

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED]
Date: Monday 21 May 2012 16:19:17
Attachments: [REDACTED]

TO: European Investment Bank
98-100, boulevard Konrad Adenauer
L-2950 Luxembourg

ATT: Secretary General

CC: Larnaca Sewerage and Drainage Board (Head Office)

Corner of Iras Street and F. Kontoglou Street,
P.O. BOX 40260, 6306,
Larnaca,
Cyprus
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ATT: Mrs. [REDACTED]

RE: Sewage pumping station possibly being built in violation of EU provision in relation to Protection of Environment, Historical and Natural Landscape Sites as well as Health of Citizens.

Dear Madam, Sir,

In relation to the project:

Larnaca Sewerage and Drainage Board

Larnaca Sewerage and Drainage Board General Manager [REDACTED] P.O. Box 40620, 6306 Larnaca The project consists of Phase II (2006-2012) of Greater Larnaca's sewerage and drainage systems' and treatment facilities' expansion. The project will contribute to the compliance of the Larnaca Sewerage and Drainage Board with the requirements of EC Directive 91/271 on Urban Wastewater Treatment (as amended by Directive 98/15/EC) by 2012. Water, sewerage, solid waste An EIA, in form and substance fully compliant with national Law, of project components
<http://www.eib.org/projects/online/2006/2006155.htm> - en - 07/06/2006 - 23k

I would like to launch the following complaint to your esteemed office:

I am an Italian citizen who has elected residence in Larnaca in Cyprus. I have been living in Cyprus for the last 16 years and now reside in Larnaca with my wife [REDACTED] and my young children.

The Larnaca Sewerage and Drainage Board is currently working on a project for Sewerage Upgrade. The project concerns the construction of a sewerage collection system and pumping stations in the Larnaca areas. Within the scope of the EIA various alternative solutions were apparently evaluated (in a study). In order to select the optimum available alternatives for location of sites of pumping stations:

I am contesting, for various reasons, a construction of a Sewage Pumping Station in a Governmental Green area next to my house. The site is also located only a few meters from my house (thus possibly endangering the health of my children and my family) as well in the proximity of two colonial buildings which I would believe are listed as historical heritage of Larnaca. I will shortly commence proceedings, under separate action, with a case in the Larnaca Courts against the Larnaca Sewerage and Drainage Board (Head Office).

I believe that local authorities and your esteemed bank have approved the project and the Environmental Impact Assessment basing their judgment on a misleading report. The mentioned discrepancies in the report environmental impact Assessment - final report are many, (found on the internet at: http://www.google.com.cy/url?sa=t&url=http://www.larnaca.gov.cy/sectors/sectors%20swage&source=web&cd=6&cad=rja&ved=0CQIDIAFKulehtto%3A%2F%2Fwww.eib.org%2Fattachments%2Fonline%2F1530_EIA_en.pdf&ei=IC7ATgMq78p4dofmBAAuugAFQICNG5CH97MFCBE7AgQVW%3B8o4o780)
The following points (listed to other authorities as well) must be noted in relation to the Pumping Station PSBII-2 which has been located on site 2 situated within the government nursery (this list is by no means exhaustive).

- The study never mentions the existence of a residential area around the proposed site. The study maintains that the location is: "Site 2 is located inside the Government Nursery of the Forest Department. In this case the site has an advantage because it is located in a relatively remote area and in greater distance than the surrounding developments". This statement is indeed misleading and incorrect. (see page 126). The definition of remote (Oxford dictionary) would be: "(of a place) situated far from the main centres of population; distant. The site is indeed in the centre of town and only a few meters away from my house, historical buildings and other residences.
- There is no mention anywhere in the report that the site is opposite two listed buildings representing some of the only few remaining historical buildings in Larnaca and that the site will be placed on a green area (one of the few remaining in Larnaca).
- The study dismissed (despite mentioning them and showing pictures) the presence of trees and other indigenous plants on the area and has no concern on or mention of the environmental impact on local flora or fauna. (It was supposed to be a report environmental impact Assessment). By looking at Google map it is evident that the site was green and populated with many trees before the devastation made by the ongoing works. (Google map reports satellite pictures of about a year ago).
- It is also evident that the reason of exclusion of proposed site 1 (alternative site dismissed by the study) are fictional and to a certain extent irrelevant to the environmental impact and would only have resulted in a possible higher cost for the execution of the work for the Larnaca Sewerage and Drainage Board. (The report mentions that Site 1 is surrounded by dense growth in three of its sides and is estimated that it will present increased impacts both at the construction as well as the operation phase). The dense growth of trees was also present in the site 2 as clearly visible from the picture placed in the report by the surveyors themselves. It is also still evident in the areas of the Nursery not yet devastated by the intervention.
- Concurrently, I am not sure that the plot ratio of 70% over the zone allocation (0.01.1 maximum coverage ratio of 0.01.1) has been respected.

Please note that despite many pleas for the Larnaca Sewerage and Drainage Board (Head Office) to halt their works until further investigation on the case is made (this has also been agreed with [REDACTED] the General Manager of the Board [REDACTED] who - apparently - is a member of the Cyprus Green Party) has, so far, rejected all pleas and requests.

I would be grateful if you could investigate the issue further and have your representative evaluate the case to ascertain that no EU provisions in matter of Health - odour and noise pollution (distance of sites from houses), environment and protection of landscape and natural and historical sites have been infringed.

I remain at your disposal should you need any further information (including all correspondence sent so far pictures, videos, etc) and look forward to having your reply at your earliest convenience.

Please note that as already mentioned to all other involved parties I have also informed national / international and EU press on the issue.

I have sent extensive correspondence to concerned bodies and I have also alerted the following Governmental and non Governmental bodies:

- Office of the Commissioner for Administration (ombudsman)
- Commission européenne
- Representation of the European Commission in Cyprus
- Ministry of Agriculture, Natural Resources and Environment
- Department of Antiquities
- LARNACA MUNICIPALITY
- Cyprus Green Party

I would be grateful if you could investigate if the actions of the Larnaca Sewerage and Drainage Board are infringing any EU legislation. Until such issues are clarified I would be grateful if you could ask the Larnaca Sewerage and Drainage Board to stop any work on the given site. Please also consider that the project, as far as I understand, is not contemplating any other Pumping Station being built in such proximity to a residential home. I would believe the pumping station must be moved to other available and suitable site and the green area repopulated with trees and brought back to its state before the construction works completely devastated the area.

Best Regards

[REDACTED]