6th ANNUAL REPORT ON ENVIRONMENTAL STRATEGY

Aegean Sea Regional Airports - Cluster B

Fraport Regional Airports of Greece B S.A.

July 2021 - July 2022

PAGE INTENTIONALLY LEFT BLANK

Table of Contents

Table of Contents 3
List of Abbreviations 5
Executive Summary 6
1. Introduction 7
1.1. Fraport Greece - Overview 7
1.2. Structure of the Environmental Strategy 9
2. FG's Environmental and Social Policy 10
3. Legal & Other Requirements 11
3.1. Legal Requirements 11
3.2. Approved Environmental Terms 14
3.3. Stakeholder Requirements 15
3.3.1. Stakeholders Identifications 15
3.3.2. Stakeholder Engagement during COVID-19 Period 16
4. Sustainable Development 17
4.1. Overview & Objectives – Environmental & Social Management System 17
4.2. Environmental Provisions as incorporated in Planning & Designs 18
5. Soil Quality 20
5.1. Overview 20
5.2. Soil Management Action Plan 20
6. Surface Water & Groundwater Quality 22
6.1. Overview 22
6.2. Water Management Plan 23
6.3. Achievements 23
7. Wildlife Hazard Management & Biodiversity Conservation 26
7.1. Overview 26
7.2. Biodiversity Conservation Action Plan 27
7.3. Achievements 28
8. Cultural Heritage 34
8.1. Overview 34
8.2. Cultural Heritage Management Plan 34
8.3. Achievements 35
9. Air Emissions 36
9.1. Overview 36

9.2. Protective Actions 36
9.3. Achievements 37
10. Noise 38
10.1. Overview 38
10.2. Noise Management Plan 38
10.3. Achievements 39
11. Waste Management 41
11.1. Overview 41
11.2. Waste Management Plan 42
11.3. Achievements 43
12. Conclusion 44

List of Abbreviations

ACA	Airport Carbon Accreditation
ACI	Airports Council International
AQMS	Air Quality Monitoring Station
CA	Concession Agreement
CCD	Concession Commencement Date
EASA	European Aviation Safety Agency
EBRD	European Bank for Reconstruction and Development
EC	European Community
EIB	European Investment Bank
ESMS	Environmental & Social Management System
E&S	Environmental and Social
FG	Fraport Greece
GG	Government Gazette
HRADF	Hellenic Republic Asset Development Fund
HAF	Hellenic Air Force
IFC	International Finance Corporation
ISO	International Organization for Standardization
MP	Measurement Point
NMT	Noise Monitoring Terminal
PCB	Polychlorine Byphenils
RFF	Rescue Fire Fighting
SEP	Stakeholder Engagement Plan
WWTP	Waste Water Treatment Plant

Executive Summary

The 6th "Annual Report on Environmental Strategy of Cluster B" provides information on how Fraport Greece (FG) has met the Environmental Requirements of the Concession Agreement (CA) for the Upgrade, Maintenance, Management and Operation of the Aegean Regional Airports ("Cluster B" airports) during the period from July 12th, 2021 until July 11th, 2022.

The report outlines the practices followed by FG to control the potential environmental impacts from both operational and construction activities that took place at the airports and presents the ongoing high quality environmental management of FG.

Via a set of objectives and targets, with specific timeframe, this Environmental Strategy Report provides a framework to ensure that social, economic, and environmental goals are reflected in the development and daily operation of each airport.

1. Introduction

1.1. Fraport Greece - Overview

Fraport Greece (FG) was established in 2015 and is responsible for maintaining, operating, managing, upgrading and developing 14 regional airports in Greece over a period of 40 years.

The operational transfer of the airports to **FG** took place on April 11th, 2017.

FG consists of two concession companies with their corporate seats in Athens, one company for Cluster A named "Fraport Regional Airports of Greece A S.A." ("Fraport Greece A", **FGA**) and one company for Cluster B named "Fraport Regional Airports of Greece B S.A." ("Fraport Greece B", **FGB**).

Fraport Regional Airports of Greece Management Company S.A. (**FGM**), is acting as management company and is responsible for central functions on behalf of Fraport Greece A and Fraport Greece B, such as employment of staff and contracting of advisors and/or suppliers.

FGM employs 203 persons, whereas a total of 268 persons are employed by **FGB** at the 7 airports of Cluster A (July 2022).

The shareholders of **FG** are Fraport AG Frankfurt Airport Services Worldwide, Copelouzos Group and European Marguerite 2020 Fund.

Cluster B under the Concession Agreement of Aegean Sea Regional Airports, includes the following seven (7) airports:

- Rodos "Diagoras" (RHO)
- Kos "Ippokratis" (KGS)
- Santorini (JTR)
- Mikonos (JMK)
- Mitilini "Odysseas Elytis" (MJT)
- Samos "Aristarchos of Samos" (SMI) and
- Skiathos "Alexandros Papadiamandis" (JSI)

Figure 1: Fraport Greece Cluster B airports

1.2. Structure of the Environmental Strategy

The Environmental Strategy Report outlines the airports' approach to control environmental impacts during operation and details the ongoing high quality environmental management of the airports. The objectives and time-framed targets outlined in this Report provide a framework to ensure that social, economic, and environmental goals are reflected in the development and daily operation of each airport.

Environmental aspects addressed are:

- Soil Quality
- Surface Water and Groundwater Quality
- Biodiversity
- Cultural Heritage
- Air Quality / Emissions
- Noise and
- Waste and Wastewater Management

For every environmental aspect, the potential impacts are presented, along with preventive measures.

2. FG's Environmental and Social Policy

The Management of **FG** has adopted an environmental and social policy for all our business locations (headquarters and airports), having defined environmental and social protection as one of our main corporate goals. Environmental & Social Protection is the responsibility of all employees who need to realize the importance of their duties, take active participation in meeting the common goals and willingly commit to the results of their activities.

In this context:

- We are managing, operating and developing our units in an environmentally and socially responsible way in compliance with the applicable laws, regulations and other commitments.
- We are promoting greater environmental and social responsibility by training our employees and providing awareness programs for all concerned parties.
- We support a precautionary and socially responsible approach to environmental challenges in respect of cost-effectiveness, economic viability and sustainability.
- We encourage the development and dissemination of environmentally friendly practices and technologies by applying environmental and social criteria when selecting goods and services.
- We engage in a regular dialogue with our community stakeholder groups and we incorporate their concerns and points of view in our corporate decision-making process. We communicate closely with our partners in the air transport value chain and work together to develop joint strategies and concepts directed towards continual improvement of environmental performance.

To meet our goals and targets towards sustainability, we focus on the following key environmental and social issues:

1. nature and biodiversity protection;
2. wildlife trafficking prevention;
3. waste management (hazardous, non-hazardous);
4. wastewater management;
5. energy management, carbon emissions (management and reduction) and climate change;
6. pollution prevention and emergency response;
7. noise management and control; and
8. traffic management.

