



**HELLENIC REPUBLIC  
MINISTRY FOR THE ENVIRONMENT, ENERGY & CLIMATE CHANGE**

**THE MINISTER**

Athens, 13 February 2012

Ref.Nr. Y.P.E.K.A./S.E.S.oik.: 196032

**To: Republic of Bulgaria  
Ministry of Environment  
& Water**

**Subject: Reply to Notification of Environmental Impact Assessment (EIA)  
in relation to the project :  
"Construction of a natural gas pipeline interconnector Greece-  
Bulgaria"**

Dear Madam,

in reply to your Notification letter (Ref. Nr. OBOL-1376/15.12.2011) about Environmental Impact Assessment (EIA) for the investment proposal concerning the construction of a natural gas pipeline interconnector Greece-Bulgaria, we would like to inform you about the intention of the Hellenic Ministry for the Environment Energy and Climate Change to participate in the transboundary EIA procedure, according to the relevant provisions of Article 3 of the ESPOO Convention and Article 3 of the 85/337/EEC Directive, as it has been amended and supplemented by Directives 97/11/EC, 2003/35/EC and 2009/31/EC.

In this direction, you may find attached to our reply a table completed by the Special Environmental Service in the Hellenic Ministry for Environment Energy and Climate Change, which is the Focal Point to the Espoo Convention, containing all the necessary technical details for the proposed project communicated by the project developer, according to the format for notification provided in the "Guidance on Notification according to the Espoo Convention", in order to proceed with the transboundary EIA procedure.

Yours sincerely,

**THE HELLENIC MINISTER FOR  
THE ENVIRONMENT, ENERGY & CLIMATE CHANGE**

**G. PAPAKONSTANTINOU**

**ATTACHMENT:**

A table containing technical details for the project:  
"Construction of a natural gas pipeline interconnector Greece-Bulgaria"

**TECHNICAL DETAILS FOR THE PROJECT:  
"CONSTRUCTION OF A NATURAL GAS PIPELINE INTERCONNECTOR  
GREECE-BULGARIA"**

**1. INFORMATION ON THE POTENTIALLY AFFECTED ENVIRONMENT**

**(i) Information relating to the potentially affected environment**

Protected areas:

The proposed pipeline routing in its course from south to north does NOT come close (or cross) any of the NATURA 2000 Network protected areas in the Greek territory.

A wild animals shelter ("NYMFEA" near Komotini) lies in the path of the pipeline route (Southern part of the pipeline far away from the border). The pipeline crosses it for a small length in an area with thin vegetation, described as agricultural by the local forest protection authorities.

The pipeline route also crosses for a small length the protective forest in the municipality of Komotini (Southern part of the pipeline far away from the border). The crossing area is described as agricultural by the local forest authorities.

Two Important Bird Areas (IBAs) exist on either side of the project corridor. The pipeline route lies on the western limit of Gr008 (Filiouri river valley and east rodopi mountains) but at a large distance from Gr009 (Kompsatos valley).

Geographic features:

The southern part of the pipeline route lies in the plains of Komotini while the Northern part lies on the Eastern Rodopi mountains. Eastern Rodopi is an intermediate height mountain lying along the Greek-Bulgarian borders. It is the southern ending of big mountainous region. The Border crossing is

located at the mountaintop of the Eastern Rodopi mountains in a forested area.

The pipeline route intersects several times with small local rivers and streams. There is NO transboundary river in the pipeline area.

#### Archaeologically sensitive areas:

The pipeline route passes near:

- the Byzantine antiquities of Papikio Mountain archaeological area north of Komotini (including the remains of a byzantine castle) and ,
- Classical antiquities (remains of prehistoric fences and the sanctuary of hero horseman (“Ἱερο ἡρώα Ἰππέα” in greek) in the mountaintops near Pandrosos & Nympha villages.

