2ND ANNUAL ENVIRONMENTAL MANAGEMENT REPORT

Period covered 01.01.2009 until 31.12.2009

JANUARY 2010 Environment Department OLYMPIA ODOS S.A.





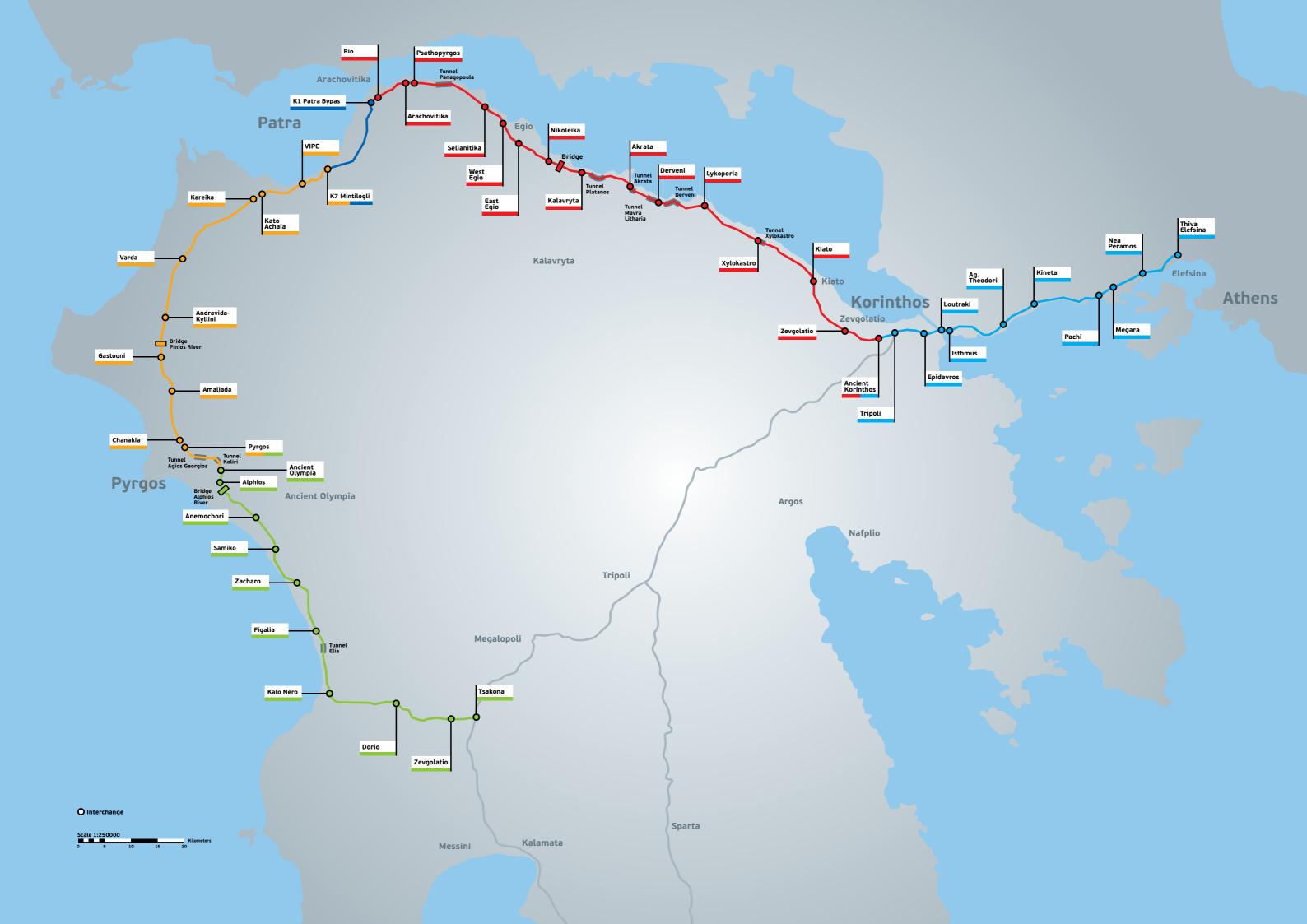


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Introduction

Based on the Concession Agreement (article 11.2.2), OLYMPIA ODOS S.A. is obliged, throughout the entire Concession Period to deliver to the Service, a semester environmental report. This is the second annual Environmental Management Report and covers the period 01.01.2009 to 31.12.2009.

