

CENTRAL GREECE MOTORWAY (E-65)



1. INTRODUCTION

This Environmental Management Report is the approach of the Construction J/V's Environmental Management Process for the first semester of 2013 and has been drawn up in the context of its contractual obligation deriving from Article 13.3 paragraph (c) of the Project's Design - Construction Agreement (11.2.2 (iii) of the Concession Agreement 3597/20-07-2007 - OGG 3445A/25-07-2007).

The documentation of each semi-annual environmental management report is part of the Annual Report submitted to the EYPE of YPEKA by January 31 of each year throughout the Design - Construction and Operation Period, in accordance with the approved Environmental terms of the project.

Also, it has to be noted that this report constitutes a development/improvement of the structure of previous retrospective reports and it is clear that the purpose of this development/improvement is the best way of addressing environmental issues. The ongoing Environmental Management Plan of the project, which is characterized by its continuous improvement, plays an important role in this development.

This Semi-annual Environmental Management Report refers to the first semester of 2013 (01.01.2013 to 30.06.2013).

1.1 DESCRIPTION OF THE PROJECT

State: Hellenic Republic

Concessionaire: CENTRAL GREECE MOTORWAY S.A.

Constructor: CENTRAL GREECE MOTORWAY (E65) J.V

Independent Engineer: SCOTT WILSON- OMEK



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The scope of the project includes the design, financing, construction, operation maintenance and use for thirty (30) years in accordance with the respective Concession Agreement:

- (i) "Central Greece" Motorway with a length of 174 km
- (ii) Skarfia - Raches section of the PATHE motorway with a total length of approximately 57 km

The project is a part of the Trans-European Networks (TEN).

It serves international traffic portals in Igoumenitsa and Kristallopigi as well as the trans-regional traffic.

The Central Greece Motorway (E65) starts at CH. 203+000 of the PATHE motorway and ends at Egnatia Odos, area of Panagia Trikalon, crossing the prefectures of Fthiotida, Karditsa and Trikala.

It includes:

- 15** Interchanges
- 7** Toll Stations
- 6** Motorists Service Stations
- 3** Operation & Maintenance Centers
- 5** Tunnels

As well as bridges, over and under-passes, support walls, drain-pipes, etc.

According to the environmental terms of the project, the Central Greece Motorway (E65) is divided in the following three sections:

Section	From CH.	To CH.	A.E.T. Decision*
1 st Section	0+000	85+800	Joint Ministerial Decision A.E.T.

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			144504/18.11.2005 (Decision Amending 144504/18.11.2005 JMD A.E.T)
2 nd Section	85+800	137+550	Joint Ministerial Decision A.E.T. 145521/18.11.2005
3 rd Section	137+550	175+000	Joint Ministerial Decision A.E.T. 147014/18.11.2005

The sections of the Concession Agreement Project are divided in eleven (11) Geographical Units (GU). For each GU, the physical object is analyzed into Groups of similar operations in the Partial Section Bi Price of Designs - Constructions.

The New State Sections that are already being constructed by the State and that, after their completion, will be incorporated into the Concession Project are as follows:

S/W	SECTION	Km.
12 S/W	Skarfia - Thermopiles section	17,320
13 S/W	Thermopiles - Sperchios section (except for the ERGOSE bridge which is under construction)	8,5
	Bridge under construction by ERGOSE at Thermopiles - Sperchios section	
14 S/W	Sperchios - Ag. Paraskevi I/C	3,5
15 S/W	Ag. Paraskevi I/C - Ag. Marina Section	8,5
16 S/W	Ag. Paraskevi Marina - Raches section	19,200

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	Technical works at PATHE - Lianokladi section which is under construction by ERGOSE	
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The above New State Sections, pursuant to the relevant environmental terms, are divided into five sections, as stated below:

Section	FROM CH.	TO CH.	A.E.T. Decision	Description
Skarfia – Thermopiles in Skarfia – Lamia section of PATHE motorway	Skarfia 179+300 (NEW)	Thermopiles 196+750 (NEW)	JMD 146113/12.07.2005	From OSE (Hellenic Railway Corporation S.A.) Bridge – 250m. NW Edge beginning of Thermopiles I/C 17,5km.
			JMD 126696/06.06.2007	Amendment of the JMD 146113/12.07.2005
			122881/08.03.2010 EYPE/YPEKA	Environmental Licensing of Ag. Triada & Molos I/C Toll Stations
Optimization of the National Road to a PATHE motorway in Skarfia – Lamia section, subsection from the beginning of Thermopiles I/C to Nea Kiti of Sperchios river”.	Thermopiles I/C 198+300	Nea Kiti of Sperchios River	JMD 131550/04.05.2003	8,8km.
			121668/08.02.2010 ΕΥΠΕ/ΥΠΕΚΑ	Environmental Licensing of Thermopiles I/C Toll Station
"Optimization of the National Road to a PATHE	Nea Kiti of Sperchios	Roditsa I/C	JMD	3,78km.

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Section	FROM CH.	TO CH.	A.E.T. Decision	Description
motorway, section from Nea Kiti of Sperchios river to Roditsa I/C".	River		146109/30.09.2005	From 130m. before the axis of the New Kiti of Sperchios River up to the East of Roditsa village
"Optimization of Athens – Thessaloniki National Road in PATHE motorway, Lamia – Raches section, subsection from CH. 3+500 to CH. 12+000"	3+500	12+000	JMD 130665/02.05.2003	8,5km. From 211+000
			JMD 195214/11.01.2011	Amendment of 130665/02.05.2003
"Overall Bypass at Stylida – Karavomilos"	12+000	31+500	JMD 100198/30.05.2006	19,50km. From New National Road to the western edge of RACHES I/C
			121667/08.02.2010 EYPE/YPEKA	Environmental Licensing of Ag. Marina I/C - Stylida I/C & Stylida I/C & Karavomilos Toll Stations

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2. GENERAL ISSUES

2.1 BRIEF REPORT

The “Central Greece Motorway S.A (E65)” J/V was informed by ODOS KENTRIKIS ELLADOS SA on 04.12.2012 about the Ministerial Decision of the Minister of Development, Competitiveness, Infrastructure, Transport and Networks, in compliance with which the administrative and supervisory responsibilities of the Concession Project transferred from Egnatia Odos S.A. to the General Secretariat of Public Works of the Ministry of Development, Competitiveness, Infrastructure, Transport and Networks.

On 25.02.2013 the Independent Engineer informed that from February 13, 2013 the new name of the I.E. Consortium is J/V URS Infrastructure & Environment UK Limited - OMEK SA, CENTRAL GREECE. There is no change in the structure or the function of the I.E. Consortium and there is no need to renew the existing agreements. For this reason all agreements and obligations of the consortium remain unaffected.

2.1.1 Outstanding Issues

1. On September 2011, the Construction J/V of the project submitted the Global Position Statement on various problems in the up-to-date implementation of the project. On 25.04.2012 and 30.04.2012, the J/V submitted the final documentation as regards the claims to the Concessionaire and the State respectively.
2. The 2nd EPD was not achieved due to serious delays in the delivery of land. On 11.10.2010, the Technical Dispute Resolution Committee decided that this time extension should be of 10-months, i.e. 31.10.2011. On 14.12.2010, the J/V informed the Concessionaire that there are still delay events relating to the 2nd EPD and therefore the above extension shall not be achieved and a further extension was requested. On 09.02.2011, EGNATIA ODOS S.A. approved a six-month extension. EGNATIA ODOS S.A. and the Concessionaire informed the Independent Engineer to defer the opinion as both parties shall attempt to find a consensual resolution of the subject.

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After application for suspension of the JMD AET no. 147014/18.11.2005 (CH. 137+550 – CH. 175+000) submitted to the Council of State by three (3) local clubs and 2 OTA of the broader region, the President of the Fifth Chamber of the Council of State has issued a Temporary Order to suspend execution of the said JMD until the issue of the Suspension Committee decision on the pending application for suspension, which was postponed from 16.11.2011 to 09.05.2012. All construction works of the J/V in this section have been suspended from 02.07.2010. Given the aforementioned and the serious delays in the delivery of land, the third EPD was not reached on 30.12.2011 and the J/V requested time extension and also communicated its right for extension and compensation in accordance with Article 30.1 of the Design-Construction Agreement.

On 13.01.2012, EGNATIA S.A. announced an extension for both the 2nd and 3rd EPD until 29.02.2012 in order for the parties to continue the negotiations and restart the operations. On 01.02.2012 the J/V and on 17.02.2012 the Concessionaire made clear that, although the extension covers contractually this period of negotiations, is in any case irrelevant to the requested extensions of both EPDs, given that the delay events remain valid until today. On 02.03.2012 EGNATIA S.A. announced a new extension for both the 2nd and 3rd EPD until 29.05.2012 based on the aforementioned rationale for the continuation of the negotiations. Then EGNATIA S.A. announced new extension until 30.08.2012. Currently EGNATIA S.A. announced new further extension until 30.11.2012 for both (2) EPDs.

