

**ANNUAL PROGRESS REPORT FOR THE IMPLEMENTATION OF
ENVIRONMENTAL TERMS DURING THE OPERATION & MAINTENANCE PHASE**

**PROJECT: "DESIGN – CONSTRUCTION – FINANCING – OPERATION – MAINTENANCE
AND EXPLOITATION OF THE PROJECT "AFTOKINITODROMOS KENTRIKIS ELLADOS
(E65)"**

Date	31.01.2014
Prepared	ENVISTA

B' SEMESTER 2013

SKARFIA - THERMOPYLES

(JMD 146113/12.07.2005)

**SECTION:
SKARFIA - THERMOPYLES**

AET: Prot. No. 146113/12-07-2005

**TABLE FOR THE IMPLEMENTATION OF THE ENVIRONMENTAL TERMS
DURING THE OPERATION PHASE**

MONTH / YEAR:

01/ 2014

S/N	ENVIRONMENTAL TERM	ENVIRONMENTAL TERMS: WAYS – METHODS OF ASSESMENT
A.	Issues of Permits/Approvals	
A.1	Permits for any activity or installation required for the operation of the motorway	<p>The foreseen by the legislation permits and approvals, including the environmental permit possibly required, are obtained, when needed.</p> <p>For the implementation of any partial additional activity or expansion that is not described in the Environmental Impact Assessment (EIA) and consequently not covered by the Approval of Environmental Terms (AET) a relevant environmental permit shall be obtained by EYPE/YPEXODE.</p> <p>The requests for granting environmental permit to the ancillary works are carried out by EYPE/YPEXODE.</p> <p>The following ancillary works have been licensed via the following environmental decisions EYPE:</p> <p>Frontal toll station of Agia Triada and lateral toll station of Molos (EYPE Decision: 122881/8-3-2010)</p>
B.	Design-related Issues	
B.1	Noise Barriers Special Study	<p>The monitoring program OKTH (Road Traffic Noise) of PATHE (METAMORPHOSI - LOGOS & LOGOS - SKARFIA-THERMOPYLES) motorway for 2013 has been submitted to the Directorate of EARTH/YPEKA via Concessionaire's document with prot. no. 31107/19-08-2013. The directorate of EARTH/YPEKA approved the Environmental Monitoring Program OKTH 2013 with its 1844425/11-10-2013 letter.</p> <p>As for the 6 noise measurement positions of Skarfia-Thermopyles (17-22 measurements) of this program, no excess of the permitted levels has been recorded. Therefore, no special study on anti-noise protection is required.</p>
C.	Operation Issues	
C.1	Traffic Noise	<p>The monitoring program OKTH OF PATHE Motorway (Metamorphossi – Logos & Logos – Skarfia - Thermopyles) for 2013 has been submitted to the Directorate of EARTH/YPEKA via the Concessionaire's letter with prot. no. 31107/19-08-2013. The Directorate of EARTH/YPEKA approved the Monitoring Program of Environmental OKTH 2013, with its 1844425/11-10-2013</p>