The annual report incorporates the data of the two semester environmental management reports and is submitted to EYPE/ MEPPW until January 31st of each year and throughout the entire Concession Period.

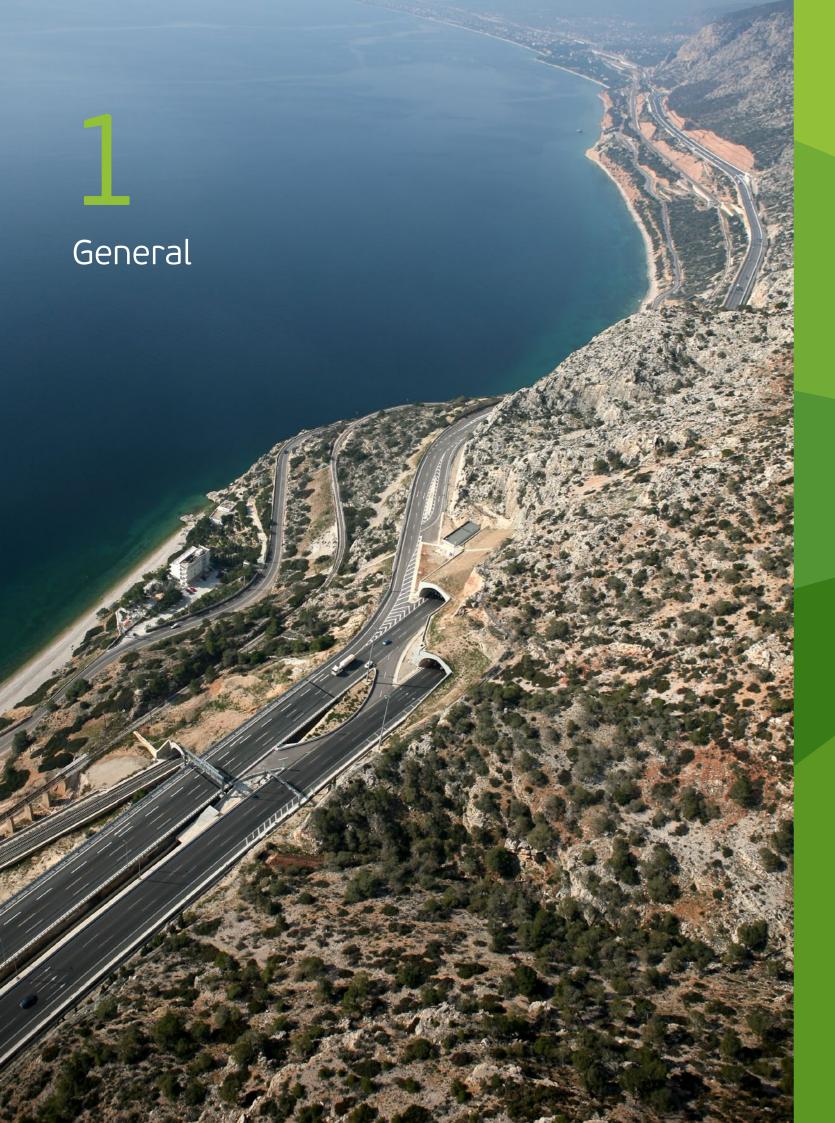
reports shall be publicized in the internet site www.olympiaodos.gr created and maintained by the Concessionaire, in accordance with the Concession Agreement. During the motorway's construction and operation, both the constructor as well as the operator comply with all pertinent provisions, as they are recorded in the Greek Legislation, ensuring the same for their contractors and subcontractors.

Within this framework and as a part of its Environmental Management System, JV APION KLEOS has developed the "Environmental Legislation Monitoring Procedure", incorporating all existing pertinent legislation and updated in case the latter is amended or updated. The specific procedure is copied to all parties who are obliged to then copy it to all cooperating sub-contractors.

