CENTRAL GREECE Motorway E-65 ferrovial DRAGADOS TERNA

CENTRAL GREECE MOTORWAY (E-65)

1. INTRODUCTION

This Environmental Management Report is the fifth approach of the Environmental Management Process of the CJV's "Central Greece Motorway (E65)" and has been drawn up in the context of its contractual obligation deriving from Article 13.3 (b) (respectively 11.2.2 paragraph (ii) of the Concession Agreement, Law 3597/20.07.2007 - OGG 3445A/25-07-2007) and the approved environmental terms of the Project, following which:

"By January 31 of each year a statement on behalf of the body for the construction and operation of the project shall be submitted to EYPE/YPEHODE setting out:

- The road construction works, accompanied by detailed documentation of compliance with environmental conditions.
- Sections of the project that have been received or have been in operation.
- Permits or approvals granted in accordance with the terms hereof.
- •Studies commissioned; qualitative, quantitative and economic data on environmental protection projects and the percentage represented by the expenditure for these projects, in relation to the total expenditure on the construction project.
- Antipollution and environmental protection projects to be done next year
- Summary of the results on the monitoring of noise, air pollution, water quality and wildlife (wolf). Problems that have been encountered, unforeseen circumstances and any information or suggestions that could be useful in order to limit any adverse environmental impacts due to the construction or operation of the project."

This Annual Environmental Management Report refers to the period of 2012.

1.1 DESCRIPTION OF THE PROJECT

State: Hellenic Republic

<u>Concessionaire:</u> CENTRAL GREECE MOTORWAY S.A. <u>Constructor</u>: CENTRAL GREECE MOTORWAY (E65) J.V

Independent Engineer: SCOTT WILSON- OMEK



The scope of the project includes the design, financing, construction, operation and maintenance 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 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 (almost) of the PATHE motorway and ends at Egnatia Odos, location of Panagia, crossing the prefectures of Fthiotida, Karditsa and Trikala.

It consists of two lanes per direction as well as of one emergency lane. The width of the motorway at the lowland is 24.5 m with a maximum speed limit at 120 km/hour, while at the mountain areas the width is 21.0 m with a maximum speed limit at 110 km/hour.

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, fauna passages, etc.



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

Section	From CH.	То СН.	A.E.T. Decision*
1 st Section	0+000	85+800	Joint Ministerial Decision 144504/18.11.2005
2 nd Section	85+800	137+550	Joint Ministerial Decision 145521/18.11.2005
3 rd Section	137+550	175+000	Joint Ministerial Decision 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
	Technical works at PATHE - Lianokladi	
	section which is under construction by	
	ERGOSE	

The above New State Sections, pursuant to the relevant environmental terms, are divided into five sections, as stated below:

Section	FROM CH.	то сн.	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 –	Thermopiles I/C 198+300	Nea Kiti of Sperchios River	JMD 131550/04.05.2003	8,8km.
Lamia section, subsection from the beginning of the Thermopiles Interchange to Nea Kiti of Sperchios river".			121668/08.02.2010 EYPE/YPEKA	Environmental Licensing of Thermopyles I/C toll stations
"Optimization of the National Road to a PATHE	Nea Kiti of Sperchios	Roditsa I/C	JMD	3,78km.



Section	FROM CH.	то сн.	A.E.T. Decision	Description
motorway, section from Nea Kiti of Sperchios river to Roditsa Interchange".	River		146109/30.09.2005	From 130m. Before the axis of the New Kiti of Sperchios River up to east Roditsa village
"Optimization of Athens – Thessaloniki National Road in PATHE	3+500	12+000	JMD 130665/02.05.2003	8,5km. From 211+000
motorway, Lamia – Raches section, subsection from CH. 3+500 to CH. 12+000"			JMD 195214/11.01.2011	Amendment of the no. 130665/02.05.2003
"Overall Bypass at Stilida – 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 – Stylida I/C & Stylida– Karavomylos I/C.

CENTRAL GREECE Motorway E-65 ferroyial DRAGADOS TERNA

CENTRAL GREECE MOTORWAY (E-65)

2. GENERAL ISSUES

2.1 BRIEF REPORT

The "Central Greece Motorway S.A (E65)" J/V was informed by ODOS KENTRIKIS ELLADOS SA via letter with protocol no. CC.X.CC.13354/04.12.2012 (protocol no. E65 15446), about the Ministerial Decision No. D17a/07/173/FN380 (OGG B 3017/14.11.2012) 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.

2.1.1 OUTSTANDING ISSUES

- 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 30/4/2012, 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.

After application for suspension of the JMD no. 147014/18.11.2005 (CH. 137+550 - 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 16/11/11 to 09/05/12. 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 by letter 14805/14-12/11 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.

- 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) and amortization of payment, 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 12NΔ-13NΔ-14NΔ-15NΔ-16NΔ State's New Sections, i.e. 25/6/2009, 10/9/2009, 28/06/2010 & 28/06/11 respectively, have not been achieved (only the area for the construction of the toll stations on Thermopiles I/C was delivered via Sites Disposal Protocol XL. Section CH. 9+630 CH. 10+385 for the construction of Agia Triada and Molos toll stations were delivered via Protocol VII; Molos lateral toll stations cannot be completed due to additional pending expropriation)
- 6. After request for suspension of JMD with no. 147014/18.11.2005 Environmental Terms Approval for the section CH. 137+550 – CH. 175+000 submitted to the Council of State by 3 local associations and 2 local authorities of the broader region, a preliminary injunction on behalf of the President of the Fifth Division of the State of Council regarding the



suspension of the said JMD until the issuance of the decision on behalf of the Suspension Committee on the pending application for suspension was issued. All J/V's works 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 on 14.12.2011 and also communicated its right for extension and compensation in accordance with Article 30.1 of the Design-Construction Agreement. The Suspension Committee of the State Council during its meeting dated 29.06.2012 (no.383/2012) decided the refusal of the request for cancellation. The said decision has been issued on 20.07.2012.

- 7. There is a significant works disruption along the Motorway due to nondelivery of reserved areas where archaeological findings were identified.
- 8. 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.

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

2.1.2 REPORT PERIOD

At the reporting date of this report (31/12/2012) the main issues of the involved with the Public Utility Networks work are the following:

1. **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, CH. 12+500) since EOAE has not proceeded with the relevant payment. However, PPC has started the works on the relocation of the electricity network in CH. 9+500 of E-65 main artery, but the



quality of the restoration works is not acceptable, since the embankment works of the motorway in this CH. have been completed; hence PPC subcontractors carry out excavations on our embankments so as 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 has been 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.

