Public

Environmental and Social Data Sheet

Overview

Project Name: FLOOD PROTECTION MEASURES GREECE
Project Number: 2018-0608
Country: Greece
Project Description: The project consists of flood protection measures in the regions of Attica, Central Macedonia and Peloponnese.

EIA required: yes
This investment programme consists of ten flood protection subprojects that all require an EIA. The Promoter shall provide the link to the website where the NTSs and the full copies of the EIAs are published or send copies to the Bank, to be published on the EIB’s website.

Project included in Carbon Footprint Exercise*: no

Environmental and Social Assessment

The proposed programme will co-finance the 2019-2023 flood investment programme of the Hellenic Ministry of Infrastructure and Transport (MoIT) which aims to increase climate and disaster resilience in the project area. Works foreseen as part of the programme include the creation of flood retention basins, the widening and deepening of riverbeds enhancing rivers’ hydraulic capacities, the reinforcement of riverbanks as well as the construction of stormwater drainage systems and the casing of streams in densely populated urban areas.

The programme concerns ten flood protection subprojects eight of which are located within the Water “District” of Attica (including one subproject in the basin that is geographically located in the Peloponnese Region), and two in the Water “District” of Central Macedonia within the city of Thessaloniki.

According to the Floods Directive (FD), Member States shall explicitly set objectives for the reduction of the potential adverse consequences from flooding and for reducing the likelihood of flooding. The specific objectives for flood risk management should consist of both structural and non-structural measures for which technical description, implementation cost, implementation agency, linkage to climate vulnerability, should be determined.

All ten flood protection subprojects under this programme have been identified as high priority structural measures in the recently approved (in July 2018) Flood Risk Management Plans (FRMPs) for the Attica and Central Macedonia water districts. The Special Secretariat for Water of the Ministry of Environment, Energy and Climate Change (YPEKA) is the national competent authority for the implementation of the Directive in Greece.

* Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB draft Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20,000 tonnes CO2e/year absolute (gross) or 20,000 tonnes CO2e/year relative (net) – both increases and savings.
Environmental Assessment

Strategic Environmental Assessment

Each FRMP was subject to a Strategic Environmental Assessment (SEA) which was approved (the latest one) in February 2018. The competent SEA authority, that is YPEKA represented by the Directorate of Environmental Licensing, concluded that the FRMPs were not likely to have significant negative impacts on the environment.

EIA Directive

In Greece, the Environmental Impact Assessment (EIA) procedure falls under the jurisdiction of the same competent authority as the one for the SEA, that is YPEKA, represented by the Directorate of Environmental Licensing. After an extensive public consultation process including all relevant stakeholders and the competent services within the Ministry of Environment, the Minister issues the relevant decision in the form of an environmental permit, approving the environmental terms of a project.

Eight of the ten flood protection subprojects under the programme have already received an environmental permit which is valid for ten years and after its expiration should be updated in case the works are not complete. In general, the impacts of the investment programme on the environment during construction are considered localized, temporary and reversible once the works are completed. Also, minor nuisances are possible and this concerns mostly dust, noise, temporary increase of the sediment transport, landscaping and adaptation to new access roads. During operation, in general the works foreseen under the programme are expected to have minor negative environmental impacts.

Regarding the Erasinos flood protection scheme, the sub-project area falls partially into a Natura 2000 area and thus it required an Appropriate Assessment study to be conducted. The study concluded in 2017 that the flood protection scheme is not expected to have any significant adverse effects. In particular, during construction, the impacts identified are (i) temporary alterations in the pattern of water flow as a result of the excavation in the riverbed and surrounding riverbanks; (ii) disturbances to fauna, particularly birds and (iii) temporary increase of the turbidity in the water due to the sediments. These impacts are considered localized, temporary and reversible once the works are completed. During operation, identified possible impact is the loss of diversity in the local flora and fauna. However, environmental considerations embedded in the design of the river stabilisation works such as using open trapezoidal stream sections covered with gabions that do not reduce the rain infiltration rate and also allow for the riparian vegetation to grow and the sediment transport capacity to decrease, mitigate this risk and confine it to a minimum. The whole design reflects a clear intention of minimum technical intervention on the natural environment of the Erasinos wetland by ensuring that the natural mechanism of the wetland eg sediment transport and accumulation, will continue in a mode very similar to the natural one.
Climate Change

