



Marathon, 18.02.2022

Ref. 3277/2022

HELLENIC REPUBLIC
REGION OF ATTICA
MUNICIPALITY OF MARATHON
MAYOR'S OFFICE

Address: 104 Marathonos Ave.
Nea Makri, 19005 Greece
Tel.: +3022943 20526
Email: mayor@marathon.gr

To: JASPERS – EUROPEAN INVESTMENT BANK
3, rue Jean Monnet
2180 Luxembourg
jaspers@eib.org

Dear Sir / Madam

I am addressing you, hereby, as the Mayor of the historical Municipality of Marathon, Greece, in order to put an end to an environmental and cultural crime against Greece and Europe.

In Marathon, where the legendary battle of 490 B.C.E. took place against the Persian Empire, the Region of Attica is planning the set-up of a sanitary landfill at the location of “Mavro Vouno” in Grammatiko village, despite the protests and contraposition of residents, local NGOs and our town council and local councils. Indeed, the whole local community, since this project was initiated in the early 2000's has been absolutely against it.

For more than 20 years, the Greek Government will not capitulate in the face of a maleficent for both the environment and public health project, whereas the case is still pending in the Greek Courts, following the appeals of residents, local entities and of the Municipality of Marathon.

Recently (19 Jan. 2022) the Regional Governor of Attica Mr. George Patoulis met with a delegation of JASPERS-European Investment Bank, discussing *inter alia*, the financing of the landfill project and the construction of two waste treatment plants at Grammatiko, for which there are invitations of public tenders. Initially the public tenders' invitations were cancelled, following appeals of residents, local entities, the Municipality of Marathon and of contractors, whilst the tenders were reopened last November. However, in addition to other problems which are already prominent in our appeals throughout these years, the two waste treatment plants will be located at an area which discontinues an existing local road crucial for the accessibility of local residents and farmers of the area, as well as accommodating access for emergency incidents, without any provision for an alternate road.

According to scientific experts and related studies, there is a significant number of problems raised with the landfill operation at Grammatiko in the Municipality of Marathon, as documented throughout the years since the project was introduced, namely:

1. The landfill is located on a water stream which mouths at the seaside of “Sesi”, South Evian Gulf, a picturesque spot at the border of the NATURA 2000 area (site code GR3000003) of the National Park of Schinias, Marathon. Additionally, it shall affect 37 local water sources and springs.
2. Due to friable and permeable soil and subsoil, underground pollution is absolutely inevitable.

3. The landfill is situated just 2 kms off the seismic fault of “Oropos”.

All the above mentioned have been raised and documented officially. Indicatively:

- a. The environmental auditors of the Greek Ministry for the Environment reported six environmental liabilities in report number 634/2014.
- b. DG Regio Ref. (2015)142502-14/01/2015, on the construction project of the Grammatiko landfill, claims that because the project is not operational and complete and there are environmental liabilities, financing is to be recovered.

In addition, the environmental licensing of the project is completely outdated and highly problematic. It was approved by the Ministry in 2003 and has not been substantially reviewed, updated and amended. Rather the Ministry keeps extending the outdated environmental licensing, albeit the fact that the Region of Attica plans the construction of two waste treatment plants at the Grammatiko landfill and the regional plan for waste management has ever since been amended at least twice. Because of the contiguity of the landfill with the NATURA 2000 National Park of Schinias, there should be special environmental impact studies. Indeed, the Chairman of the Petitions Committee (Ref. D307021/27.04.2018) had asked for further information on the contiguity of the landfill with the NATURA 2000 Natural Park and the need for new environmental impact studies.

Furthermore, the landfill is situated just around 5 kms in straight line, by the significant archaeological site of “Rhamnous” (one of the ancient Athenian demes), not to mention the natural environment, the iron mines of Grammatiko of the late 19th century – a site of modern industrial architecture and the agricultural and tourist activities threatened by the landfill and the waste plants to be constructed.

Most certainly, Greek Authorities, as well as European Commission officials have all the documentation needed to assess this issue that affects not just the local community and the Municipality of Marathon, but in a broad sense the environmental, historical and cultural legacy of our region.

As the Mayor of Marathon representing the residents, local entities, as well as the thousands of visitors who arrive from around the world each year, I hereby need to declare our firm disagreement against a project which negates the very essence of the ideals bestowed by our ancestry. The decisions and actions of the Region of Attica and of Government Authorities keep ignoring the will of the local community, against the rule of law in a democratic society and against public consultation.

Nevertheless, we are not against the construction and operation of waste treatment plants in our Municipality, as long as the required up-to-date environmental impact studies are devised – and not outdated studies of 2003, which the Petitions Committee has already pointed out by asking the Region of Attica to provide new studies. In addition, the location should not be sloppy, resulting to infrastructure abolition, as in this case of the one rural road serving local residents and farmers, while there is an alternative.

We all abide to the principles of the Treaty on European Union, namely ‘the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights,’ [Art. 2]. Furthermore, the Treaty declares [Art. 191 par. 2] that ‘Union policy on the environment shall aim at a high level of protection taking into account the diversity of situations in the various

regions of the Union. It shall be based on the precautionary principle and on the principles that preventive action should be taken, that environmental damage should as a priority be rectified at source and that the polluter should pay.'

Given your commitment to the implementation of the aforementioned principles, may I hereby urge you to take immediate action against the environmental and cultural crime taking place at Grammatiko, in Marathon, Greece. We ask that the European Investment Bank, does not finance the construction and operation of the waste treatment plants in Grammatiko landfill, or any such project brutally violating the explicit principles of the Union.

I remain at your disposal for any further information.

Sincerely yours,

The Mayor of Marathon

Stergios TSIRKAS