These archaeological sites are away from the border. In any case, according to the Report of Detailed Archaeological Assessment of the Ministry of Culture and Turism (ΥΠΠΙΟΤ/ΓΔΑΠΚ/ΑΡΧ/Α1/Φ40/ 108145/4643 / 21-11-2011) there are no objections from the local Archaeological Authorities for the proposed pipeline route, provided that all the required measures are taken to preserve the antiquities in the general project area.

#### Ecology of the region:

The area of the project lies primary in the Sub-Mediterranean (Ostryo-Crpinion) and Sub-Continental (Quercion-confertae) vegetation zones as defined by Mavromatis, while its extreme northern part lies in the Oro-Mediterranean (Fagion-Abietion Cefalonicae) zone.

The southern route of the pipeline lies in agricultural cultivated land. Most of the pipeline northern route lies within the area of the A00060024 CORINE Biotope (Eastern Rodopi Mountain Range).

The vegetation is constituted by deciduous forests and bushes. The Condition of the Biotope is considered as Good with tendency of rapid deterioration because of the extension of logging and road network construction, replacement of the deciduous forest with pines and illegal hunting. The

extension of logging activities and construction of new roads encourages illegal hunting. The replacement of native forestal vegetation with plantations also decreases the biodiversity. The Priority for protection of the biotope is considered secondary.

The forests of the region of Eastern Rodopi from which the Natural Gas pipeline route passes consist mainly from beeches, pinewoods and bushy oaks in lower altitudes.

Significant mammals in the abovementioned CORINE biotope are :

- *Canis lupus* (Λύκος)
- *Felis silvestris morea* (Αγριόγατος του Μωριά)

Especially for *Canis Lupus* (wolf) which is considered an endangered species in Greece the following should be considered (Red Book - MEECC-2009):

- Threat Category - Greece: Vulnerable VU [D1]
- Threat Category - International: (least concern) LC

Significant Birds in the abovementioned CORINE biotope are :

- *Accipiter brevipes* (Σαύτι)
- *Aquila chrysaetos chrysaetos* (Χρυσαιτός)
- *Caprimulgus europaeus* (Γυδοβυζάχτρα)
- *Circaetus gallicus* (Φιδαητός)
- *Coracias garrulus* (Χαλκοκουρούνα)
- *Dendrocopos medius medius* (Μεσοτσικλητάρα)
- *Dryocopus martius martius* (Μαυροτσικλητάρα)
- *Emberiza cia* (Βουνότσιχλονο)
- *Emberiza hortulana* (Βλάχος)
- *Hieraaetus pennatus* (Σταυραητός)
- *Jynx torquilla torquilla* (Στραβολαίμη)
- *Lullula arborea arborea* (Δεντροσταρήθρα)
- *Neophron percnopterus* (Ασπροπάρης)

- *Picus viridis viridis* (Πρασινοτουκλητάρα)
- *Sylvia curruca curruca* (Λαλοτσιροβάκος)

Additional information/comments:

**(ii) Information on activities within the potentially affected region**

Activities which may influence the transboundary environmental effects caused by the proposed activity:

Due to the nature of the project and the geographical location of the border crossing, there are NO Activities which may influence the transboundary environmental effects that could be caused by the proposed activity.

Additional information/comments:

The Proposed Pipeline Routing is the best both technically and environmentally, compared with two (2) other options that were examined. The Preliminary Environmental Impact Assessment report has examined any impacts that may arise from this and proposes the necessary measures of protection.

Considering that:

- Large quantities of air, water and solid pollutants, which could potentially have trans-boundary impacts are not emitted during the construction or operation of the project.
- The project does not affect large areas of habitats and protected ecotopes so that the impacts could possibly have trans-boundary character.
- The route does not cross, or affect any trans-boundary large river or lake.
- The project does not affect the climate adversely.

It is concluded that the project, during its construction and operation phases, does not cause any significant, long-lasting and irreversible impacts both to the physical and the man-made environment, both in the Greek and Bulgarian territory considering any trans-boundary effects.