3. Legal & Other Requirements

3.1. Legal Requirements

National and EU legislation govern largely the environmental aspects of airport activities and act as a foundation for environmental programming and performance.

In addition, **FG** abides by the E&S Designated Performance Requirement, which means the applicable Alpha Bank Performance Standards as per the 25.07.2016 E&S Policy, the IFC Performance Standards; the EBRD Designated Performance Requirements and the EIB. The environmental guidelines of each bank are publicly disclosed.

In the interest of responsible and sustainable environmental management, **FG** will endeavor to meet or exceed additional self-imposed standards, including the adoption of applicable international regulations. Tenants at **FG** airports are also required to uphold the same standards.

Table 1: Core Environmental Legislation as amended and in force

Greek Legislation No	GG	Content	European Legislation
General			
Law 1650/1986	A 160	Protection of the environment in Greece	
Law 4014/2011	A 209	New framework for the environmental permitting procedure	
Law 4685/2020	A 92	Modernization of the Environmental legislation	Directives 2018/844 and 2019/692
Law 4843/2021	A 193	Incorporation of EU Directive (E) 2018/2002	Directive 2018/2002 and 2018/1999
Law 4936/2022	A 105	National Climate Law - Switching to Climate Neutrality and Adapting to Climate Change, Urgent Provisions to Deal with the Energy Crisis and Protect the Environment	
JMD 5825/2010	B 407	Building Energy Efficiency Code	Directives 91/2002/EC and 31/2010/EC
Waste Management			
Law 4042/2012	A 24	Protection of the environment through criminal law, on waste management	Directives (WFD) 2008/99/EC and 2008/98/EC
Law 4819/2021	A 129	Integrated framework for waste management	Directives 2018/851 and 2018/852
PD 82/2004	A 64	Management of used mineral oils	
PD 109/2004	A 75	Management of used vehicle tire	
JMD 41624/2057/E103/2010	B 1625	Management of batteries	

Greek Legislation No	GG	Content	European Legislation
JMD 23615/651/Δ103/2014	B 1184	Management of Waste Electrical and Electronic Equipment (WEEEE)	
JMD YPEN/DDA/81490/1650/2021	B 4382	Incorporation of EU Directive 2018/849 for amending Directives 2000/53 / EC on end-of-life vehicles, 2006/66 / EC on batteries and accumulators and waste batteries and accumulators	
JMD YPEN/DNEP/36928/2227/2018		Modification of MD 23615/651 / E.103 / 8-5-2014 “Defining rules, terms and conditions for the alternative management of waste electrical and electronic equipment (AHHE), in accordance with the provisions of Directive 2012/19 / EC " on waste electrical and electronic equipment (AHHE) "	
JMD 36259/1757/E103/2010	B 1312	Management of Construction and Demolition Waste (CDW)	
JMD 13588/725/1985	B 383	Measures conditions and restrictions on hazardous waste management.	Directive 91/156/EC
Environmental & Aircraft Noise			
JMD 211773/2012	B 1367	Environmental and aircraft noise	Directive (END) 2002/49/EC
JMD 13586/724/2006	B 384	Environmental Noise	Directive (END) 2002/59/EC
PD 80/2004	A 63	Noise management at EU airports	Directive 2002/30/EC
PD 1178/81	A 291	Measurements and checks on aircraft noise	
Environmental Liability			
PD 148/2009	A 190	Environmental liability for the prevention and remedy of environmental damage.	Directive (ELD) 2004/35/EC
Air Pollutants			
JMD 14122/549/E.103/2011	B 488	Ambient air quality	Directive 2008/50/EC
JMD 22306/1075/Δ103/2007	B 920	Target values and limits for assessment of concentrations of arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in atmospheric gases	Directive 2004/107/EC
Nature Conservation			
PD 67/81	A 43	Protection of wild flora and fauna	
Law 3937/2011	A 60	Conservation of Biodiversity	Directive 92/43/EC
Archaeology & Sites of Cultural Interest			
Law 4858/2021	A 220	Ratification of the Code of Legislation for the protection of antiquities and cultural heritage in general.	
Law 3028/2002	A 153	Cultural heritage protection	

Greek Legislation No	GG	Content	European Legislation
Wastewater			
JMD 145116/2001	B 354	Establishment of Measures, Conditions and Procedures for the Re-use of Waste Water and other provisions	
JMD 191002/2013	B 428	Amendment of JMD 145116/2011, which abolishes the relevant permit	
MD E1b/221/65	B 138	Emissions standards and limits of wastewater discharged into water intended for bathing and any other use except from water consumption. As modified by MD Γ4/1305/1974, Γ1/17831/1971, ΓΥΓ2/133551/2008	
Electromagnetic Fields			
Decision 661/2012	B 2529	Procedures on licenses of land based antennas	

3.2. Approved Environmental Terms

According to the applicable national legislation, each airport operates under Approved Environmental Terms, which ensure the optimal operation of the airport in regards to protecting the environment.

The terms set limits, guidelines and monitoring schemes adjusted to the specifications of each airport, in order to defend all environmental aspects.

Table 2: Approved Environmental Terms Decisions of Cluster B airports

Airport	Environmental Terms Approval
RHO	• **32648/04.11.1994** as it has been extended and modified by the following**:** ○ **100425/17.01.2006** ○ **23983/11.05.2016** ○ **37974/07.12.2017** ○ **6304/20.03.2018** ○ **72087/2629 / 09.01.2019**
KGS	• **32649/04.11.1994** as it has been modified and extended by the following: ○ **106589/08.08.2006** ○ **197968/03.05.2012** ○ **6126/16.03.2018**
JTR	• **51227/25.10.2016** as it has been modified by the following**:** ○ **1758/23.01.2018**
JMK	• **32650/04.11.1994** as it has been modified and extended by the following: ○ **103324/18.04.2006** ○ **175511/15.10.2014** ○ **39773/26.09.2017** ○ **2976/02.02.2018** ○ **24442/1574/14.03.2022**
MJT	• **81441/20.12.2002** as it has been extended and modified by the following: ○ **23984/11.05.2016** ○ **1004/16.01.2018**
SMI	• **106454/14.03.2000** as it has been modified and renewed by the following**:** ○ **131852/27.10.2010** ○ **3704/12.02.2018** ○ **24437/1573/14.03.2022**
JSI	• **68597/24.06.1999** as it has been renewed extended and modified by the following**:** ○ **106193/11.07.2008** ○ **120306/11.01.2010** ○ **37970/22.12.2017** ○ **5778/13.03.2018** ○ **6306/20.03.2018**

3.3. Stakeholder Requirements

FG, as a community-based organization, values the relationships build with business partners and local communities. Meaningful Stakeholder Engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social aspects.

This is achieved by the establishment and implementation of a corporate Stakeholder Engagement Framework (SEF) defining the established and implemented process between FG, local and national-wide stakeholders during the whole life-cycle of the project.

