

Strasbourg, 1st August 2024



T-PVS/Files(2024)13

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE AND NATURAL HABITATS

Standing Committee

44th meeting Strasbourg, 2-6 December 2024

Bureau of the Standing Committee

10-12 September 2024 Strasbourg

Open File: 2016/5

Presumed negative impact of developments on the Vjosa river including hydro-power plant development and Vlora International Airport (Albania)

- REPORT BY THE GOVERNMENT -

Document prepared by the Ministry of Tourism and Environment of Albania

- 2 -

- July 2024 –





REPUBLIC OF ALBANIA MINISTRY OF TOURISM AND ENVIRONMENT

Date 31.07.2024

Dear Mr. Poutiers,

Subject:

Open File No. 2016/5: Albania: Presumed negative impact of developments on the Vjosa river including hydro-power plant development and Vlora International Airport

With reference to the <u>decision of the Bureau meeting</u> held on 18-19 March 2024 on the abovementioned complaints, the Government of Albania reports as following:

Vlora Airport

With reference to the recommendation 219 (2023) of the Bern Convention, on the Presumed/possible impacts of infrastructure and urbanization developments particularly Vlora International airport the following is to be clarified:

Due to the fact that the works for the construction of the Vlora Airport are still ongoing, and the objective to start the operations at this Airport is in the spring of 2025, the obligations arising from, monitoring, improvement and EIA implementation in the long-term plan after the airport is certified and put into operation, the Civil Aviation Authority (CAA) has begun interactions with the MoTE in regard to addressing of environmental issues. The Civil Aviation Authority is part of the working group established for the purpose, among others, to take measures to mitigate the likely impact of the airport on the environment.

Following and in accordance with the international standards of civil aviation that has been transposed into the national legislation, as well as the best practices applied, CAA will certify and continuously will monitor the activities of the Airport against the impact of the operations to the environment with the sole objective of minimizing these impacts at the lowest level. CAA will put in place all the enforcement mechanisms for the airport operator to fulfill the obligations against the implementation of the EIA.

The well-established processes and the respective Key Performance Indicators will enable the continuous monitoring of the flora and fauna, updating of the EIA and the review of measures to be improved in a continuous manner. If necessary, the Civil Aviation Authority will engage specialists in the field to help to improve and increase the effectiveness of the Wildlife Management Plan implementation.

The PIM of Vjosa River NP is at the final stage under consultation process with all the interested stakeholders.

Moreover, the Albanian Government acknowledges the concerns raised by the European Commission and various stakeholders regarding the environmental impacts associated with the construction of Vlora Airport in the Narta Lagoon. The Government of Albania these concerns seriously and a comprehensive response to address each point is as following:

- The construction of Vlora Airport has been meticulously planned to minimize habitat destruction. Detailed Environmental Impact Assessments (EIA) were conducted before the commencement of the project, identifying critical habitats and proposing measures to mitigate adverse effects. These measures include the creation of buffer zones and careful site selection to avoid ecologically sensitive areas;
- To combat soil erosion and sedimentation, we will implement erosion control measures, such as reforestation and soil stabilization techniques in areas disturbed by construction activities to prevent further erosion;
- The project design includes specific provisions to avoid and minimize the loss of critical habitats. Where unavoidable, habitat restoration and compensation programs will be in place to recreate lost habitats and enhance existing ones. This will ensure that the ecological balance of the Narta Lagoon is maintained;
- Strict water quality management protocols will be established to prevent pollution from construction runoff. These protocols will involve regular monitoring of water quality and the use of environmentally friendly construction materials and practices to safeguard aquatic life;
- Construction schedules are designed to avoid peak migration periods, reducing the disturbance to migratory birds. Noise reduction measures and the establishment of quiet zones within the construction area further mitigate the impact on bird populations;
- We have prioritized the preservation and enhancement of key resting areas for migratory birds within the lagoon. Supplementary feeding programs and habitat management plans will be implemented to ensure that food supply disruptions will be minimized and that birds can continue to rely on the Narta Lagoon as a vital stopover point.

