

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.

1. Definition of guidelines and standards for the environment

To ensure a correct approach to the environmental management of construction sites and the contractualisation of environmental needs in the context of the assignments for the management and implementation of the works, the related tender specifications (DCE) contain specific documents on the environment: the "*Linee Guida per la Gestione Ambientale dei cantieri*" (Guidelines for the Environmental Management of construction sites) and the "*Notice de Respect de l'Environnement*" (Note Regarding the Environment).

For the works in which the Contractor is partly transmitted from TELT to [REDACTED] or [REDACTED] the requirements have been harmonized and specific documents have been drawn up to ensure the same level of supervision on these sites as well.

1.1 Addresses and standards on the Italian side

During 2021, the environmental clauses were drawn up for the following tenders:

- Works for the base tunnel (Construction sites 03 and 04)
- Works for the management and reuse of materials - Construction site 10.

1.2 Addresses and standards on the French side

During 2021, the environmental clauses were drawn up for the following tenders:

- Anticipatory works of the Construction site 06/7 - Base Tunnel
- Works of the RD906 in Saint-Jean-de-Maurienne
- Bridge work on the Saint-Antoine stream (Modane)
- Works of the Construction site 11 - reuse of materials, main tender
- Anticipatory works of the Construction site 11 (6 separate tenders).
- **Environmental monitoring by the Contractor**

2. The environmental impact of construction sites is carefully monitored by TELT through the monitoring of the various environmental matrices outside the construction sites and through the involvement of a specific professional figure, the Environmental Coordinator.

The principle of scrupulous monitoring of environmental impacts with the aim of avoiding environmental damage and limiting disturbances associated with construction sites is the same in Italy and France, even if it differs in operational practice to adapt to the regulatory requirements and the environmental context of the country in which the works are carried out.

2.1 Supervision of construction sites on the Italian side

Design of the Environmental Monitoring Plan:

In 2021 the design of the unitary Environmental Monitoring Plan of the work took place, in accordance with the final project and with the latest revision of the "Guidelines for the preparation of the Environmental Monitoring Project of the works subject to EIA procedures" (Legislative Decree 152/2006 and subsequent amendments, Legislative Decree 163/2006 and subsequent

amendments). In particular, the following were issued: Descriptive reports of the Ante Operam phase of the Operational construction site 10 in Salbertrand and Torrazza Piemonte

Implementation of the Environmental Monitoring Plan:

In 2021, the environmental protection activities of the La Maddalena site in Chiomonte proceeded in continuity with the past.

In detail, the Operational construction site 04 was formally activated and therefore the environmental monitoring activities have changed, applying the Descriptive Report of Environmental Monitoring Plan of the ongoing Operational Construction Site 04 of the interchange niches built in the La Maddalena exploratory tunnel.

During 2021, as part of the environmental protection activities of the La Maddalena site, the following activities were carried out:

- Periodic meetings (21 in 2021) with the construction management and grouping of companies;
- Periodic site visits for cross-examination with ARPA Piemonte;
- Verification and control of data and periodic reports (weekly, monthly, yearly) of the Environmental Management System by the companies and of the Environmental Monitoring Plan, published on the environmental portal, and management of anomalies detected in the data;
- Preparation of the annual summary reports of environmental monitoring activities, sent to the competent control bodies, as part of the Implementation Verification Procedure;
- Implementation of "second-level internal controls" (13 controls carried out in 2021).

Environmental Coordination Mission:

The contract for the Environmental Coordination mission started in December 2020. Coordination is a mission that arises from the binational nature of TELT. Although not formally required by the Italian law, it constitutes one of the pillars of the environmental management of construction sites and guarantees technical support in coordinating the supervision in accordance with ISO standards.

In particular, during 2021, the Environmental Coordination structure took care of the development of the Integrated Environmental Control System through the drafting of specific control and verification reports and providing specialist assistance for the in-depth study of some specific issues on some environmental components.

2.2 Surveillance of construction sites on the France side

Water monitoring (LSE – Loi sur l'eau):

During 2021, water monitoring was regularly carried out in accordance with the regulatory protocols (Prefectural Decree no. 2011-165 of 11/03/11 and amendments).