Climate modelling and subsequent analysis\(^2\), indicate that extreme rainfall events in Greece will generally increase in intensity and frequency, thereby increasing the flood risk. In the eastern continental regions such as Attica and Central Macedonia Regions, maximum consecutive 3-day precipitation is projected to increase by 20% and flash floods i.e. floods that follow within a few hours of a heavy or excessive rainfall event, are expected to occur more frequently in the project area in the next 70 years.

Flood attenuation and protection measures under the project will take climate change trends into account in their design, thereby making a significant contribution to Climate Change Adaptation.

Social Assessment

In three out of the ten flood protection subprojects under the programme, the required land acquisition process will result in the physical resettlement of people affected, which are about 30 people for Esxatia subproject –Roma people -, 15 people for Giannoula subproject and 6 people for Ag. Georgios (Erasinos) subproject. In all cases, people affected including the Roma, are the property owners. Regarding the Esxatia sub-project, extensive consultations with affected communities and interested parties through home visits and detailed questionnaires took place in line with the requirements of the EIA Directive. Appropriate stakeholder information and extensive consultation have already taken place without complaints to date, and the expected by-law mitigation and compensation procedures will be followed before the construction starts.

Overall, the flood protection investments such as river rehabilitation works and new storm water drainage systems will have lasting positive social benefits as they will protect lives, economic activity, and cultural heritage against the effects of severe flooding. The works will also contribute to employment creation during construction. No permanent employment due to the project is foreseen.

Public Consultation and Stakeholder Engagement

The Floods Directive requires Member States to encourage the active involvement of interested parties and stakeholders in the production, review and updating of the FRMPs. Hence, the relevant competent authorities for the production of both FRMPs and the relevant SEAs used a variety of information channels to reach out to the public and stakeholders (they made draft FRMPs available via the internet, which was also the primary medium for the submission of written comments). A broad range of stakeholders participated in the public consultation process and they were involved in the preparation of the FRMPs, e.g. civil protection authorities.

In this respect all subprojects under the programme, related reports and progress details have been/will be made public under the EIA process. Regarding the Erasinos and Rafina subprojects, environment related complaints were submitted during the public consultation process which were rejected at the end by the competent environmental authority.

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http://unfccc.int/files/national_reports/annex_i_natcom_/application/pdf/48032915_greece-nc7-br3-1-nc7_greece.pdf
In particular for the Erasinos sub-project, complaints of similar nature were submitted to the national supreme court. These were rejected as the court considered that the complaint was based on a misinterpretation of the technical features of the planned works.

Conclusions and Recommendations

In line with the EU Directives, the project will result in investments in flood control measures to safeguard economic growth and it will have direct positive impacts on the reduction of flood risk in downstream stretches. It will directly secure the life of over half a million people in the service area as well as the economic activity and the quality of the environment in the two largest urban areas of Greece (Athens and Thessaloniki).

The Promoter will be required to act according to the provisions of the relevant EU Directives, including the EIA (2014/52/EC) amending the EIA Directive 2011/92/EC, Habitats (92/43/EEC) and Birds (2009/147/EC) Directives.

The promoter will be required to undertake not to allocate Bank funds to project components that require a full EIA until the EIA and/or the necessary nature assessment have been finalised and approved by the relevant competent authority. Once any EIA is available, the promoter will provide the Bank with an electronic copy of its Non-Technical Summary (NTS) and full copy of the EIA, for publication on the EIB website.

The promoter will be required not to commit any EIB funds against any project component that impacts nature conservation sites, without receiving from the relevant competent authorities the declaration under Art. 6(3) of the Habitats Directive that there are no significant effects and informing the Bank of such declaration having been obtained.

Under these conditions the project is acceptable for EIB financing in Environmental and Social terms.

3 4888/2013 Decision of National Supreme Court