

5. COMPLIANCE WITH EU LEGISLATION (GA.II.23.1.1g and h, or SESAR FPA II.23.1b.g and h)

5.1. Overview of environmental aspects, compliance with EU and national legislation, issues during the implementation of the Action and measures taken.

A. Definition of environmental guidelines and standards

In order to ensure a proper approach to the environmental management of the worksites and making this commitment into the contract of the environmental requirements as part of procurement for the management and execution of the works, the relevant tender specifications contain specific environmental documents: the “Guidelines for the Environmental Management of Construction Sites” and the “Note regarding Respect for the Environment”.

For works where the Project ownership is in part transferred from TELT to [REDACTED], the requirements have been harmonised and specific documents have been drawn up to ensure the same level of control on these sites.

B. Environmental monitoring by the Project owner

1) Environmental monitoring on Italian territory

Drafting of the Environmental Monitoring Plan (EMP): in 2020, the drafting of the comprehensive EMP for the work was undertaken, in compliance with the final project and with the latest revision of the “Guidelines for the preparation of the Environmental Monitoring Project (EMP) of works subject to EIA procedures” (Legislative Decree 152/2006 and subsequent amendments and additions, Legislative Decree 163/2006 and subsequent amendments and additions). In particular, the following have been issued: the General Methodological Report, which defines the monitoring standards, such as the regulatory references, the methodological approach and the analysis methods, and the Descriptive Report of the ongoing Operational Construction Site 04, which defines in detail the monitoring stations, sampling frequency, thresholds and operational arrangements. The Operational Construction Site 04 is the first Italian construction site on the international section and was started in Chiomonte, in continuity with the La Maddalena Exploratory Tunnel construction site, in the summer of 2020.

Implementation of the Environmental Monitoring Plan (EMP): during the course of 2020, environmental monitoring activities continued at the La Maddalena site in Chiomonte, in continuity with the past.

Until July 2020 in particular, the environmental monitoring activities concerned the activities related to the La Maddalena Exploratory Tunnel. Since July, Operational Construction Site 04 has been formally implemented which had therefore led to a modification of the environmental monitoring activities have changed, applying the Descriptive report of the EMP of the ongoing Operational Construction Site 04, and these are now being carried out by a new entity, whose contract was notified in May 2020.

During 2020, as part of the environmental monitoring activities of the La Maddalena site, the following activities were carried out:

- Periodic meetings (nine in 2020) with the project management and groupings of enterprises;
- Periodic visits to the site for joint controls with [REDACTED];
- Verification and control of the data and periodic reports (weekly, monthly, annual) of the Environmental Management System with regard to the companies and the Environmental Monitoring Plan, published on the environmental portal, and management of any anomalies detected in the data;
- Preparation of annual summary reports on the environmental monitoring activities, sent to the competent supervisory bodies, as part of the Implementation Verification Procedure;
- Implementation of 'second-level internal controls' (4 controls implemented in 2020).

Environmental Coordination Mission in Italy: the contract for the Environmental Coordination Mission has been notified in November 2020. The related activities started in December 2020. Coordination is a mission arising from the bi-national nature of TELT. Although not formally required by the Italian regulations, it makes part of one of the pillars of the environmental management of construction sites and will provide technical support in the coordination of the supervision in accordance with ISO standards.

2) Environmental monitoring on French territory

Water monitoring: over the course of 2020, water monitoring was regularly carried out in accordance with regulatory protocols (Prefectural Decree no. 2011-165 of 11/03/11 and amendments). Monitoring of the progress of the project was carried out particularly on construction sites of SMP4, CO9a, CO9d.

It is important to raise that the water monitoring also includes the hydrogeological surveillance network, and involves the management of a maintenance contract for the network.

Monitoring of fauna, flora and ecosystems, and actions to reduce impacts: during the course of 2020, fauna, flora and ecosystem monitoring was regularly carried out in accordance with the regulatory framework (Prefectural Decrees no. 2011-091 of 28/02/2011, no. 2013-1105 of 19/11/2013 and amendments, no. 2016-1166 of 16/08/2016 and amendments). In addition to monitoring in the strict sense of the term, a number of actions were effected to reduce the impact of the sites on protected fauna and flora, and in particular to prepare the sites that would have soon hosted the Operational Construction Site 5a (transplanting of protected plant species, demarcation of sensitive areas close to the sites, verification of the absence of bats in the trees and buildings concerned, etc.).

Atmospheric monitoring: on the French territory, monitoring of the atmosphere effected in accordance with the requirements of the regulatory framework ("ICPE" authorisations) is the responsibility of the construction companies. However, in order to assure external monitoring of air quality, in 2020 TELT entered into a partnership agreement with the [REDACTED], which is carrying out an experimental pilot programme to measure the evolution of air quality in Maurienne. The experimentation started in the first quarter of 2020 and will last 2 years.

Monitoring of the acoustic environment: on the French territory, monitoring of the atmosphere in accordance with the requirements of the regulatory framework ("ICPE" authorisations) is the responsibility of the companies working on site. However, in order to assure external quality monitoring, TELT will undertake complementary acoustic measurements as of mid-2021.

Environmental Coordination Mission in France: during the course of 2020, the Environmental Coordination Mission for the environmental supervision of the construction sites in progress or which started during the year was carried out regularly, and concerned:

- Operational Construction Site 09a – cut and cover tunnel: 10 COE meetings, 7 Level II control visits;
- Operational Construction Site 09d - Villargondran Dams: 9 COE meetings, 7 level II control visits. Site closed in December 2020;
- Operational Construction Site 05° - Avrieux wells (site started in September 2020): 5 COE meetings, 2 Level II control visits.

