Asian Development Bank (ADB), Accountability Mechanism, Complaint Form
(Add rows or pages, if needed)

A. Choice of function - problem solving or compliance review (Choose one below)
- Special Project Facilitator for problem solving (Assists people who are directly and materially harmed by specific problems caused, or is likely to be caused, by ADB-assisted projects through informal, flexible, and consensus-based methods with the consent and participation of all parties concerned)
- Compliance Review Panel for compliance review (Investigates alleged noncompliance by ADB with its operational policies and procedures in any ADB-assisted project in the course of the formulation, processing, or implementation of the project that directly, materially, and adversely affects, or is likely to affect, local people, as well as monitors the implementation of remedial action relates to the harm or likely harm caused by noncompliance)

B. Confidentiality
Do you want your identities to be kept confidential? □ Yes X No

C. Complainants (Anonymous complaints will not be accepted. There must be at least two project-affected complainants.)

<table>
<thead>
<tr>
<th>Name and designation (Mr., Ms., Mrs.)</th>
<th>Signature</th>
<th>Position/Organization (If any)</th>
<th>Mailing Address</th>
<th>Telephone number (landline/mobile)</th>
<th>E-mail address</th>
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Authorized Representative or Assistant (if any). (Information regarding the representatives, or persons assisting complainants in filing the complaint, will be disclosed, except when they are also complainants and they request confidentiality.)

<table>
<thead>
<tr>
<th>Complainant represented</th>
<th>Name and designation (Mr., Ms., Mrs.)</th>
<th>Signature</th>
<th>Position/Organization (If any)</th>
<th>Mailing Address</th>
<th>Telephone number (landline/mobile)</th>
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D. Project

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<tr>
<th>Name</th>
<th>Natakhtari - Jinvali Highway (a section of Rustavi - Natakhtari bypass E60)</th>
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<tbody>
<tr>
<td>Location</td>
<td>Dusheti and Mtskheta Municipalities (villages: Chorokhi, Abanokhevi, Bulachauri, Kubriantkari), Georgia</td>
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<tr>
<td>Brief description</td>
<td>This project aims at building a new 4 lane highway in Georgia. By allotting a loan to the Georgian Government, the ADB is the financier of the project.</td>
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</table>

E. Complaint:

What direct and material harm has the ADB-assisted project caused, or will likely cause, to the complainants?

If the project is implemented as outlined in the current scoping document (attached), it will cause the following damage to our communities and lives:

- Create the source for heavy and permanent pollution of a significant fertile strip of arable land along most of the riverbed of the Aragvi river (left bank).

- Cause the death of dynamic rural villages, mostly reliant on revenues from agriculture. These villages are engaged in the development of eco-agriculture, as well as represent beneficiaries of agriculture development programs (E.U., Oxfam...)

- Cause the demise of the affected villages by splitting each of them into two isolated parts, unable to function as one social structure. Most importantly, access to the river is crucial to their rural and farming lives which will be destroyed permanently, after generations of gradually building better lives.

- End to the production of internationally classified tomato variety native to the village of Choporti - *Pink Choportula*, and other high-quality agricultural products, including significant vineyards.

- Waste of strategic arable land (located 40km away from the capital city Tbilisi) that is perfectly positioned to help secure the autonomy of Georgian food production.

- Damage to the ecosystem: the wetlands formed by the river and the water reservoirs contributed to creating a micro-climate aggregating a precious flora and fauna.

- Compromise the quality of Tbilisi Water Reservoirs that are located on these territories, with road being located closer to them (the highway would be passing about 200 metres away from the reservoirs) and an increased level of transit traffic.

- Cause the degradation of a unique and beautiful landscape as well as the destruction of a healthy and quiet environment valued by nature lovers, favoured for leisure by urban residents and elected for relocation by neo-rurals. This will cause the tourism development to permanently cease in the Valley.
- Cause the depreciation of the land and properties in the valley, with the loss of agricultural and recreational value.

These points summarize the expected irreversible harm the project (if implemented) would bring to our communities and our natural environment. More details are provided in the attached letter which was sent to the ADB in July 2020.

Have the complainants made prior efforts to solve the problem(s) and issue(s) with the ADB operations department including Resident Mission concerned?
☐ Yes. If YES, please provide the following: when, how, by whom, and with whom the efforts were made. Please describe any response the complainants may have received from or any actions taken by ADB.

☐ No. (There was a letter sent to multiple recipients at ADB: as a response we received this AM complaint form to fill and submit)

F. Optional Information

1. What is the complainants' desired outcome or remedy for the complaint?

Change of the route of the Natakahi-Jinvali highway (as there are already two identified alternatives), avoiding the left bank of the Lower Aragvi Valley and its villages.

2. Anything else you would like to add?

Supporting such a project would damage Asian Development Bank's reputation which has been associated with development, respect of environment and putting people first. The project is receiving increasing attention from the national and international media to document, broadcast and show the severe threat this project presents to the people and the environment.

It should also be emphasized that due to the Covid 19 restrictions the scoping meeting was not held in accordance with the Georgian legislation, and locals only have the possibility to submit the proposals over email which greatly restricts the local community awareness and people's participation in environmental decision making process.

Attached documents:
1) Letter to ADB sent in July 2020
2) Letter to Government of Georgia sent in July 2020
3) Scoping document (highlighting significant issues regarding the chosen route)
4) Link to Save the Aragvi Valley Facebook page: https://www.facebook.com/thereagvians/
5) Article about the project in English in a national newspaper (The Messenger)
Name of the person who completed this form: Mery Zurabishvili

Signature: [signature] Date: 15 Sept 2020

Please send the complaint, by mail, fax, e-mail, or hand delivery, or through any ADB Resident Mission, to the following:

Complaint Receiving Officer (CRO), Accountability Mechanism
ADB Headquarters, 6 ADB Avenue, Mandaluyong City 1550, Philippines,
Telephone number: +63-2-6324444 local 70309, Fax: +63-2-6362086,
E-mail: amcro@adb.org