



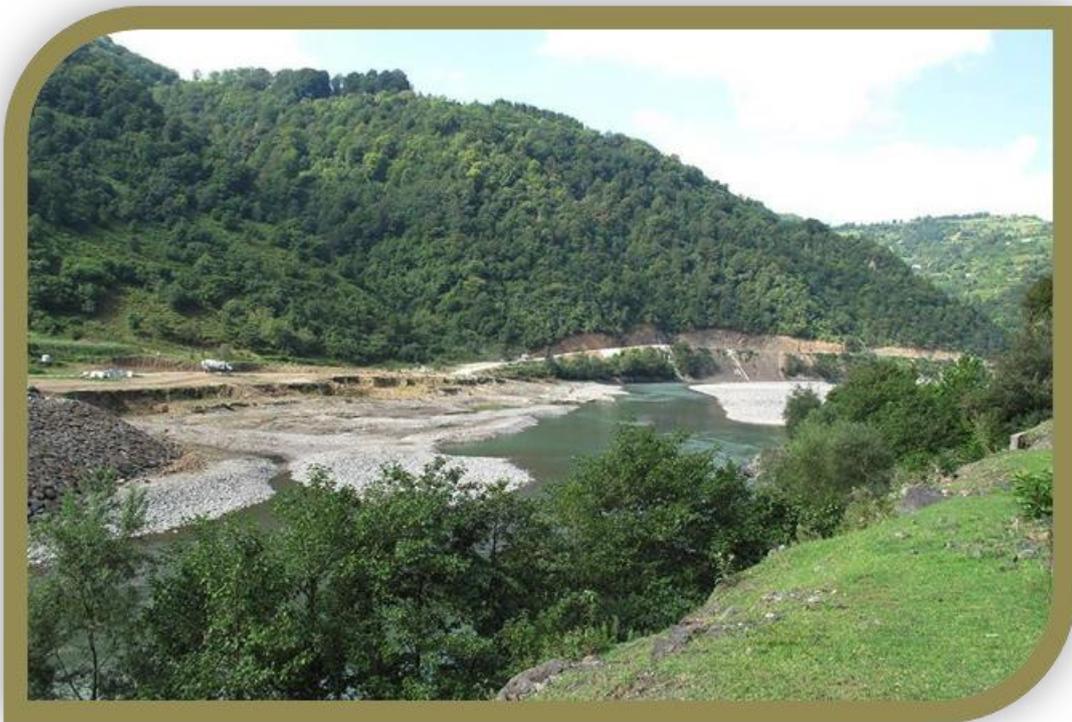
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Environmental Protection of International River Basins Project



CHOROKHI-AJARISTSKALI RIVER BASIN MANAGEMENT PLAN 2016-2021

REPORT ON STEPS UNDERTAKEN FOR THE COUNTRY ADOPTION PROCEDURE AND ADDITIONAL PUBLIC CONSULTATION MEETINGS ORGANISED



Tbilisi, March 2016

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1. Development of the River Basin Management Plan

The EU Water Framework Directive (WFD) establishes a legal framework for protection and sustainable use of water resources. Under the WFD management plan is required for each River Basin District (RBD).

For the purpose of effective basin management, the Chorokhi-Adjaristskali River basin, including its surface waters, ground water and coastal waters, was considered as "River Basin District", a territorial unit within which environmental and chemical status of the water bodies has to be determined, respective environmental objectives set, and a Programme of Measures developed and implemented, with further monitoring and evaluation.

The Chorokhi-Ajaristskali River Basin management plan (hereinafter the River Basin Management Plan or RBMP) was prepared by the Regional Environmental Center for the Caucasus in cooperation GREENTECS within the EU-funded project: Environmental Protection of International River Basins, under the consultancy assignment signed between the Regional Environmental Center for the Caucasus and the project lead implementer Hulla&Co Human Dynamics KG.