With regard to implementation of the Ministerial Order No. 287, dated 26.09.2023, "On the establishment of the working group, on monitoring the measures undertaken for the verification of the implementation of the conditions as set in the Environmental Declaration for the project "Construction of the Vlorë International Airport", attached as Annex I, the summarized information regarding the verification conducted by the Directorate of Management, Monitoring, and Registry of Protected Areas at the National Agency of Protected Areas and conducted by the Inspection and Control Directorate at the National Agency of Environment and the Regional Environment Agencies of Fier, Vlorë, and Gjirokastër, on the dates 30.10.2023, 04.12.2023, 16.01.2023, 06.02.2024, 20.03.2024, 24.04.2024 and 26.06.2024.

As it's already known the Vjosa River since 2023 is recognized as a national park (Category II), as per the Decision of the Council of Ministers (DCM) No. 180, dated March 13, 2023. This designation, aligned with IUCN criteria, underscores our commitment to conserving its pristine ecosystems and natural heritage, providing robust legal protection, and ensuring that conservation measures are prioritized to maintain the river's ecological integrity. In addition to the national park designation, steps have been taken to have the Vjosa River, and its tributaries proclaimed as a UNESCO Biosphere Reserve.

This designation will enhance our efforts to promote sustainable development, scientific research, and conservation of biodiversity within the region. Since the Vjosa River was proclaimed a Nature Park, all hydropower plant (HPP) developments have been halted. This moratorium on HPP projects remains in place following the upgrade to national park status, ensuring that the river's natural state is preserved and protected

from disruptive infrastructure projects. The status quo is being maintained to uphold the ecological and cultural significance of the Vjosa River. The proposals from international NGOs to upgrade the protection and management strategies for the Vjosa River align with our national and international conservation objectives have been taken into account. The recommendations will be taken into consideration also for our ongoing and future conservation strategies.

In the framework of bilateral collaboration between two countries Albania and Greece for the Aoos/Vjosa River protection, has been established the transboundary Joint Technical Working Group Aoos/Vjosa. The first JTWG e-meeting was held on 24.03.2023. This first meeting addressed among other things, the elaboration of a bilateral cooperation agreement (MoU) with focus on cross-border environmental protection and management of the Aoos/Vjosa River.

Albania has included transboundary cooperation on water resources in one of its main objectives in the policy of water resources management. In this context water resources management to have bilateral agreements with all its neighbour countries on transboundary waters management are also one of the main outcomes under EU4River project. On the other hands we are following different initiatives for transboundary water with NGOs collaborating both sides, on which we can mention ESPID4 Vjosa project.

Himara Water Supply

Regarding the issue of investment in the Shushica river, the investment and works are interrupted for the moment in Shushica river. This is because a group of international and national experts mission has been set up, with the coordination of the IUCN, to assess the situation and to see possible alternatives for its solution. The mission held the first meeting on July 10, and will continue with the field visit for a preliminary assessment of the situation.

Court cases

1. Complainant: AOS

Defendants: Council of Ministers, National Council of the Territory,

Third Parties: Ministry of Tourism and Environment, National Agency of Protected Areas.

Subject: Repeal of VKM no. 694, dated 26.10.2024, for changing the status and surface of the ecosystem natural/wetland Poro Pine - Nartė " from "natural reserves I managed" to "protected landscape" and removal of status "protected area" of reduced surface repealing Decision no. 10, dated 29.12.2020 of the National Council. of the Territory.

This process is currently in a court session, at the Administrative Court of Appeal in Tirana.

2. Complainant: AOS

Defendants: Council of Ministers, National Council of the Territory,

Third Parties: Ministry of Tourism and Environment, National Agency of Protected Areas.

Subject: Partial repeal of VKM no. 59 dated 26.01.2022 "for the approval of the change of the status and surface of natural ecosystems national park (category ii) of environmental protected zones".

This process is currently in a court session, at the Administrative Court of Appeal in Tirana.