All the above pending problems have created continuous delays resulting to the failure even of the approved extension for completion (until 31/01/2011) and to the request of a new extension.

GU 5N, 6N.1: There are delays due to non-timely networks relocation. The relocation of the electricity 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 are 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 12N: No relocation of PPRC network has been realized in the area from CH. 10+270 and 12+160 SRD1 (Responsibility EYDE PATHE TKE LAMIA).

PATHE/GU 15N: The relocation of PPC network has not been completed in DRS3 (Mavromantila Toll Station)



2. <u>HELLENIC ORGANIZATION OF TELECOMMUNICATIONS</u> (OTE):

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



3. LOCAL ORGANIZATION FOR LAND IMPROVEMENT (TOEB)

GU 8N&9N: The relocation works of Theopetra TOEB and Vassiliki TOEB have been started. Contact with YEB of Trikala for the acceleration of the design regarding the relocation of Raksa irrigation system (110+500 – 115+600).

CENTRAL GRECE Molorway E-65 ferroyial DRAGADOS TERNA

CENTRAL GREECE MOTORWAY (E-65)

4. <u>WATER SUPPLY – DRAINAGE</u>

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 overpass (9+300 - 9+400 km) which affects the construction of the embankments in the area.

CENTRAL GREECE Molorway E-65 ferroyial DRAGADOS TERNA

CENTRAL GREECE MOTORWAY (E-65)

5. <u>MILITARY FUEL PIPELINE IN CH. 111+950 AND 122+990:</u>

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.

- **6.** The designs preparation and submission is under development.
- 7. The process to obtain permits for quarries, borrow pits, disposal site and equipment is in progress for the project's needs. The requests for the permits have been sent to the relevant services. Moreover, five (5) from these have been approved in their entirety (Kalamaki, Geladaria, Onohonos River, Geladaria, Kioska/Anavra) so far, while many areas have been rejected from the involved Archaeological Services & Forestries. In many cases there are delays on behalf of the involved bodies, of more than a year. The whole issue is critical.
- **8.** A Certificate of Environmental Control for Thermopiles I/C has been issued. Regarding Molos I/C, despite the fact that a design on traffic regulations has been submitted and implemented, the IE did not issue the Certificate of Environmental Control because of lack of necessary expropriated site in branch 1.
- **9.** The implementation of the Environmental Operating System of the Project continues as usual.
- **10.** The review of the Environmental Management System of the Project is under development.

2.1.3 PROBLEMS AND POSSIBLE RISKS

- Since the J/V works are suspended, all G.U. are entrusted with additional delays corresponding to at least the period from 14.02.2011 to the end of the suspension of works and the remobilisation time of the resources required.
- 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 (0+000 14+500) where the 2nd Exclusive Deadline was not achieved and a 10-month extension has been granted. The fact that these expropriations are



finally completed on 14.02.2011, and the aforementioned delays in Public Utility Network relocations resulted in failure to achieve the approved extension (31.01.2011), and an extra extension has been requested. Currently, an extension until 30.11.2012 is granted from EGNATIA S.A.

- Also, delays occur in the G.U. 8N, 9N, 10N, 11N where, in addition to the last two sections, the construction J/V works have been interrupted on 02.07.2010 (CH. 137+000 CH. 553+175), due to a temporary order of the Council of State (no. 827/2010). Under these circumstances, the 3rd Exclusive Partial Deadline was not achieved. Currently, an extension until 30.11.2012 is granted from EGNATIA S.A.
- A temporary bypass of ERGOSE of the existing Lamia-Karpenissi National Road, along with the suspension of the works of ERGOSE Bridge (constructor MICHANIKI S.A.) prevents the construction works on E-65 motorway in CH. 15+375, until the completion of this 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, 6N, 9N & 10N. The continued delays are in contradiction with the approved schedule (according to which most of the works should have been completed on June 2009).
- Important disorganisation of the works due to reserved spaces of archaeological findings in a high level 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 sites of (borrow pits/disposal pits), as up to now a number of these sites suggested by the Construction J/V has 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.
- Officially, specific regulations from EOSA regarding the design of KO34 area (CH.108+450) are still pending, given that the study of the basic design has been basically annulled since the relevant land and property register has been withdrawn.
- The logging of the area CH. 139+000 ~ CH. 139+200 is still pending



(abandoned military camp) due to on behalf of the unit.

- Delay due to failure to accomplish the revised delivery deadline of the site for sections (12ΝΔ-13ΝΔ-14ΝΔ-15ΝΔ-16 ΝΔ) on 25/6/2009, 10/9/2009, 11/9/2009, 28/6/2010 & 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 toll station in Ag. Marina & Karavomilos.
- 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 toll stations on G.U. 15N∆ due to nonexpropriation in the construction areas of Mavromantila and Agia Paraskevi toll stations. Possible delays in the progress of works of SRD1 due to failure to relocate the PPC network in CH. 10+270 and 12+160.

2.1 ENVIRONMENTAL REQUIREMENTS

The design, construction and operation of the project are 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 with the applicable legislation.

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), the Project Environmental Terms in force, 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 there has been rapid progress in the legislative work of YPEKA, as regards the Environmental Legislation. It is significant that the entry into force 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 applies via the publication of YPEKA Ministerial Decision 1958/13.01.2012 (OGG 21V/13.01.2012) "Classification of public and private projects and activities into categories and subcategories in accordance with Article 1, paragraph 4 of Law 4014/21.09.2011 (O.G.G. A' 209/2011)."

The 2012 legislative work of YPEKA is set out in the table below.

Table 2.2-1: 2012 YPEKA legislative work

Date	Number	Subject			
LAWS & PRESIDENTIAL DECREES					
13.02.2012	Law 4042/2012 OGG 24/A/13.02.2012	"Criminal Protection of the environment - Harmonization by Directive 2008/99/EC – Framework of waste generation and management - Compliance with Directive 2008/98/EC - Setting matters of the Ministry of Environment, Energy and Climate Change" incorporating into the national law the directive-framework 2008/98/EU on waste"			
DECISIONS 8	CIRCULARS				
PD 1958/13.01.2012 Classification of public and private projects and activities into categories and subcategories pursuant to Article 1 paragraph 4 of Law 4014/2011 (OGG A 209/2011)					



