bog woodlands (91D0), as well as the habitat of the Annex II species Estonian saw-wort (*Saussurea alpina* ssp. *esthonica*).

An environmental impact assessment was conducted regarding the activities planned under the preliminary design for the Konuvere–Pärnu-Jaagupi section of national road no. 4 (Tallinn–Pärnu–Ikla, E67), specifically the stretch between km 78.8 and 99.0. The Natura preliminary assessment prepared as part of this process determined that the construction of the planned road section would not result in direct or indirect adverse effects on Natura 2000 sites. Consequently, there are no impacts on the habitat types and species that constitute the conservation objectives, nor on the integrity of the site.

See EIA Report: <https://pilv.transpordiamet.ee/s/oG5UxvH8IKpddS> (File: T42_Konuvere-Pärnu-Jaagupi_KMHA_2021_0075_v6, chapters 7.1, pp 101-104).

SIGNATURE OF THE AUTHORISED PERSON

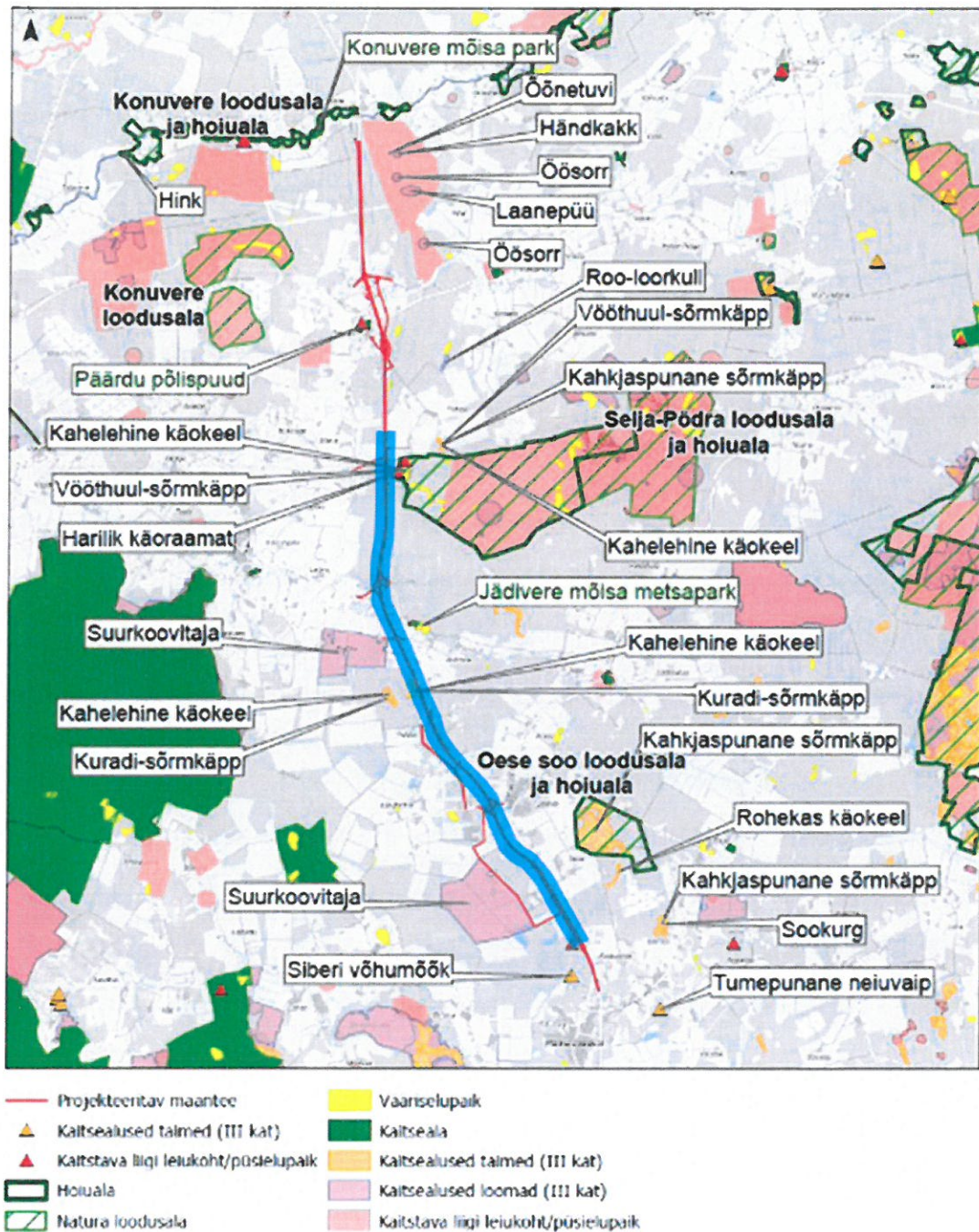
Name and function:	Rainer Vakra, Director General
Date of signature:	21.09.2021
Signature and stamp:	