Local (airport specific) Stakeholder Engagement Plans (SEPs) are in place for every FG operated airport, outlining how FG communicates and seeks feedback from stakeholders in each location. The local SEPs are designed to guide stakeholder consultations leading up to all activities of the operation of each airport. The overall goal is to implement a well-managed, open and meaningful stakeholder dialogue, sharing of information and knowledge to build long-term synergies and collaboration with local communities.

Each local (airport-specific) SEP has the following structure:

- updated list and classification of concerned (affected or interested) stakeholders;
- past stakeholder engagement events, incl. relevant feedback;
- provisioned dates and type of upcoming stakeholder engagement events;
- communication tools per event; and
- note about the grievance policy.

3.3.1. Stakeholders Identifications

The concerned stakeholders at each **FG** operated airport were identified during the project preparation phase, as well as via the relevant Social Baseline Studies conducted in years 2017-2018 and is continuously updated.

The current list of concerned stakeholders of each airport is listed in the relevant local SEP, which is a “live” document maintained by FG. Both the SEF and the site-specific (local) SEPs are regularly reviewed and updated as necessary, ensuring that FG is aware of those that should be involved in the engagement process.

The groups of stakeholders as per the relevant mapping of FG are the following:

- Local community
- Airport Users
- State Authorities, and Institutions
- Non-Governmental Organizations (NGOs)
- Professional Associations
- Scientific and Environmental Organizations

- Media
- Vulnerable Groups

3.3.2. Stakeholder Engagement during COVID-19 Period

In 2021, efforts were made to resume Stakeholder Engagement meetings at a local level, however due to pandemic restrictions, this was not feasible.

4. Sustainable Development

4.1. Overview & Objectives – Environmental & Social Management System

Company Mission:

The objective of **FGB** is the safe, secure, and efficient management of the seven (7) Greek Regional Civil Airports.

FG provides the infrastructure and the necessary services for meeting, sending off and serving of airplanes, passengers, visitors, baggage, cargo and mail according to the best practices and the applicable legislation.

FG aims to create a pleasant passenger experience for airport users, thus creating new business opportunities for concessionaires and service providers; as well as to make our airports attractive and environmentally friendly destinations for passengers, tour operators and airlines in the region.

We constantly improve the quality of our services, productivity and environmental performance in order to keep our market place in the long term.

FG ensures that:

- we communicate our IMS policy to all employees and persons working on our behalf;
- we communicate this policy and the results of our activities to our Shareholders and to Second and Third parties as appropriate, and to the Public;
- we maintain and continuously improve our IMS policy and related management systems;
- we set objectives and targets related to the identified environmental aspects; and
- we review the IMS policy on a regular basis.

Requirements

FG has incorporated, as applicable, international environmental and social standards (EIB, EBRD, IFC, etc.), as well as policies and guidelines of its shareholders (mostly by Fraport AG) in the development of its own respective Environmental & Social Management System (ESMS) in order to address the environmental and social impacts and issues associated with each airport project.

In the context of the ESMS, which has been based on the ISO 14001 requirements, **FG** has identified the key environmental and social management issues for the following areas:

- Pollution Prevention: noise, vibrations, storm water, wastewater, non-hazardous waste, hazardous waste, hazardous materials (handling & storage), soil/groundwater protection (leaks & spills), air emissions.
- Community Health, Safety & Security
- Biodiversity Conservation

- Resource Efficiency (water, energy, raw materials)
- Cultural Heritage

for which, it takes the appropriate control and monitoring measures.

FG, through promotion of sustainable growth of air-travel, is supporting local communities by boosting regional financial activity and job creation. The Project is enhancing sustainable local working conditions and hiring, both by **FG** and business partners.

The ESMS complies with all ordinances, statutes and regulations of the Greek State Agencies and European Union policy and legislation related to the protection of the environment.

All major contractors, the ground handling services providers as well as the fuel handlers in the airports hold ISO 14001 certification or equivalent.

For construction projects the contractors must elaborate and enforce a project specific Health Safety & Environmental Plan.

4.2. Environmental Provisions as incorporated in Planning & Designs

Airport tenants, contractors and operators are required to ensure appropriate systems and procedures are in place to manage specific environmental risks associated with their activities from resources consumption. Tenants are encouraged to conserve energy through KENAK, the Greek state "Regulation on the Energy Performance of Buildings" and the technical guidelines issued by the Technical Chamber of Greece to be applied to all new and extensively renovated airports buildings. Recommendations are provided to tenants during audits on methods to reduce their energy and resource consumption and waste generation.

Energy

Energy conservation as already incorporated in the design is achieved through:

- terminal use minimization during winter period by isolating unnecessary parts of the buildings with minimal use;
- protection of the building against outdoor adverse conditions by enhancing shell insulation specification, solar protection glazing and / or external shading;
- use of natural light preferred where possible;
- high efficiency chilled and hot water production equipment; and
- adjustable energy consumption to variable load demand (variable flow systems).

Water Conservation and Quality

- monitoring to track water consumption,
- spill traps/management, oil separators and closed fuel delivery systems as foreseen in the environmental terms,

- refurbishment of existing Waste Water Treatment Plants and connection to local sewage network for KGS.

Resources (materials and waste management)

The following criteria are used, when possible for the selection of materials that reflect our sustainability approach:

- reuse of building & appropriate excavation materials onsite;
- use of lower biochemical oxygen demand (BOD) de-icing materials;
- use of nontoxic pest-control products.

5. Soil Quality

5.1. Overview

FG's objective is to protect soil from airport activities and appropriately manage and/or rehabilitate any contaminated sites.

The majority of contaminated sites are associated with historic activities on and off each airport including spills, landfill activities and constituents of firefighting foams.

Some activities that could affect soil are:

- construction and earthworks;
- grounds maintenance including vegetation removal and weed control;
- storage, handling, use and disposal of hazardous materials;
- aircraft refuelling, vehicle and aircraft wash down;
- aircraft, vehicle, mechanical plant and electrical equipment maintenance;
- car parking;
- waste management infrastructure, storage and disposal; and
- surrounding land use activities.

These activities could cause:

- contamination from spillage, leakage, seepage, or residual runoff from hardstand areas.
- migration of existing contamination from the original source through natural pathways or disturbance during construction.
- erosion.

5.2. Soil Management Action Plan

FG is regularly inspecting the airport, tenant, contractor and operator activities. Where there is soil or groundwater contamination caused by their operations, airport operators are required to undertake relevant measures to monitor, manage or remediate the contamination (obligation imposed by the Approved Environmental Terms).

According to article, 13.4 of the Concession Agreement **FG**, aims to remediate any identified pre-existing contamination within the concession sites.

Actions to manage potential impacts to soils include:

- periodic measurement campaigns to evaluate soil pollution and surveys of polluted sites as well as to monitor potential pollution;
- remediation of contaminated zones;

- activities with the potential to contaminate soil or groundwater will undergo a risk assessment to inform appropriate management procedures;
- procedures and resources in place to immediately treat accidental spillages.