Date	Number	Subject
19.01.2012	JMD 1264/12 OGG 230/B/09.02.2012	Amendment of JMD no. Δ7/19488/22-8-2011 of the Ministers of Finance and Environment, Energy and Climate Change (OGG 1986/B/7-9-2011), amending JMD no. Δ7/B/Οικ.13803/Γ.Δ.ΦΠ4213 of the Ministers of Economy – Finance and Development "Enactment of cash compensation (fee) for the grant of any license or authorization or right provided by the Mining and Quarrying Legislation" (OGG 1228/B/11-8-2004).
09.02.2012	JMD 210474/12 OGG 204/B/09.02.2012	Determination of Evaluation Indicators and Indicators for Maximum Permitted Environmental Noise Level coming from the operation of transportation projects (pursuant to Directive 2002/49/EC).
23.02.2012	JMD Н.П. 8353/276/E103/17.02.2012 OGG 415/B/23.02.2012	"Amending and supplementing JMD No. 37338/1807/2010 on "Defining measures and procedures for the conservation of wild birds and their habitats, in compliance with Directive 79/409/EEC" (B' 1495), pursuant to the provisions of the first subparagraph of paragraph 1 of Article 4 of Directive 79/409/EEC "For the conservation of wild birds" of the European Council of April 2, 1979, as codified by Directive 2009/147/EC"
08.05.2012	JMD 146163/03.05.2012 OGG 1537B/08.05.2012	"Measures and Conditions for Sanitary Waste Management Units", issued under the delegated Article 38 of par.7, Law 4042/2012.
02.03.2012	JMD 110/1205322/12 OGG 1419/B/30.04.2012	Setting out technical specifications for the elaboration of delimitation studies of the land areas of "NATURA 2000" network – update, description and delimitation of terrestrial habitat types in areas of Community importance.
02.03.2012	MD 109/1205320/2012 OGG 1460/B/02.05.2012	Setting out estimated fee for the elaboration of delimitation studies of the land areas of "NATURA 2000" network - update, description and delimitation of terrestrial habitat types in areas of Community importance.



Date	Number	Subject		
08.05.2012	MD 20741/27.04.2012 OGG 1565B/08.05.2012	Amending and supplementing MD 1958/12		
11.04.2012	JMD Ф.15/4187/266/11.04.2012 OGG 1275B/11.04.2012	Standard Environmental Commitments for industrial activities.		
24.12.2012	JMD 59845/03.12.2012 OGG 3438B/24.12.2012	Standard Environmental Commitments for tourism projects		
09.04.2012	MD 15277/23.03.2012 OGG 1077B/09.04.2012	Specialized procedures for the integration into the AEPO and the Standard Environmental Commitments of the intervention approval in forests – forested areas.		
03.05.2012	MD 21697/02.05.2012 OGG 224YΟΔΔ/03.05.2012	Formation of the Central Council for Environmental Permitting (KESPA)		
03.05.2012	JMD 21398/02.05.2012 OGG 1470B/03.05.2012	Establishment and operation of a special website for AEPO (Decision on Environmental Terms Approval) posting and AEPO renewal/modification decisions.		
05.10.2010	MD 48963 OGG 2703B/05.10.2012	Specifications on the content of the Decisions or Environmental Terms Approval (AEPO) for projects and activities of category A' of the Minister or Environment, Energy and Climate Change (B' 21) decision No. 1958/13.1.2012, as in force, pursuant to Article 2, paragraph 7 of Law 4014/2011 (A' 209).		
05.06.2010	CIRCULAR 27953/05.06.2012	Instructions for operating a special website for posting AEPO pursuant to Article 19a of Law 4014/2011 (OGG A/209/2011)		
30.03.2012	CIRCULAR decision no. 431	National Database of Wastewater Treatment Plants		
11.04.2012	JMD oik. 110424	Amending decision no. 150559/10-6-2011 of the Ministers of Interior, Decentralization and e-		



Date	Number	Subject
	OGG 1190B/11.04.2012	governance, Finance, Economy, Competitiveness and Shipping, Environment, Energy and Climate Change, Infrastructure, Transport and Networks, Rural Development and Food, Culture and Tourism: "Procedures, terms and conditions for the granting of permits for existing rights of water use."
14.06.2012	MD oik. 110613/14.06.2012 OGG 1881B/14.06.2012	Amending decision no. 150559/10-6-2011 of the Ministers of Interior, Decentralization and egovernance, Finance, Economy, Competitiveness and Shipping, Environment, Energy and Climate Change, Infrastructure, Transport and Networks, Rural Development and Food, Culture and Tourism: "Procedures, terms and conditions for the granting of permits for existing rights of water use." (OGG B' 1440/16.6.2011), as in force."
17.12.2012	JMD oik. 111084/17.12.2012 OGG 3386B/17.12.2012	Amending decision no. 150559/10-6-2011 of the Ministers of Interior, Decentralization and e-governance, Finance, Economy, Competitiveness and Shipping, Environment, Energy and Climate Change, Infrastructure, Transport and Networks, Rural Development and Food, Culture and Tourism: "Procedures, terms and conditions for the granting of permits for existing rights of water use." (OGG B' 1440/16.6.2011), as in force."
11.04.2012	MD оік.110428/09.04.2012 OGG 189/11.04.2012	"Establishment of the National Committee of Maritime Environmental Strategy."
17.04.2012	JMD Z3-1531/2012 OGG 1306B/B/18.04.2012)	Specifying conditions for the use of environmental claims on plastic items and packaging.
27.04.2012	JMD 211773/12 OGG 1367/B/27.04.2012	Setting out Evaluation Indicators and Indicators for maximum permitted levels of environmental noise coming from the operation of transportation projects, technical specifications of special acoustic design calculation and application of anti-noise barriers, specifications for environmental noise monitoring programs and other provisions.



Date	Number	Subject
04.05.2012	JMD 198015/ЕҮПЕ-ҮПЕКА OGG 1510B/04.05.2012	Standard Environmental Commitments for mobile phone base stations. (Group 12/α.α 6 B).



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 has been prepared for issues concerning the construction of the project and submitted to the Concessionaire.



3.2 ENVIRONMENTAL MANAGEMENT SYSTEM – ENVIRONMENTAL TERMS COMPLIANCE CHECKLISTS

The Environmental Management System is drawn up based on the Environmental Monitoring & Control Program where relevant procedures on the project's environmental management are included.

The responsible department for the environment in cooperation with the project engineers carry out regular inspections and complete relevant 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 under ISO 14001:2004 and consists of the Manual, the Procedures, the Guidelines and the Forms that are related to the environment and the observance of the project's environmental requirements. The Environmental Management System is applied uniformly throughout the project and is 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 control the Program and shortly inform the bodies monitoring the construction of the project, monthly and annual progress reports for the implementation of the environmental terms are drawn up. 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.).
- The results of the inspections and the conclusion of the monthly checklists
- A full photographic presentation of the environmental issues

At the end of each semester, 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.