3. On 25.01.2011, J/V informed the Concessionaire on its decision to exercise the right of the works suspension. After 14.02.2011 only activities settling outstanding works as well as safety and fencing works of constructed parts of the project occurred.
4. The J/V has not received the approved Certifications 11 to 22 (Works of April, May, June, July, August, September, October, November & December 2010, January, February and March 2011), creating a serious problem of financing and influencing clearly the pace of construction which led to the suspension of the works.
5. The revised delivery deadlines of 12NA-13NA-14NA-15NA-16NA State's New Sections, i.e. 25.06.2009, 10.09.2009, 28.06.2010 & 28.06.2011 respectively, have not been achieved (only the area for the construction of the toll stations on Thermopiles I/C was delivered via Sites Disposal

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- Protocol XL (03.02.2010). Section CH. 9+630 – CH. 10+385 for the construction of Agia Triada and Molos toll stations were delivered via 07.07.2009 Protocol VII; Molos lateral toll stations could not be completed due to additional pending expropriation)
6. There was a significant works disruption along the Motorway due to non-delivery of reserved areas where archaeological findings were identified.
 7. With respect to the Public Utility Networks, so far the whole process on GE 1N.2, 4N, 5N, 6N, 7N, 8N & 9N has been delayed.
 8. The contractual deadline for delivery of the private lands 31.03.2009 has not been achieved. Furthermore, the public lands of the project have been officially delivered to the J/V on 28.05.2009 (Protocol I) instead of 30.04.2008 (Design-Construction Agreement) although the ownership of some sections is not clear. As regards the private lands through the requisition process, until the reference date (25.09.2012), the following sections have been delivered officially to the J/V, whereas no section has been delivered to the J/V after 18.05.2011 (through Protocol 53) and until 23.04.2012, whereupon LVIII - LXII the protocols have been delivered. Four (4) more protocols have been delivered afterwards.
 9. Also, it has to be mentioned that the required sites of the JMD 2036/29.11.2010 approved amendments have not been delivered.
 10. The J/V has submitted its updated claims to the Concessionaire on 14.12.2012, within the agreed negotiating framework with the State to reach an agreement to restart the project.
 11. On March 15, 2013 signed the agreement on the Contractor's Past Claims by both parties (State – Concessionaire - Constructor).

In many cases the received sections are not continuous including non-expropriated parcels and do not allow the occupation of land across the width of the expropriated zone in sufficient length with obvious implications in the construction.

- **GU 1N.1 (0+000 – 6+200)**, on 14.02.2011, with LII Protocol, all the non-deliverable sections have been delivered. Also, in February 2011, ERGOSE finally (after a year of delay) designated sites for the deposition of gravel located on the CH. 5+610/5+680, but - due to the current suspension of the works - this activity cannot be realized.
- **In GU 1N.2 (6+200 - 14+500)**, on 14.02.2011, with LII Protocol all the non-deliverable sections have been delivered. **It should be noted that up to 14.02.2011, the situation of the expropriations for the critical section**

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0+000 - 14+500 remained as it was from 05.03.2010, (almost one year of delay), which was the date of the last delivery protocol and thus the finally approved extension of the 2nd EPD completion fails and thus a new extension is requested.

- **In GU 2N.1 - 3N.1 (28+500 – 43+200)**, for the GU 2N.2 there is a revocable land register (CH. 29+267 – 30+326), for the 3N.1 (up to CH. 43+200) the relevant land register design has been approved by the D12. Expropriation did not take place in any of the two G.U.s.
- **In GU 3N.2 - 3N.3 (43+200 - 48+161)**, on 20.01.2011, through 47 Protocol, some areas between CH. 46+813 – Ch. 48+145.
- **In GU 4N, 5N, 6N.1 (48+500 - 90+500)**, some requisitions have been paid but not all of them. In the City of Menelaida (CH. 47+000 - 56+000), the parcel owners, accompanied by the police, stopped the works, although these parcels are delivered to the J/V as public land. Serious delays in the commencement of construction works of Overpasses due to the refusal of the owners of adjacent parcels to lease the land for the diversion of traffic resulting in the creation of large detours causing additional delays. Finally, there is a delay of works due to non-requisitioned parcel (ΚΠ 115) in CH. 80+880, which occupies almost the entire width of the road artery.
- **In GU 6N.2 (90+500 - 97+000)**, the delivery of land has not been completed.
- **In GU 7N.1 (97+000 – 109+500)** on 18.5.2011, with LIII Protocol, all pending sections of land have been delivered.
- **In GU 7N.2 (109+500 - 111+000)** on 18.5.2011, with LIII Protocol, all pending sections of land have been delivered.
- **In GU 8N (111+000 - 123+000)**, there are still undeliverable lands in Raksa area (CH. 115+600 ~ 118+000) pursuant to the approved 2nd Ministerial Decision, resulting in failure to perform the works (for example Underpass CH. 117.1). In this region (Raksa), the non-completion of the delivery of land creates a negative timeframe, given the archaeological involvement in the same region as well. The remaining pending sections have been delivered through the recent 58-59 protocols.
- **In GU 9N (123+000 - 136+000)**, there are still inconsistencies that make the works execution impossible, creating a negative timeframe, have been arranged through the recent LVIII protocol.
- **In GU 10N (136+000 - 144+000)**. Undeliverable lands remain in section CH. 137+200 ~ CH. 144+000. By 02.07.2010 works in CH. 137+553 ~ CH. 144+000, after the temporary injunction by the Council of State, have been interrupted (No. 827/2010).
- **In GU 11N.1, 11N.2 & 11N.3** Suspension of all works by 02/07/2010 because of a temporary injunction by the Council of State (No. of request for works suspension 827/2010).
- Regarding **PATHE**, the works are delayed because both the contractual and the revised land delivery dates in sections 12NΔ, 13NΔ, 14NΔ, 15 NΔ,

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16 ΝΔ have not been achieved (construction area of Thermopiles I/C toll station was delivered on 03.02.2010 with XL Protocol). Under VII Protocol, a section of motorway from CH.: 9+630 – CH.: 10+385 was delivered to the J/V for the construction of the frontal toll stations of Agia Triada and Molos I/C and in particular the road SRK3 and branches 1.2 for the construction of Molos lateral toll station. The additional expropriations in Molos I/C have been delivered with LXX Protocol, on 14.03.2013. The additional expropriations in the Lateral Toll Stations of Agia Marina I/C and Karavomylos I/C respectively have been delivered additionally with LXIX and LXXI Protocols, on March 14, 2013. The delivered areas have serious problems due to the already established construction work in Agia Triada and the non-delivery of additional land expropriations in Agia Triada I/C. In addition, there are delays in 15ΝΔ section because of inalienable land in the areas of Mavromantila, Agia Paraskevi, Agia Marina, Karavomilos toll stations.

2.1.2 Report period

At the reporting date of this report (30.06.2012) the main issues of the involved with the Public Utility Networks work are the following:

➤ **PPC:**

GU 1N.1: The low-voltage and medium-voltage networks in the area where the sections AB1 & AB2 are crossing the Old National Road have been relocated.

GU 1N.2: The relocation works of High Voltage in Lianokladi MSS remain stopped. The local Service of PPC has not responded so far on the relocation of networks along the axis (CH. 12+040, 12+500) since EGNATIA has not proceeded with the relevant payment. However, the PPC has started the network power relocation works in CH. 9+500 in the main artery of E-65 but the quality of the restoration works is not acceptable, since the embankment works of the motorway in this CH. have been completed; hence the PPC subcontractors carried out excavations on our embankments in order to create underground passages. Finally, the issue of power cut and relocation of drilling (CH. 11+700) remains, while impeding the embankments construction. The relocation of the electricity grid from the vertical road to Kompotades in CH. 12+831 is completed. Also, OSE optical fibers in TE47 1 structure in Karpenissi I/C branch 1 impede the construction of the A1 abutment and thus the completion of branch 1 for the linking of E65 with the existing National Road.

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All the above pending problems have created continuous delays resulting to the failure even of the approved extension for completion (up to 31.01.2011) and thus a new extension has been requested.

GU 5N, 6N.1: There are delays due to non-timely networks relocation. The relocation of PPC network in the area of Karditsa I/C has not been completed in CH. 89+350.

GU 6N.2: All Public Utilities Networks within the expropriation zone of the project have been localized and all necessary arrangements for their relocation have been made.

GU 7N.1: All Public Utilities Networks within the expropriation zone of the project have been localized and all necessary arrangements for their relocation have been made.

GU 7N.2 & 8N: The relocation cost of PPC network from EGNATIA S.A. has been paid. Relocations in progress.

GU 9N: The network design and relocation in the area of Kalampaka I/C is still pending.

GU 10N: Contacts with PPC and additional information and clarifications provision in order for the relevant relocation design to be made.

PATHE/GU 12S/W: No relocation of PPC network in CH. 10+270 and 12+160 SRD1 (Responsibility of EYDE PATHE TKE Lamia).

PATHE/GU 15S/W: The relocation of PPC network in DSR3 (Mavromantila Toll Station) has not been completed.

➤ Hellenic Organization of Telecommunications (OTE):

PATHE: Horizontal alignments have been submitted to all the organizations of telecommunications for possible underground networks and their relocation. WIND & COSMOTE companies have been answered negatively so far. The air network from 12+300 to 12+500 (SRD1) has not been relocated.

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➤ **Local Organization For Land Improvement (TOEB)**

GU 8N & 9N: The relocation works of Theopetra TOEB and Vassiliki TOEB networks have started. Contacts with YEB of Trikala for the acceleration of the design regarding the relocation of Raksa irrigation system (110+550 – 115+600).