Georgia has committed to the harmonization of its national legislation with the EU Acquis, including the Water Framework Directive. According to the EU-Georgia Associated agreement, Georgia has accepted an obligation to develop river basin management plans based on the requirements of the Water Framework Directive for 2024. As part of commitment the law on "water resource management" was developed and after consultations with different ministries and other stakeholders, also after public hearings, the last version of the draft law will be submitted to the Parliament of Georgia in spring 2016.

According to the law of Georgia on "water resource management", one of the basic principles of the management of water resources is the river basin management mechanism. Planning and management of water resources at river basin level are based on river basin management plans. The river basin management plan is a legal basis for setting the quantity and quality parameters for protection and use of water resources belonging to the basin district, as well as for the monitoring of water resources.

2. Procedure of elaboration, review and approval of river basin management plans

In the frame of EPIRB pilot project "Assistance in the preparation of secondary legislation in support of new Water Code of Georgia" the normative act on defining and approval of the procedures for development, review and adoption of River Basin Management Plans (RBMPs) was developed. Based on the result of this pilot project the draft Decree of the Government of Georgia on "Procedure of elaboration, review and approval of river basin management plans" has been developed by the Ministry of Environment and Natural Resources Protection of Georgia. The Chorokhi-Ajaristskali River Basin management plan has been elaborated according to the requirements and provisions stipulated in this Decree.

Time frame of the planning cycle, elements and structure of the Chorokhi-Ajaristskali RBMP has been defined in line with Article 5 of the draft Decree of the GoG.

Participation of stakeholders and community in elaboration of river basin plan was conducted also following the Article 14 of the WFD and article 6 of the draft decree of GoG regarding Public involvement in development and review of river basin management plans. Georgia is determined to follow the obligations regarding public access to information and public participation, therefore, the Ministry of Environment and Natural Resources Protection, project beneficiary, has supported the efforts of the EPIRB project team to carry out communication, information and public participation activities regarding the development of the draft Chorokhi-Adjaristskali River Basin Management Plan. In particular following activities were implemented according to the sets out the actions described in article 6 of the draft decree of GoG:

- *"At least 2 years prior to the start date of river basin management plan validity period, a general analysis of RBD including the list of main problems related to water management should be published and made available for public to obtain comments from the stakeholders".*

The River Basin Management Planning (RBMP) tasks have been initially discussed and agreed with the members of National Coordination Committee, held on December 12, 2013.

The first Public Consultation Meeting was held on June 18, 2014 in Batumi. The background information and preliminary overview of the important water management issues for the Chorokhi-Ajaristskali basin were presented and important feedbacks of local stakeholders gathered for the next step of plan development.

The second stakeholder consultation meeting was held on March 25, 2015 in Batumi. The meeting gathered more than 35 participants. The event gave short introduction to the draft RBMP, as well as provided opportunity for feedback and comments through interactive discussion organized within two working groups. The group discussions were guided by independent facilitators, and the outcomes of the discussions were shared in the plenary session by selected rapporteur.

- *“At least 1 year prior to the start date of river basin management plan validity period, the draft plan should be published and made available for public to obtain comments from the stakeholders. This stage also includes public discussions¹”.*

The draft Chorokhi-Ajaristskali RBMP was published on April 30, 2015 on:

- The EPIRB project website at www.blacksea-riverbasins.net
- The Ministry of Environment and Natural Resources Protection of Georgia website at <http://moe.gov.ge>
- REC Caucasus website at: www.rec-caucasus.org
- *“Stakeholders and community shall be provided at least six months for making comments in writing. Public shall receive the basic information and documents upon request that was used during the elaboration of the river basin management plan”.*

The draft Chorokhi-Ajaristskali RBMP entered the public consultation phase on April 30, 2015 until the end of October 2015 including a public consultation meeting and possibilities for submitting comments. The opportunity to participate in the consultations was promoted by: direct notification mass-emails; relevant NGO networks; news items on the EPIRB project website www.blacksea-riverbasins.net and the beneficiary website www.moe.gov.ge; the regularly published project newsletter “In the Flow”, targeted media announcements.