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 for the implementation of the project. Furthermore, the relevant designs that arise from the obligation to observe the contractual requirements, the applicable legislation and the 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 on the environmental licensing of the ancillary works, relevant Environmental Studies (such as Special Technical Implementation Studies (STIS) Technical Environmental Study (TEPEM), Environmental Impact Assessment (MPE), compliance records pursuant to Article 7 of Law 4014/2011, etc.) are being prepared and submitted. The competent authority for the approval of the above studies is EYPE/YPEKA.

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



Table 4.1.1-1 Ancillary Works Environmental permit

No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	(Approval, resubmission-rejection, etc.)
1.	MATERIAL WITHDRAWAL FROM ONOHONO RIVER (BP5N1)	Municipality of Sofades, Prefecture of Karditsa	141388/25-6-2009	141388/04.08.2009	STIS approval
2.	BORROW PIT AT AGIA PARASKEVI, "KALAMAKI BR" (BP1N3)	Municipality of Agia Paraskevi, Prefecture of Lamia, Prefecture of Fthiotida	136998/05.03.2009	136998/28.07.2009	STIS approval
3.	WORKSITE AT AGIOS TRIFONAS, LAMIA (MSS CH. 12+000) (IS1N1)	Stavros, Municipality of Lamia, Prefecture of Fthiotida.	136998/05.03.2009	136998/28.07.2009	STIS approval
4.	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 Forestry Directorate does not approve the license of intervention
5.	BORROW PIT "Platana - Rema" (BP1N2)	Lygaria, Municipality of Lamia, Prefecture of Fthiotida.	136998/05.03.2009	136998/28.07.2009	STIS approval
6.	BORROW PIT AT "MAGOULA" SPERCHIOS RIVER (BP1N4)	Magoula, among Municipality of Ypati and Lianokladi, Prefecture of Fthiotida	136998/05.03.2009	136998/28.07.2009	The position has been rejected by STIS
7.	BORROW PIT AT Asprokambos, GERAKARIS STREAM(BP1N5)	Kompotades, Municipality of Ypati, Prefecture of Fthiotida.	136998/05.03.2009	136998/28.07.2009	STIS approval
8.	BORROW PIT AT "AERODROMIO" AREA (BP6N1)	Kefalovrysso, Municipality of Faloria, Prefecture of Trikala	140546/04.06.2009	140546/29.07.2009	STIS approval



No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments
					(Approval, resubmission-rejection, etc.)
9.	ETME Review Borrow Pit "AERODROMIO" (BP6N1)	Kefalovrysso, Municipality of Faloria, Prefecture of Trikala	148761/18.12.2009	121188/29.01.2010	STIS approval
10.	Borrow Pit "Kioskia" (BP4N1)	Anavra, Municipality of Tamassi, Prefecture of Karditsa, Anavra	143395/10-08-2009	143395/02-09-2009	STIS approval
11.	Borrow Pit "Geladaria" (BP4N2)	Municipality of Tamassi, Prefecture of Karditsa, Anavra	145522/16-10-2009	145522/17-11-2009	STIS approval
12.	Anavra Worksite "Kedrakos" position (IS5N1)	Municipality of Tamassi, Prefecture of Karditsa, Anavra	143394/10-08-2009	143394/02-09-2009	STIS approval
13.	Agios Georgios Worksite "Voulgarolakka" position	Municipality of Kampos, Agios Theodoros, Prefecture of Karditsa	143394/10-08-2009	143394/02-09-2009	STIS approval
14.	"GKOLNA" Worksite (BP5N4)	Municipality of Goriani, Prefecture of Grevena	121768/10-02-2010		The study has been returned due to the decision of the Council of State for temporary suspension of works in the 3 rd JMD.
15.	Borrow Pit in "Mavrogies" position (BP5N4)	Sikeona, Municipality of Filo, Prefecture of Karditsa	121768/10-2-2010 Resubmission 14076/16.06.2011 (J/V protocol no.)	14693/10.11.2011	STIS approval
16.	Borrow Pit in "Vrontaria" Position (BP6N2)	Fiki, Municipality of Pialia, Prefecture of Trikala	124501/21.04.2010	127798/08.07.2010	STIS approval
17.	Stone processing installation in the quarry materials – borrow pit in "Pyrgaki" Position (IS1N2)	Stavros, Municipality of Lamia, Prefecture of Fthiotida	144259/11.09.2009	144259/17.11.2009	STIS approval
18.	Stone processing installation in the quarry materials – borrow pit in "Kalamaki Vr." Position (IS1N3)	Agia Paraskevi, Municipality of Lamia, Prefecture of Fthiotida	144259/11.09.2009	144259/17.11.2009	STIS approval
19.	Stone processing installation in the worksite facilities of	Stavros, Municipality of Lamia, Prefecture of	144259/11.09.2009	144259/17.11.2009	STIS approval



No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments
					(Approval, resubmission-rejection, etc.)
	Lamia (IS1N4)	Fthiotida			
20.	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 leasing application by the Mortgage Service of Prefecture of Fthiotida
21.	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 the region of Natura 2000.
22.	Worksite in "Lampes" position (IS6N1)	Proastio, Municipality of Selana, Prefecture of Karditsa	126671/11.06.2010	195831/31.01.2011	STIS approval
23.	Worksite in "Samolaka" position (IS2N1)	Styrfaka, Municipality of Lianokladi, Prefecture of Fthiotida	126332/04.06.2010	127799/08.07.2010	STIS approval
24.	Borrow Pit "Ammoudes" (BP5N5)	Filia, Municipality of Sofades, Prefecture of Karditsa	9285/26.07.2010 (J/V prot. no.)	132626/ 22.11.2010	STIS approval
25.	Borrow Pit "Haliades" (BP5N6)	Filia, Municipality of Sofades, Prefecture of Karditsa	9567/03.08.2010 (J/V prot. no.)	132626/ 22.11.2010	STIS approval
26.	Worksite of Perivoli (IS3N1)	Perivoli, Municipality of Ksiniada, Prefecture of Fthiotida	9575/06.08.2010 (J/V prot. no.)		Expected to be approved
27.	Worksite (IS2N3) in "Ohiro" position (T2 tunnel exit area)	Moshokaria, Municipality of Lianokladi, Prefecture of Fthiotida	128699/09.08.2010	201981/01.08.2011	
28.	Temporary deposit in "Fteres" position (DS2N1)	Moshokaria, Municipality of Lianokladi, Prefecture of Fthiotida	128343/23.07.2010	201981/01.08.2011	
29.	Asphalt plant and material mixer 3A	Anavra, Municipality of Tamassi, Prefecture of	128343/23.07.2010	201980/01.08.2011	STIS approval