Table 3: Targets for soil management

Target	Timeframe
Environmental Baseline Report (repetition)	Scheduled for second half of 2022

6. Surface Water & Groundwater Quality

6.1. Overview

FG's objective is to protect surface water and groundwater from airport activities and appropriately manage or rehabilitate any contaminated sites.

All the airports of Cluster B are near coastal areas and are typical of coastal environments. Being close to the sea, surface and groundwater levels and quality can be susceptible to quality and quantity alterations affected by sea level rise, tidal influences and flooding.

In addition, some activities that could affect water quality may be:

- changes to the drainage network, leading to increased flow velocities or reduced flood storage capacity;
- development that creates increased impermeable areas and increased runoff;
- construction, earthworks and vegetation removal;
- weed and pest control;
- aircraft and GSE refuelling;
- equipment refuelling;
- vehicle and aircraft cleaning;
- aircraft, vehicle and equipment maintenance;
- collection, storage, handling, use and disposal of hazardous materials;
- waste management infrastructure and storage;
- upstream land uses;
- known and potentially contaminated sites;
- potential malfunction of sewage system and wastewater treatment installations.

These activities may cause:

- pollution from spillage; leakage or seepage into storm water infrastructure;
- impact on known and potentially contaminated sites;
- changes to the upstream or downstream flooding regime and possible disturbance of local water drills;
- increased flow velocities; leading to erosion;
- creation of mosquito-breeding habitat leading to public health risks;
- attraction or spread of pest animals and weeds;
- possible disturbance of local fauna and flora.

6.2. Water Management Plan

FG is developing water management procedures aiming to eliminate any potential surface and groundwater environmental disturbance.

Potable, surface and groundwater quality is monitored at various sites regarding various physicochemical parameters by sampling:

- terminal water network;
- monitoring boreholes;
- surface water across the airports (open drainage system).

All chemical analyses are conducted contracted accredited laboratories.

Measures to manage potential impacts to surface water and groundwater quality include:

- implementation of water protection measures as described in the Environmental Terms for each airport;
- spill response and reporting procedures;
- waste handling procedures;
- installation and maintenance of storm water treatment devices (oil-separators and sand traps);
- tenant and construction audits with routine inspections;
- incorporation of existing surface water and groundwater information during planning of the new developments,
- drainage infrastructure designed and modelled to prevent potential flood impacts.

Table 4: Target for water management

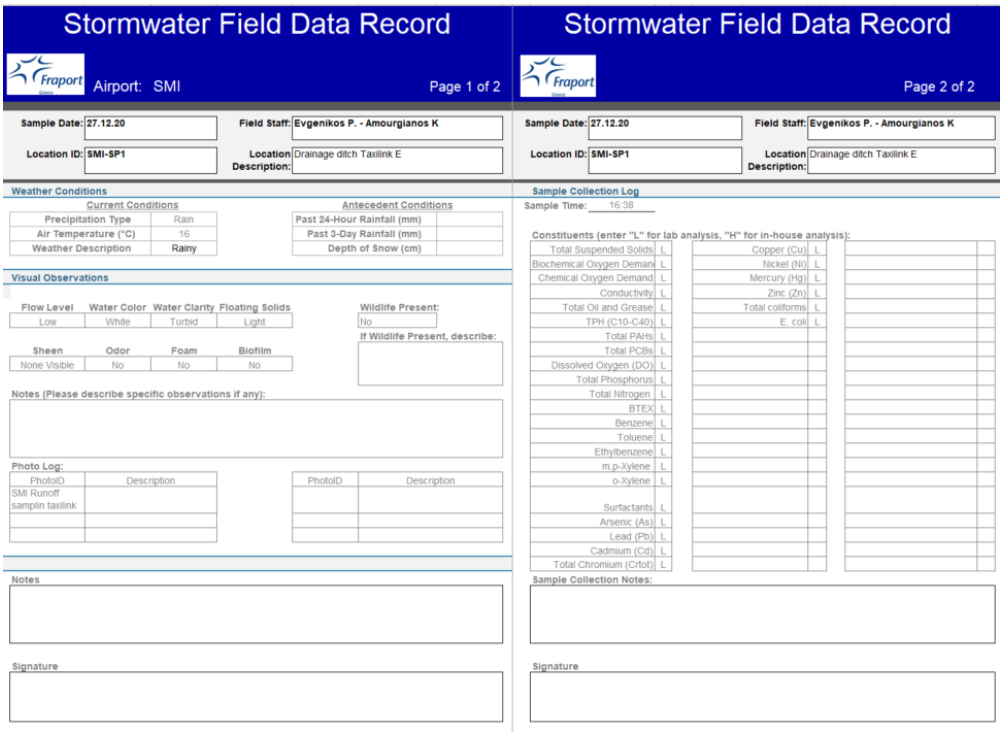
Target	Timeframe
Water management procedures	Ongoing - Annually
Environmental Baseline Report (repetition)	Scheduled for second half of 2022

6.3. Achievements

- ✓ Water Quality Monitoring Program**:** which consists of chemical analyses of surface and groundwater samples in predefined positions within the airport throughout the year.
    - The chemical analyses are performed by accredited laboratories. FG personnel has received appropriate training to conduct sampling.

- Samples of surface runoffs and samples from monitoring wells in all 7 Cluster B airports are analysed for various chemical parameters including but not limited to pH, BOD_5, COD, DO, TSS, TN, TP, heavy metals, TPH, PAHs, oil & fats, BTEX and PCBs.
- Fuel handlers conduct their monitoring analyses as per the Environmental Terms requirements. **FG,** in cooperation with the Fuel Handlers, monitors the results and undertakes proper actions if necessary.

Figure 2: SMI storm water runoffs sampling



Stormwater Field Data Record

Airport: SMI

Page 1 of 2

Sample Date: 27.12.20 | Field Staff: Evgenikos P. - Amourgianos K

Location ID: SMI-SP1 | Location Description: Drainage ditch Taxilink E

Weather Conditions

Current Conditions		Antecedent Conditions	
Precipitation Type	Rain	Past 24-Hour Rainfall (mm)	
Air Temperature (°C)	16	Past 3-Day Rainfall (mm)	
Weather Description	Rainy	Depth of Snow (cm)	

Visual Observations

Flow Level	Water Color	Water Clarity	Floating Solids
Low	White	Turbid	Light

Wildlife Present: No

If Wildlife Present, describe:

Sheen	Odor	Foam	Biofilm
None Visible	No	No	No

Notes (Please describe specific observations if any):

Photo Log:

PhotoID	Description	PhotoID	Description
SMI Runoff samplin taxilink			

Notes

Signature

Stormwater Field Data Record

Page 2 of 2

Sample Date: 27.12.20 | Field Staff: Evgenikos P. - Amourgianos K

Location ID: SMI-SP1 | Location Description: Drainage ditch Taxilink E

Sample Collection Log

Sample Time: 16:38

Constituents (enter "L" for lab analysis, "H" for in-house analysis):

Total Suspended Solids	L	Copper (Cu)	L		
Biochemical Oxygen Demand	L	Nickel (Ni)	L		
Chemical Oxygen Demand	L	Mercury (Hg)	L		
Conductivity	L	Zinc (Zn)	L		
Total Oil and Grease	L	Total coliforms	L		
TPH (C10-C40)	L	E. coli	L		
Total PAHs	L				
Total PCBs	L				
Dissolved Oxygen (DO)	L				
Total Phosphorus	L				
Total Nitrogen	L				
BTEX	L				
Benzene	L				
Toluene	L				
Ethylbenzene	L				
m,p-Xylene	L				
o-Xylene	L				
Surfactants	L				
Arsenic (As)	L				
Lead (Pb)	L				
Cadmium (Cd)	L				
Total Chromium (Crtot)	L				

Sample Collection Notes:

Signature

Figure 3: Storm water field data record. Airport Engineers have received relevant training in order to perform the sampling. Part of the sampling is the filling in of the relevant field data record per sample.