➤ **Water supply - Drainage**

GU 1N.2: The Municipal Water Supply and Sewerage Company of Lamia (DEYAL) has not yet relocated part of the water supply pipeline to the area of TE40 (km 9+300 – 9+400) overpass which affects the construction of the embankments in the area.

➤ **Military fuel pipeline in CH. 111+950 and 122+990:**

GU 8N: GEA submitted the safety standards of the fuel pipeline, and details on the relocation of the pipeline on 26.06.2010. In Vassiliki I/C (CH. 122+800) where, - according to the instructions of GEA - changing of the route of the pipeline will be demanded, a technical solution along with the design of the junction is under consideration.

- The implementation of the Environmental Operating System of the Project continues as usual.
- The revision of the Environmental Management System of the Project is under development.

2.1.3 Problems and possible risks

- While the J/V's operations are under suspension, all G.U.s are 'charged' with additional delays corresponding to the period from 14.02.2011 until the end of the works' suspension and the remobilisation time of the appropriated funds.
- Delays in the process of requisition which also lead to delay in the delivery of certain sites and in turn of several parts of the project, as in GU 1N.1 & 1N.2 (CH. 0+000 – CH. 14+500) where the 2nd Exclusive Deadline was not achieved and a 10-month extension has been granted. The fact that these expropriations finally have been completed on 14/02/2011, as well as the aforementioned delays in Public Utility Network relocations, resulted in failure to achieve the approved extension (up to 31.01.2011),

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when an additional extension has been requested. Extension is currently given until 30.11.2012 by EGNATIA SA.

- Furthermore, these delays affected GUs 8N, 9N, 10N, 11N where additionally for the last two sections, the works of J/V have been stopped from 02/07/2010 (CH. 137+553 – CH. 175+000), due to temporary injunction on behalf of the Council of State (no. 827/2010). Under those circumstances, the 3rd Exclusive Partial Deadline cannot be achieved. Extension is currently given until 30.11.2012 by EGNATIA SA.
- ERGOSE temporary bypass of the existing Lamia-Karpenissi National Odos along with the cessation of the works in the bridge of ERGOSE (MICHANIKI SA constructor) prevents the construction works of E-65 motorway in CH. 15+375, until the completion of the said bridge.
- Delays in the test archaeological cuts due to the fact that the sites are not delivered and also due to the inadequacy of the staff provided by the Archaeological Services at GUs 2N, 4N, 5N, 6N, 9N & 10N. The continued delays contradict the approved schedule (according to which most of the works should have been completed on June 2009).
- Significant disorganization of the works due to the engagement of the sites with archaeological findings along the motorway alignment.
- Delays due to the delayed relocation of Public Utility Organizations at GU 1N.2, 5N, 6N, 7N, 8N, 9N.
- Delays due to the lack or rejection of the appropriate borrow pits/quarries, as up to now a number of such sites have been rejected by the Archaeological & Forest Services. Delays were also due to the delay of the competent Service to reply to our submissions. For example, up to now, only one (Kalamaki Vryssi) of the four (4) borrow pits to be approved in the area of Lamia has received a permit on April 2010 – thirteen (13) months following the relevant request which seriously affected the progress of the embankments at GU 1N. Moreover, the Cadastral Service of Karditsa Prefecture received approval to intervene in the withdrawal of material and arrangement of the Onohonos' riverbed, in accordance with the approved Special Technical Implementation Study (STIS) while during the progress of

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the works, some residents appeared, who claimed that they own the area of the works without having proprietary titles which led to the disruption of the works.

- Specific regulations regarding the design of KO34 area (CH.108+450) are still pending on behalf of EGNATIA S.A., given that the study of the basic design has been basically annulled since the relevant land and property register has been withdrawn.
- The felling trees in the 139+000 ~ 139+200 region (abandoned military camp) is pending due to objections on behalf of the military unit.
- Delay due to failure to accomplish the revised delivery deadline of the site for sections (12NΔ-13NΔ-14NΔ-15NΔ-16NΔ) on 25.06.2009, 10.09.2009, 11.09.2009 & 28.06.2010 & 28.06.2011 respectively. Delay in the entire completion of the toll station at Molos I/C due to the additional expropriation, although the toll stations have been delivered with appropriate traffic regulations. Non-delivery of land for the construction of Ag. Marina & Karavomilos toll stations.
- Delay due to the existence of worksite installations by third parties within the range of works occupancy (Agia Triada Toll Stations) at the section 12NΔ thus creating serious problems for the works until the sites are completely free. Furthermore, there is a delay in the construction of the ITS network at Roditsa I/C (14NΔ) due to the incomplete works at PATHE.
- Delays in the construction of tolls in G.U. 15S/W due to non-expropriations in the construction sites of Mavromantila and Ag. Paraskevi tolls. Possible delays in the progress of the works of SRD1 due to non-relocation of PPC network in CH. 10+270 and 12+160.

2.2 ENVIRONMENTAL REQUIREMENTS

The design, construction and operation of the project are conducted in full compliance with the Approved Environmental Terms as well as with all the requirements that derive from the Concession Agreement (C.A) and the attached contractual documents (Design & Construction Agreement, Special Conditions of Contract, Technical Conditions of Contract, Project Design Regulation) as well as the applicable legislation.

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Basic requirement for the construction of the project is the Law No. 3597/20.07.2007 (GG 3445A/25.07.2007), which includes the contractual issues, the current legislation, as detailed in the previous Environmental Management Reports (semi-annual and annual ones), as well as the conditions and restrictions arising from the individual permits and approvals, including STIS of the various individual projects, the approvals of amendments of the main road project, etc., for which the contractor of the Project is responsible.

Finally, it is noted that in 2012 the progress in the legislative work of YPEKA continues, as regards the Environmental Legislation. It is significant that the way of projects' environmental license and activities as well as the environmental control system have been reset (Law 4014/2011 - OGG 209A/21.09.2011). The new legislative framework aims to provide effective protection of the environment while reducing the time required to process and the number of projects requiring environmental authorization so that the EU average to be approached. Moreover, it develops a "red line" on illegal construction so as to be effectively combated in the future and the environmental balance in the existing exceedances that can and should be addressed, to be restored.

The validity of that law is implemented by the Ministerial Decision 1958/13.01.2012 of YPEKA (OGG 21V/13.01.2012) "*Classification of public and private projects and activities into categories and subcategories according to Article 1, paragraph 4 of Law 4014/21.09.2011 (OGG A' 209/2011)*"

The 2013 legislative work of YPEKA is set out in the table below.

Table 2.2-1: YPEKA legislative work A' semester 2013

Date	Number	Subject
<u>LAWS & PRESIDENTIAL DECREES</u>		
13.06.2013	P.D. 114/2013 (OGG147/A'/17.6.2012)	To limit the use of certain hazardous substances in electrical and electronic equipment in compliance with

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Date	Number	Subject
		Directive 2011/65/EU of the European Parliament and the Council
<u>DECISIONS & CIRCULARS</u>		
02.05.2013	PD 1958/12 Decision no. 36060/1155/E.103 (OGG 1450/B/14.06.2013)	Establishment of a framework of rules, measures and procedures for the integrated prevention and control of the environmental pollution from industrial activities, in conformity with the provisions of Directive 2010/75/EU "on industrial emissions (integrated pollution prevention and control)" of the European Parliament and the Council of November 24, 2010.
25.04.2013	Decision with no. Η.Π. 26910/852/E 103 (OGG 1021/B/25.04.2013)	Amendment of JMD no. 54409/2632/2004 "Trading system for greenhouse gas emissions in compliance with the provisions of Directive 2003/87/EC etc." (B' 1931), as applicable, in compliance with the provisions of Directive 2009/29/EC "amending Directive 2003/87/EC so as to improve and extend trading scheme for greenhouse gas emission community" of the European Parliament and the Council of April 23, 2009.
19.04.2013	Decision no. oik. 167563/EYPE	Specialized procedures and specific criteria on environmental licensing of the projects and activities of Articles 3, 4, 5, 6 and 7 of Law 4014/2011, as set out in Article 2 paragraph 13 thereof, of the specific forms of the above procedures, and any other matter relating to the proceedings of this subject.
24.01.2013	Decision no. 3791	Standard Environmental Commitments (SEC) for renewable energy projects classified in Category B' of the 10 th Group "Renewable Energy Sources" of Annex X no. 1958/2012 (B' 21) Ministerial Decision, with s/n 1, 2, 8 and 9
25.02.2013	MD oik. 166476 (OGG B' 595/14.03.2013)	Modification of no. 1958/13.1.2012 (OGG 21/B) of the Minister of Environment, Energy & Climate Change "Classification of public and private projects and activities into categories and subcategories in accordance with Article 1§4 of the Law 4014/21.9.11



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Date	Number	Subject
		(OGG 209/a)", as amended by Decision No. 20741/8.5.2012 (OGG 1565/B)
12.04.2013	cir. oik. 24040/2590/2013 (OGG --/12/04.2013)	Implementation of the legislation on the cross-border transport of non-hazardous waste

3. ENVIRONMENTAL MANAGEMENT OF THE PROJECT

3.1 ENVIRONMENTAL MONITORING & CONTROL PROGRAM

The “Environmental Monitoring & Control Program” is based on the environmental terms of the project and on the Concession Agreement and includes the following:

- Prioritisation of protective actions - measures that should be taken by the Constructional J/V according to the Environmental Terms and other contractual obligations.
- The designs, studies and technical reports that should be drawn up in the framework of construction and operation of the project and that involve several environmental issues.
- The implementation control process of the terms and actions by the competent authorities.