DECLARATION BY THE COMPETENT AUTHORITY FOR MONITORING NATURA 2000 SITES

(To be filled in and signed by the competent Member State authority and uploaded as part of the application — merged into one file together with the environmental compliance questionnaire and the other declaration(s).)

COMPETENT AUTHORITY	
Competent authority:	Estonian Environmental Board
Department:	Natural Resource Management Department
Contact person:	Meeli Kesküla, Leading Specialist
Legal address:	Roheline 64 80010 Pärnu Estonia Tel: +372 662 5999, e-mail address: info@keskkonnaamet.ee
COMPLIANCE DECLARATION	
Name of the project:	Collaborative Adaption of bottlenecks on the E67 in Estonia and Latvia for safe and resilient dual-use road infrastructure — MobileEstLat_E67
Location:	ESTONIA, Rapla and Pärnu counties
We hereby confirm that:	
1) the project is not likely to have significant effects on a Natura 2000 site and therefore an appropriate assessment as described by Article 6(3) of Directive 92/43/EEC was not considered necessary	Yes
2) a map at scale of 1:100.000 (or the nearest possible scale) is attached, indicating the location of the project as well as the Natura 2000 sites concerned, if any	Yes
Additional comments	
<i>Please state the reasons for your decision.</i> <i>Please include the name of the site, reference number, the distance of the project to the nearest Natura 2000 site(s), and justification that the project (either individually or in combination with other projects) is not likely to have significant negative effects on Natura 2000 site(s) (or site(s) intended to be included in the Natura 2000 network). In case of designated sites, refer to the analysis (screening) carried out in view of the site-specific conservation objectives.</i> <i>Attach, if relevant, the administrative decision.</i>	
No Natura 2000 sites are located within the area of the planned road section. The nearest Natura 2000 site is the Selja-Põdra Nature Area (RAH0000332), situated 220 m from the project area (shown on the map attached). The conservation objective of the Selja-Põdra Nature Area is the protection of the habitat types listed in Annex I of Council Directive 92/43/EEC, namely *Fennoscandian wooded meadows (6530), transition mires and quaking bogs (7140), rich fens (7230), *western taiga / old natural forests (9010), *old broad-leaved deciduous forests (9020), herb-rich spruce forests (9050), *bog woodland and swamp forests (9080), and *wooded transition mires and bog woodlands (91D0)**, as well as the habitat of the species listed in Annex II, namely the lady's slipper orchid (<i>Cypripedium calceolus</i>). At the national level, the nature area is protected in its western part, which lies closer to the road, as the Selja-Põdra Conservation Area (KLO2000198), and in its eastern part as the Mäliste capercaillie permanent habitat area (KLO3000229). The Konuvere Nature Area (RAH0000347), located north of the planned road section, lies 1.2 km from the beginning of the planned road section. However, the area to be cleared in connection with the construction works will remain 770 m from the nature area. The conservation objectives of the Konuvere Nature Area include the protection of the Annex I habitat types watercourses of plain to montane levels with submerged	

Map of Natura 2000 sites nearby the project area, reconstruction of the road E67 section Päärdu - Pärnu-Jaagupi is marked with a blue line (the base map is taken from EIA report)



DECLARATION BY THE COMPETENT AUTHORITY UNDER THE WATER FRAMEWORK DIRECTIVE 2000/60/EC

(To be filled in and signed by the competent Member State authority under Article 3(2) of the Water Framework Directive and uploaded as part of the application— merged into one file together with the environmental compliance questionnaire and the other declaration(s).)