3. Complainant: AOS

Defendants: Council of Ministers, National Council of the Territory,

Third Parties: Ministry of Tourism and Environment, National Agency of Protected Areas. Subject: Partial repeal of VKM no. 60, dated 26.01.2022, "On the declaration of Natural Ecosystems, Natural Reserves, the partial repeal of Decision no. 10, dated 28.12.2020 of the National Council of the Territory, on the approval of the boundaries of protected areas, on the revision of the boundaries.

This process is currently in a preparatory session, at the Tirana Administrative Court of Appeal.

4. Complainant: AOS

Defendants: Council of Ministers, Council of Nations of the Territory, Ministry of Infrastructure and Energy, Ministry of Tourism and Environment, National Environment Agency,

Subject: Obtaining the measure of security of the lawsuit, the suspension of any further action to continue the construction works of the "Vlora International Airport" project by the interested person Union of Economic Operators (BOE): Mabco Constructions SA of Matebex Group, YDA Insaat Sanayi Ve Ticaret Anonim Sirketi and 2A Group sh.p.k., or subcontractors agreed by it, until the end of the trial with a final decision.

This process is being tried before the Administrative Court of Appeal in Tirana, and the court has so far only made a decision on the rejection of the plaintiffs' request for insurance.

5. Complainants: Twenty-eight residents of the Brataj Administrative Unit, Center "Eco Albania" and Association "Impetus"

Defendant: National Environment Agency, Ministry of Infrastructure and Energy

Third Party: Ministry of Tourism and Environment, State Bar.

Subject: Repeal of the Decision on Preliminary EIA AN100920210004, Commission 52, dated 16.11.2021, issued by the National Environment Agency.

Finding the absolute invalidity of the administrative contract no. 2022 Rep., dated 920/2 Col., for the project "Construction of hydropower plants on the Shushica River" between MIE as the Contracting Authority and the company "Shushica Hydropower" sh.p.k.

This legal process is currently in court session, near the Administrative Court of First Instance of Tira

Verification on the Vlora airport site report

The entity "Vlora International Airport - VIA" sh.p.k. is equipped with Environmental Declaration AN-281120210002, dated 06.12.2021, issued by the National Environmental Agency for the development of the project "Construction of the Vlorë International Airport." The Environmental Declaration has been prepared in accordance with the Law No. 10440, dated 7.7.2011 "On Environmental Impact Assessment", as amended, Annex I, Point 7/b, which states that "Construction of airports with runways having a baseline length of 2,100 meters or more."

In the context of this law, "airport" implies airports that correspond to the definition given in the Chicago Convention of 1944, which established the International Civil Aviation Organization (Annex 14 of this convention).

The location where the project is developed falls in Cadaster Zone No. 1007, Property No. 6, Akërni, Administrative Unit Novoselë, Vlorë, with an area of 309 hectares. Based on the Decision of the Council of Ministers No. 694, dated 26.10.2022 "On changing the status and area of the natural/forested ecosystem "Pishë Poro-Nartë" from "Managed Natural Reserve" to "Protected Landscape" and removal of the status of "Protected Area" from the unchanged area," this area is outside the system of protected areas network.

However, due to the proximity to the Protected Landscape "Pishë Poro - Nartë" and the potential impact that the development of this activity may have on adjacent ecosystems, the working group, which included representatives from the National Agency of Protected Areas and Regional Protected Areas Agency, conducted on-site verification of the progress and implementation of the conditions of the Environmental Declaration.

From the on-site verification conducted by the working group, on the respective dates of 30.10.2023, 04.12.2023, 16.01.2023, 06.02.2024, 20.03.2024, 24.04.2024, 26.06.2024 and 24.07.2024, compared with the conditions set in the Environmental Declaration, it is found that, in general, the terms of the contract have been properly applied and specifically:

- 1. The entity has avoided works that are at a distance of no less than 600 meters from the nesting site from mid-May to July, to avoid disturbing the birds during their breeding period in these areas.
- 2. During the construction phase, the entity has completely avoided night work within a distance of up to 600 meters from the saltwork, as well as unnecessary illumination of the construction site, and also has used LED devices with low-angle lighting in those sectors where there is working activity.
- 3. Measures have been taken in the airport footprint area to deprive birds for nesting, for the period of March April. For this purpose, it was instructed that with the approach of the nesting period, these measures should be reinstated by placing elements that prevent birds in the identified areas, such as scarecrows, scare balloons, and any other measure to ensure their non-installation in the area where the works are being carried out.
- 4. There are no discharges of polluted waters into the natural water bodies of the area.
- 5. Regarding the underpasses or corridors to solve the problem of animal migration, the entity, in collaboration with field specialists, was requested to identify the locations for the construction of underground passages (underpasses) to prevent habitat fragmentation. Regarding this point, the entity expressed that it cannot be implemented in the footprint area of the airport for technical reasons.

The periodic monthly monitoring of flora and fauna has been carried out by the monitoring group of NAPA and RAPA Vlorë, by an observation conducted not only in the airport footprint but also in the larger area surrounding the airport, in order to identify the species of flora and fauna present in this territory. Monitoring is done by listing all the species of plants and shrubs installed, while for the fauna through direct observation,

using trail cameras, and also the data obtained from the Waterfowl Census conducted on January 13, 2024.



Figure 1 - The airport and the monitoring area around it

The monitoring area covers approximately an area of about 1250 hectares (while only 309ha are related with the airport), which is located around the area where the airport is being constructed. This area includes agricultural land, inhabited areas, roads, and irrigation canals. The land is hilly and very poor in terms of vegetation.

Flora:

The majority of the area consists by saline lands which, in terms of biodiversity, present a very small number of herbaceous or shrubby vegetation. The identified installed species of herbaceous and shrubby vegetation are:

- 1. Salicornia europea;
- 2. Tamarix parviflora;
- 3. Juncus maritimus-acutus;
- 4. Verbascum spp;
- 5. Erodium spp (moscatum);
- 6. Scolymus maculatus (Thistle);
- 7. Hordeum maritime (Sea barley).

The saline and agricultural lands around the airport are primarily used for cultivation today. Small areas near the village of Akërni are cultivated with olive trees (Olea europaea).

A microhabitat for species such as Phragmites australis, Typha angustifolia, Typha latifolia, Scirpus lacustris, and Scirpus maritimus are the irrigation canals present in the monitoring area.



Saline lands with Juncus dhe Tamarix parviflorum

Fauna:

The birds observed through direct field observation during the 2024 census were in small numbers (species identified on the terrestrial surface of the saline lands around the airport:



Ranges of Winter Waterbirds Census 2024



"Blackbird"

The surface area of polygons 7 and 8, which includes the airport area and its surrounding zone, is approximately 910 hectares. According to the 2024 census, there were 608 birds out of a total of 10752 birds observed, accounting for 5.65% against the total. The main species observed were:

- 1. Common Buzzard (Buteo buteo);
- 2. Yellow-legged Gull (Larus michahellis);
- 3. Starling;
- 4. Blackbird.

According to the Environmental Declaration with AN281120210002 dated 06.12.2021, the entity "Vlora International Airport - VIA" sh.p.k possesses during the construction phase must respect the conditions set forth in this declaration.

The description, as applicable, of the main measures to be taken to avoid, reduce, and if possible, correct significant negative effects:

- 1- The entity is equipped with the relevant legal documentation for the construction of the Vlorë International Airport.
- 2- The entity in its self-monitoring report has not declared the discovery of cultural objects, archaeological traces, water sources, etc.
- 3- The entity has deposited inert waste (excavation debris) generated from excavations in the designated deposits determined by the technical director on both sides of the runway footprint and within the construction site territory. Inert waste (excavation debris) resulting from works on the construction site