The purpose of the Environmental Monitoring & Control Program is to clearly determine the actions and measures required for the environmental management of the construction phase of the project and that derive from recording and assessing the environmental terms, other obligations or guidelines arising from the contractual documents and the applicable legislation.

The Environmental Monitoring & Control Program is currently at the submission phase to EYPE/YPEXODE.

3.2 ENVIRONMENTAL MANAGEMENT SYSTEM – ENVIRONMENTAL TERMS COMPLIANCE CHECKLISTS

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The “Environmental Terms Compliance Checklists” are drawn up based on the Environmental Monitoring & Control Program and the Environmental Management System. These checklists include the way and methodology of required actions in order to ensure the implementation of the Environmental Terms.

The responsible department for the environment in cooperation with the project engineers carry out regular inspections and complete the checklists by applying the "Environmental Monitoring & Control Program". Furthermore, they provide the necessary orders or guidelines that are based on the Environmental Monitoring & Control Program for every issue related to the environment.

The Environmental Management System, which is applied by the J/V, has been drawn up taking into consideration the requirements of ISO 14001:2004. It consists of the Manual, the Procedures, the Guidelines of the Works related to the environment and the observance of the project's environmental requirements. The manual, the procedures and the guidelines for environmental management is applied uniformly throughout the project and are currently in continuous progress in order to meet the project's needs.

3.3 MONTHLY, SEMI-ANNUAL AND ANNUAL PROGRESS REPORT FOR THE IMPLEMENTATION OF ENVIRONMENTAL TERMS

At the same time, in order to monitor the Program and inform the Environmental Department of the Independent Engineer on a monthly basis, the Environmental Department of the J/V draws up monthly and annual progress reports for the implementation of the environmental terms in the form of a table. These monthly reports include:

- Works or designs carried out regarding the implementation of the Environmental Terms and all possible variations on the Environmental Monitoring & Control Program.
- The relevant actions of the persons responsible (inspections, special reports, etc.).
- A full photographic presentation of the environmental issues

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In July of each year, a semi-annual progress report is being drawn up with respect to the implementation of the Environmental Terms in accordance with article 11.2.2., case (ii) of the Concession Agreement.

In January of each year, an annual progress report is being drawn up, pursuant to article 11.2.2 (iii) of the Concession Agreement, which includes the annual review of all issues described in the periodical reports.

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4. ENVIRONMENTAL ISSUES PROGRESS – WORKS CONSTRUCTION

The progress of the construction works is submitted by the joint venture Central Greece Motorway E65 to the Concessionaire via monthly reports of progress.

The above paragraphs constitute the documentation for the compliance of the environmental commitments regarding the construction works progress.

4.1 PERMITS - DESIGNS - APPROVALS

This section presents all requests submitted by the Constructional Joint Venture in order to obtain permits in the framework of the project's implementation. Furthermore, the relevant designs that arise from the obligation to observe the contractual requirements and environmental terms of the project are presented.

4.1.1 Permits and approvals in accordance with the environmental terms of the project.

In the context of observing the environmental terms and other requirements based on the applicable legislation, relevant studies on the environmental licensing of the ancillary works are being prepared and submitted for approval and permit. The competent authority for the environmental studies is EYPE/YPEKA.

The following table (table 4.1.1-1) presents all relevant information on the submissions conducted to EYPE/YPEKA.

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Table 4.1.1-1
Studies for the environmental permit of ancillary works

No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (approval, re-submission-rejection, etc.)
1.	STIS. MATERIAL WITHDRAWAL FROM ONOHONO RIVER (BP5N1)	Municipality of Sofades, Prefecture of Karditsa	141388/25-6-2009	141388/04.08.2009	STIS approval
2.	STIS. BORROW PIT AT AGIA PARASKEVI, "KALAMAKI BR" (BP1N3)	Agia Paraskevi, Municipality of Lamia, Prefecture of Fthiotida	136998/05.03.2009	136998/28.07.2009	STIS approval
3.	STIS. WORKSITE AT LAMIA IN "AG. TRIFONAS" POSITION (MSS CH. 12+000) (IS1N1)	Stavros, Municipality of Lamia, Prefecture of Fthiotida.	136998/05.03.2009	136998/28.07.2009	STIS approval
4.	STIS. BORROW PIT / DISPOSAL SITE "Pyrgaki – Kofina" (BP/DS1N1)	Stavros, Municipality of Lamia, Prefecture of Fthiotida.	136998/05.03.2009	136998/28.07.2009	STIS approval The Regional Forest Service Directorate does not approve the intervention permit
5.	STIS. BORROW PIT "Platana - Rema" (BP1N2)	Lygaria, Municipality of Lamia, Prefecture of Fthiotida.	136998/05.03.2009	136998/28.07.2009	STIS approval
6.	STIS. BORROW PIT IN "MAGOULA" POSITION AT SPERHIOS RIVER	Among Municipality of Ypati and Lianokladi, Prefecture of	136998/05.03.2009	136998/28.07.2009	The position has been rejected by STIS

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No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (approval, re-submission-rejection, etc.)
	(BP1N4)	Fthiotida			
7.	STIS. BORROW PIT IN "ASPROKAMPOS" POSITION AT GERAKARIS STREAM(BP1N5)	Kompotades, Municipality of Ypati, Prefecture of Fthiotida.	136998/05.03.2009	136998/28.07.2009	STIS approval The location has been rejected by the Hellenic Public Real Estate Corporation (HPREC)
8.	STIS. BORROW PIT AT "AERODROMIO" AREA (BP6N1)	Kefalovryso, Municipality of Faloria, Prefecture of Trikala	140546/04.06.2009	140546/29.07.2009	STIS approval
9.	STIS Review Borrow Pit "AERODROMIO" (BP6N1)	Kefalovryso, Municipality of Faloria, Prefecture of Trikala	148761/18.12.2009	121188/29.01.2010	Approval of the revised STIS
10	STIS. Borrow Pit "Kioskia" (BP4N1)	Municipality of Tamassi, Prefecture of Karditsa, Anavra	143395/10-08-2009	143395/02-09-2009	STIS approval
11	STIS. Borrow Pit "Geladaria" (BP4N2)	Municipality of Tamassi, Prefecture of Karditsa, Anavra	145522/16-10-2009	145522/17-11-2009	STIS approval
12	STIS. Anavra Worksite "Kedrakos" position (IS5N1)	Municipality of Tamassi, Prefecture of Karditsa, Anavra	143394/10-08-2009	143394/02-09-2009	STIS approval
13	STIS. Agios Georgios Worksite	Municipality of Kampos, Agios	143394/10-08-2009	143394/02-09-2009	STIS approval

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No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (approval, re-submission-rejection, etc.)
	"Voulgarolakka" position	Theodoros, Prefecture of Karditsa			
14	STIS. "GKOLNA" Worksite (BP5N4)	Municipality of Goriani, Prefecture of Grevena	121768/10-02-2010	----	The design was returned because of the decision of the Council of State for temporary suspension of the works in the 3rd JMD.
15	STIS. Borrow Pit in "Mavrogies" position (BP5N4)	Sikeona, Municipality of Filo, Prefecture of Karditsa	121768/10-2-2010 Resubmission 14076/16.06.2011 (J/V No.)	14693/ 10.11.2011	STIS approval
16	STIS. Borrow Pit in "Vrontaria" Position (BP6N2)	Fiki, Municipality of Pitalia, Prefecture of Trikala	124501/ 21.04.2010	127798/0 8.07.2010	STIS approval
17	STIS. Stone processing installation in the quarry materials – borrow pit in "Pyrgaki" Position (IS1N2)	Stavros, Municipality of Lamia, Prefecture of Fthiotida	144259/11.09.2009	144259/1 7.11.2009	STIS approval
18	STIS. Stone processing installation in the quarry materials – borrow pit in "Kalamaki Vr."	Agia Paraskevi, Municipality of Lamia, Prefecture of Fthiotida	144259/11.09.2009	144259/1 7.11.2009	STIS approval

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No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (approval, re-submission-rejection, etc.)
	Position (IS1N3)				
19	Stone processing installation in the worksite facilities of Lamia (IS1N4)	Stavros, Municipality of Lamia, Prefecture of Fthiotida	144259/11.09.2009	144259/17.11.2009	STIS approval
20	STIS. Washing of aggregates with a sieve in the sand borrow pit in Gerakaris r. (IS1N5)	Kompotades, Municipality of Ypati, Prefecture of Fthiotida	144259/11.09.2009	144259/17.11.2009	Rejected due to refusal of the lease application by the Mortgage Service of Prefecture of Fthiotida
21	STIS. Worksite in Kalampaka MSS position (CH. 132+000) (IS9N1)	Municipality of Kalampaka, Prefecture of Trikala	125561/17.05.2010	199070/09.05.2011	Rejected by EYPE due to location within Natura 2000 area
22	STIS. Worksite in "Lampes" position (IS6N1)	Proastio, Municipality of Selana, Prefecture of Karditsa	126671/11.06.2010	195831/31.01.2011	STIS Approval
23	STIS. Worksite in "Samolaka" position (IS2N1)	Styrfaka, Municipality of Lianokladi, Prefecture of Fthiotida	126332/04.06.2010	127799/08.07.2010	STIS Approval
24	STIS. Borrow Pit "Ammoudes" (BP5N5)	Filia, Municipality of Sofades, Prefecture of Karditsa	128447/27.07.2010 (J/V prot. no.)	132626/22.11.2010	STIS approval