No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments
					(Approval, resubmission-rejection, etc.)
		Karditsa			
30.	Environmental permit on wells drilling within the project "Planting - Irrigation and Rehabilitation of the area for the section CH. 56+000 – CH. 90+000 of Central Greece motorway (E65)."	CH. 56+000 – CH. 90+000	13323/01.04.2011 (J/V protocol no.)		Submission of Pre-study on Environmental Assessment Expected to be approved
31.	Materials and 2units of asphalt mix in "Sykia" position (IS1N7)	Koma, Municipality of Lamia, Prefecture of Fthiotida	201026/06.07.2011		Expected to be approved
32.	Borrow pit in "Fournia" position (BP3N2)	Makryrachi, Municipality of Ksiniada, Prefecture of Fthiotida	204542/27.10.2011	200814/20.07.2012	STIS was returned in order for the procedures of Law 4014/2011
33.			15481/21.12.2012		EIS submission according to Articles 6 & 7 of Law 4014/2011 Expected to be approved
34.	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 to revise the layout and compliance with the Design-Construction Contract of the project so as to promote its environmental licensing Decision No. 15046/06.04.2012
35.	Operation and Maintenance Centre in CH. 69+700	Municipality of Sofades, Prefecture of Karditsa	204544/27.10.2011		Expected to be approved
36.	Frontal Toll Station and administration building in CH. 65+650	Municipality of Sofades, Prefecture of Karditsa	204543/27.10.2011		Expected to be approved
37.	Borrow pit in the region of	Agios Stefanos, Municipality of Ksiniada, Prefecture of	204863/08.11.2011	200811/20.07.2012	STIS was returned in order



No.	Ancillary work	Area	Submission to EYPE (ref. no. EYPE)	EYPE's Decision	Comments (Approval, resubmission-rejection, etc.)
	Agios Stefanos (BP3N5)	Fthiotida			for the procedures of Law 4014/2011
38.			15482/21.12.2012		EIS submission according to Articles 6 & 7 of Law 4014/2011

Within 2013, additional relevant designs of more 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, the respective permits and opinions are obtained by the competent authorities, such as Forest Services, Archaeological Services, Local Administration Services, etc.

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
- IΔ Service of Prehistorical and Classical Antiquities
- ΛΔ Service of Prehistorical and Classical Antiquities
- A Service of Prehistorical and Classical Antiquities
- 19th Service of Byzantine Antiquities
- 24th Service of Byzantine Antiquities
- 17th Service of Byzantine Antiquities
- Regional Unit of Fthiotida
- Regional Unit of Karditsa
- Regional Unit of Trikala
- Regional Unit 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 (2012)

No	Service	Subject	Request	Response		Comments
			J/V Ref. No	J/V Ref. No	Service Ref. No	
1.	Directorate of Quarries, Marbles and Aggregates of the YPEKA General Directorate of mineral resources	Submitting evidence relating to deposit of State and Funds rights for STIS approval of B/P in the area of Agios Stefanos, Municipality of Ksiniada, Prefecture of Fthiotida, BP3N5	14879/23.01.201 2	14997/13.03.201	Δ10- B/Φ.46.47/1683/21 9/02.03.2012	STIS Approval
2.	Directorate of Quarries, Marbles and Aggregates of the YPEKA General Directorate of mineral resources	Submitting evidence relating to deposit of State and Funds rights for STIS approval of B/P in the area of 'Fournia', Municipality of Ksiniada, Prefecture of Fthiotida, BP3N2	14880/23.01.201	14996/13.03.201	Δ10- B/Φ.46.46/1684/22 0/01.03.2012	STIS Approval
3.	Office for Coordination and Monitoring of Archaeological Surveys in the framework of Major Projects of the Ministry of Culture and Tourism	Decision not to maintain ancient remains at "Ntrogkari" or "Kalamaras" (CH. 116+600 – 114+260) Municipality of Trikkaia, Regional Unity of Trikala, Region of Thessalia		15003/16.03.201	ΥΠΠΟΤ/ΓΔΑΠΚ/ΑΡ Χ/Α1/Φ40/16606/8 68/24.02.2012	
4.	Decentralized Administration of Thessaly – Central Greece	Transmission to our J/V, of the positive opinion under PPC conditions for the installation and operation of quarry aggregates - borrow pit		15017/22.03.201 2	770/51826/ 16.03.2012	Positive Opinion



No	Service	Subject	Request	Response		Comments
			J/V Ref. No	J/V Ref. No	Service Ref. No	
		at 'Agios Stefanos' position, Agios Stefanos, Municipality of Ksiniada, Prefecture of Fthiotida (BP3N5)				
5.	YPEKA/ Mining inspectorate	Submission of Inaction Statement for 2011 (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 Trikkaia, Prefecture of Trikala	15089/27.04.201			Submission of borrow pit Activity Statement. For information
6.	YPEKA/ Mining inspectorate	Submission of Inaction Statement for 2011 (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	15090/27.04.201			Submission of borrow pit Activity Statement. For information
7.	YPEKA/ Mining inspectorate	Submission of Inaction Statement for 2011 (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	15091/27.04.201			Submission of borrow pit Activity Statement. For information
8.	YPEKA/ Mining	Submission of Inaction	15092/27.04.201			Submission of



No	Service	Subject	Request	Response		Comments
			J/V Ref. No	J/V Ref. No	Service Ref. No	-
	inspectorate	Statement for 2011 (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	2			borrow pit Activity Statement. For information

S/N	Service	Subject	Request	Response		Comments
			J/V Ref. No.	J/V Ref. No.	Service Ref. No.	
9.	Office for Coordination and Monitoring of Archaeological Surveys in the framework of Major Projects of the Ministry of Culture and Tourism	Decision not to maintain ancient remains that have been uncovered in 'Palioklissi' of Agnantero position (CH. 99+350 – CH. 99+371,03) Pamissos Municipality of Mouzaki, Regional Unity of Karditsa, Prefecture of Thessalia		15098/30.04.2012	1781/17.04.2012	
10.	ΙΔ ΕΡΚΑ	Update on the suspicion of antiquities in CH. 31+000 – CH. 36+000 (bypass of Agios Stefanos archeological site in Ksiniada) and request for notification of land acquisition phase in order to initiate test cuts		15129/16.05.2012	1518/07.05.2012	
11.	Office for Coordination and Monitoring of Archaeological Surveys in the framework of	Decision not to maintain ancient remains that have been uncovered in 'Alonaki' position (CH. 55+710 – CH.		15196/15.06.2012	2625/01.06.2012	