- *“River basin management plan shall contain information on public discussions and consultation held at the preparation stage as well as the results incorporated in the management plans”.*

Besides the last public consultation meeting, the opportunity to submit written comments to the draft RBMP was open until the end of October 2015. There were up to 40 comments received across all the consultation meetings; similar comments have been grouped together and thus 17 comments have been summarized. All the comments requesting changes to the draft RBMP received while the consultation meetings have been collected and processed by the consultants developing the RBMP in close cooperation with the Ministry of Environment and Natural Resources of Georgia. In order to ensure transparency a summary report has been prepared which gives an overview on the original comments received and the responses and actions taken, whether it resulted in changes in the draft RBMP, etc. (Annex 1)

3. Final Steps for Adoption of the the Chorokhi-Ajaristskali RBMP

After addressing comments through the public consultation process, as well as incorporating monitoring results of surface and groundwater field surveys, made available as a tentative final draft to adopt it in accordance with the national planning procedures. The final step prior of adoption of the Chorokhi-Ajaristskali RBMP is incorporation of the issues related to assessment and monitoring of coastal waters to the final draft RBMP, including the following activities:

¹ Extract from the draft Decree of the Government of Georgia on “Procedure of elaboration, review and approval of river basin management plans”

- Develop of RBMP extension sections for the adjacent coastal strip;
- Incorporate the coastal monitoring plan into the final draft RBMP;
- Conduct 3 local Public consultation meetings in the pilot region(in Keda, Kobuleti and Batumi) ;

The final of the Chorokhi-Ajaristskali RBMP, including the results of the coastal monitoring survey and comments obtained during the public consultation meetings will be ready by beginning of September and then submitted to the the Ministry of Environment and Natural Resources Protection. It is Expected that the law of Georgia on “water resource management” as well as Decree of the Government of Georgia on “Procedure of elaboration, review and approval of river basin management plans” will be adopted.

Thus, the following final steps will be made by the MENRP according to the provisions of legal documents mentioned above:

- *Draft river basin management plan will be discussed internally within the ministry with participation of relevant departments and agencies of the ministry of the MENRP;*
- *Draft river basin management plan will be disseminated and discussed at national level with participation of relevant ministries, other state agencies, as well as with the government of Adjara autonomous republic;*
- *MENRP will present the finalized draft river basin management plan to the Government for approval;*
- *River basin management plan will be approved by the governmental decree.²*

4. Post public consultation steps

Chorokhi-Ajaristskali RBMP legally could be adopted and enforced if it is directly referenced by a law³ (e.g, in case if the current draft framework law “On Integrated Water Resources Management” is passed by the Parliament of Georgia. The draft law stipulates that river basin management plans shall be adopted by the Government of Georgia).

Final formal steps for adoption of the Chorokhi-Ajaristskali RBMP (RBMP) are determined by standard requirements under governmental procedures⁴ for review and adoption of governmental legal acts. These steps are described as follows:

Step 1. Submission of the draft RBMP to the Water Resources Management Service (WRMS) of the Ministry of Environment and Natural Resources Protection (MENRP).

Step 2. Initial review and comments on the draft RBMP by the WRMS.

Step 3. Revision of the draft RBMP according to the comments and remarks made during the initial review by the WRMS.

² Extract from the draft Decree of the Government of Georgia on “Procedure of elaboration, review and approval of river basin management plans”

³ See Article 7, Paragraph 9 of the Law of Georgia on Normative Acts.

Ref.: **Law of Georgia on Normative Acts (2009)** / Document number - 1876 / Date of issuing - 22-10-2009 / Document type Law of Georgia / Source and date of publishing - LHG, 33, 09-11-2009 / Registration code- 010.240.010.05.001.003.647 / Last amended by Law of Georgia - 3616-III of 28-05-2015 - Website, 04-06-2015/ Consolidated publication [English Version]
<https://matsne.gov.ge/en/document/view/90052>

⁴ **Rules of Procedure of the Government of Georgia (2013)** / Decree of the Government of Georgia N54 of 07-03-2013 / Source and date of publishing - LHG, www.matsne.gov.ge, 14-03-2013 / Registration code- 010240010.10.003.017218 / Last amended by the Decree of the Government of Georgia N38 of 18-01-2016 - Website, 21-01-2016/ Non-Consolidated publication [Georgian Version]
<https://matsne.gov.ge/ka/document/view/1869816>

Step 4. Start of the internal formal review procedure within the MENRP : Submission to and then dissemination by the WRMS of the revised draft RBMP to the relevant structural units of the MENRP for their review and comments – to be completed within one month period.