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No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (approval, re-submission-rejection, etc.)
25	STIS. Borrow Pit "Haliades" (BP5N6)	Filia, Municipality of Sofades, Prefecture of Karditsa	128805/04.08.2010 (J/V prot. no.)	132626/22.11.2010	STIS approval
26	STIS. Worksite of Perivoli (IS3N1)	Perivoli, Municipality of Ksiniada, Prefecture of Fthiotida	9575/06.08.2010 (J/V prot. no.)		Expected to be approved
27	STIS. Worksite (IS2N3) in "Ohiro" position (T2 tunnel exit area)	Moshokaria, Municipality of Lianokladi, Prefecture of Fthiotida	128699/09.09.2010 (J/V prot. no.)	201981/01.08.2011	Approval
28	STIS. Temporary deposit in "Fteres" position (DS2N1)	Moshokaria, Municipality of Lianokladi, Prefecture of Fthiotida	128699/09.08.2010 (J/V prot. no.)	201981/01.08.2011	Rejected
29	STIS. Plant of asphalt production and 3A material mixer	Anavra, Municipality of Tamassi, Prefecture of Karditsa	128343/23.07.2010 (J/V decision no.)	201980/01.08.2011	STIS Approval
30	Environmental Impact Pre- study. Environmental licensing of drilling wells under the project "Landscape Planting - Irrigation and Rehabilitation for	CH. 56+000 – CH. 90+000	13323/01.04.2011 (J/V decision no.)		Submission of Environmental Impacts Pre-study Expected to be approved

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No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (approval, re-submission-rejection, etc.)
	the CH. 56+000 – CH. 90+000 of the Central Greece Motorway (E65)".				
31	STIS. Materials store and 2 units of asphalt production in "Sykia" position (IS1N7)	Koma, Municipality of Lamia, Prefecture of Fthiotida	201026/ 06.07.2011	---	Expected to be approved
32	STIS/ EIS. Borrow pit in "Fournia" position (BP342)	Makryrachi, Municipality of Ksiniada, Prefecture of Fthiotida	204542/ 27.10.2011 STIS submission 15481/21.12.2012 (J/V prot. no.) EIS submission		EYPE/YPEKA has returned the STISs with prot. no. 299814/20.07.2012 and asked for the submission of EIS in accordance with Law 4014/2011. Expected to be approved
33	STIS. Lateral Toll Station in CH. 60+200	Anavra, Municipality of Sofades, Prefecture of Karditsa	204541/ 27.10.2011	---	Concessionaire's claim to our J/V for the review of the horizontal alignments and compliance with Design-Construction Agreement of the project, so as to promote environmental licensing (protocol No.

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No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (approval, re-submission-rejection, etc.)
					15046/06.04.2012)
34	STIS. Operation and Maintenance Centre in CH. 69+700	Municipality of Sofades, Prefecture of Karditsa	204544/ 27.10.2011	---	Expected to be approved
35	STIS. Frontal Toll Station and station's administration building in CH. 65+650	Municipality of Sofades, Prefecture of Karditsa	204543/ 27.10.2011	---	Expected to be approved
36	STIS/EIS. Borrow pit in Agios Stefanos position (BP345)	Agios Stefanos, Municipality of Ksiniada, Prefecture of Fthiotida	204863/ 08.11.2011 STIS submission 15482/21.12.2012 (J/V prot. no.) EIS submission	---	EYPE/YPEKA has returned the STISs with prot. no. 200811/20.07.2011 and asked for the submission of EIS according to Law 4014/2011. Expected to be approved

Within the second semester of 2013, additional relevant designs or even design reviews for environmental permitting of ancillary works such as disposal sites, worksites, borrow pits, etc. are expected to be submitted in order to receive environmental permit.

Moreover, in line with the environmental terms of the project, all the respective permits and opinions are obtained by the competent authorities, such as Forest Services, Archaeological Services, Prefectural Administration Services, etc.

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The Constructional Joint Venture submits the required requests to obtain relevant permits. The main competent services involved in the project are the following:

- Forest Service of Lamia
- Forest Service of Karditsa
- Forest Service of Trikala
- Forest Service of Kalampaka
- Forest Directorate of Grevena
- ΙΔ Service of Prehistorical and Classical Antiquities
- ΛΔ Service of Prehistorical and Classical Antiquities
- Α Service of Prehistorical and Classical Antiquities
- 19th Service of Byzantine Antiquities
- 24th Service of Byzantine Antiquities
- 17th Service of Byzantine Antiquities
- Regional Section of Fthiotida
- Regional Section of Karditsa
- Regional Section of Trikala
- Regional Section of Grevena
- etc.

The following table (table 4.1.1-2) presents all requests submitted by the Constructional Joint Venture in order to obtain the relevant permits and opinions issued by the services in the framework of the project.

Table 4.1.1-2
Requests for permit by the relevant competent authorities
(A' semester of 2013)

No	Service	Subject	Request	Response		Comments
			J/V Ref. No	J/V Ref. No	Service Ref. No	
1.	YPEKA/ Mining inspectorate	Submission of Inaction Statement for 2012 (pursuant to Article 13 of Law 1428/1984) for the quarry site – borrow pit at 'Airport' or 'Potamia' position, Local Community of Kefalovrysso, Municipal Unity of Faloria, Municipality of Trikala, Prefecture of Trikala	15598/11.04.2013			Submission of borrow pit Activity Statement. For information
2.	YPEKA/ Mining	Submission of Inaction Statement for 2012	15599/11.04.2013			Submission of borrow pit Activity Statement.

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No	Service	Subject	Request	Response		Comments
			J/V Ref. No	J/V Ref. No	Service Ref. No	
	inspectorate	(pursuant to Article 13 of Law 1428/1984) for the quarry site – borrow pit at "Geladaria" position, Local Community of Anavra, Municipal Unity of Tamassi, Municipality of Sofades, Prefecture of Karditsa				For information
3.	YPEKA/ Mining inspectorate	Submission of Inaction Statement for 2012 (pursuant to Article 13 of Law 1428/1984) for the quarry site – borrow pit at "Kioska" position, Local Community of Anavra, Municipal Unity of Tamassi, Municipality of Sofades, Prefecture of Karditsa	15601/11.04.2013			Submission of borrow pit Activity Statement. For information
4.	YPEKA/ Mining inspectorate	Submission of Inaction Statement for 2012 (pursuant to Article 13 of Law 1428/1984) for the quarry site – borrow pit at "Kalamaki Vryssi" position, Local Community of Agia Paraskevi, Municipal Unity of Tamassi, Municipality of Lamia, Prefecture of Fthiotida	15600/11.04.2013			Submission of borrow pit Activity Statement. For information

S/N	Service	Subject	Request	Response		Comments
			J/V Ref. No.	J/V Ref. No.	Service Ref. No.	
5.	YPEKA Directorate of quarries and aggregate materials	Return of the Technical Study on Exploitation of the borrow pit at "Chaliades", Municipality of Sofades, Karditsa (BP5N6), due to the expiry of a large period since the deposit of the evidence of the State rights and Funds by the J/V which makes the update of the study more	9466/03.08.2010	15520/05.02.2013	Δ10-B/Φ25.13/1552/271/28.1.2013	STIS return

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S/N	Service	Subject	Request	Response		Comments
			J/V Ref. No.	J/V Ref. No.	Service Ref. No.	
		necessary than ever				
6.	YPEKA Directorate of quarries and aggregate materials	Return of the Technical Study of Borrow pit Exploitation at "Ammoudes", municipality of Sofades, Karditsa (BP5N5), due to the expiry of a large period since the deposit of the evidence of the State rights and Funds by the J/V which makes the update of the study more necessary than ever	9271/23.07.2010	15521/05.02.2013	Δ10-Β/Φ.25.12/οικ.1553/272/28.01.2013	STIS return
7.	EYPE/YPEKA	EYPE Request to the J/V to submit five (5) additional copies of the EIS to amend No. 145504/18.11.2005 "Central Greece Road Axis (E65), Makrihori – Lamia section" regarding environmental permitting on quarry aggregates in the area of Agios Stefanos, Municipality of Domokos, Fthiotida (BP3N5)	14670/07.11.2011 15482/21.12.2012	15522/05.02.2013		
8.	EYPE/YPEKA	EYPE Request to the J/V to submit five (5) additional copies of the EIS to amend No. 145504/18.11.2005 "Central Greece Road Axis (E65), Makrihori – Lamia section" regarding environmental permitting on quarry aggregates in the area of Fournia, Municipality of Domokos, Fthiotida (BP3N2)	14639/26.10.2011 15481/21.12.2012	15523/05.02.2013		
9.	Hellenic Ministry of Culture and Sports	Conditional Approval on the non-conservation of antiquities discovered at "Magoula Potistikou Stavrou" (CH. 14+510 – CH. 14+540), Stavros, Municipality of Lamia, Fthiotida Prefecture,		15611/22.04.2013	ΥΠΑΙΘΠΑ/ΓΔΑΠ Κ/ΔΙΠΚΑ/ΤΑΧ/51134/23529/3430/1689/09.04.2013	