COMPETENT AUTHORITY	
Competent authority:	Estonian Environmental Board
Department:	Water Department
Contact person:	Karina Laasik, Leading Specialist
Legal address:	Roheline 64 80010 Pärnu Estonia Tel: +372 662 5999, e-mail address: info@keskkonnaamet.ee
COMPLIANCE DECLARATION	
Name of the project:	Collaborative Adaption of bottlenecks on the E67 in Estonia and Latvia for safe and resilient dual-use road infrastructure — MobileEstLat_E67
Location:	ESTONIA, Rapla and Pärnu counties
We hereby declare that:	
A detailed assessment of the potential impact of the project on all potentially affected water bodies has been carried out and it results that <i>(please tick the boxes as appropriate)</i> :	
1) the project will not lead to deterioration of the status of water bodies	☒
2) where the project will lead to deterioration of the status of water bodies, all criteria set out in Article 4(7) of the Water Framework Directive are being complied with	☐
Additional comments (optional)	
The planned road section crosses the Velise River, Palase Main Ditch, Maanda Ditch, Poti Stream, and Enge River. In Kodesmaa village, the Langerma boardwalk crosses the Langerma Stream. For the Enge and Velise Rivers, the water protection zone extends 10 metres, the building exclusion zone 50 metres, and the shore restriction zone 100 metres. These are publicly accessible water bodies, along whose banks a 4-metre-wide public access path is provided. For Poti Stream, the water protection zone extends 10 metres, the building exclusion zone 25 metres, and the shore restriction zone 50 metres. The water protection zones of the Palase Main Ditch and Langerma Stream extend 10 metres. Under the Nature Conservation Act, the purpose of these protection zones is to preserve natural communities located along shorelines, limit harmful impacts arising from human activities, guide development in a manner that considers the specific characteristics of the shoreline, and ensure free movement and access in such areas. The purpose of the water protection zone is to protect water bodies from diffuse pollution and prevent erosion of their banks. Economic activities and the felling of trees and shrubs within the water protection zone are prohibited without the consent of the Environmental Board. If tree felling is planned during construction, it must be coordinated with the Environmental Board. The construction of new buildings and structures is prohibited within the building exclusion zone. However, this prohibition does not apply to public roads planned under an approved detailed spatial plan or comprehensive plan. Pursuant to Regulation No. 72 of the Minister of Economic Affairs and Infrastructure of	

25 June 2015, issued on the basis of Section 92(10) of the Building Code, the planned road section is classified as an official state road open to public use. Therefore, the restrictions arising from the building exclusion zone do not apply to the planned road section.

Construction-related impacts are associated with the natural watercourses within the project impact area, namely the Enge River, Velise River, and Poti Stream. The Palase, Maanda, and Langerma main drainage ditches are included, either partially or in their entirety, in the list of state-maintained common drainage channels and, according to the provisions of the Land Improvement Systems Act, constitute parts of land improvement systems. A land improvement system is a set of structures required to increase the agricultural value of land and to ensure environmental protection (Land Improvement Systems Act, Section 3(1)).

Maintenance of land improvement systems includes clearing the area, removing vegetation, flow obstructions, debris, and sediment from main channels and drainage ditches. Consequently, these main drainage ditches cannot be regarded as natural or semi-natural water bodies.

At the crossing of the Enge River at kilometre 89.7, the Jädivere Bridge will be constructed on the main carriageway, with its foundation placed on a limestone layer at a depth of 2.0-2.5 metres. At the crossing of the Velise River at kilometre 81.7, the Päärdu Bridge will be constructed for both the main carriageway and the collector road, using 6-7 metre-long piles driven 1-2 metres into limestone bedrock.

The construction of the bridges will likely require work to be carried out partially on the riverbanks and within the river channel itself. Riverbanks must be reinforced to facilitate bridge construction and the establishment of access routes along the banks. The introduction of sediment into the watercourse and the resuspension of bottom sediments may alter water colour, transparency, and pH levels, thereby affecting aquatic biota.

Culverts should preferably be constructed during the summer period when flow volumes in the ditches are minimal. During foundation works, culvert installation, and backfilling operations, water flow in the ditch must be temporarily blocked, and dewatering may be required to keep the excavation dry.

In addition, hazardous substances such as oil and fuel residues may leak from road construction machinery into the soil and surface water during the construction phase. Heavy metals originating from tyres, brake pads, and exhaust emissions, as well as rubber particles generated by tyre wear, may also enter the environment. Under normal operating conditions, the quantities of pollutants released from construction equipment are small. These substances generally reach soil and aquatic environments through precipitation and snowmelt runoff, by which time they have been diluted to low concentrations.

Consequently, no significant adverse impact on soil or water quality is expected from these sources.

SIGNATURE OF THE AUTHORISED PERSON

Name and function:	Rainer Vakra, Director General
Date of signature:	21.09.2026
Signature and stamp:	