- 4- During on-site verifications, several locations were taken, and from the verification of the coordinates specified in the Environmental Declaration in the Asig Geoportal system, it was found that the entity works in the tracks defined according to the proposed project.
- 5- The entity has deposited inert waste (excavation debris) generated from excavations in the designated deposits determined by the technical director on both sides of the runway footprint and within the construction site territory. Inert waste (excavation debris) resulting from works on the construction site and deposited on both sides of the runway footprint will be reused for filling, levelling, and arrangements within the airport surface.
- 6- During on-site verifications within the construction site during this period, no damage to trees was observed, as within this area, no tree surfaces were noted.
- 7- According to the self-monitoring documentation submitted by the environmental studio preparing the periodic monitoring report, the specified norms in the Environmental Declaration for the noise levels generated by works at the construction site are respected, referring to Law No. 9774 dated 12.07.2007 "On the assessment and management of noise in the environment" as well as Directive No. 8, dated 27.11.2007 "On the threshold levels of noise in certain environments".
- 8- From on-site verifications, it was found that during this time, fencing has been realized in the southwest part of the footprint as well as in the entrance part.
- 9- According to the documentation submitted by the environmental studio preparing the periodic monitoring report, it results that during the works, the specified norms in the Environmental Declaration for air discharges are respected, referring to Law No. 162/2014 "On the protection of air quality in the environment" and DCM No. 248, dated 24.03.2003 "On the approval of temporary norms for air discharges and their implementation". The entity is tasked with ensuring the spraying of the exit roads of heavy machinery to minimize and keep within parameters air pollution.
- 10- The entity has deposited inert waste (excavation debris) generated from excavations in the designated deposits determined by the technical director on both sides of the runway footprint and within the construction site territory. Inert waste (excavation debris) resulting from works on the construction site and deposited on both sides of the runway footprint will be reused for filling, levelling, and arrangements within the airport surface. During on-site verifications, no water sources were observed on the construction site surface.
- 11- The entity declares that during the development of works on the construction site, there have been no technical interventions with negative consequences on the environment.
- 12- From on-site verifications, it resulted that the entity has built sewerage networks for the management of surface water throughout the perimeter of the construction surface.
- 13- From on-site verifications, it resulted that the entity has placed informative/signalling boards inside the construction site to avoid accidents/incidents during the works.
- 14- The entity declares that there have been no accidents or defects causing pollution to the environment.
- 15- The entity does not generate polluted waters from works on the construction site; as for wastewater, the entity is connected to the network of sewage of the local unit.
- 16- The entity declares that it has not carried out and does not carry out activities during the night hours on the construction site.
- 17- The entity is in the construction phase. Landscape rehabilitation in the project footprint will be carried out upon completion of the construction phase.
- 18- The entity carries out construction activities within the project footprint.