✓ All the Waste Water Treatment Plants (WWTP) are monitored for treated effluent quality and re-use is performed.

7. Wildlife Hazard Management & Biodiversity Conservation

7.1. Overview

Wildlife Hazard Management Programme is designed and implemented for each airport operated by Fraport Greece, in compliance with regulatory framework and tailor made to the local environmental conditions.

Wildlife hazard identification, assessment and management on and off-airport aims to reduce the presence of species constituting a risk to flight safety. Understanding of how each species use habitat is key for the development of an effective wildlife hazard management programme as well as for biodiversity conservation initiatives.

The Biodiversity Conservation Programme provides a framework within which Fraport Greece opts to manage biodiversity at the airport areas and close vicinity. This Fraport Greece programme continually improves its performance in the specific environmental aspect, under the framework of the Environmental & Social Management System (ESMS). The programme includes the Biodiversity Conservation Action Plan 2021-2025 for the 14 regional airports operated by Fraport Greece and aims to meet the below objectives:

1. ***Biodiversity Conservation Objective:*** to conserve the airport biodiversity for non-hazardous species

2. ***Grassland Preservation Objective:*** to preserve the existing grassland areas of the airport and their botanical diversity

3. ***Wetland Conservation Objective:*** to conserve open-water areas not attracting hazardous birds

4. ***Marine Environment Conservation Objective:*** to conserve significant coastal/marine habitat and species of airport surrounding areas

5. ***Conservation of Local Charismatic Species:*** protection and showcase of charismatic or endangered species present at airport surrounding areas (e.g. Golden jackal).

Figure 4: Golden jackal (*Canis aureus*)

7.2. Biodiversity Conservation Action Plan

Over a period of 5 years, starting in 2021 and until the end of 2025, wildlife monitoring is conducted not only for bird species but also for amphibians and reptiles, insects and invertebrates. In particular, actions include:

- Systematic and thorough monitoring of bird species and their populations on and off-airport takes place regularly (up to an area of 13km radius) with emphasis on bird behavior (e.g. nesting, roosting, flight behavior) and migration periods.

- Wildlife monitoring is conducted with various field survey techniques by the use of high-tech equipment such as wildlife trail camera traps.

Consequently, a comprehensive database will be created for a variety of wildlife species and their populations that are found at the airports operated by Fraport Greece or its close vicinity.

Table 5: Indicative targets for biodiversity conservation

Target	Timeframe
Development of a dataset for birds, amphibians and reptiles, insects and invertebrates	2021-2025
Conservation of orchid species and other positive botanical indicators	2021-2025
Monitoring of benthic communities of the marine environment adjacent to airports	2021-2025

Detailed reference of the actions for the achievement of the above mentioned targets are included in the Biodiversity Conservation Programme. Highlights of these actions are also presented at the Annual Wildlife Hazard Management Review 2021, which is uploaded on www.fraport-greece.com.

Figure 5: Papaver rhoeas may be observed on and off-airports

7.3. Achievements

✓ ***Wildlife Trafficking Prevention***

Fraport Greece has signed the United for Wildlife Taskforce Buckingham Palace Declaration against wildlife trafficking, extending its biodiversity protection policy to the 14 regional airports

and in close collaboration with ACI World. Recognizing the devastating impact of the illegal wildlife trade on the environment and the ecosystems, the company has pledged to actively participate in tackling the issue. By taking an active role alongside leading companies in the international transport industry, Fraport Greece will establish protocols to notify and alert the relevant law enforcement authorities in order to combat the illegal animal trade at the 14 regional airports. The action plan for the implementation of the company's commitments is part of Fraport Greece Biodiversity Conservation Programme and sits under a holistic strategy aiming at a sustainable development. With wildlife protection at the top of its priorities, Fraport Greece aims to raise awareness to Greek and European stakeholders in order to mitigate wildlife trafficking in the most coordinated way possible

Figure 6: **Common chameleon (*Chamaeleo chamaeleon*), Photo by: Ilias Strachinis, Herpetologist.** In Greece, only a subspecies population is found on Samos Island. This population is threatened by the illegal trade

- ✓ ***ACI World Wildlife Trafficking Prevention Taskforce***

The Wildlife Hazard Manager has presented to the members of the ACI World Wildlife Trafficking Prevention Taskforce how "*How airports can take action to stop wildlife trafficking. Case study: Fraport Greece*". His presentation focused on awareness, policy, mechanisms, training and communication from an airport operator's perspective

Table 6: European goldfinch and Common chaffinch are illegally traded as songbirds

European goldfinch	Common chaffinch

✓ The below table includes some of the bird species observed at Cluster B airports and their vicinity by Fraport Greece personnel, during the period 11/7/2021-11/07/2022

Table 7: Bird species observed at Cluster B airports (11/7/2021-11/07/2022)

Airport	Date	Bird species
Kos "Ippokratis"	14 July 2021	Barn owl *(Tyto alba)*
	30 August 2021	Rüppell's warbler *(Curruca ruppeli)*
	7 January 2022	Short-eared owl *(Asio flammeus)*
Mikonos	15 July 2021	Little-ringed plover *(Charadrius dubius)*
	11 May 2022	Glossy ibis *(Plegadis falcinellus)*
	11 May 2022	European bee-eater *(Merops apiaster)*
Mitilini "Odysseas Elytis"	18 October 2021	Little owl *(Athene noctua)*
	28 March 2022	White stork *(Ciconia ciconia)*
	23 June 2022	Slender-billed gull *(Chroicocephalus genei)*
Rodos "Diagoras"	24 January 2022	Crag martin *(Ptyonoprogne rupestris)*

Airport	Date	Bird species
	3 April 2022	Trumpeter finch *(Bucanetes githagineus)*
	6 May 2022	Rosy starling *(Pastor roseus)*
Samos "Aristarchos of Samos"	30 March 2022	Purple heron *(Ardea purpurea)*
	1 April 2022	Eurasian bittern *(Botaurus stellaris)*
	16 April 2022	Common cuckoo *(Cuculus canorus)*
Santorini	12 March 2022	Peregrine falcon *(Falco peregrinus)*
	22 March 2022	Kentish plover *(Charadrius alexandrinus)*
	4 April 2022	Black-tailed godwit *(Limosa limosa)*
Skiathos "Alexandros Papadiamandis"	13 November 2021	Common kingfisher *(Alcedo atthis)*
	11 March 2022	Green sandpiper *(Tringa ochropus)*
	19 May 2022	Ruff *(Calidris pugnax)*