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S/N	Service	Subject	Request	Response		Comments
			J/V Ref. No.	J/V Ref. No.	Service Ref. No.	
		Central Greece				
10.	Hellenic Ministry of Culture and Sports	Conditional Approval on the non-conservation of antiquities discovered at "Alonaki" (CH. 55+660 – CH. 55+700), Anavra, Tamassi, Municipality of Karditsa, Thessaly Prefecture		15618/25.04.2013	ΥΠΑΙΘΠΑ/ΓΔΑΠ Κ/ΔΙΠΚΑ/ΤΑΧ/58 837/27654/3900/ 1950/12.04.2013	
11.	EYPE/YPEKA	Submission of five (5) additional copies of the Environmental Impact Study of the borrow pit (BP3N5) at "Agios Stefanos" M. of Domokos, Fthiotida Prefecture	15619/26.04.2013			
12.	EYPE/YPEKA	Submission of five (5) additional copies of the Environmental Impact Study of the borrow pit (BP3N2) at "Fournia" M. of Domokos, Fthiotida Prefecture	15620/26.04.2013			

4.1.2 Project Environmental Designs

The contractual scope of the Constructional Joint Venture is to prepare the relevant technical and other designs for the implementation of the project. Furthermore, the environmental terms of the project referred to the relevant hydraulic and landscaping designs should be conducted for the construction of the project. The J/V of the project has commissioned to a specialized design office the elaboration of the environmental studies required to grant permits for the modifications that arise from the finalization of the works have been assigned. The designs are prepared by the Construction Joint Venture and are submitted to the Concessionaire in order to promote them for approval to the Owner of the Project (Egnatia Odos SA) and the department of YPEKA, i.e. the Special Environment Agency (EYPE). The environmental studies of the project are presented in the following table (table 4.1.2-1).

Table 4.1.2-1

Joint Ministerial Decision / Road Work Designs

No.	Decision Protocol No.	Decision Title / Project Section	
1.	Joint Ministerial Decision 144504/18.11.2005	“Central Greece (E65) Road Axis / Makrihori – Lamia”	
2.	Joint Ministerial Decision 145521/18.11.2005	“Central Greece (E65) Road Axis / Makrihori – Kalampaka”	
3.	Joint Ministerial Decision 147014/18.11.2005	“Central Greece (E65) Road Axis / Kalampaka - Egnatia Odos & Agia Paraskevi I/C” for its connection with Egnatia Odos”.	
4.	Joint Ministerial Decision 103681/05.05.2006	“Connecting road of the Smokovo I/C with the existing road network”.	
5.	Joint Ministerial Decision 146113/12.07.2005	Skarfia - Thermopiles at the section of Skarfia - Lamia of the PATHE Motorway	
6.	Joint Ministerial Decision 126696/06.06.2007	Amendment of the Joint Ministerial Decision 146113/12.07.2005	
7.	122881/08.03.2010 EYPE/YPEKA	Environmental licensing of Agia Triada and Molos I/C toll stations of PATHE motorway	
8.	Joint Ministerial Decision 131550/04.05.2003	“Optimization of the National Road to a PATHE motorway, Skarfia - Lamia section, subsection from the beginning of the Thermopiles Interchange to Nea Kiti of Sperchios river”.	
9.	121668/08.02.2010 EYPE/YPEKA	Environmental licensing of the toll station in	

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No.	Decision Protocol No.	Decision Title / Project Section	
		Thermopiles I/C of PATHE motorway	
10.	Joint Ministerial Decision 146109/30.09.2005	“Optimization of the National Road to a PATHE motorway, section from Nea Kiti of Sperchios river to Roditsa Interchange”.	
11.	Joint Ministerial Decision 130665/02.05.2003	“Optimization of the National Road Athens - Thessaloniki to a motorway that will serve Patra - Athens - Thessaloniki - Evzoni (PATHE), Lamia - Raches section, subsection at CH.3+500 to CH.12+000”	
12.	JMD 195214/11.01.2011	Amendment of the 130665/02.05.2003	
13.	Joint Ministerial Decision 100198/30.05.2006	“Overall Bypass at Stylida – Karavomylos”	
14.	121667/08.02.2010 EYPE/YPEKA	“Environmental licensing of the toll stations of Agia Marina – Stylida ICs and Stylida – Karavomylos I/C of PATHE motorway”	

Table 4.1.2-2

Joint Ministerial Decision / Road Work Designs submitted by the Construction J/V

No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	
1.	Report for the determination of environmental permit procedures of the	6484/10.03.2010	----	----	

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No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	
	modification project of Central Greece Road Axis (E-65) in Lamia – Makrihori section (CH. 0+000 – CH. 14+500) (Supporting documentation of art.13 of JMD with no 11014/703/Φ104/2003 KYA)	14111/22.06.2011	----	Resubmission	
		15414/08.11.2012	167266/01.04.2013	Submission of 2 additional copies Approval: Decision no. oik. 167266/01.04.2013 on the JMD AET amendment no. 144504/18.11.2005	
2.	Report for the determination of environmental permit procedures of the modification project of Central Greece Road Axis (E-65) in Makrihori – Kalampaka section (CH. 14+500 – CH. 85+800) (Supporting documentation of art.13 of JMD with no 11014/703/Φ104/2003 KYA)	12005/04.01.2011	----	Submission	
		14129/23.06.2011	----	Resubmission	
3.	Additional Environmental Impact Assessment for the improvement of CH. 47+000 – CH. 56+000 (of Smokovo semi section)	12015/05.01.2011	----	Submission	
4.	Report for the definition of procedures of environmental licensing for the Central Greece (E- 65) in section of Makrihori – Kalampaka (CH. 85+800 – CH. 137+550)	3113/23.07.2009 3786/21.09.2009 4796/27.11.2009 5097/14.12.2009	----	The design was submitted by EOSA with protocol no A248145/04.03.2010 The design has been given back by EYPE with protocol no	

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No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	
	(File under Article 13 of JMD 11014/703/Φ104/2003)	6005/11.02.2010		122785/26.04.2010	
		12006/04.01.2011	----	Resubmission	
		14130/23.06.2011	----	Resubmission	
5.	Environmental Impact Assessment for the relocation of Kalampaka MSS (CH. 132+000) to a new location near Trikala (CH. 117+000)	11990/04.01.2011	----	Submission	
		----	----	Return of the design by EOSA for resubmission (A282383/26.01.2011)	
		13178/22.03.2011	----	Resubmission	
6.	Environmental Impact Assessment for the Cut & Cover construction in CH. 137+000 with recoverable materials	12854/28.02.2011	----	Submission	
				Return of the design by EOSA for resubmission (A287258/17.03.2011)	
		13726/09.05.2011	203583/04.12.2012	Resubmission Approval: there are substantive differences in the impact on the environment, and environmental conditions approved by JMD A.E.T no. 145521/18.11.2005 shall apply	

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No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	
7.	Environmental Impact Assessment for the Cut & Cover construction in CH. 138+400 with recoverable materials	12854/28.02.2011	----	Submission	
				Negative response EOSA (A287258/17.03.2011) due to the fact that the said project belongs to the JMD 147014/18.11.2005 which is suspended in the interim order of the Council of State	
		13726/09.05.2011	----	Resubmission	
8.	Additional Environmental Impact Assessment (EIA) for the connecting road from Anavra to Thavmakos (A' Section) of length 13,5 km. in replacement of the connecting road Smokovo – Monastiri, of 9 km. approximate length	12016/05.01.2011	EYPE/YPEKA letter no. 198627/28.05.2012 transmitted to the Directorate of Environment and Spatial Planning of Central Greece due to jurisdiction, in accordance with the new classification of projects and activities of the M.D. 1958/2012 (OGG 21B/13.01.2012)	Since the major section of the proposed alignment of the road is within the limits of Karditsa, the Directorate of Environment and Spatial Planning of Central Greece asks EOAE with a relevant document (prot. no. DI.PE.CHO.S. of Central Greece 2803/117679/12.07.2012) to submit an issue of this EIS to DI.PE.CHO.S. of Thessaly of the Decentralized Administration of Thessaly - Central Greece	
9.	Study for the Environmental Licensing of the Construction and	3907/28.09.2009	122881/ 08.03.2010 EYPE /	Approved	

CENTRAL GREECE MOTORWAY (E-65)

No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	
	Operation of the toll stations in Athens – Thessaloniki N.R., in the subsection Skarfia – Thermopiles of Skarfia – Lamia section, in Agia Triada and Molos I/C locations. (File pursuant to article 13 of the JMD 11014/703/Φ104/2003)		YPEKA		
10.	Study for the Environmental Licensing of the Construction and Operation of the toll stations in Athens – Thessaloniki N.R., in the subsection of Thermopiles I/C beginning – Nea Kiti of Sperchios of Skarfia – Lamia section, in Thermopiles I/C location (File pursuant to article 13 of the JMD 11014/703/Φ104/2003)	4049/08.10.2009	121668/08.02.2010 EYPE / YPEKA	Approved	
11.	Study for the Environmental Licensing of the Construction and Operation of the toll stations in Athens – Thessaloniki N.R., in the subsection Roditsa I/C end – Agia Marina I/C beginning of Lamia – Raches section, in Agia Paraskevi and Mavromantila I/C.	4049/08.10.2009	JMD 195214/11.01.2011	Approved	

CENTRAL GREECE MOTORWAY (E-65)

No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	
	(File pursuant to article 13 of the JMD 11014/703/Φ104/2003)				
12.	Study for the Environmental Licensing of the Construction and Operation of the toll stations in Athens – Thessaloniki N.R., in the subsection of Agia Marina I/C beginning, Stylida – Raches I/C of Skarfia - Raches section, in the locations of Agia Marina I/C, Stylida and Stylida I/C – Karavomilos. (File pursuant to article 13 of the JMD 11014/703/Φ104/2003)	4049/08.10.2009	121667/08.02.2010 EYPE / YPEKA	Approved	

4.1.3 Special Designs

During the first semester of 2013 no special designs have been prepared.