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		<p>letter. This study determines, by using appropriate models and methodologies (according to JMD 211773/2012 (OGG 1367/B/27-4-2012), JMD 13586/724 (28.03.2006 OGG 384) and European Directive 2002/49/EC), the type and efficiency of the anti-noise measures (noise barriers), the technical characteristics and their adaptation to the topological characteristics of the region.</p> <p>For the implementation of the above OKTH program, the current MD 17252/91 and the European Directive 2002/49/EC are kept, both in full calculation and evaluation of the new European indicators, Lden & Lnight.</p>
C.2		<p>As for the 6 noise measurement positions of Skarfia-Thermopyles (17-22 measurements) of the OKTH program, no excess of the permitted levels has been recorded.</p> <p>Where future monitoring programs OKTH are exceeded, the proper study on noise barrier implementation will be elaborated and submitted for approval to the directorate of EARTH/YPEKA.</p>
C.3		
C.4	Pollution due to accident	<p>Because of the State incomplete contracting works in sections of PATHE Motorway (E65), the retention reservoirs (tanks) for the pollutants, as required by the EIS JMD 146113/12-07-2005 "Approval of environmental terms for the construction and operation of the Skarfia - Thermopyles subsection in Skarfia - Lamia of PATHE motorway" have not been completed yet. Therefore, when they will be completed and delivered by the State, the Concessionaire will implement a plan to address pollution which will involve the use of such tanks, pursuant to the E.T. and its contractual obligations.</p> <p>Meanwhile, the Concessionaire has entered into force and implemented some Action plans that would anticipate the appropriate actions in the event of accidental pollution and include all measures/required equipment etc. that should be taken in case of accident and leakage of non-biodegradable substances. There is also a possibility of accidental fuel leakage from maintenance and operation machinery, etc. which may result to a direct contamination of water, soil, etc. especially when the quantity is large. In this case, adsorption materials such as sand, chippings or a special geotextile will be used immediately after run out. Such materials exist in the central worksite for immediate use. Their disposal, in the event of any such occurrence, shall be in accordance with the instructions for the disposal of toxic waste.</p>
C.5	Vegetation	<p>This term is adhered. The Concessionaire has contracted for the maintenance and the managing of the vegetation and the plantings of PATHE motorway with GEK-SPACON J/V.</p>
C.4	Waste Management	<p>The Concessionaire has contracted with the Company "Chr. Keridis S.A." for the motorway cleaning and waste harvesting, transferring them into appropriate licensed areas.</p>

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D.	Maintenance Issues	
D.1	Materials combustion	<p>The term is adhered. The subcontractor of KENTRIKI ODOS S.A. (Ch. Keridis S.A.) collects the waste generated by the motorway operation and maintenance, and transfers them into appropriate licensed sites or into special waste collection sites of the approved alternative management systems.</p> <p>Also, the Concession Company prepares an annual report of waste producer pursuant to Article 11 (4) (c) of JMD no. 13588/725/06, and in accordance with Law 2939/2001 and 3854/2010. A table of waste producer for 2012 was prepared and submitted to EYDE/LSEP (prot. no.: 29605/26-03-2013), while a similar table for 2013 should also be submitted in time.</p>
D.2	Waste materials Management	<p>The Concessionaire has contracted with the company “Chr. Keridis S.A.” for the motorway cleaning and the waste harvesting.</p> <p>Also, the Concession Company prepares an annual report of waste producer pursuant to Article 11 (4) (c) of JMD no. 13588/725/06, and in accordance with Law 2939/2001 and 3854/2010. A table of waste producer for 2012 has been prepared and submitted to EYDE/LSEP (prot. no.: 29605/26-03-2013), while a similar table for 2013 should also be submitted in time.</p>
D.3	Liquid waste	<p>A general Environmental Management Plan, which includes procedure ENV-P-01 for handling hazardous liquid waste in compliance with the respective environmental terms and the applicable legislation, has been drawn up, submitted and is being implemented. A relevant file with agreements and orders for waste collection of waste management licensed businesses has been created.</p> <p>Inspections are conducted in the areas where construction works are executed and the respective check list is completed. Pursuant to the checks, in case of non respect of the provisions, instructions are given (corrective actions) for the conformance method. The performance of corrective actions is checked via new inspections based on the check list.</p> <p>Also, the Concession Company prepares an annual report for waste producer under JMD no. 13588/725/06, Article 11(4) (c), and pursuant to Law 2939/2001 and 3854/2010.</p> <p>A table of waste producer for 2012 has been prepared and submitted to EYDE/LSEP (prot. no.: 29605/26-03-2013), while a similar table for 2013 should also be submitted in time.</p>