In particular, the monitoring of works in progress of the construction sites 9a (cut-and-cover tunnel), 9b (basin of Saint-Jean-de-Maurienne, SMP4, 5a (wells of Avrieux), anticipatory work of construction sites 6/7 was carried out.

It should be noted that water monitoring also includes the hydrogeological surveillance network. The implementation of water monitoring, entrusted to a specialized company, involved an expenditure of approximately €724k for 2021, in addition to €40k for the maintenance of the measurement network.

Monitoring of fauna - flora and ecosystems and actions to reduce impacts:

During 2021 the monitoring of fauna - flora and ecosystems was regularly carried out in accordance with the regulatory framework (Prefectural Decrees no. 2011-091 of 02/28/2011, no. 2013-1105 of 11/19/2013 and amendments, no. 2016-1166 of 08/16/2016 and amendments). In addition to monitoring in the strict sense of the term, numerous actions were carried out to reduce the impact

of construction sites on protected fauna and flora, and in particular to prepare the sites that hosted the construction sites opened in 2021 (transplanting of protected plant species, demarcation of sensitive areas close to the construction sites, verification of the absence of bats in trees and buildings concerned, etc.).

The various investigations and interventions on the ground carried out by specialized ecologists involved an expenditure of approximately €285k.

Atmosphere Monitoring:

On the French territory, the monitoring of the atmosphere effected in accordance with the requirements of the regulatory framework ("ICPE" authorizations) is the responsibility of the construction companies.

However, in order to assure external monitoring on atmospheric quality, TELT has started a partnership agreement with the ATMO association (air quality observatory approved by the ministry of the environment) which is carrying out an experimental pilot program for measuring the evolution of air quality in Maurienne. The trial began in the first quarter of 2020 and will last 2 years. In 2021, continuous measurements were carried out on 8 micro-sensors of fine particles and on a pollutant measurement unit (in Modane), for a cost of approximately €50k.

Acoustic environment monitoring:

On the French territory, the monitoring of noise in accordance with the requirements of the regulatory framework ("ICPE" authorizations) is the responsibility of the construction companies.

However, in order to assure external monitoring of the acoustic quality, TELT carries out complementary measures starting from mid-2021. In particular, a fixed measurement point was set up in Villar Clément (Operational construction sites 9a and 8) and precise measurements were carried out to settle the controversial points in Villarodin-Bourget (CO5a), for a cost of approximately €20k.

Environmental Coordination Mission:

During 2021, the Environmental Coordination mission for the environmental supervision of construction sites in progress or which started during the year was carried out regularly and in concerned:

- Operational Construction Site 09a – cut-and-cover tunnel (concluded in November 2021): 10 COE meetings, 9 level II control visits, 1 system audit;
- Operational Construction Site 05a - Avrieux Wells: 12 COE meetings, 20 level II control visits, 1 system audit;
- SMP4 Construction Site: 9 COE meetings, 10 level II control visits.
- MT7 Construction Site (Resses d'en Bas): 6 COE meetings, 7 site visits.
- MT10 Construction Site (first part of the Modane ring road): 5 COE meetings, 5 site visits.

Through the environmental coordination mission, TELT also regularly checks the results of the acoustic, atmospheric and drainage water quality monitoring carried out by the construction companies, as well as the environmental documentation produced by the company. In 2021, the mission cost around €191k.

Annual balance

In November 2021, TELT presented the environmental balance sheet of the construction sites in progress as part of the annual meeting of the Environmental Management Committee, an instance chaired by the deputy prefect and composed of the State services responsible for the environment, local communities and associations of inhabitants and for the protection of the environment.

Globally, there have been no notable impacts from construction sites in the course of 2021.

3. Actions in favour of fauna-flora and biodiversity

In compliance with the objectives defined in the environmental policy, TELT pays constant attention to ecosystems, committing itself to seize the opportunity of implementing some measures to

promote solutions with lasting added value. TELT carries out a vast program of research and measures in favour of protected species and habitats, in each country according to needs and opportunities (see specific paragraphs).