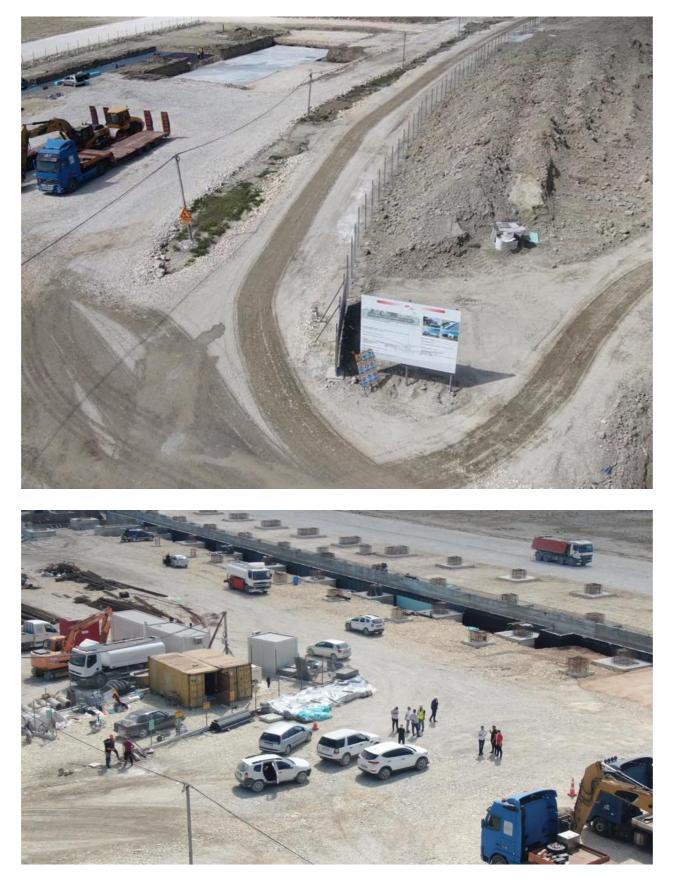


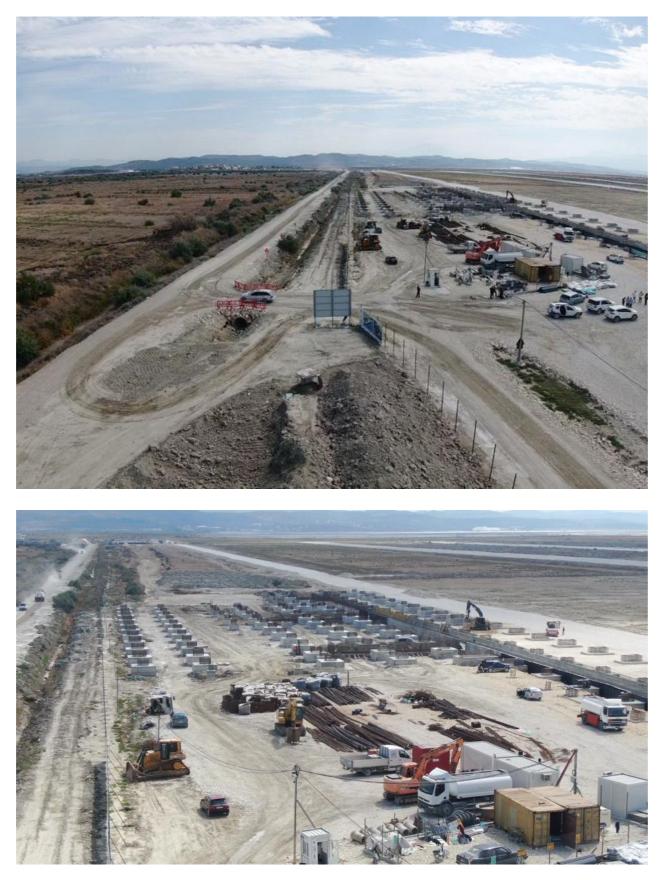


























To be clarified is that during the period of verifications conducted by the working group, the entity has not made substantial changes in relation to the footprint of project, as in this phase of the works, it is carrying out the levelling, filling of the runway, and the construction of the airport terminal.

- February 2024 –



REPUBLIC OF ALBANIA MINISTRY OF TOURISM AND ENVIRONMENT

Tirana, 8 February 2024

Subject: Open File No. 2016/5: Albania: Presumed negative impact of developments on the Vjosa river including hydro-power plant development and Vlora International Airport

Dear Mr. Poutiers,

With reference to the recommendation 219 (2023) on the Presumed/possible impacts of infrastructure and urbanization developments particularly Vlora International airport as adopted I would like to report of the Government of Albania on this regard.

Following the Recommendation No. 219 (5th September 2023, revised 1st December 2023) on the possible impacts of infrastructure and urbanisation developments particularly Vlora International Airport on the Vjosa-Narta Protected Area (Albania), where the government was asked to respond to the information of the complainant, and to report on any progress in implementing Recommendation No.219rev (2023), please find below the following report:

With regard to implementation of the Ministerial Order No. 287, dated 26.09.2023, "On the establishment of the working group, on monitoring the measures undertaken for the verification of the implementation of the conditions as set in the Environmental Declaration for the project "Construction of the Vlorë International Airport", attached herewith, the summarized information regarding the verification conducted by the Directorate of Management, Monitoring, and Registry of Protected Areas at the National Agency of Protected Areas and conducted by the Inspection and Control Directorate at the National Agency of Environment and the Regional Environment Agencies of Fier, Vlorë, and Gjirokastër, on the dates 30.10.2023, 04.12.2023, 16.01.2023, and 06.02.2024.