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A synopsis of the financial information related to environmental studies and environment protection projects is presented in appendix 14 of the Report.

Note: all appendices of the present report have been submitted to the Special Environment Service of the Ministry of Environment, Energy and Climate Change, responsible for the environmental supervision of the OLYMPIA ODOS project and are available upon request.



Appendix A of Annex 2 of the Concession Agreement states the Common Ministerial Decisions (CMD) and the Law comprising the Project's environmental licensing and forming the main framework for the monitoring of the progress of the Project's environmental issues.

More specifically:

1	Law 2338/1995 Thiva I/C – Elefsina Toll Plaza
2	CMD 126393/16.02.2007 Elefsina – Korinthos (excluding Kakia Skala sec
3	CMD 108569/18.10.2006 Kakia Skala
4	CMD 92073/16.05.1994 Isthmos – Ancient Korinthos I/C
5	CMD 104892/16.06.2006 Ancient Korinthos I/C – Patra By-Pass K1 I/C
6	CMD 106321/28.07.2006 Patra By-Pass K1 I/C – Mydilogli Semi-I/C
7	CMD 102696/30.05.2006 Mydilogli I/C - Amaliada
8	CMD 100163/30.05.2006 Amaliada – Tsakona

Both in the construction as well as in operation phase, the procedures and directives for the works' environmental management are implemented by the Constructor, aiming at the in compliance with the terms and constraints of the above decisions. APION KLEOS submits to OLYMPIA ODOS S.A. monthly reports regarding the progress of the construction related works.

Within the framework of the contractual obligations the Constructor has developed an Environmental Management Plan (EMP) for the Project in accordance with ISO 14001:2004. The EMP includes the organizational structure, planning actions, duties allocation, technical methods, procedures as well as processes for the development, implementation, achievement, revision and support of the Constructor's environmental policy as well as the compliance with the Project's environmental terms.

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The EMP constitutes the basic and general framework for the management of refer to the rational means and handling/ management of each environmental issue, taking into account the pertinent legislation and the decisions applicable to each case.

Along the same direction, The Operator, Olympia Odos Operation S.A. is constantly trying to improve the level of the Services provided to the Users in such a way so as to contribute to sustainable development and maximize their contribution to society.

Permits -Designs related to construction

Such designs are presented in detail in the appendices 1, 2, 3 and 4.

"Elefsina – Korinthos" road section is an existing part of the National Road Network. Thus, the foreseen structures pertain mainly to its maintenance and the creation of the safest possible traffic conditions as well as the servicing of the motorway users. The following structures are foreseen, among others, during the project's operation:

- Operation of Elefsina Toll Station around K.P. 27+000, and
- Construction and operation of parking and rest areas roughly every 10km (taking into account the MSS locations as well). The areas shall be developed in locations where expropriated land is available.

The final arrangement of the above mentioned technical projects as presented in appendix 11 of this Report shall be derived after the finalization of the necessary designs, currently under elaboration.

Already in this direction, the modification of project sections, as they are described in the EIS, is conducted according to the necessary process foreseen by article 13 of CMD No 11014/703/ F104/14.3.2003 (Gov. Gaz.

332/B), pursuant to the approved environmental terms.

Appendix 10 states the positive recommendations by EYPE/ MEECC pertaining to:

a. The assessment of the environmental differentiations caused by the installation and operation of ramp toll stations along Elefsina – Korinthos motorway and b. The environmental licensing of the project: "Alignment modification in the area of Xylokastro (from K.P. 31+000 to IK.P. 33+000 along Korinthos -Patra motorway".

measures to address the environmental impact stated in the EIS (ch. 9) and with respect to Ancient Korinthos I/C - Patra By-Pass K1 I/C section, the Constructor is submitting a full file for approval to the competent EPAE in order to integrate the Kerinitis, Selinountas, Meganitis, Foinikas, Krathis, Sithas and Elissonas river bridges as best as possible into the landscape of particular aesthetic value (the file also contains the bridges' architectural design).

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- Within the framework of complying with the environmental terms and the required environmental licensing, Special Technical Implementation Designs (STID) accompanying the specific works are elaborated and submitted for approval and licensing to EYPE/MEECC.