✓ The below table includes some of the snake species observed at Cluster B airports by Fraport Greece personnel, during the period 11/7/2021-11/07/2022

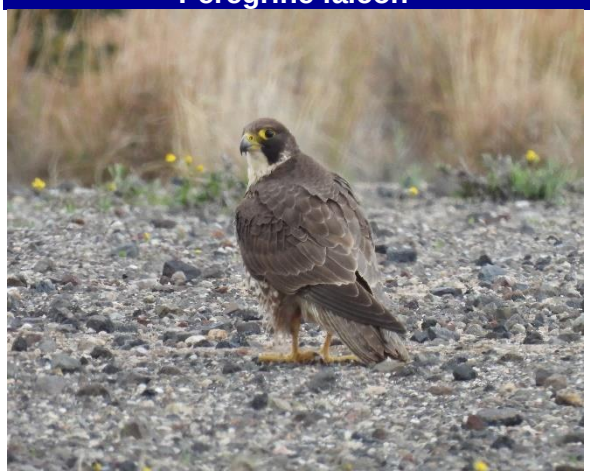
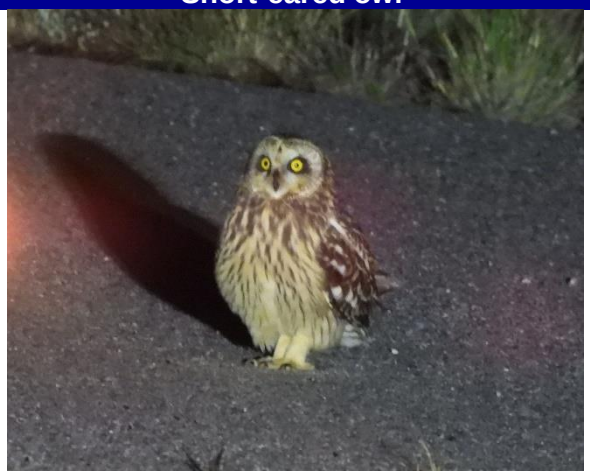
Table 8: Snake species observed at Cluster B airports (11/07/2021-11/07/2022)

Airport	Date	Snake species
Kos "Ippokratis"	20 June 2022	Sand boa *(Eryx jaculus)*
Mikonos	29 March 2022	Four-lined snake *(Elaphe quatuorlineata)*
Mitilini "Odysseas Elytis"	4 May 2022	Grass snake *(Natrix natrix)*
Rodos "Diagoras"	5 May 2022	Black whip snake *(Dolichophis jugularis)*
Skiathos "Alexandros Papadiamandis"	20 May 2022	Eastern montpellier snake (*Malpolon insignitus)*

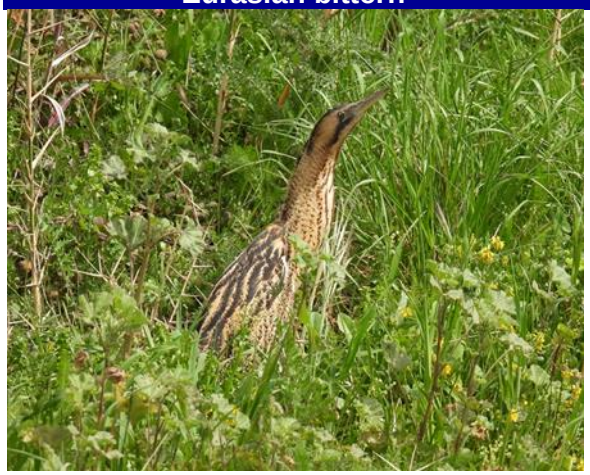
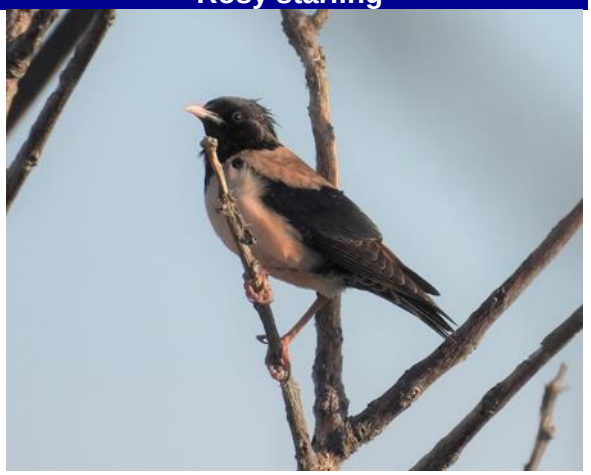
Figure 7: Grass snake (*Natrix natrix*)

Figure 8: Eastern montpellier snake (*Malpolon insignitus*)

Table 9: Bird species observed at Cluster B airports (11/7/2021-11/07/2022)

Peregrine falcon	Short-eared owl
	

Kentish plover	Black-tailed godwit

Eurasian bittern	Rosy starling
	

8. Cultural Heritage

8.1. Overview

The sustainable and respectful management of the heritage values will be achieved by:

- developing and maintaining a detailed knowledge of the heritage values that exist within and in the proximity of FG's concession areas;
- identifying heritage values early on in the development process so that those heritage values can be considered, remain undisturbed and protected;
- developing and submitting solutions under relevant legislation, in consultation with relevant stakeholders, to impact those heritage values when that cannot be avoided;
- developing and implementing procedures for appropriately managing heritage values using the guiding principles of avoid, protect and mitigate;
- ensuring compliance with heritage legislation, associated statutory approvals and the provisions of the concession agreement; and
- educating **FG** personnel of the heritage values that exist within and in the proximity of **FG's** concession areas and the appropriate actions when interacting with these values.

8.2. Cultural Heritage Management Plan

FG's management of cultural heritage is following procedures laid out in the Concession Agreement, consistent with the following practices:

- ❖ test excavations to determine the existence of Antiquities,
- ❖ vibration monitoring as per relevant environmental terms,
- ❖ maintain the existing building structure, envelope, and interior non-structural elements of a historic building or contributing building in a historic district.

Almost all of the airports of Cluster B are in proximity of cultural heritage important values (e.g. proclaimed archaeological sites, churches, monasteries, sites of important aesthetic value etc.), as described in Chapter 4.1.

Activities with the potential to affect cultural heritage at the airports include any ground disturbing activities that could damage known or unknown heritage value. These would include:

- landscaping activities;
- construction / and demolition works.