Step 5. Revision of the draft RBMP by the WRMS according to the comments and remarks made during the internal ministerial review.

Step 6. Submission of the revised draft RBMP by the WRMS to the MENRP.

Step 7. Start of the inter-governmental formal review procedure: Formal submission by the MENRP of the draft RBMP to the Government Chancellery of the Government of Georgia.

Draft RBMP has to be accompanied by the draft decree of the Government aiming at legal adoption of the RBMP and with its related explanatory note that should reflect:

- a. The general information on the draft decree on RBMP, which, in turn, includes: The reason for adoption of the draft RBMP; The aim of the draft RBMP;
- b. Financial consequences of the draft RBMP (e.g, the sources of financing the expenses concerning the implementation, influence on State Budget income part, influence on State Budget expenses part, new state financial obligations, possible financial results for the people who may be influenced by the implementation, etc.)
- c. Possible (social and economic) results for the legal and natural persons who may be influenced by the implementation.
- d. Time frame for implementation.
- e. Initiating Governmental Agency and author/s of the draft.

Step 8. Dissemination of the draft RBMP to the line Ministries and other state stakeholders for their review and comments. This stage is organized by the Chancellery of the Government of Georgia through “Electronic Governance System”.

Step 9. Receiving of comments (if any) or endorsements (no objections) from the line Ministries for their review and comments. This stage is organized by the Chancellery of the Government of Georgia and deadline for comments is set up within 5 working days from the start of dissemination. In parallel, preparation of legal conclusion on the draft RBMP decree by the Chancellery of the Government of Georgia.

Step 10. Based on the results out of the step 9 above - final decision of the Chancellery of the Government of Georgia to integrate the draft RBMP decree into agenda of upcoming governmental session.

Note: In case of comments are received from the line Ministries, the MENRP will have to revise and then submit revised draft. Time frame for this procedural step is not provided by the law.

Step 11. Consideration and legal adoption of the draft RBMP decree at the governmental session, signature by the prime-minister and official publication.

Annex 1. List of comments received in written and responses

Institution / Organization ⁵	Reference ⁶	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
The Ministry of Environment and Natural Resources Protection	6.2.1 Basic Measures for Point and Non-Point Source Pollution Reduction	Basic Measures targeting pollution that has to be also considered: <ul style="list-style-type: none"> Household and industrial wastes and linked leakages; Discharges (industrial and accidental); Railway transportation; and Extraction of inert materials especially at the source of the river. 	The measures proposed by the Ministry were incorporated in the chapter “Basic Measures for Point and Non-Point Source Pollution Reduction” of the draft RBMP.	Yes
The Ministry of Environment and Natural Resources Protection	6.2.3. Basic Measures for Reduction of Hydromorphological Pressures	Supplementary Measures: Environmental gap analyses related to waste management.	The following measure has been added to the basic measures related to the drinking water abstractions: Designation of sanitary zones for the headworks of drinking water abstraction and implementation of strict protection regime within these zones.	Yes
The Ministry of Environment and Natural Resources Protection	6.2.3 Basic Measures for Reduction of Hydromorphological Pressures	The below additional measures targeting hydro-morphological alterations have been identified: <ul style="list-style-type: none"> Arraignment of artificial fish pass facilities and/or use of artificial replenishment approaches in high risk water bodies; Protection of river sanitary zones (there are several pollution sources identified in Chakvistskali river which supplies Batumi city with drinking water) Planning of measurements in compliance with spatial development plan of Ajara. 	It was taken into account	Yes
The Ministry of Environment and Natural Resources Protection	Table 43 - 7.3 Ecological Effectiveness Analysis and Ranking of Measures	The following changes in the priority list of the PoMs have been suggested: <ul style="list-style-type: none"> Review of permitting conditions – from medium priority category to high; Introduction of the new methodology for environmental flow calculation – from medium priority category to high; Reduction of water loss in Batumi water supply system – from low priority category to medium. 	It was taken into account	Yes
The Ministry of Environment and Natural Resources Protection	General	Include climate change adaptation measures based on climate change adaptation strategy of Ajara region elaborated in 2015.	It was taken into account	Yes
The Ministry of Environment	General	As a supplementary measure, to include in the draft	As a part of pressure impact analysis, waste has not been identified as a significant	No