4.2 ANTIQUITIES

The Constructional Joint Venture is in direct communication with the competent archaeological services. Based on the Concession Agreement and the Design/Construction Agreement, the J/V is responsible for performing trial archaeological cuts following the competent authority's instructions.

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The following table (table 4.2-1) presents in detail the up-to 25/6/2012 situation performed in the reserved areas.

(view Table) Areas blocked due to Archaeology

G.U.	Start	Finish	Blocked on	Free on	Remarks
1N. 2	13+300	14+200	30/10/2009 (prot. 4455)	29/4/2010 (prot.7603)	Unblocked via 24 th EBA letter no. 2451/29-4-10.
	14+300		7/4/2010	18/1/2013 (prot.15501)	The delivery of areas 14+300-14+540 and 14+510-14+540 has been decided by the archeological council on 15/1/2013
	14+400	14+540	23/6/2010 (prot.8673)	18/1/2013 (prot.15501) (prot.15611)	The 24 th EBA letter, with prot. No. 3373 / 23-06-2010, requested the suspension of the works from CH. 14+400 - 14+540 due to antiquities. Interruption of archeological works on 06/12/2010 and reset of archeological excavations by 14.03.2011. The ΙΔ' Ephory of Classical Antiquities undertook the excavations for this area according to the 24 th EBA letter with prot. no. 4712/31.8.2011. Approval on non conservation of ancient residues in 14+510-14+540 .
2N. 1	20+800	21+580	1818/16-3-2010		Waiting for change of study or expropriation for bridge construction according to the existing study.
	25+954	26+250	3/6/2010	27/9/2010	The ΙΔ ΕΠ & ΚΑ letter with prot. no. 3774 / 03-06-2010 requested the interruption of the works on CH. 25+954 - 26+250 due to findings. With 6656/27-9-2010 section 26+080-26+250 is now available With 7103/5562 (15435) section 25+954-26+100 is now available
4N	53+660	55+700		30/10/2012 (prot.15411) (prot.15618)	Decision of the archeological council
	55+675	55+765	20/12/2010 (prot.11977)		Section from CH. 55+670-55+770 (20/12/10) blocked. Area surface = 4868 m2 Unblocked 55+710-55+750 via 52130/2625/1-6-2012 (prot.15196)
	55+830	55+900	20/12/2010 (prot.11977)		The ΙΔ' Ephory of Prehistorical and Classical Antiquities requested the ΚΑΖ 3634/22-8-2011 for this section to be unblocked. Unblocked according to the Minister of Culture letter with prot. no. 10483/31-10-11.
	55+995	56+135	20/12/2010 (prot.11977)	24/05/2013 (prot.15649)	Section from CH. 55+995 - 56+135 blocked, prot. no.: ΙΔ' Ephory of Prehistorical & Classical Antiquities 3782/20-12-10. Unblocked 55+980-56+200 "Alonaki"
	56+135	56+180	29/10/2010	24/05/2013 (prot.15649)	Still Blocked. Unblocked 55+980-56+200 "Alonaki"

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G.U.	Start	Finish	Blocked on	Free on	Remarks
	58+470	58+530	1/10/2009 (prot.4060)	22/3/2010	Graves (Update with Ephory of Prehistoric and Classical Antiquities letter no. 3889/3-9-2010 ΛΔ' to the Ministry of Culture - Egnatia)
5N	60+200		1/9/2009	30/11/2009	Pipe – Unblocked (Update with Ephory of Prehistoric and Classical Antiquities letter no. 3889/3-9-2010 ΛΔ' to the Ministry of Culture - Egnatia)
	63+319	63+390	1/10/2009 (prot.4060)	25/5/2010 με το υπ' αριθμ. 2751/24-6-2010	Housing waste – section unblocked with letter (prot. no.: 2751/24-6-2010) by the ΛΔ' Ephory of Prehistoric & Classical Antiquities
	63+980	64+082	28/7/2009	1/12/2009 με το υπ' αριθμ. 3889/3-9-2010	Update with Ephory of Prehistoric and Classical Antiquities letter no. 3889/3-9-2010 ΛΔ' to the Ministry of Culture - Egnatia)
	64+120	64+280	1/10/2009 (prot.4060)	2751/21-6-2010	Unblocked via ΛΔ' Ephory of Prehistoric and Classical Antiquities letter with prot. no. 2751/24-6-2010
	64+320	64+540	1/10/2009 (prot.4060)	19/8/2010	Still Blocked.
	64+640		1/10/2009	22/3/2010	Unblocked Update with Ephory of Prehistoric and Classical Antiquities letter no. 3889/3-9-2010 ΛΔ' to the Ministry of Culture - Egnatia)
	67+900,00	68+140	27/11/2009 (prot.4979)		Section BLOCKED BY THE ΛΔ' Ephory of Prehistoric and Classical Antiquities on CH. 67+900 - 68+140 & CH. 68+510-68+621(prot. no. 4841/27-11-09)
	68+510,00	68+620,00	27/11/2009 (prot.4979)		
	73+925,00	73+950,00	16/4/2010	25/5/2010	Unblocked (AREA B.C. H015)
	76+430	76+470	1471/16-4-2010	9/9/2010 (prot.10721)	Section unblocked by the ΛΔ' Ephory of Prehistoric and Classical Antiquities (prot. no. 3959/7-9-10) (housing, graves and factory waste)
	77+000,00	78+000,00			Έγιναν διερευνητικές τομές. Area available.
	78+191.00	78+210,00	8/12/2009		Δέσμευση περιοχής από ΛΔ' Εφορεία Κλασικών Αρχαιοτήτων στην χθ 78+200, prot.no.: 5001/9-12-09
	79+450	79+900			Exploratory cuts. Area available.
	82+750	83+300			Exploratory cuts. Area available.
	84+450	84+650			Area to be investigated
6N. 2	95+277	95+359	3/9/2009	17/9/2009	Notification of release with letter no. 3889/3-9-2010 ΛΔ' Ephory of Prehistoric and Classical Antiquities to the Ministry of Culture - Egnatia)
	95+360	95+390	3/9/2009	17/9/2009	Notification of release with letter no. 3889/3-9-2010 ΛΔ' Ephory of Prehistoric and Classical Antiquities to the Ministry of Culture - Egnatia)
	95+391,74	95+457,87	3/9/2009	3/9/2010 (prot.10147)	Unblocked with letter no. 3891 / 3-9-10 of the ΛΔ' Ephory of Prehistoric and Classical Antiquities (Sanctuary residue and part of cemetery)

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G.U.	Start	Finish	Blocked on	Free on	Remarks
	95+556	95+568	3/9/2009	1/10/2009	Notification of release with letter no. 3889/3-9-2010 ΑΔ' Ephory of Prehistoric and Classical Antiquities to the Ministry of Culture - Egnatia)
7N. 1	99+350,22	99+371,03	22/10/2009	17/4/2012 (prot.15098)	Unblocked via the Min. of Culture letter with prot. no. 36356/1781/17-4-2012 (ΚΑΣ 14-2-11 Meeting).
	105+220,23	105+233,17	26/1/2010 (prot.5856)	16/7/2010 (prot.9349)	Unblocked by the ΑΔ' Ephory of Prehistoric and Classical Antiquities (prot. no.: 3182 / 16-7-10) (Housing waste)
8N	113+340	113+440	28/7/2010 (prot.8814)	28/1/2013 (prot.15511) (prot.15610)	Blocked by the ΑΔ' Ephory of Prehistoric and Classical Antiquities, prot. no.: 2792/28-6-10 (introduction to the ΚΑΣ January 2013). Unblocked. Following a meeting of the Archaeological Council on 22.1.2013 decided to plow in the residue and the delivery of the area. Approval of ΥΠΑΙΘΠΑ for conservation of the plowing in.
	116+660	116+870	2628/10-6-2010	29/7/2010 (prot.9843)	Unblocked via 19 th EBA letter no. 3560/29-7-2010.
	116+600	117+260	2628/10-6-2010	24/2/2012 (prot.15003)	Section 116+870 - 116+998 unblocked on 10/1/2011 according to 19 th EBA letter no. 4299.
	116+980	117+260	2628/10-6-2010	29/7/2010 (prot.9843)	Unblocked via 19 th EBA letter no. 3560/29-7-2010.
10N	136+580	136+630	21/7/2010 (prot.9316)		Still Blocked (19th EBA).