Table 10: Cultural Heritage targets

Target	Timeframe
Develop and maintain a heritage database within and in the proximity of FG's concession areas.	Achieved and revised as necessary
Increasing awareness by FG personnel and airport tenants of the diverse heritage values within FG's concession areas, the importance of these values and the process to protect these values.	Ongoing

8.3. Achievements

- ✓ Catalogue with relevant heritage sites for each airport.
- ✓ The catalogue was part of the Heritage Action Plan that was implemented by **FG** and includes the following (where applicable) per airport:
  - ✓ Archaeological places and their relevant protection zones.
  - ✓ Places of significance to the cultural and spiritual beliefs.
  - ✓ Artefacts and the remains of important structures.
  - ✓ Sites of exceptional beauty and traditional settlements.
  - ✓ Architectural landmarks & buildings of beauty and/or importance.
- ✓ Chance Finds procedure, (part of the Heritage Action Plan) aims to address the possibility of Antiquities becoming exposed during ground altering activities within the Concession Areas of the 14 Regional Airports and to provide protocols to ensure that the Antiquities are documented and protected as required.

  The purpose of the procedure is to:

  - avoid significant adverse impacts to antiquities
  - describe the provisions for managing chance finds through a chance find process which will be applied in the event that cultural heritage is subsequently discovered.

  This procedure includes guidelines and minimum requirements for all involved and other parties to define their own chance find procedures according to the nature and scale of their construction works.

9. Air Emissions

9.1. Overview

FG manages airport operations in a way that prevents air emissions causing a nuisance or harm to neighbouring areas.

Some activities that generate air emissions include:

- aircraft ground operations including refuelling,
- vehicle and equipment operations,
- use of air-conditioners, pumps and generators,
- general Aviation maintenance, including spray painting and paint stripping activities, workshop activities and cleaning operations using organic solvents,
- use of ground power units and auxiliary power units,
- landscaping activities,
- construction and demolition works.

These activities could cause:

- air emissions, including greenhouse gases and potentially ozone depleting substances,
- reduced visibility (mainly from dust or smoke),
- public nuisance or health issues,
- offensive or concerning odours (e.g. fuel odours),

9.2. Protective Actions

Measures to manage potential impacts to air quality include:

- environmental awareness and inductions,
- monitoring plan and implementation of the measures imposed by the Environmental Terms. The plan includes type and frequency of monitoring parameters and monitoring equipment. The collected data are being evaluated, air pollutant contours are being calculated, and the subsequent trends are being presented. Relevant measures will be adopted in case of limits exceedance.
- appropriate collection and disposal of ozone- depleting substances from air-conditioning units,
- proper maintenance of vehicles and equipment.

Airport tenants, contractors and operators are required to ensure appropriate systems and procedures are in place to manage specific air quality environmental risks associated with their activities.

Taking into account the need for higher energy reduction commitments (i.e. ACI's Net-Zero 2050 pledge), the action plan for carbon management includes the following projects::

1. Upgrade of the airports' Energy Management System.
2. Installation of photovoltaics in all airports except CHQ due to lack of available space.

Table 11: Targets for air emissions

Target	Timeframe
Ensure appropriate servicing and maintenance of equipment.	Ongoing – Throughout the concession period
Air emissions monitoring plan for all airports –	Ongoing
Quantification of CO_2	Annually

9.3. Achievements

The results of the monitoring program are included in the Annual Environmental Bulletins and published on FG website as per the requirements of the Environmental Terms for each airport of Cluster B.

- ✓ Permanent air quality monitoring station (AQMS) at RHO.
- ✓ Annual monitoring campaigns with mobile stations at KGS, JMK, JTR and MJT.
- ✓ Quantification of Greenhouse Gas emissions for the all seven (7) airports.
- ✓ Rodos, Mitilini and Samos are maintaining the ACA accreditation Level 1 of MAPPING. The remaining airports have also received Greenhouse Gas emissions verification statement according to ISO 14064.

10. Noise

10.1. Overview

Noise requirements apply to noise associated with ground-based airport activities and aircraft landing and take-off procedures as well as ground running and idling on aprons.

Noise receptors surrounding the airport that could be affected are predominantly the surrounding or adjacent in some cases, urban areas and local fauna.

During maintenance works, noise is carefully managed to reduce impacts.

FG manages noise in such a manner to minimise nuisance to, or adversely affect, neighbouring receptors. Activities that generate noise may be:

- aircraft landing and take-off procedures;
- aircraft ground running and idling on aprons;
- aircraft maintenance and testing activities;
- fixed and mobile equipment;
- general airport and infrastructure maintenance activities;
- internal road network traffic;
- tenant and operator activities;
- construction and demolition works (temporary only for the duration of future works implementation).

These activities could cause:

- nuisance to airport operators and the community;
- impact on roosting and breeding behaviour of local fauna.

10.2. Noise Management Plan

FG is producing a noise management plan during the operational period, for each airport.

The Monitoring Plan and the implementation of the proposed measures is described by the Environmental Terms. The plan includes type and frequency of monitoring parameters and monitoring equipment. The collected data are evaluated, noise contours are calculated, and the subsequent noise trends are presented. Corrective actions are implemented in case of limit exceedance.

Measures to manage potential impacts from noise emissions include:

- environmental awareness and inductions;
- recording, investigation and follow-up of noise enquiries;
- implementing operational procedures for noise- generating activities;

- tenant and construction audits;
- aircraft ground running policy and review of the policy in response to airport operational matters and tenant feedback;
- regular servicing and maintenance of vehicles and equipment.

Table 13: Targets for noise management

Target	Timeframe
Noise Monitoring Plan	Ongoing
Timely investigation of any exceedances reported and/or complains	When required

10.3. Achievements

The results of the monitoring program are included in the Annual Environmental Bulletins and published on FG website as per the requirements of the Environmental Terms for each airport of Cluster B.

- ✓ Permanent noise monitoring terminals (NMT) at RHO (two NMTs).
- ✓ Annual monitoring campaigns with mobile stations at KGS, JMK, JTR and MJT.
- ✓ In addition to the measurements, noise level predictions were performed using simulation software and noise contour maps are created (Lden and Lnight) to identify population and buildings within settlement boundaries that are subject to noise levels higher than the limit values.