⁵ Please ask respondents whether the name of their organization can be published, if not feasible the sector to which they belong should be included: agriculture, industry, civil society etc.

⁶ Chapter of the draft RBMP

Institution / Organization ⁵	Reference ⁶	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
and Natural Resources Protection		RBMP gap analysis related to waste management.	pressure, so no supplementary measure will be included in the draft PoM of RBMP. However it will be recommended for the next planning cycle.	
NGO Green Alternative	General	On the ecological status of the Chorokhi-Ajaristskali river basin, the biggest threats are current and planned HPP projects. Therefore, it is not clear what is meant by “trans boundary” character in the RBMP. It is not defined or explained why Environmental Objectives were exempt from the eight river bodies.	Heavy modification of natural features (biology, hydrology, morphology) of 8 water bodies (WBs) of the Chorokhi River, designated as Heavily Modified Water Bodies (HMWBs) is completely determined by the operations of upstream HPP cascade (Muratli scheme). The management of the given HPPs is out of the control of Georgia’s jurisdiction and fully rests upon Turkey. With its own resources our country can do nothing to achieve a good ecological potential (env. objective for HMWBs, as prescribed by the EUWFD) for mentioned 8 HMWBs. The only feasible measures that can be implemented by the Government of Georgia within its competencies is to enhance flood-carrying capacity of the river by implementing river bank reinforcement and flood plain enhancement measures (levying, damming, restoring floodplain vegetation, etc.) within 10-km section to the mouth that could not improve the ecological potential of 8 HMWBs of the Chorokhi River. Thus, the transboundary context of the issue, as defined by The Guidance Document 20 on the Exemptions to the Environmental Objectives of the EUWFD Common Implementation Strategy (p. 15, sub-chapter 3.2.7 Transboundary Context) was considered as justification for exemption to Environmental Objectives. This approach was discussed and agreed upon with key stakeholders, including the Ministry of Environment through vis-à-vis and larger key stakeholder meetings.	
NGO Green Alternative	General	Exclusion of pressures and impacts of greenfield HPPs without appropriate study of their impact, contradicts the general goal of the RBMP as well as WFD.	Exclusion of pressures and impacts of greenfield HPPs from the scope of work of the RBMP was preconditioned by the fact that during the preparation of the draft document none of these projects, except for one was under implementation thus; there was no physical pressure imposed by planned HPPs on the WBs by that time. The IMPRESS - Guidance Document 3 on Pressures and Impacts, used as a major document for pressure-impact analysis under the given project recommends consideration of past and actual activities (same as driving forces) having direct effects (same as pressures) on WBs for identifying significant pressures and impacts and ultimately WBs “at risk”. As per same methodology, planned activities and foreseeable pressures are not applied for designating Water Bodies “at risk” and/or defining the current ecological status of the WBs. Based on this approach, the RBMP design team didn’t consider planned HPPs and associated to them the potential pressures as factors for identifying Water Bodies “at Risk”. Though, these projects were discussed in general terms based on desk review of exiting data and information (e. g. EIA and other technical design documentation of the planned HPP projects) as part of the River Basin Analysis (RBA)/background analysis. Moreover, the recommendations were made to revisit and review the RBMP plans once the construction of these HPPs commences. As for the concrete HPP on the Ajaristskali River that was under construction by the time of the development of the RBMP, 2 joint field surveys conducted in parallel with preparation of the RBMP didn’t reveal any significant deterioration of hydromorphological and biological quality elements of the WBs at or downstream the construction site (e. g. on the Shkalta river). Therefore, the RBMP design team didn’t designate the WBs at the construction site/Ajacent to the construction site as WBs “at Risk”. Currently, almost all planned HPPs are under construction. Visual site observation recently made by the project experts has revealed significant deterioration of morphological	