S/N	Service	Subject	Request	Response		Comments
			J/V Ref. No.	J/V Ref. No.	Service Ref. No.	
	Major Projects of the Ministry of Culture and Tourism	55+750), Municipality of Sofades, Regional Unity of Karditsa, due to the fragmentary state of their preservation				
12.	Region of Thessalia	Approval of study on temporary traffic arrangements – works completion on the underpasses G037 Krinitsa of Palaiopyrgos road and G041 Raksa-Rizoma road	14798/13.12.2011	14863/18.01.2012	4952/195763/ 22.12.2011	Approval
13.	Region of Thessalia	Approval of study on temporary traffic arrangements for the construction of underpass G041 CH.119+825.52	14984/06.03.2012	15063/19.04.2012	957/36731/ 23.03.2012	Approval
14.	Region of Thessalia	Extension of the duration of approval concerning the first submission of temporary traffic arrangements for the construction of the Underpass G037 CH. 113+803.33	15061/18.04.2012	15124/15.05.2012	1686/61714/ 02.05.2012	Approval
15.	Region of Thessalia/ Trikala Directorate of Development	Request of the J/V to extend the Prefect of Trikala Decision No. Ref DA/F29.71/1038/16.07. 2010 Decision (prot. no. J/V 9124/19.07.2010) license to operate the borrow pit at "Airport" position of Kefalovrysso, Municipality of Faloreia, Prefecture of	15237/13.07.2012	15263/25.07.2012		Answer of the Region of Thessaly/ Directorate of Development of Trikala and updating our J/V on the required actions



S/N	Service	Subject	Request	Response		Comments
			J/V Ref. No.	J/V Ref. No.	Service Ref. No.	-
		Trikala (BP6N1)				
16.	ΙΔ ΕΡΚΑ	Request from ID' EPKA to consider both the possibility of relocation of the eastern part of the trench (CH. 26+050 – CH. 26+000 of the axis of the road or from CH. 0+050 – CH. 0+100) to the east side and into the already researched archaeological site, and to change the depth of the bottom of the excavation trench, or any other solution in order not to harm the antiquities discovered	15242/13.07.2012			
17.	ΙΔ ΕΡΚΑ	Request of ID' EPKA to send the amended proposal on the construction of the eastern part of the runoff trench and its cut (CH. 26+050 – CH. 26+000 of the road axis or CH. 0+050 – CH. 0+100) in order not to harm the antiquities discovered	15334/13.09.2012			
18.	ΙΔ' ΕΡΚΑ	The J/V sends to IΔ' the modification of the trench T70A (CH. 25+954 – CH. 26+100 of the road axle or CH. 0+61,69 - CH. 0+079.91) to avoid antiquities in "Paleochori" area, at Styrfaka, Prefecture of Fthiotida.	15339/14.09.2012			



S/N	Service	Subject	Request	Response		Comments
			J/V Ref. No.	J/V Ref. No.	Service Ref. No.	
19.	EYPE/YPEKA	Submission of EIA pursuant to Articles 6 & 7 of Law 4014/2011, for the environmental licensing of the Borrow pit in "Fournia" position (BP3N2)	15481/21.12.2012			
20.	EYPE/YPEKA	Submission of EIA pursuant to Articles 6 & 7 of Law 4014/2011, for the environmental licensing of the Borrow pit in "Agios Stefanos" position (BP3N5)	15482/21.12.2012			

4.1.2 ROAD 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 (EYDE SD-EPA & IO) 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.



Table 4.1.2-1

Initial Joint Ministerial Decisions – Road Work Designs

No.	Decision Protocol No.	Decision Title / Project Section	Expiration
1.	Joint Ministerial Decision 144504/18.11.2005	"Central Greece (E65) Road Axis / Makrihori – Lamia"	18/11/2015
2.	Joint Ministerial Decision 145521/18.11.2005	"Central Greece (E65) Road Axis / Makrihori – Kalampaka"	18/11/2015
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".	18/11/2015
4.	Joint Ministerial Decision 103681/05.05.2006	"Connecting road of the Smokovo I/C with the existing road network."	05/05/2016
5.	Joint Ministerial Decision 146113/12.07.2005	Skarfia - Thermopiles at the section of Skarfia - Lamia of the PATHE Motorway	12/07/2015
6.	Joint Ministerial Decision 126696/06.06.2007	Amendment of the Joint Ministerial Decision 146113/12.07.2005	06/06/2017
7.	122881/08.03.2010 ЕҮПЕ/ҮПЕКА	Environmental licensing of Agia Triada and Molos I/C toll stations of PATHE motorway	06/06/2017
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".	04/05/2013
9.	121668/08.02.2010 ЕҮПЕ/ҮПЕКА	Environmental licensing of the toll station in	04/05/2013



No.	Decision Protocol No.	Decision Title / Project Section	Expiration
		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".	30/09/2015
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"	02/05/2013
12.	KYA 195214/11.01.2011	Amendment of the 130665/02.05.2003	02/05/2013
13.	Joint Ministerial Decision 100198/30.05.2006	"Overall Bypass at Stylida – Karavomylos"	30/05/2016
14.	121667/08.02.2010 ЕҮПЕ/ҮПЕКА	"Environmental licensing of the toll stations of Agia Marina – Stylida ICs and Stylida – Karavomilos I/C of PATHE motorway"	30/05/2016



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	Expiration Date
1.	Report for the determination of	6484/10.03.2010			
	environmental permit procedures of the 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)	14111/22.06.2011		Resubmission	
2		15414/08.11.2012		Submission of 2 more copies	
3	. Report to determine the environmental licensing	12005/04.01.2011		Submission	
	procedures concerning the modification of Central Greece Motorway (E-65) Road Axis in Makrihori - Kalampaka section (CH. 14+500 – CH. 85+800) (Supporting documentation of art. 13 of the JMD with no. 11014/703/F104/2003)	14129/23.06.2011		Resubmission	



No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	Expiration Date
4.	Supplementary EIS on the optimization of CH. 47+000 – CH. 56+000 (Including Smokovo).	12015/05.01.2011		Submission	
5.	Report to determine the environmental licensing procedures concerning the modification of Central Greece Road Axis (E-65) in Makrihori – Kalampaka section (CH. 85+800 – CH. 137+550) (Supporting	3113/23.07.2009 3786/21.09.2009 4796/27.11.2009 5097/14.12.2009 6005/11.02.2010		The design was submitted by EOAE (Egnatia Odos SA) the with protocol no A248145/04.03.2010 The design was returned by EYPE (Special Service of Environment) with protocol no 122785/26.04.2010	
	documentation of art.13 of JMD with no 11014/703/Φ104/2003)	12006/04.10.2011		Resubmission Resubmission	
6.	EIS for the relocation of Kalampaka MSS (CH. 132+000) in an new position near Trikala (CH. 117+000)	11990/04.01.2011		Submission Return of study by EOAE for resubmission (A282383/26.01.2011)	
		13178/22.03.2011		Resubmission	
7.	EIS for Cut & Cover construction in CH.	12854/28.02.2011		Submission	
	137+000 with recoverable materials			Return of study by EOAE for resubmission (A287258/17.03.2011)	
		13726/09.05.2011	203583/04.12.2012	Resubmission Approval: substantive differences not made as regards the impact on the environment, and environmental conditions are approved by the JMD 145521/18.11.2005	