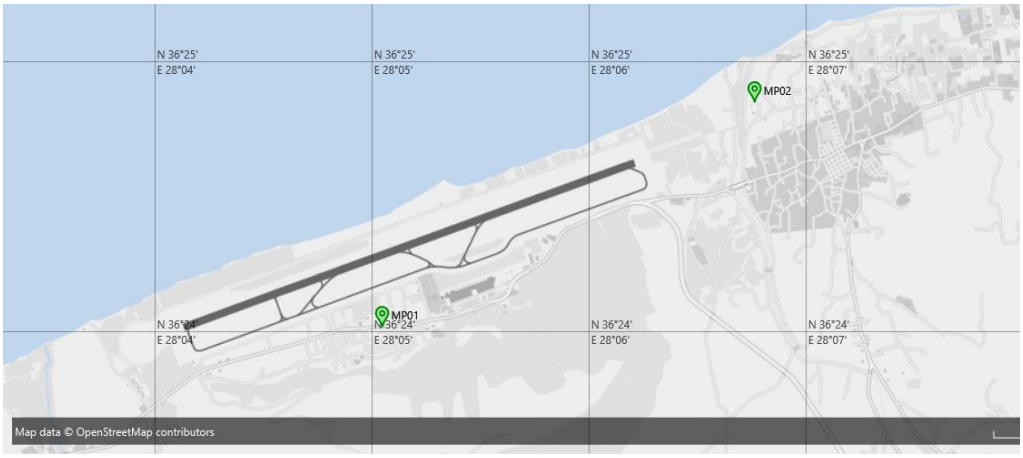


Figure 9: Noise Monitoring Terminals at RHO airport

Figure10: Noise monitoring station (MP01) at RHO

FG has set up a communication channel for the public via two email accounts (info@fraport-greece.com & environmental@fraport-greece.com) where complaints (e.g. for noise) or even proposals for improvement are received. After a complaint is received, the Environmental Management Section undertakes the actions to verify the source of the problem and implement all necessary corrective actions.

11. Waste Management

11.1. Overview

FG ensures that management (collection, storage, and safe post-management) of waste materials (hazardous and non-hazardous) is carried out in accordance with applicable legislation, standards and State planning for waste management.

Recycling and re-use are both of great importance for **FG** and are being implemented, where possible, in both operational and construction waste.

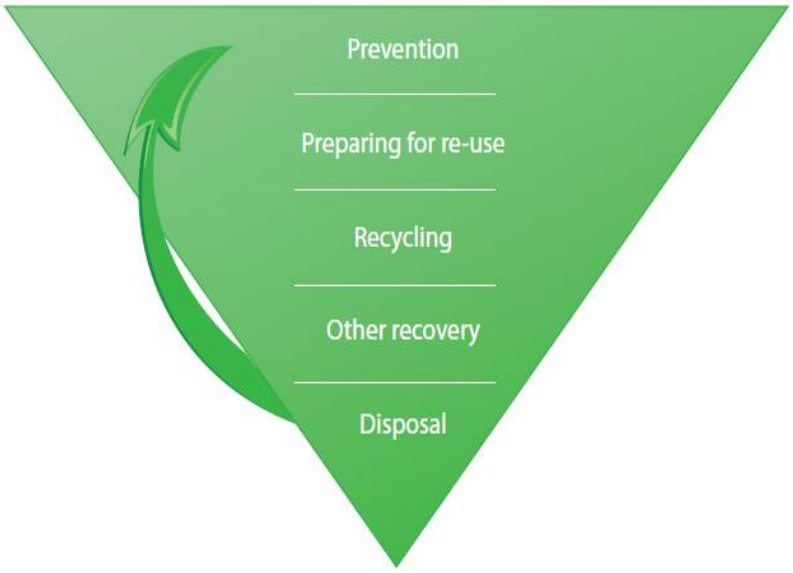


Figure 11: FG's waste management hierarchy

The main objective is to promote waste minimization and maximize recovery of materials where possible.

With regards to Municipal Solid Waste (MSW), sorting at the source is implemented in all airports, with focus on the four (4) basic categories of recyclables (paper, plastics, metals and glass), residual MSW and bulky waste. Separate biowaste management is under development and pilot implementation.

Airport operations inevitably produce solid waste on a daily basis from a variety of sources involving personnel, passengers, tenants and handlers. Also, a variety of hazardous materials are used such as lubricant and mineral oils, batteries and accumulators, tires, waste from Electric and Electronic Equipment (WEEE), etc.

All types of waste have the potential to cause harm to persons, property and the environment. As a result, they should be handled in an appropriate manner. Where feasible, **FG** is substituting, reducing or eliminating the use of hazardous materials and those used are appropriately recycled according to relative legislation.

Airport users who produce or receive waste from individuals or other parties retain the responsibility for its management. Therefore, they are asked to ensure that the management of waste is safely carried out, through direct cooperation with an authorized public or private waste collector or through FG's central waste management system, where applied. Especially for MSW, FG established a Central MSW Management System at all airports.

Some activities related to hazardous materials may be:

- bulk fuel storage and handling including aviation, unleaded and diesel fuels;
- aircraft refuelling, vehicle and aircraft wash down;
- vehicle refuelling at the service station;
- aircraft, vehicle and mechanical plant and electrical equipment maintenance;
- construction, earthworks and demolition works;
- quarantine operations;
- general airport operation, construction, maintenance and landscaping including weed and animal pest control.

These activities could cause:

- accidental release of hazardous materials, leading to water, land and air contamination;
- human and ecosystem health impacts.

11.2. Waste Management Plan

Waste Management procedures have been developed so that all waste streams are properly identified, segregated and treated, along the following lines:

- Separation of solid waste types at the point of generation (sorting at source). Use of separate collectors (bins, containers, press-containers) for separation of paper and cardboard, metals, plastics, glass, and biowaste, where feasible.
- Dedicated areas for the collection and storage of recyclable materials.
- Hazardous waste disposed and recycled properly by licensed handlers.
- Waste containers around the airport for passengers and tenants - transferred to onsite waste containers and then transported to offsite treatment or disposal facilities.

FG's Health and Safety procedures have been developed in relation to storage, handling and disposal of waste, asbestos and other hazardous materials, maintenance of asbestos register, Health and Safety incident reporting, etc.

Airport users and contractors are also required to ensure appropriate systems and/or procedures are in place to manage specific environmental risks associated with their activities and abide by the relevant legislative requirements for waste management.

Hazardous materials in relation to **FG's** activities are managed under different mechanisms depending on the nature of the activity.

These mechanisms are included in:

- Environmental Management Plan – includes procedures for spill response, interceptor trap maintenance, environment incident reporting, tenant audits, etc.
- Airport Emergency Response Plan – detailed procedures for dealing with major incidents in relation to hazardous materials, fuel and oil spills.

Table 14: Targets for waste management

Target	Timeframe
10% increase of 2021 MSW recovery rate comparing with 2020 (Cluster B)	Achieved – new target to be set in Q3 2022
Monitor chemical storage and handling practices during internal and tenant audits.	As per internal and tenant audit schedule
Monitor availability of up-to-date Materials Safety Data Sheets at points of use during internal and tenant audits.	As per internal and tenant audit schedule

11.3. Achievements

- ✓ Integrated management of non-hazardous waste, with focus on sorting at source of paper and cardboard, plastics, metals, glass and biowaste, in order to maximize materials recovery.
- ✓ Management and recycling (where feasible) of hazardous waste including oils, batteries, tires, electronic and electrical equipment, via Alternative Management Systems and private licensed collectors.

12. Conclusion

FG continues to actively monitor and report on progress against the goals and the lessons learned and seeks regular feedback and input on how to improve continually.

Analytical results of the various monitoring programs are included in the Annual Environmental Bulletins which are published on **FG** website (https://www.fraport-greece.com/eng/sustainability/environmental-strategy/environmental-bulletins) as per the relevant environmental requirements for each Cluster B airport.