 - Following the aforementioned

Appendix 6 contains the positive recommendation by Achaia Pref. Admin./ Directorate for Urban Planning and Environment/ EPAE on the submitted design file pertaining to the Krathis river bridge.

Regarding the archaeological surveys that take place within the limits of the project, the Constructor is in direct contact and cooperation with the competent archaeological services. According to the Concession Agreement and the Design – Construction Contract, the CJV is responsible for the execution of archaeological investigations pursuing a recommendation by the pertinent archaeological service. The progress of the archaeological surveys is presented in appendix 7 of the present Report.

A halt of all works is imposed by the 5th Section of the Supreme State Court, which has released an order for the pausing of the enforcement of JMD 100163/30.5.2006 regarding the approval of the environmental terms at the section Pyrgos (Alfeios)-Tsakona, 18+700 to 23+000.

Environmental management, hazardous and non hazardous materials and waste management

During the construction and the operation of the project, waste of any nature is managed based on the pertinent legislation and the constraints/ requirements imposed by the approved environmental terms, both for the Project's existing and new sections.

JV APION KLEOS in the frame of its Environmental Management Plan has developed procedures regarding:

Waste Management which

has been prepared for the management of waste, recording the existing legislative framework and the means/ directives for their management.

Water Resources Management

which has been prepared for the management of water resources, presenting in detail all the constructor's actions contributing to the minimization of the adverse impact the construction has on the adjacent water resources.

Hazardous Materials Selection and Procurement that has been prepared describing all the constructor's actions contributing to the prevention of the uncontrollable use of hazardous materials during the Project's

construction period.

As a result of the implementation of the project's Environmental Management Plan, and the respective procedures, all environmental parameters for waste management, hazardous material management as well as energy and material usage for the construction of the project, are recorded . These data refer to environmental protection projects related to construction and operation. A synopsis of these data is presented in appendix 8 of the present Report.

The Operator has respectively developed an environmental policy in order to

- Promote effective ecological practices in the Operation of all
- the Project's sections. Reduce special power, water
- and paper consumptions, by adopting appropriate internal operation and communication practices.
- Adopt ecological criteria regarding the procurement of goods and services to the extent it is practically feasible.
- Avoid the use of harmful substances, products and procedures, if possible.

The results and the environmental performance of the project in 2009 are presented in appendix 8 of the Report.







Environmental parameters, monitoring programme (noise, traffic load vibrations, air quality, water)

A programme for the Project's environmental monitoring and audit is been implemented, based on the relevant study, in order to ensure compliance with the Project's environmental requirements.

This study in its next phase shall also include the installation of an audit system with permanent and periodical noise and air pollutants measurement stations in positions to be approved by EYPE/MEECC, as required by the Project's approved environmental terms.

During the last period, a PM and traffic load vibrations measurements campaign has been undertaken. The programme and the methodology applied in the monitoring of the environmental parameters (S.C.C. article 2.4.2) shall be submitted for approval to EYPE/MEECC. The PM2,5 and 10 as well as the traffic load vibrations measurements acquired are presented in appendix 9 of the present Report.

Air quality management as well as noise obstruction minimization due to the motorway's construction is the main object of the Project's Constructor and its Operator.

For that purpose, the Constructor develops a programme for the Project's monitoring and audit during construction. The implementation of this programme has already started from the existing sections of "Elefsina – Korinthos" and "Patra By-Pass K1 I/C – Mydilogli Semi-I/C". Measurements have been conducted along these sections within the framework of the elaboration of the "Noise-Barriers the primary and the processed Implementation Special Acoustic Design".

With respect to the Motorway's New Sections, acoustic measurements are being conducted in order to establish the current traffic noise status along "Ancient Korinthos I/C – Patra By-Pass K1 I/C", "Midilogli I/C – Kato Achaia" sections as well as the Rio – Antirio bridge road accesses.

During the motorway's operation sample sound measurements shall be conducted while at the same time monitoring the traffic load per six months or less.

The Operator carries out traffic counts at the Project's toll plazas. More specifically, each month the company drafts an operation report, including precise traffic data, i.e. number of vehicles passing through all toll plazas and the traffic composition; said report is duly submitted to the competent supervising Services of the Ministry EPPPW The company has at its disposal both traffic data.