Institution / Organization ⁵	Reference ⁶	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
			parameters of the WBs at the/Ajacent to construction sites. Given the RBMP is still a draft document, these changes will be reflected in it, implying that EOs will be set and relevant measures elaborated for WBs affected by the construction of new HPPs.	
NGO Green Alternative	General	It is not clear what purpose copy pastes of big parts of the EIAs for different HPPs serve.	EIA information was used as a background information	
National Environmental Agency	General	Incorporate into the plan, the results and data of joint field surveys of 2014 and 2015.	It will be taken into consideration. 2014 survey data are already incorporated. However, physical-chemical and chemical analysis results for JSFs for all three JFSs are currently being scrutinized by the key experts, as well as biological monitoring results for 2015. Once the final report on 2015 JFS is ready its results will be incorporated in the RBMP	Yes
National Environmental Agency	General	Incorporate into the plan, the results of pilot projects as a separate chapter.	It was taken into consideration	Yes
Department of Environmental Protection and Natural Resources of Autonomous Republic of Ajara	General	Incorporate list of stakeholders including contact details into the RBMP	It was taken into consideration	Yes
NGO Flora and Fauna	General	Include enhancement of transboundary cooperation in RBMP	It was not considered as a separate measure since there was no objective set for Chorokhi river basin, based on exclusion of the 8 HMWBs from EO, however enhancement of the trans boundary has been highlighted as a recommended action in RBMP.	Yes, partially
NGO Flora and Fauna	General	Not all local stakeholders have been involved in the RBMP consultation process. It will be useful to organize additional consultation meetings in order to involve all the necessary key stakeholders.	The message has been delivered to the EPIRBP project office.	Yes
NGO Remisia	General	The impact of climate change on Chorokhi-Ajaristskali river basin water resources	It was taken into account	Yes
Black Sea Eco-Academy	General	The RBMP is a very large document and so it would be convenient for the key stakeholders to have a shorter and interpreted version.	Summery RBMP document brochure will be designed in two languages.	Yes, Partially
Black Sea Eco-Academy	General	Clarify potential consequences of climate change on identified pressures.	It will be taken into account	Yes

Annex 2: List of comments received during the public consultation meeting and responses