In 2021 a binational research project was also activated on Erica Carnea, a protected species on the France side and rare on the Italy side, a project that involves the botanists of the [REDACTED] and the botanists of the [REDACTED] and the [REDACTED]. The binational research will take place over the course of 2022.

3.1 Actions on the Italian territory

In implementation of the specific dispositions on biodiversity of CIPE Resolutions no. 30 and no. 39, TELT continued its commitment in participating in the technical round tables, coordinated by the Piedmont Region, for the sharing of the experimental environmental monitoring protocols, implementing the Protocol of Intent between the Piedmont Region and TELT on biodiversity. In particular, the monitoring of biodiversity improvement interventions continued 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 area must be developed with a view to reconstituting and strengthening the ecological and faunal corridors present in the Valley."

During 2021, the Biodiversity working group developed the research part relating to the verification of the correct functioning of the ecological corridor created by evaluating any additional interventions. The results of the applied research will be available during the first semester of next year.

In 2021:

- The research activities of the Biodiversity Working Group continued, concentrating not only in the Chiomonte area but also in the Salbertrand area where the Operational Construction Site 10 will be built.
- The research activities were completed in collaboration with the [REDACTED] for the hydraulic characterization of the Salbertrand site in order to monitor the meso-habitat of aquatic plants in wetlands.

3.2 Actions on French territory

On the French side of the project, in accordance with the prefectural decrees no. 2013-1105 (and subsequent amendments) and no. 2016-1166 (and subsequent amendments), TELT continued the implementation of the 23 projects dedicated to fauna, flora and biodiversity on a target area of about 150 ha in Maurienne, with the involvement of about twenty partners including municipalities, land and pastoral associations, protection bodies of natural areas, etc.

Between agreements, indemnities, works, specialist assistance, the expenditure for the implementation of these measures for 2021 was approximately €397k.

In November 2021, these measures were presented and discussed within the Compensation and Accompanying Measures Monitoring Group, chaired by the sub-prefect and composed of experts and operators in the sector, nature defence associations, as well as by the competent administration.

Moreover, in agreement with the supervision bodies (in particular with the DDT (Departmental Territory Management) and with local partners, TELT continued the actions undertaken for collective agricultural compensation. In addition to the management of the agreements with the various partners, and with the support of ecologists and agronomists, these activities also involve the implementation of landscaping works and green spaces, for an expense, in 2021, of approximately €270k.

4. Implementation of ISO 14001 - Environmental management

In November 2021, the renewal audit of the ISO 14001-2015 certification was carried out by AFNOR. The outcome of the audit was positive and TELT's certification was maintained.

5. Relations with the competent bodies in the field of the environment

The organization of the environmental bodies is different on both sides of the border. TELT therefore adapts the management of relations with Bodies differently in the two countries.

5.1 Reports on the Italian side

ARPA Piemonte is the body responsible for the environmental supervision of TELT construction sites and, as foreseen by CIPE resolutions, plays an "environmental follow-up" role currently being formalized through a specific agreement.

Technical relations with [REDACTED] take place through frequent meetings and site inspections. The sharing of data from environmental monitoring must take place through a specifically designed tool, the Environmental Portal.

During 2021, the portal was presented to the Piedmont Region and to the Ministries in order to integrate all the needs of the competent administrations in environmental matters. The environmental portal constitutes the management tool that allows the sharing of data with the competent administrations [REDACTED] Region and Ministries) and guarantees the interface between all the subjects responsible for the environment, who will operate on the construction sites. The operation of the system is progressive, as the different construction sites are launched.

In particular, in 2021 the portal manages all the active construction sites both in the work in progress phase and in the Ante Operam phase such as the construction site 04 - Maddalena, the construction site 10 - Salbertrand and Torrazza and the construction site 02C – car and truck terminal, construction site under the responsibility of the Delegated Contractor [REDACTED]

5.2 Reports on the French side

Relations with the state services responsible for the environment (DDT and DREAL) take place through bi-monthly meetings (Revues de dossiers).

TELT has prepared and is developing, also for the French side, an environmental portal with characteristics similar to those requested on the Italian side which was made accessible to the administration at the beginning of 2021 and is in continuous development to collect monitoring data.