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The location where the project is developed falls in Cadaster Zone No. 1007, Property No. 6, Akërni, Administrative Unit Novoselë, Vlorë, with an area of 309 hectares. Based on the Decision of the Council of Ministers No. 694, dated 26.10.2022 "On changing the status and area of the natural/forested ecosystem "Pishë Poro-Nartë" from "Managed Natural Reserve" to "Protected Landscape" and removal of the status of "Protected Area" from the unchanged area," this area is outside the system of protected areas network.

However, due to the proximity to the Protected Landscape "Pishë Poro - Nartë" and the potential impact that the development of this activity may have on adjacent ecosystems, the working group, which included

representatives from the National Agency of Protected Areas and Regional Protected Areas Agency, conducted on-site verification of the progress and implementation of the conditions of the Environmental Declaration.

From the on-site verification conducted by the working group, on the respective dates of 30.10.2023, 04.12.2023, 16.01.2023, and 06.02.2024, compared with the conditions set in the Environmental Declaration, it is found that, in general, the terms of the contract have been properly applied and specifically:

- 6. The entity has avoided works that are at a distance of no less than 600 meters from the nesting site from mid-May to July, to avoid disturbing the birds during their breeding period in these areas.
- 7. During the construction phase, the entity has completely avoided night work within a distance of up to 600 meters from the saltwork, as well as unnecessary illumination of the construction site, and also has used LED devices with low-angle lighting in those sectors where there is working activity.
- 8. Measures have been taken in the airport footprint area to deprive birds for nesting, for the period of March April. For this purpose, it was instructed that with the approach of the nesting period, these measures should be reinstated by placing elements that prevent birds in the identified areas, such as scarecrows, scare balloons, and any other measure to ensure their non-installation in the area where the works are being carried out.
- 9. There are no discharges of polluted waters into the natural water bodies of the area.
- 10. Regarding the underpasses or corridors to solve the problem of animal migration, the entity, in collaboration with field specialists, was requested to identify the locations for the construction of underground passages (underpasses) to prevent habitat fragmentation. Regarding this point, the entity expressed that it cannot be implemented in the footprint area of the airport for technical reasons.

With regard to the evidence from long-term comprehensive data and the Wildlife Monitoring Programme, a periodic monthly monitoring of flora and fauna, has been carried out by the monitoring group of NAPA and RAPA Vlorë, by an observation conducted not only in the airport footprint but also in the larger area surrounding the airport, in order to identify the species of flora and fauna present in this territory. Monitoring is done by listing all the species of plants and shrubs installed, while for the fauna through direct observation, using trail cameras, and also the data obtained from the Waterfowl Census conducted on January 13, 2024.



Foto nr.1 Aeroporti dhe zona e monitorimit për rreth tij

The monitoring area covers approximately an area of about 1250 hectares (while only 309ha are related with the airport), which is located around the area where the airport is being constructed. This area includes agricultural land, inhabited areas, roads, and irrigation canals. The land is hilly and very poor in terms of

vegetation.

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The majority of the area consists by saline lands which, in terms of biodiversity, present a very small number of herbaceous or shrubby vegetation. The identified installed species of herbaceous and shrubby vegetation are:

- 8. Salicornia europea;
- 9. Tamarix parviflora;
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- 11. Verbascum spp;
- 12. Erodium spp (moscatum);
- 13. Scolymus maculatus (Thistle);
- 14. Hordeum maritime (Sea barley).

The saline and agricultural lands around the airport are primarily used for cultivation today. Small areas near the village of Akërni are cultivated with olive trees (Olea europaea).

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Fauna:

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Poligonet of Winter Waterbirds Census 2024



Lloji i shpendit "Blackbird"

The surface area of polygons 7 and 8, which includes the airport area and its surrounding zone, is approximately 910 hectares. According to the 2024 census, there were 608 birds out of a total of 10752 birds observed, accounting for 5.65% against the total. The main species observed were:

- 5. Common Buzzard (Buteo buteo);
- 6. Yellow-legged Gull (Larus michahellis);

- 7. Starling;
- 8. Blackbird.