4.3 ENVIRONMENTAL MONITORING

4.3.1 Waste Management

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All types of waste are being managed based on the requirements of the Greek legislation for the environment and the environmental terms of the project. For the construction of the project, worksites manage waste in accordance with the directives for environmental management, which will be monitored by the Department for the Environment of the Joint Venture, until the completion of the Design - Construction Period.

The following table (table 4.3.1-1) presents the method of waste management which derives from the construction works and other activities.

Table 4.3.1-1:
Waste Disposal Table

Waste / Material Type	Origin	Collection & Storage Method	Managing Agency	Actions
Waste Lubricating Oils - Mineral Oils (ALE)	Project machinery & motor-powered equipment	In barrels within the worksites	Licensed Operator for Alternative Waste Lubricating Oils Management (ELTEPE)	Agreement with ELTEPE
Batteries - Accumulators	Project machinery & equipment	In wooden pallets located at special areas	Licensed Operator for Alternative Management (SYDESIS S.A.)	Agreement with SYDESYS S.A.
Vehicle tires	Project vehicles	In safe open areas within the worksite	Licensed Operator for Alternative Management (EKOELASTIKA)	Agreement with EKOELASTIKA S.A.

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Waste / Material Type	Origin	Collection & Storage Method	Managing Agency	Actions
			S.A.)	
Metallic scrap	Project Construction	In safe open areas within the worksite	Any licensed metal collector	Transportation where scrap is produced
Wooden pallets	Procurement of materials for the construction of the project	In open areas within the worksite	Any pallet trader / manufacturer	Transportation
Solid hazardous waste	Equipment maintenance, project construction	In safe special areas within the worksites	Any licensed collector of solid hazardous waste	Agreement with the body for alternative hazardous waste management
Liquid hazardous waste	Equipment maintenance, project construction, material excess	In barrels within the worksites	Any licensed collector of liquid hazardous waste	Agreement with the body for alternative hazardous waste management
Electrical & Electronic Equipment (AHHE)	Worksites, Lighting maintenance	In predefined areas within the worksites	Licensed Operator for Alternative Management (APPLIANCES RECYCLING S.A.)	Agreement with APPLIANCES RECYCLING S.A.
Urban solid waste	Worksites, offices	In municipal litter bins	The Municipal Authorities	Agreement or cooperation
Other solid waste (paper)	Worksites, trial laboratories	In litter bins within the worksites	Any licensed collector of solid non-hazardous waste	Application to Municipalities Working with P.A.DY.TH. SA (Environmental

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Waste / Material Type	Origin	Collection & Storage Method	Managing Agency	Actions
				Development of Western Thessaly SA)
Liquid waste	Site Offices	Waterproof cesspits	Any licensed subcontractor / Municipal Water Supply and Sewerage of Karditsa	Waterproof cesspits
Liquid waste	Asphalt mix & concrete manufacturing unit	Oil-Dirt collector - settlement tank	Any licensed collector of liquid non-hazardous waste	Agreement with subcontractor

The quantities of waste, which are being ecologically managed within the first semester of 2013 in the framework of the project's construction, shall be presented in the following table (Table 4.3.1-2) and mainly refer to office supplies. It is noted that a part of the produced waste is processed via permanent and legitimate facilities that take part in the construction of the project and that comply with the applicable legislation on waste disposal. Finally, it has to be noted that, due to the reduction of the pace of the works and their suspension from 01/2011, the quantities of waste produced have also been reduced, while in many cases the facilities and sites of collection and temporary storage of waste (tanks, sedimentation tanks, biological treatment plants of compact type, etc.) have been removed.

Table 4.3.1-2:
Waste Disposal Table

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Waste / Material Type	EKA Code	Method of management (quantities in kilos, c.m. pieces, etc.)				Observations
		Recycling /regeneration	Temporary storing	Temporary deposit	Permanent Disposal/A vailability	
Vehicle tires	16 01 03		Storing on wooden pallets in a specially designed area within worksites			Temporary storing of 162 pieces
Batteries - Accumulators	16 06 01		Storing on wooden pallets in a specially designed area within worksites			Temporary storing of 96 (from road signage) and 6 (from mechanically-operated) pieces

4.3.2 Air Pollution

A parameter control plan is applied in order to reduce impact on the community, on the natural environment, etc.

According to the Environmental Impact Assessment (EIA) of the road works, no excess of dust emission limit is expected greater than 20m from the works at all the length of the motorway under construction and worksite areas. However, all necessary measures to reduce dust emission are taken, such as water springing, filter bags etc.

Finally, it has to be noted that, due to the reduction of the construction pace and the suspension of the works (01/2011), the production of gaseous pollutants was significantly reduced, up to zero. The maintenance and monitoring works of the already constructed part of the project (maintenance of drainage ditches, safety

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monitoring of the project, etc) conducted during the suspension of the works, are carried out by ordinary mechanical means and in a small stretch of land so that the production of gaseous pollutants to be negligible.

Up to date, there are no complaints - reminders from the air pollution resulted by the construction of the project.

4.3.3 Vibrations

A parameter monitoring plan is under development in order to reduce impact on the community, on traffic, on public utility networks, etc. Also, all materials extraction sites proposed by the Construction J/V for the needs of the construction of the road project, do not require the use of explosives for their exploitation.

Finally, it has to be noted that, due to the reduction of the construction pace and the suspension of the works (01/2011), the production of vibrations was significantly reduced, up to zero. The maintenance and monitoring works of the already constructed part of the project (maintenance of drainage ditches, safety monitoring of the project, etc) conducted during the suspension of the works, are carried out by ordinary mechanical means and in a small stretch of land so that the production of gaseous pollutants to be negligible.

Up to date, there are no complaints - reminders from the vibrations resulted by the construction of the project.

4.3.4 Noise

The Construction Joint Venture monitors the noise emitted during the entire construction process, in order to ensure compliance with the applicable noise

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levels provided by the law and in the event of exceeding the limits all required measures are taken.

Finally, it has to be noted that, due to the reduction of the construction pace and the suspension of the works (01/2011), the noise production was significantly reduced, up to zero. The maintenance and monitoring works of the already constructed part of the project (maintenance of drainage ditches, safety monitoring of the project, etc) conducted during the suspension of the works, are carried out by ordinary mechanical means and in a small stretch of land so that any noise production to be negligible.

According to the results of the above mentioned measurements carried out in previous periods (see previous reports), the noise emitted due to various construction works doesn't affect any area close to the works. All works following the measurements carried out, were performed based on the applicable limits provided by the standing legislative framework, as well as from the Environmental Terms of the project.

Up to date, there are no complaints - nuisances from the noise resulted by the construction of the project.

4.3.5 Water resources

All measures related to the prevention of pollution - burden to the waters through methods of good worksite practice and their monitoring, under the Program of Environmental Monitoring and Control, are taken. For the specific purpose, holding tanks connected to oil removers have been developed at various worksites aiming to the monitoring of the perimeter at the source of pollution (runoff tanks). PH measurements at the exit of the tank and at its confluence to the natural recipient showed that the PH of the waters of the natural recipient remains stable.

At the protection of the water resources framework, specialized risk assessment studies for the treatment of accidental pollution and the avoidance of pollution of ecologically sensitive wetlands of:

- Sperchios river

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- Kalentzi river
- Pinios river
- Reservoir of Smokovo
with oils or hazardous substances.

Also, in the protection of the water resources framework during the development of the project phase, a series of measures are taken, featuring the operation of oil removers, settling tanks, biological cleaning, chemical toilets, etc.

Finally, the use of hazardous substances is limited to the minimum required, as is the case with other substances that may alter the qualitative characteristics of the water sources.

4.3.6 Natural Environment

During the construction, the Construction J/V applies a special monitoring program for wildlife under the Environmental Terms of the Project. The results of the monitoring program are submitted quarterly to the Division of Environmental Planning of YPEKA.

It is noted that the monitoring program includes:

- A) The preparation of a new program by the J/V – E-65 (Contractor: NGO Callisto) during 2009 – 2010, for E-65 from CH. 43+000 – CH. 60+000 and
- B) Update of the proposals which had been expressed for E-65 from CH. 20+000 to CH. 47+000 approximately, in the framework of the “Monitoring Program of the wolf and the big mammals”, drawn up on 2005 - 2006 by ERGOSE for the project of the New rail line between Lianokladi RS - Domokos RS (Contractor: D. Argyropoulos, SSE EPE, GAMMA4 EPE and G. Giannatos with Callisto NGO as a special partner), due to the proximity of the two projects and their synergistic consequences. The update of the proposals for CH. 20+000 to CH. 43+000 was based on the data of ERGOSE program (2005 - 2006) as well on the new data (works and methods of field, results – analysis, literature reviews) resulted by the preparation of the E-65 J/V (2009 - 2010) program.



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Also, the monitoring program takes into consideration the data resulted by the preparation of corresponding programs in the broader area. Particularly in the north part of the area of the project, a relevant monitoring program of the wildlife has been developed (first phase) under Egnatia Odos SA responsibility. It has to be noted that the works in the north part of the project area didn't start yet, since the section is under suspension following the temporary order on behalf of the Council of State.

The ultimate goal of the above is the most comprehensive handling of the effects caused by the large infrastructure projects in the ecosystem (fauna) of the project area. Two most recognized non-governmental organizations, 'Arcturus' and 'Callisto' are also involved in the overall effort. The construction J/V has suspended the aforementioned programs, as part of the suspension of the works.