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S/N	ENVIRONMENTAL TERM	ENVIRONMENTAL TERMS: WAYS – METHODS OF ASSESMENT
E.	General Issues	
E.1	Obligation to comply with the Environmental Terms	The Environmental Terms of the project are adhered by all the competent bodies.
E.2	Construction and Operation Expenses for the protection of the environment	The required percentage of the total budget of the operation/maintenance works that are necessary for the full compliance with the Environmental Terms and restrictions of the present JMD, has been ensured by priority. A detailed analysis regarding the expenses that are provided for the realization of protection works of the environment is included in the annual progress report on the compliance with the environmental terms.
E.3	Change of the Project's Basic Characteristics	During the operation of the project, no differences have arisen and the new decision approving the environmental terms has not been required. It will be met if such a need arises.
E.4	Submission of annual report to EYPE	The term is adhered. The annual and 2 nd semiannual report for 2012 have been submitted with 13639/19-2-2013 Kentriki Odos S.A. letter (prot. no. EYDE/MKEPA&IO: 18590/28.02.2013), while the 1 st semi-annual report was submitted via Kentriki Odos S.A. letter with prot. no. 14270/19-8-2013.
E.5	E.T. controllability by the competent authorities	This report is in the Concessionaire's Headquarters
E.6	Project Environmental Terms Validity	The Environmental Terms are in force.
D.	Construction and Maintenance Issues	

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E.11	Measures for preventing implications of EIS and AET	All measures for preventing environmental implications that are proposed in the EIS and that do not contravene this AET, are taken into account.

THERMOPYLES I/C – SPERCHIOS NEW RIVERBED

(JMD 131550/4.03.2003)

**SECTION:
THERMOPYLES - SPERCHIOS**

**TABLE FOR THE IMPLEMENTATION OF THE ENVIRONMENTAL TERMS
DURING THE OPERATION PHASE**

AET: Prot. No. 131550/4-03-2003

MONTH / YEAR:

07/ 2013

S/N	ENVIRONMENTAL TERM	ENTIRONMENTAL TERMS: WAYS – METHODS OF ASSESSENT
A.	Issues of Permits/Approvals	
A.1	Permits for any activity or installation required for the operation of the motorway	<p>The foreseen by the legislation permits and approvals, including the environmental permit possibly required, are obtained, when needed.</p> <p>For the implementation of any partial additional activity or expansion that is not described in the Environmental Impact Assessment (EIA) and consequently not covered by the Approval of Environmental Terms (AET) a relevant environmental permit shall be obtained by EYPE/YPEXODE.</p> <p>The requests for granting environmental permit to the ancillary works are carried out by EYPE/YPEXODE.</p> <p>The following ancillary works have been licensed via the following environmental decisions EYPE:</p> <p>Frontal toll station of Agia Triada and lateral toll station of Molos (EYPE Decision: 122881/8-3-2010)</p>
B.	Operation Issues	
B.1	Traffic volume/ Traffic noise	<p>The term is adhered.</p> <p>The traffic volumes are measured on a monthly basis and ADT is much lower than those predicted in the EIS.</p> <p>For 2011, ADT was 16.399 and for 2012 it was 13.678 while, for 2013, it was 13.168.</p>

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C.1	Pollution due to accident	<p>The Intervention Plan for Emergency Situations has been drawn up by the Concessionaire and constitutes an Annex of the Policing & Fire Fighting Agreement signed with the Ministry of Interior. This plan specifies measures to timely collect and remove hazardous substances while preventing pollution of the water/soil resources, etc. This Intervention Plan includes all measures/required equipment etc. that will be needed in case of accident and leakage of non-biodegradable substances, including the necessity to construct Pollution Control Units.</p> <p>There is a possibility of accidental fuel leakage from maintenance and operation machinery, etc. which may result to a direct contamination of water, soil, etc. especially when the quantity is large. In this case, adsorption materials such as sand, chippings or a special geotextile will be used immediately after run out. Such materials exist in the central worksite for immediate use. Their disposal, in case this happens, shall be held in accordance with the disposal for the toxic waste disposal. Furthermore, a comprehensive action plan for the operation of the highway has also been drafted and implemented.</p>
C.2	Vegetation	This term is adhered. The Concessionaire has contracted for the maintenance and the managing of the vegetation and the plantings of PATHE motorway with SPACON Geniki Techniki S.A.
C.3	Waste management	The Concessionaire has contracted with the Company "Chr. Keridis S.A." for the motorway cleaning and waste harvesting, transferring them into appropriate licensed areas.
D.	Maintenance Issues	
D.1	Materials combustion	<p>The term is adhered. The subcontractor of KENTRIKI ODOS S.A. (Ch. Keridis S.A.) collects the waste generated by the motorway operation and maintenance, and transfers them into appropriate licensed sites or into special waste collection sites of the approved alternative management systems.</p> <p>Also, the Concession Company prepares an annual report of waste producer pursuant to Article 11 (4) (c) of JMD no. 13588/725/06, and in accordance with Law 2939/2001 and 3854/2010. A table of waste producer for 2012 has been prepared and submitted to EYDE/LSEP (prot. no.: 29605/26-03-2013), while a similar table for 2013 should also be submitted in time.</p>
D.2	Waste materials Management	The Concessionaire has contracted with the company "Chr. Keridis S.A." for the motorway cleaning and the waste harvesting.