No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	Expiration Date
				Environmental Terms Report	
8.	EIS for the Cut & Cover	12854/28.02.2011		Submission	
	construction in CH. 138+400 with recoverable materials			EOAE Negative answer (A287258/17.03.2011) because the said project belongs to JMD 147014/18.11.2005 which is suspended under a temporary order of the State Council.	
		13726/09.05.2011		Resubmission	
9.	Supplementary EIS for the connecting road from Anavra to Thavmakos (Section A') of 13, 5 km in length in order to replace the connecting road of Smokovo - Monastiri, of approximately 9 km in length.	12016/05.01.2011	EYPE/YPEKA, under its letter no. 198627/28.05.2012, transmitted the study to the Directorate of Environment and Planning Design of Central Greece, due to competence, according to the new classification of projects and activities of the MD 1958/2012 (OGG 21B/13.01.2012).	Since most part of the proposed alignment of the road is within the limits of Karditsa, the Directorate of Environment and Planning Design of Central Greece requests by EASA via the document (prot. no. 2803/117679/12.07.2012), to be also submitted to the Directorate of Environment and Planning Design of Thessalia the Decentralized Administration of Thessalia - Central Greece an issue of the said EIS.	
10.	Design for the Environmental Permit of Toll Stations Construction and Operation in Athens – Thessaloniki National	3907/28.09.2009	122881/ 08.03.2010 EYPE/YPEKA	Approved	12/07/2015



No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	Expiration Date
	Road, in subsection Skarfia – Thermopiles of Skarfia – Lamia Section, in Agia Triada and Molos I/C. (File under Article 13 of JMD				
11.	Design for the Environmental Permit of Toll Stations Construction and Operation in Athens – Thessaloniki National Road, in subsection Archi Thermopiles I/C – Nea Kiti Sperchios of Skarfia – Lamia Section, in Thermopiles I/C location. (File under Article 13 of JMD 11014/703/Φ104/2003)	4049/08.10.2009	121668/ 08.02.2010 EYPE/YPEKA	Approved	04/05/2013
12.	Design for the Environmental Permit of Toll Stations Construction and Operation in Athens – Thessaloniki National Road, in subsection Roditsa I/C end of Lamia – Raches Section, in Agia Paraskevi and Mavromantila locations. (File under Article 13 of JMD	4049/08.10.2009	JMD 195214/11.01.2011	Approved	02.05.2013



No	Design Title	Submission J/V Ref. No	Decision of Approval	Observations	Expiration Date
	11014/703/Ф104/2003)				
13.	Design for the Environmental Permit of Toll Stations Construction and Operation in Athens – Thessaloniki National Road, in subsection Agia Marina I/C beginning of Stilida – Raches I/C of Skarfia - Raches Section, in Agia Marina I/C of Stilida and Karavomilos locations. (File under Article 13 of JMD 11014/703/Φ104/2003)	4049/08.10.2009	121667/ 08.02.2010 EYPE/YPEKA	Approved	30/05/2016

4.1.3 SPECIAL DESIGNS

During 2012 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.

The following table (table 4.2-1) presents in detail the up-to-date (31/12/2012) situation performed in the areas blocked.

	1				
A/A	Start	End	Unavailable	Delivered	Comments
	13+300	14+200	30/10/2009 (prot. 4455)	29/4/2010 (prot.7603)	
1N.2	14+400	14+540	23/6/2010 (prot.8673)		24 th EBA letter, with prot. No. 3373/23-06-2010, requested the suspension of the works from CH. 14+200 - 14+540 due to antiguities.
	14+	300	7/4/2010		14+200 - 14+540 due to antiquities.
2N.1	25+954	26+250	3/6/2010		IΔ EΠΚΑ letter, with prot. No. 3774/03-06-2010, requested the suspension of the works from CH. 25+954 - 26+250 due to antiquities. With 6656/27-9-2010 section 26+080-26+100 is now available With 7103/5562 section 25+954-26+100 is now available
	53+660	55+700	30/10/2012 (15411)		Archeological Council Decision
	55+375	55+585	15/7/2009		
	55+670	55+920	28/8/2010	31/10/2011	Section from CH. $55+670-55+770$ is non-available, Area Surface = 4868 m^2 . Area available on $31/10/11$.
4N	55+675	55+765	20/12/2010 (prot.11977)		Section 55+710-55+750 available via 52130/2625/1-6-2012
	55+710	55+750		1/6/2012 (prot.15196)	
	55+995	56+135	20/12/2010 (prot.11977)		
	56+020	56+180	29/10/2010		Section from 56+020- 56+180 remains non- available



			Unavailable	Delivered	1
A/A	Start	End	Onavallable	Delivered	Comments
			1/10/2000	1	
	58+470	58+530	1/10/2009 (prot.4060)		
			(ргот. 1000)		
	60+	-200	1/10/2009		
	001	200	(prot.4060)		
		ı			AREA NON AVAILABLE BY ΛΔ ΈΡΗΟRΑΤΕ OF
					PREHISTORIC AND CLASSICAL ANTIQUITIES IN CH. 63+940 - 64+915 (from 24/9/09) – SECTION AVAILABLE VIA LETTER (PROT. NO. 2751) BY ΛΔ΄
	63+319	64+915	20/9/2009		EPHORATE OF PREHISTORIC AND CLASSICAL ANTIQUITIES IN CH. 64+120 - 64+280 (from
					19/08/10), B) AREA NON AVAILABLE BY ΛΔ΄ EPHORATE OF PREHISTORIC AND CLASSICAL
					ANTIQUITIES IN CH. 63+319 - 63+399, CH. 64+100 -
					64+290 & CH. 64+320 - 64+540 (PROT. NO. 3899/1-
					10-09)
			1/10/2009		
	63+319	63+399	(prot.4060)		
	63+940	64+915	24/9/2009		
	64+100	64+290	1/10/2009		
	04+100	04+290	(prot.4060)		
	64+120	64+260		19/8/2010	
5N				-,-,	
	64+280			24/6/2010	
				(prot.9759)	
	64.220	C4 : F40	1/10/2009		
	64+320	64+540	(prot.4060)		
			27/11/2009		
	67+896,50	68+140	(prot.4979)		AREA NON AVAILABLE BY ΛΔ'EPHORATE OF
					PREHISTORIC AND CLASSICAL ANTIQUITIES IN CH. 67+900 - 68+140 & CH. 68+510-68+621 (PROT. NO.
	68+510,00	68+620,00	27/11/2009		4841/27-11-09)
			(prot.4979)		
	73+200,00	73+900,00			
	70.057.55	70.075.55	10/0/25:	05/5/55:5	A #11 (ABSA K.G. 1121-2)
	73+925,00	73+950,00	19/3/2010	25/5/2010	Available (AREA K.O. H015)
	76+444,18	76+467,20	10/4/2010	1/9/2010	
	77+000,00	78+000,00			Exploratory cuts
	79+450,00	79+900,00			Exploratory cuts
		<u> </u>		I	