According to the Environmental Declaration with AN281120210002 dated 06.12.2021, the entity "Vlora International Airport - VIA" sh.p.k possesses during the construction phase must respect the conditions set forth in this declaration.

The description, as applicable, of the main measures to be taken to avoid, reduce, and if possible, correct significant negative effects:

- 19- The entity is equipped with the relevant legal documentation for the construction of the Vlorë International Airport.
- 20- The entity in its self-monitoring report has not declared the discovery of cultural objects, archaeological traces, water sources, etc.
- 21- The entity has deposited inert waste (excavation debris) generated from excavations in the designated deposits determined by the technical director on both sides of the runway footprint and within the construction site territory. Inert waste (excavation debris) resulting from works on the construction site and deposited on both sides of the runway footprint will be reused for filling, levelling, and arrangements within the airport surface.
- 22- During on-site verifications, several locations were taken, and from the verification of the coordinates specified in the Environmental Declaration in the Asig Geoportal system, it was found that the entity works in the tracks defined according to the proposed project.
- 23- The entity has deposited inert waste (excavation debris) generated from excavations in the designated deposits determined by the technical director on both sides of the runway footprint and within the construction site territory. Inert waste (excavation debris) resulting from works on the construction site and deposited on both sides of the runway footprint will be reused for filling, levelling, and arrangements within the airport surface.
- 24- During on-site verifications within the construction site during this period, no damage to trees was observed, as within this area, no tree surfaces were noted.
- 25- According to the self-monitoring documentation submitted by the environmental studio preparing the periodic monitoring report, the specified norms in the Environmental Declaration for the noise levels generated by works at the construction site are respected, referring to Law No. 9774 dated 12.07.2007 "On the assessment and management of noise in the environment" as well as Directive No. 8, dated 27.11.2007 "On the threshold levels of noise in certain environments".
- 26- From on-site verifications, it was found that during this time, fencing has been realized in the southwest part of the footprint as well as in the entrance part.
- 27- According to the documentation submitted by the environmental studio preparing the periodic monitoring report, it results that during the works, the specified norms in the Environmental Declaration for air discharges are respected, referring to Law No. 162/2014 "On the protection of air quality in the environment" and DCM No. 248, dated 24.03.2003 "On the approval of temporary norms for air discharges and their implementation". The entity is tasked with ensuring the spraying of the exit roads of heavy machinery to minimize and keep within parameters air pollution.
- 28- The entity has deposited inert waste (excavation debris) generated from excavations in the designated deposits determined by the technical director on both sides of the runway footprint and within the construction site territory. Inert waste (excavation debris) resulting from works on the construction site and deposited on both sides of the runway footprint will be reused for filling, levelling, and arrangements within the airport surface. During on-site verifications, no water sources were observed on the construction site surface.
- 29- The entity declares that during the development of works on the construction site, there have been no technical interventions with negative consequences on the environment.
- 30- From on-site verifications, it resulted that the entity has built sewerage networks for the management of surface water throughout the perimeter of the construction surface.
- 31- From on-site verifications, it resulted that the entity has placed informative/signalling boards inside the construction site to avoid accidents/incidents during the works.
- 32- The entity declares that there have been no accidents or defects causing pollution to the environment.

- 33- The entity does not generate polluted waters from works on the construction site; as for wastewater, the entity is connected to the network of sewage of the local unit.
- 34- The entity declares that it has not carried out and does not carry out activities during the night hours on the construction site.
- 35- The entity is in the construction phase. Landscape rehabilitation in the project footprint will be carried out upon completion of the construction phase.
- 36- The entity carries out construction activities within the project footprint.





We clarify that during the period of verifications conducted by the working group, the entity has not made substantial changes in relation to the footprint of project, as in this phase of the works, it is carrying out the levelling, filling of the runway, and the construction of the airport terminal.

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