Water resources shall be managed according to the pertinent legislation and the restrictions/ limitations imposed by the approved environmental terms both for the existing as well as the new project sections.



Energy conservation and efficiency

JV APION KLEOS has, on behalf of OLYMPIA ODOS S.A., coordinated the design regarding the realization of the action plan aiming to save energy in buildings to be constructed to fulfill the project's operation requirements. Specifically, the building facilities for Nea Peramos MOMC were studied, along "Elefsina – Korinthos" section.

Thus, based on the design results, the buildings' best possible energy efficiency performance shall be achieved via designing low energy consumption buildings (bio-climate design, efficient energy design), implementing mature and efficient energy technologies to cover the auxiliary energy requirements (heating, cooling, lighting) as well as installing control systems for the building facilities' efficiency and operation.

OLYMPIA ODOS S.A. has awarded a study for the assessment of the energy consumption of the project.

- This study aimed mongst other at • Quantifying, assess and analyze the use of electricity for street lighting along the existing
- sections of the road • Proposing concrete measures for energy consumption reduction and energy conservation





Vegetation, planting and road cleaning

The vegetation and planting pertain to the environmental integration and protection of the areas adjacent to the project.

In order to facilitate the fulfillment of the above obligations, a Final Planting Design for the surrounding areas, the respective I/Cs, slopes and median strips was elaborated for Elefsina – Korinthos section. This design was approved by the project's Independent Engineer.

The planting of Patra By-Pass is in very good shape due to the "recent" construction and maintenance for the last period of time.

There are very few locations along the road where the flower-beds/ median strips are not planted. The CJV's designer is of the opinion that the overall planting plan of the road does not require this "character" to change via planting new plant species. All that is required is to plant species already planted nearby to the remaining sections. During 2009 the Operator's personnel and the competent subcontractors carried out regular trimming, weeding and cleaning works for the most part of the project, and specifically of 97 km of central reserve, 402 km of shoulders and of the 28 interchanges and their branches, as well as of the 45 parking areas.

It is noted that cleaning pertains to the entire cross section until the expropriation limits.









In the framework of road safety, the Operator, Olympia Odos Operation S.A. has Patrollers and Intervention Teams patrolling the Project with specially marked vehicles dealing with incidents (immobilized vehicles, accidents, traffic problems etc.) by implementing temporary signage to safely arrange traffic and assist the emergency services (Police, Fire Brigade and Paramedics).

In this framework, within 2009: • 3,941,000 (about 10800 per

- day) kilometers of patrols and Interventions were covered to supervise the road network
- 19879 incidents were handled with the Company's assistance, such as: 13320 immobilized vehicles (mechanical failure, flat tire, lack of fuel, abandonment), 4037 obstacles on the pavement, 1580 road accidents (105 with injured and 1475 with material damage), 408
- user problems (pedestrians, vehicles moving in the opposite direction, non authorized users, dangerous traffic violations), 349 traffic congestions and 185 other emergency incidents (fire, adverse weather conditions, etc.) out of which:
- 10278 were handled **immediately** by the Company, since they were detected (located) by its own vehicles, or by its subcontractors' vehicles - 9601 incidents were handled within 11' in average by the Company, since they were otherwise detected (phone, cameras etc.), while regarding the response of the subcontractors respectively: 15' for light vehicles and 32' for heavy vehicles

The Operator's competent personnel (Intervention Teams) implement on a daily basis temporary signage for incidents works carried out on the road either by the Operation Company or the Construction JV. Regarding Korinthos-Patra NNR special attention is paid due to it features (no central reserve) and the sections with steep turns and

Based on the "Emergency Procedure", there is a provision for the management and handling of "green areas fire" incidents, as well as for environmental accidents, such as substance leakage on the carriageway etc.

Within the framework of elaborating the fire hoses designs along the EKPPT motorway, maps were prepared depicting the forest land for "Elefsina -Korinthos", "Ancient Korinthos I/C – Patra By-Pass K1 I/C" and "Patra By-Pass K1 I/C - Midilogli Semi-I/C" sections.