			Unavailable	Delivered	
A/A	Start	End			Comments
	82+750,00	83+300,00			Area to be investigated
	84+450,00	84+650,00			Area to be investigated
				9/9/2010	
	76+430	76+470		(prot.10721)	
				,	
	78+191.00	78+210,00	8/12/2009		Remains non-available
	SRD6 00+392,74	SRD6 00+411,00	14/7/2010	2/9/2010	
			9/12/2009		
	78+200		(prot.5111)		
			" ,		
6N.2	95+390	95+459		3/9/2010	
014.2	33.330	33. 133		(prot.10147)	
				17/4/2012	
7N.1	99+350,00	99+371,03	22/10/2009	17/4/2012 (prot.15098)	
/ IV. I				(prot.13030)	
	105+220,23	105+233,17	26/1/2010	16/7/2010	
	103+220,23	105+255,17	(prot.5856)	(prot.9349)	
			20/7/2010		
	113+340	113+440	28/7/2010 (prot.8814)		Remains non-available
			(prot.oo14)		
	116.660	117.200	10/6/2010	10/1/2010	Section 116+660-116+870 & 116+980-117+260
	116+660	117+260	(prot.8299)	(prot.12077)	available on 26-08-2010.
8N	116+660	116+870		29/7/2010	
				(prot.9843)	
				24/2/2012	
	116+600	117+260		(prot.15003)	
	116+980	117+260		29/7/2010	
				(prot.9843)	
			21/7/2010		
10N	136+580	136+630	(prot.9316)		Remains non-available
			, ,		



4.3 ENVIRONMENTAL MONITORING

4.3.1 WASTE MANAGEMENT

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.



Waste / Material Type	Origin	Collection & Storage Method	Managing Agency	Actions
Vehicle tires	Project vehicles	In safe open areas within the worksite	Licensed Operator for Alternative Management (EKOELASTIKA S.A.)	Agreement with EKOELASTIKA S.A.
Metallic scrap	Project Construction	In safe open areas within the worksite	Any licensed metal collector	Transportation where scrap is produced
Wooden palettes	Procurement of materials for the construction of the project	In open areas within the worksite	Any palette 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.
Municipal solid waste	Worksites, offices	In municipal litter bins	The Municipal Authorities	Agreement or cooperation



Waste / Material Type	Origin	Collection & Storage Method	Managing Agency	Actions
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 Development of Western Thessaly SA)
Liquid waste	Site Offices	Waterproof cesspits	Any licensed subcontractor	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 2012 in the framework of the project's construction, shall be presented in the following table (Table 4.3.1-2) and 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 is noted that due to the reduction of the construction pace and their suspension of 01/2011, the quantities of waste produced have also been reduced, while in many cases the facilities and places of collection and temporary storage of waste (bins, settling tanks, sewage treatment plants release compact, etc.) have been removed.



Table 4.3.1-2: Waste Disposal Table (2011)

Waste / Material Type	EKA Code	Method of management (quantities in kilos, pieces, etc.)				Observations
		Recycling /regeneration	Temporary storage	Temporary deposit	Permanent Disposal/A vailability	
Vehicle tires	16 01 03		Storage on wooden pallets in a specially designed area within worksites			Temporary storage of 162 pieces
Batteries - Accumulators	16 06 01		Temporary Storage on wooden pallets in a specially designed area within worksites			Temporary storage of 92 (of Road Signs) and 6 pieces of motorized items

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



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 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
- 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.



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 was under suspension until 20.07.2012 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.

4.4 ENVIRONMENTAL ACCIDENT

There is a provision for managing and handling disasters such as fire or accidents such as leakage of substances, etc.

4.5 ENVIRONMENTAL COST

Please find a table summarizing the financial data for the environmental protection projects that took place in 2012.

α/α	EXPENSES for the protection of the environment	AMOUNT (€)
	Personnel Expenses and other expenses	
1.	Personnel costs for the environmental issues management and compliance with the Environmental Management System	75.000,00
	<u>Total</u>	75.000,00



It has to be noted that part of the environmental costs are included in the remuneration of the contractors taking part in the work's construction and therefore they cannot be assessed. Also, it has to be noted that the remuneration from environmental commitments, such as deviations due to archaeological sites, configurations and structures dimensional increases to facilitate fauna, etc., which are currently not valued, are not included in the above table.

Compared with the previous years, a significant reduction is to be seen in the expenditure on the environmental protection from the construction of the project, which is due to the suspension of the works by 02/2011.

CENTRAL GRECE Molorway E-65 ferroyial DRAGADOS TERNA

CENTRAL GREECE MOTORWAY (E-65)

4.6 NEXT YEAR ANTI-POLLUTION PROJECTS AND ENVIRONMENTAL PROTECTION

Anti-pollution and environmental protection projects that may be conducted in 2013 include:

- Construction of crossing wildlife structures.
- Construction of new site anti-pollution control projects, such as settling tanks of waste, special storage areas, etc.
- Elaboration of landscaping studies.
- Elaboration of network studies on primary and secondary green irrigation network.
- Work management/maintenance of green planting works.
- Continuation and expansion of the wildlife monitoring program.
- Elaboration of designs for environmental licensing of any new required ancillary works.
- Elaboration of specific environmental studies resulting from the Environmental Terms (e.g. risk assessment studies).
- Elaboration and submission of environmental studies for the environmental licensing of changes improvements to the basic design.
- Costs for the monitoring of the E.T. implementation, in the framework of implementing the Environmental Management Plan of the project in the construction phase.
- Elaboration of studies and construction of air pollution stations.
- Elaboration of network studies on primary and secondary green irrigation network.
- Restoration of borrow pits/quarries