Reference ⁷	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
General comments	The need for a surface water cadastre was mentioned, as being one of the EU WFD requirements. Furthermore, it was mentioned that the project should consider also the estuaries of the rivers.	The pilot project implementation is planned by the project to include coastal waters in the RBMP. Surface water cadastre was not requested by the WFD.	Yes
	The revision and appropriate harmonization of the Georgian terminologies with the EU WFD terminologies was suggested. (e.g. “modified water bodies”)	The terminology is defined by the draft “Law on Water Resources Management”, after adoption of the Law (probably, at the end of 2015) the terminology used in the draft “Chorokhi-Ajaristskali river basin management plan” will have to be checked	No
	Information was requested whether the heavy metal pollution being washed down by the Chorokhi River from upstream is monitored and would pose any threat on the reservoirs, due to the danger of accumulation. If yes, participants were interested about possible prevention measures.	As per results of joint field surveys, no heavy metal pollution was identified in the river basin.	No
	In the discussion after the presentation, a reference was made to the Strategy of Integrated Management of Black Sea Basin, elaborated in 2009, which unfortunately has not been implemented. The main question targeted the correlation of the Chorokhi-Ajaristskali RBMP and the mentioned strategy, as well as whether the legal sphere should be improved in order to ensure its implementation.	The Strategy has not been officially adopted and is not binding document. As it was elaborated in 2009, probably, it itself has to be updated	No
	Some of the participants noted that no reference was made to any geological studies. Correct names of the rivers should be used as otherwise it will pose a problem for identification at a later stage.	Hydrogeological studies were conducted as part of JFSs and they are incorporated in the document.	Yes
	Inclusion of research with focus on the groundwater and the impact which the newly constructed HPPs could have on this was suggested. If the exploitation of the power station will question the life of the population, it will also create problems with all investors, and devastate totally the life of thousands.	Newly constructed HPPs already passed ecological expertise and have the Environment Impact Permits, issued by the Ministry.	Yes
	Working Group on Pollution (Point and Diffuse sources) WG1: considered that the current draft plan is realistic and achievable, although investments, time limits, mobilization of resources and awareness raising are considered as critical points. The group members expressed the importance of having the dates reflected in the draft plan in agreement with the responsible authorities.	As the project is continued, during next period these position will be individually discussed with responsible authorities and water users included in the Program of measures	Yes
	The importance of community organizations taking part in the development of such plans, like the RBMP, was noted. It was also mentioned that through awareness raising of the population, their interest on protection of rivers could be increased. As such, for example, could lead to decreasing of the illegal waste disposals and the floating wastes, such as plastic, along the rivers.	The community organizations will be involved in the further public hearings as well as they are considered as one of the responsible parties for implementing a number of pilot projects as part of basic and supplementary measures	Yes
5. Environmental objectives	Working Group on Hydromorphological alterations (Abstraction, Hydropower works etc.) – WG2: agreed with the environmental objectives set in the plan and added the significant management issues identified for rivers should be identified separately, and	Hydromorphological pressures are considered as part of pressure impact analysis of river basin at the surface water body level based on desk review and JFSs, which is a requirement of the WFD and is recommended by the IMRPSS CIS	Yes Partially

⁷ Chapter of the draft RBMP

Reference ⁷	Comment	Response/Action	Comment has been integrated in the RBMP [YES/ NO]
	have highlighted necessity to add hydro-morphological pressures to the environmental goals, namely to improve recovery capacity of hydro-fauna by artificial replenishment of endangered species.	guidance document. Artificial replenishment of endangered species will be added to the measures	
6. Programme of Measures 6.2.1.	WG 1: proposed the below measures additionally to those included in the draft RBMP: Basic Measures targeting pollution that has to be also considered: <ul style="list-style-type: none"> Household and industrial wastes and linked leakages; Discharges (industrial and accidental); Railway transportation; and Extraction of inert materials especially at the source of the river. 	The measures proposed by the WG 1 were incorporated in the chapter “Basic Measures for Point and Non-Point Source Pollution Reduction” of the draft RBMP.	Yes
6. Programme of Measures 6.2.2.	WG 1: proposed the below measures additionally to those included in the draft RBMP: Supplementary Measures: <ul style="list-style-type: none"> Environmental gap analyses related to waste management. 	The following measure has been added to the basic measures related to the drinking water abstractions: Designation of sanitary zones for the headworks of drinking water abstraction and implementation of strict protection regime within these zones.	Yes
6. Programme of Measures	WG 2: The below additional measures targeting hydro-morphological alterations have been identified by the working group: <ul style="list-style-type: none"> Arraignment of artificial fish pass facilities and/or use of artificial replenishment approaches in high risk water bodies; Protection of river sanitary zones (there are several pollution sources identified in Chakvistskali river which supplies Batumi city with drinking water) Planning of measurements in compliance with spatial development plan of Ajara. 	It was taken into account	Yes
7.5 Prioritization of Basic Measures	WG 1: It is recommended to include measures focusing on drinking and bathing water protection and sanitary protection zones in the priority measures.	It was taken into account	Yes
	WG 2: The working group suggested the below changes in the priority list of the PoMs: <ul style="list-style-type: none"> Review of permitting conditions – from medium priority category to high; Introduction of the new methodology for environmental flow calculation – from medium priority category to high; Reduction of water loss in Batumi water supply system – from low priority category to medium. 	It was taken into account	Yes