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		Also, the Concession Company prepares an annual report of waste producer pursuant to Article 11 (4) (c) of JMD no. 13588/725/06, and in accordance with Law 2939/2001 and 3854/2010. A table of waste producer for 2012 has been prepared and submitted to EYDE/LSEP (prot. no.: 29605/26-03-2013), while a similar table for 2013 should also be submitted in time.
D.3	Liquid waste	<p>A general Environmental Management Plan, which includes procedure ENV-P-01 for handling hazardous liquid waste in compliance with the respective environmental terms and the applicable legislation, has been drawn up, submitted and is being implemented. A relevant file with agreements and orders for waste collection of waste management licensed businesses has been created.</p> <p>Inspections are conducted in the areas where construction works are executed and the respective check list is completed. Pursuant to the checks, in case of non respect of the provisions, instructions are given (corrective actions) for the conformance method. The performance of corrective actions is checked via new inspections based on the check list.</p> <p>Also, the Concession Company prepares an annual report for waste producer under JMD no. 13588/725/06, Article 11(4) (c), and pursuant to Law 2939/2001 and 3854/2010. A table of waste producer for 2012 has been prepared and submitted to EYDE/LSEP (prot. no.: 29605/26.03.2013), while a similar table for 2013 should also be submitted in time.</p>
D.4	Motorway Fence	During the administrative receipt for use of part of the said section on behalf of the Concessionaire, some deficiencies in fencing the Motorway have been observed, which are recorded in the official correspondence between the Concessionaire and the State. The course of recovery of these deficiencies is underway.
E.	General Issues	
E.1	Obligation to comply with the Environmental Terms	The Environmental Terms of the project are adhered by all the competent bodies.
E.2	Construction and Operation Expenses for the protection of the environment	The required percentage of the total budget of the operation/ maintenance works that are necessary for the full compliance with the Environmental Terms and restrictions of the present JMD, has been ensured by priority. A detailed analysis regarding the expenses that are provided for the realization of protection works of the environment is included in the annual progress report on the compliance with the environmental terms.

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AET: Prot. No. 131550/4-03-2003

MONTH / YEAR:

07/ 2013

S/N	ENVIRONMENTAL TERM	ENTIRONMENTAL TERMS: WAYS – METHODS OF ASSESSENT
E.3	Submission of annual report to EYPE	The term is adhered. The annual and 2 nd semiannual report for 2012 has been submitted with 13639/19-2-2013 Kentriki Odos SA letter (prot. no. EYDE/MKEPA&IO: 18590/28.02.2013) while the 1 st semi-annual report for 2013 has been submitted with 14270/19-8-2013 Kentriki Odos SA letter.
E.5	E.T. controllability by the competent authorities	This report is in the Concessionaire's Headquarters
E.6	Project Environmental Terms Validity	The Concessionaire has submitted a file for the E.T. renewal of the said section with prot. no. 13645/20.02.2013 (EYDE/MKEPA&IO prot. no. 18610/01.03.2013).
D.	Construction and Maintenance Issues	
E.11	Measures for preventing implications of EIS and AET	All measures for preventing environmental implications that are proposed in the EIS and that do not contravene this AET, are taken into account.