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The Construction JV APION KLEOS is in direct cooperation with contributes to the management and handling of such incidents. According to the proceduresdirectives for the management of the relevant issues, JV APION KLEOS works and cooperates closely with the Environmental Service and other departments of OLYMPIA ODOS S.A.



Training, raising awareness and corporate social responsibility activities

Environmental training aims to reinforce knowledge and raise awareness about the environment, to develop the necessary skills, to form the right behaviour, to activate and make informed decisions and responsible actions.

Audit/ inspection is a tool of the environmental management system, including the systematic, substantiated, periodic and objective assessment of the performance of the working sites, the environmental protection management system and processes.

Along this direction, the JV APION KLEOS is organizing training and briefing seminars whereas all internal inspections are accompanied by the training and briefing of all competent persons at working sites regarding issues and developments pertaining to the environment.

In the frame of its Corporate Social Responsibility regarding society and the environment, **OLYMPIA ODOS S.A. supported** financially the project for the protection from landslides of the Lepreo Elementary School in the Municipality of Zacharo.

Following the destructive forest fires of August 2007, the school suffered serious damages due to the landslides and the rockfalls from the adjacent hill deforested by the fire. The students were in danger and therefore their number was dramatically reduced during the school year of 2007-2008.

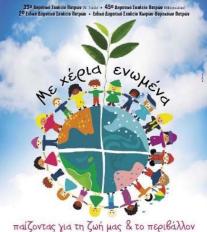
ECOCITY, an environmental nongovernmental organization, within the framework of actions to support and reorganize the local communities, victims of the forest fires of August 2007, took the initiative to construct structures in order to secure the soil from landslides around the surrounding area of the school and the schoolyard.

Under the supervision of a volunteer civil engineer, a geotechnical and a landscape architect as well as of the Technical Services of the Municipality of Zaharo and the Community of Lepreo, the works for the construction of a protective wall, the installation of mesh and its painting, the structure for the drainage of the mountain foot, the planting, cleaning and arrangement of the surrounding areas were completed.

The project was completed in the beginning of June 2009, thus ensuring a sense of security to students, teachers and parents.

The sponsorships and the volunteer work were the driving forces of the entire operation.

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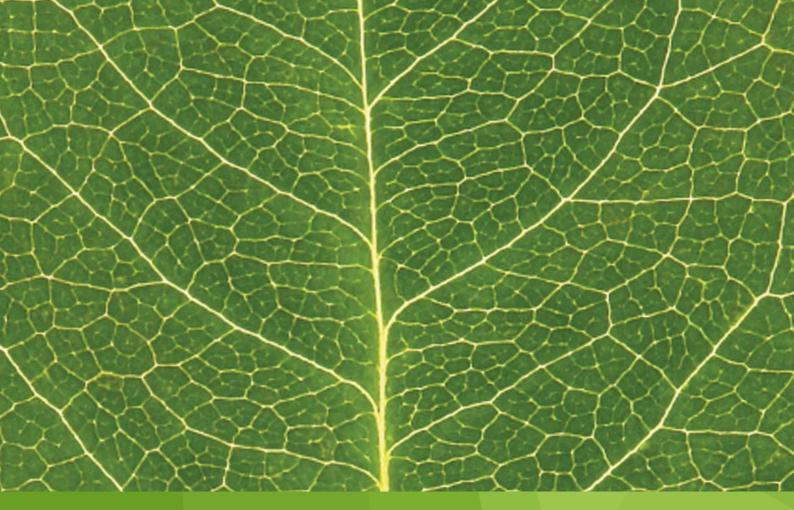


The students of the 39th and the 45th Primary Schools as well as of the 2nd Special Primary School and the Deaf and Hearing Impaired Special Primary School

"The planet does not belong to us, we belong to it", students from four primary schools of Patras sent a strong message to young people and adults about the protection of the environment and the planet in general.

The services of the Vice-Prefect for the Environment of Achaia and the Education Committee of the Municipality of Patras assisted all these efforts.

- Make personnel aware to matters of the environment's protection
- Train the personnel in ecological and energy saving practices, in environmental management issues during their work
- Constantly improve the conditions, in order to ensure the health and safety of personnel and employees



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