Through the environmental coordination mission, TELT also regularly verifies the results of the monitoring of noise, air and waste water quality produced by the construction companies.

In October 2020, TELT presented the environmental balance sheet of the construction sites under way and the progress of the environmental compensation measures at the annual meeting of the Environmental Management Committee, an event chaired by the vice-prefect and composed of the State departments responsible for the environment, along with the local authorities and the associations of local residents and for the protection of the environment.

C. Compensatory measures in favour of the fauna, flora and biodiversity

1) Compensatory measures on the Italian territory

On the Italian side of the project, in implementation of the specific dispositions regarding biodiversity in CIPE Resolutions no. 30 and no. 39, TELT has participated in the technical round tables coordinated by the [REDACTED] for the sharing of the experimental environmental monitoring protocols, implementing the Protocol of Intent between the [REDACTED] and TELT on biodiversity. In particular, within the framework of the technical round tables, the project for the forest improvement interventions has been defined in order to increase the level of ecosystem complexity and therefore of animal and plant biodiversity, in compliance with Disposition no. 121 of CIPE Resolution 39/2018, which indicates that "the compensation interventions of the transformed forest surface shall be developed with a view to reconstituting and strengthening the ecological and wildlife corridors present in the Susa Valley.

In the first half of 2020, forest compensation interventions were carried out in conformity with the methods indicated in the project, accompanied by the research activities of the Biodiversity Working Group, which has been responsible for managing the scientific aspects.

2) Compensatory measures on the French territory

On the French side of the project, in accordance with the prefectural decrees no. 2013-1105 (and subsequent modifications) and no. 2016-1166 (and subsequent modifications), TELT continued the implementation of the 23 projects dedicated to fauna, flora and biodiversity on an area of approximately 190 ha in Maurienne, with the involvement of some 20 partners including municipalities, land and pastoral associations, bodies for the protection of natural areas, etc...

Moreover, in agreement with the supervisory bodies (in particular the DDT (Direction Départementale du Territoire) and local partners, TELT has continued the actions undertaken for collective agricultural compensation.

In addition to the management of agreements with the various partners, and with the support of ecologists and agronomists, these activities also involve the implementation of landscape works and green spaces.

All these activities will continue during (and beyond) 2021.

D. Specialist environmental assistance

During the course of 2020, the environmental division provided specialist environmental assistance to the other division, and namely:

Italian side:

- to the construction division: - for the environmental management of the La Maddalena site, - for the management of the activation phase of the Salbertrand site;
- to the agreements procedures and consultations with the territory division: for the preparation of the technical content necessary for dialogue with the authorities;
- to the communications division: for support in the preparation of dissemination tools.

French side:

- to the construction division: - for the verification of the environmental part of the PROs, a planning level equivalent to the Italian "definitive" phase, (in particular for the Modane ring road, for the protection of the banks of the Arc), - for the analysis of the environmental part of the bids for works tenders;
- to the agreements procedures and consultations with the territory division: - for the technical part of the preparation of authorisation dossiers, - for technical meetings on compensatory measures;
- to the communications division: for support in the preparation of dissemination tools.

E. Implementation of ISO 14001 - Environmental management

Between the end of 2020 and the beginning of 2021, the renewal audit of the ISO 14001-2015 certification was carried out by [REDACTED]. The outcome of the audit was positive and TELT's certification was renewed.

F. Relations with environmental bodies

On the Italian side of the project, [REDACTED] is the body responsible for the environmental supervision of the TELT sites and, as foreseen by the CIPE resolutions, performs a role of "environmental accompaniment" which is currently being formalised through a specific agreement.

The technical relations with [REDACTED] are managed by the environmental division and are carried out through frequent meetings and site inspections. The sharing of data from environmental monitoring must take place through a specifically designed tool, the Environmental Portal.

Over the course of 2020, all the requirements and associated functions of the new environmental portal were developed. The environmental portal is the management tool that allows data to be shared with [REDACTED] and provides the interface between all those responsible for the environment, who will be working at the sites. The operation of the system is progressive according to the start of the different building construction sites. In particular, in 2020 the portal became operational for the construction site 4 and O2C, a construction site under the responsibility of the Delegated Contractor [REDACTED] where the Ante Operam monitoring is in progress.

On the French side of the project, relations with the state services responsible for the environmental affairs ([REDACTED]) are maintained through bi-monthly meetings (*Revue de dossiers*), handled by the PACF management.

TELT is preparing an environmental portal for the French side too, with similar characteristics to those requested on the Italian side. It will be at disposal to the administration at the beginning of 2021 and it will be settled up further to collect monitoring data.

G. Other environment-related initiatives and activities

In 2019, a scientific laboratory was established by TELT at the Chiomonte Archaeological Museum building used by the [REDACTED] to carry out research activities on:

- ✓ The *Zerynthia polyxena* butterfly and
Host plant
- ✓ Chiroptera
- ✓ Wolves and ungulates

In 2020, the research activities of the Biodiversity Working Group were going on, focusing not only on the Chiomonte area, but also on the Salbertrand area, where the CO10 operational worksite will be built.

As part of the environmental awareness activities, a film was organised in collaboration with the University of Turin ([REDACTED]):

- ✓ A film on the research activities in progress in the area of the future industrial site of Salbertrand and on the presence of bats in the area of Chiomonte

At the end of 2020, exchanges were initiated between the botanists of the [REDACTED], the botanists of the [REDACTED] and the [REDACTED] institute in order to contribute to the activation of a binational research project on Erica Carnea (winter heath), a protected species on the French side and rare on the Italian side. This project should be completed in 2021.

The health situation in 2020 meant that the educational and awareness-raising activities in the field planned for the spring could not be carried out (in particular, this affected the guided and thematic visits to some of the sites of the compensation measures on the French side).

